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FILED
SUPERIOR COURT
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

MAR 09 2023

By  Deputy
Amaris Morales Eumana

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

THERESA BINGHAM, individually, and
on behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

HERITAGE HEALTH CARE, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: CIVSB2029495

Honorable David S. Cohn
Department S26

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES, LITIGATION COSTS, AND
ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Litigation Costs, and
Enhancement Payment; Declaration of Class
Representative (Theresa Bingham); Declaration
of Settlement Administrator (William Argueta);
and [Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: April 3, 2023
Time: 10:00 a.m.
Department: S26

Complaint Filed: December 30, 2020
FAC Filed: October 21, 2022
Trial Date: None Set



**DECLARATION OF EDWIN AIWAZIAN IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT, ATTORNEYS' FEES, LITIGATION COSTS, AND
ENHANCEMENT PAYMENT**

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Theresa Bingham (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On October 21, 2022, in Department S26 of the above-entitled Court, the Honorable David S. Cohn preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Heritage Health Care, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Theresa Bingham to represent the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed CPT Group, Inc. (“CPT Group, Inc.” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees, Litigation Costs, and Enhancement Payment (“Motion for Final Approval”), no Class Members have objected to the Class Settlement or the request for Attorneys’ Fees and Litigation Costs, Enhancement Payment, Administration Costs, or allocation for the penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, et seq. (“PAGA”).

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WORK PERFORMED BY CLASS COUNSEL

4. This matter involves litigation in two (2) cases: the above-captioned action entitled *Theresa Bingham v. Heritage Health Care, Inc.*, filed on December 30, 2020 in San Bernardino County Superior Court, Case No. CIVSB2029495 and the action entitled *Theresa Bingham v. Heritage Health Care, Inc.*, filed on January 22, 2021 in San Bernardino County Superior Court, Case No. CIVSB2102827 (collectively, the “Litigation”). I and several other attorneys at Lawyers for Justice, PC have been actively engaged in litigating this matter since prior to the commencement of the above-captioned action on December 30, 2020.

5. Before initiating the cases, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff, and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, Private Attorneys General Act (“PAGA”) representative claims, wage-and-hour enforcement, Plaintiff’s claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiff were well-suited for class-wide and representative adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees who worked for Defendant, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial, prior to reaching the Settlement. The parties conducted formal and informal discovery and investigation into the facts of the cases, and also informally exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with mediation and settlement negotiations. Class Counsel propounded Special Interrogatories (Set One) onto Defendant and prepare to engage in a *Belair-West* process. The volume of information, data, and documents that Class Counsel reviewed and analyzed included and was not limited to: Plaintiff’s employment records, a detailed sampling of

Class Members' time and pay data, earning statements and summaries, multiple iterations of Defendant's Employee Handbook, company policy acknowledgements (including, but not limited to, Defendant's Employee Acknowledgement), internal memoranda, organizational chart, and Defendant's operations and employment policies, practices, and procedures documents (including, but not limited to, Defendant's Confidentiality and Non-Disclosure Agreement, Employee Separation Report, Corrective or Disciplinary Warning Notice and New Employee Safety Orientation, Meal Break Agreement, and Premium Only Plan), among other information and documents. Class Counsel researched applicable law, developed liability, damages, and penalties valuation models in connection with mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g. to discuss issues relating to the pleadings, case management, discovery, and production of information, documents, and data in the course of litigation and mediation. Class Counsel also drafted pleadings and the mediation brief and prepared for and attended court proceedings, and prepared for and engaged in mediation and settlement negotiations, among other tasks.

7. As outlined herein, the parties have conducted formal and informal discovery and investigation during the course of litigating the cases. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. The information, documents, and data provided a critical understanding of the nature of the work performed by the Class Members, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and valuation issues in connection with all phases of the litigation, and ultimately in connection with the mediation and settlement negotiation process. Class Counsel also invested time researching and investigating the applicable law, which is evolving as it relates to certification, off-the-clock theory, meal and rest periods, PAGA representative claims, wage-and-hour enforcement, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

8. After conducting significant investigation of the facts and law during the prosecution of the cases, counsel for the parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in a formal, full-day mediation

1 conducted by Paul Grossman, Esq., a well-regarded mediator experienced in mediating complex
2 labor and employment matters. During all settlement discussions, the parties conducted their
3 negotiations at arm's length in an adversarial position. In the course of mediation and settlement
4 negotiations, the parties exchanged information and data, and discussed all aspects of the cases,
5 including the risks and delays of further litigation, the risks to the parties of proceeding with
6 class certification and trial, the law relating to off-the-clock theory, meal and rest periods,
7 representative PAGA claims, and wage-and-hour enforcement, Defendant's financial condition,
8 the evidence produced and analyzed, and the possibility of appeals, among other things.
9 Arriving at a settlement that was acceptable to the parties was not easy. Defendant contended
10 that individualized questions of fact predominate over any common issues, and these issues
11 would pose challenges to certification and representative adjudication. Defendant and its
12 counsel felt strongly about Defendant's ability to prevail on the merits and avoid class
13 certification, and Plaintiff and Class Counsel believed that they would be able to obtain class
14 certification and prevail at trial. With the aid of the mediator's evaluation, the parties ultimately
15 agreed that the cases were well-suited for settlement given the legal issues relating to Plaintiff's
16 principal claims, as well as the costs and risks to the parties that would attend further litigation.
17 These risks of further litigation include, and are not limited to, a determination that the claims are
18 unsuitable for class treatment and/or representative adjudication, class de-certification after
19 certification of a class, allowing a jury to decide the claims asserted in the cases, and the real
20 possibility of no recovery after years of litigation, especially in light of Defendant's financial
21 condition.

22 9. Pursuant to the escalator clause in Paragraph IX.B. of the Settlement Agreement,
23 the Settlement Administrator confirmed that there were 40,385 Workweeks during the period
24 from December 30, 2016 through October 22, 2021, therefore the Workweeks Threshold did not
25 exceed and the Maximum Settlement Amount will remain \$1,300,000.00.

26 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks
27 attorneys' fees in the amount of \$433,290.00, which is one-third (33.33%) of the Maximum
28 Settlement Amount of \$1,300,000.00, as set forth in the Settlement Agreement and the Class

1 Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and
2 Class Counsel, Plaintiff has agreed to a contingency fee of at least forty-five percent (45%) of
3 the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
4 took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to
5 the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
6 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
7 has achieved in the cases; and (6) the other cases that Class Counsel has turned down in order to
8 devote its time and efforts to this matter.

9 11. I am aware that common and acceptable rates for contingency representation in
10 wage and hour class action litigation are normally in the range from 33.3% to 50%.

11 12. While not necessarily required to be demonstrated because the percentage fee is
12 proper for this settlement, Class Counsel has incurred many hours of work in connection with
13 prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar
14 analysis with a multiplier of 1.17. Attorneys at Lawyers for Justice, PC have spent a total of
15 **530.80 hours** performing tasks and obtaining recovery in this matter. Attached hereto as
16 **"EXHIBIT A"** is an Attorney Task and Time Chart that sets forth in detail the nature of the
17 legal services provided by attorneys at Lawyers for Justice, PC and the time incurred in
18 performing those services. These hours include work done by myself and several other attorneys
19 at the firm. Additionally, separate from the hours referenced herein, Lawyers for Justice, PC had
20 litigation support personnel actively engaged in assisting with the prosecution of this matter.

21 13. The work performed in this particular matter, the background of our firm, as well
22 as the individual backgrounds, training, and experience of the attorneys who worked on this
23 matter, in litigating complex wage-and-hour actions, and in particular, employment and
24 representative class actions, support a reasonable blended hourly rate of compensation at the rate
25 of at least \$700 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice,
26 PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$700 per hour
27 for legal services performed, by courts granting approval of settlements in other cases: final
28 approval of the class and representative action settlement in *David Dugan v. TEC Equipment,*

1 *Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021,
2 and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class
3 and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los
4 Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of
5 attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in
6 *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court
7 Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of
8 attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative
9 action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County
10 Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of
11 attorneys' fees involved an hourly rate of \$764.82; final approval of the class and representative
12 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
13 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an
14 hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley*
15 *Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450)
16 was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of
17 \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler*
18 *Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was
19 granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77;
20 and final approval of the class and representative action settlement in *Demetrius Camarillo v.*
21 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
22 granted on June 30, 2017, and the award of attorneys' fees involved a higher hourly rate of
23 \$845.64.

24 **ADEQUACY OF LAWYERS for JUSTICE, PC**

25 **EDUCATION**

26 14. In May of 2004, I graduated from *Pepperdine University School of Law* with a
27 Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from
28 the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree

1 program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles
2 County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from
3 the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard*
4 *University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a
5 concentration in Natural Sciences from *Pepperdine University*.

6 ***JUDICIAL EXTERNSHIPS***

7 15. From approximately September 2002 to approximately December 2002, I served
8 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of*
9 *Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I
10 served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal*
11 *for the Second Appellate District*.

12 ***LITIGATION AND CLASS ACTION EXPERIENCE***

13 16. In December of 2004, I obtained a license to practice law from the California
14 State Bar. From approximately December 2004 to approximately August 2008, I was employed
15 by *Girardi & Keese*.

16 17. At *Girardi & Keese*, my practice focused on class actions and other complex
17 cases involving toxic torts and products liability. In addition, I gained substantial experience on
18 cases involving insurance bad faith, premises liability, and medical negligence. While employed
19 by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150
20 depositions, and prepared dozens of expert witnesses for deposition or trial.

21 18. Since its inception, in or around October of 2008, *Lawyers for Justice, PC* has
22 almost exclusively focused on the prosecution of consumer and employment class actions,
23 involving wage-and-hour claims, race discrimination, unfair business practices or consumer
24 fraud. Currently, *Lawyers for Justice, PC* is the attorney of record in well over a dozen
25 employment-related putative class actions in both state and federal courts in the State of
26 California. *Lawyers for Justice, PC* has successfully litigated cases involving the executive,
27 administrative, and other overtime exemptions to the State of California and federal overtime
28 compensation requirements. During this relatively short time, in association with other law

1 firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of
2 individuals in California.

3 ***EXAMPLES OF RESULTS IN WAGE AND HOUR CLASS ACTION AND***
4 ***REPRESENTATIVE ACTION CASES***

5 19. What follows are just a few examples of the type of results Lawyers *for* Justice,
6 PC (“LFJ”) has achieved on behalf of its clients:

7 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a
8 wage-and-hour class action against a major property management company involving allegations
9 of misclassification of various “manager” positions. On September 20, 2010, the court granted
10 final approval of the class action settlement. The Los Angeles County Superior Court Case
11 Number is BC400414.

12 b) LFJ, in association with co-counsel therein, represented the plaintiffs in a
13 wage-and-hour class action against a national retailer of household items involving allegations of
14 misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court
15 granted final approval of the class action settlement. The Los Angeles County Superior Court
16 Case Number is BC413498.

17 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
18 wage-and-hour class action against a national property management company involving
19 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court
20 granted final approval of the class action settlement. The Los Angeles County Superior Court
21 Case Number is BC430918.

22 d) LFJ, in association with co-counsel therein, represented the plaintiffs in a
23 wage-and-hour class action against a national retailer involving allegations of misclassification
24 of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class
25 certification. On August 26, 2013, the court granted final approval of the class action settlement.
26 The Los Angeles County Superior Court Case Number is BC424012.

27 e) LFJ, in association with co-counsel therein, represented the plaintiff in a
28 wage-and-hour class and PAGA representative action against a bank, involving allegations of

1 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
2 granted final approval of the class and PAGA representative action settlement. The Kern County
3 Superior Court Case Number is S-1500-CV-273194-LHB.

4 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
5 wage-and-hour class and PAGA representative action against a national wholesale distributor of
6 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
7 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
8 representative action settlement. The Sacramento County Superior Court Case Number is 34-
9 2012-00136285.

10 g) LFJ, in association with co-counsel therein, represented the plaintiff in a
11 wage-and-hour class action against a multinational corporation that provides global workplace
12 solutions, involving allegations of misclassification of the “Operations Manager” position. On
13 September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles
14 County Superior Court Case Number is BC478769.

15 h) LFJ, in association with co-counsel therein, represented the plaintiff in a
16 wage-and-hour class and PAGA representative action against a national retailer of household
17 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted
18 final approval of the class and PAGA representative action settlement. The San Francisco
19 County Superior Court Case Number is CGC-13-532344.

20 i) LFJ, in association with co-counsel therein, represented the plaintiff in a
21 wage-and-hour class and PAGA representative action involving allegations of misclassification
22 of the salaried residential “Property Manager” position. On September 17, 2015, the court
23 granted plaintiff’s motion for class certification. On October 20, 2017, the court granted final
24 approval of the class and PAGA representative action settlement. The Los Angeles County
25 Superior Court Case Number is BC474784.

26 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a national retailer of upscale
28 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the

1 court granted final approval of the class and PAGA representative action settlement. The Los
2 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
3 Council Coordination Proceeding Number is 4794.

4 k) LFJ, in association with co-counsel therein, represented the plaintiffs in a
5 wage-and-hour class action against a national retailer of apparel and fashion accessories, on
6 behalf of non-exempt employees. On August 5, 2016, the court granted final approval of the
7 class action settlement. The Los Angeles County Superior Court Case Number is BC488069.

8 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
9 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
10 involving allegations of misclassification of the “Department Manager” position. On August 12,
11 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
12 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
13 County Superior Court Case Number is RG13680477.

14 m) LFJ represented the plaintiff in a PAGA representative action against a
15 real estate and property management company, on behalf of non-exempt employees. On
16 November 4, 2016, the court granted approval of the PAGA representative action settlement. The
17 Orange County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

18 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
19 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of
20 non-exempt employees. On November 18, 2016, the court granted final approval of the class and
21 PAGA representative action settlement. The San Francisco County Superior Court Case Number
22 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

23 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
24 representative action against a foodservice distributor, on behalf of non-exempt employees. On
25 January 26, 2017, the court granted final approval of the class and PAGA representative action
26 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

27 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
28 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to

1 the employer's motion to compel arbitration, which resulted in a published opinion by the
2 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
3 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
4 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
5 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
6 5046.

7 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a
8 wage-and-hour class and PAGA representative action against a consumer packaging company,
9 on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the
10 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
11 Number is BC590429.

12 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a
13 wage-and-hour class and PAGA representative action against a manufacturer of food service
14 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final
15 approval of the class and PAGA representative action settlement. The Orange County Superior
16 Court Case Number is 30-2015-00810013-CU-OE-CXC.

17 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
18 wage-and-hour class and PAGA representative action against a lumber and hardware company
19 on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the
20 class and PAGA representative action settlement. The Orange County Superior Court Case
21 Number is 30-2014-00747750-CU-OE-CXC.

22 t) LFJ represented the plaintiff in a wage-and-hour class and PAGA
23 representative action against a property management company, on behalf of non-exempt
24 employees. On June 14, 2017, the court granted final approval of the class and PAGA
25 representative action settlement. The Los Angeles County Superior Court Case Number is
26 BC586234.

27 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
28 representative action against a food company on behalf of non-exempt employees. On June 30,

2017, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175871.

v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative action against a chocolate company on behalf of non-exempt employees. On July 19, 2017, the court granted final approval of the class and PAGA representative action settlement. The Alameda County Superior Court Case Number is RG15764300.

w) LFJ represented the plaintiff in a PAGA representative action, against the parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On October 18, 2017, the court granted approval of the PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC569664.

x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative action against a manufacturer of plastic containers on behalf of non-exempt employees. On October 31, 2017, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC577233.

y) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt employees. On December 11, 2017, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC569646.

z) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a property management company on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding Number is 4819.

aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a global provider of flexible office

space solutions. On February 15, 2018, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC498401.

bb) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class action against a container manufacturer, on behalf of non-exempt employees. On October 15, 2018, the court granted the plaintiff's motion for class certification. The Tulare County Superior Court Case Number is VCU264528.

cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative action against a behavioral health service provider on behalf of non-exempt employees. On November 13, 2018, the court granted final approval of the class and PAGA representative action settlement. The Alameda County Superior Court Case Number is RG16811450.

dd) LFJ, in association with co-counsel therein, represented the plaintiff in a PAGA representative action against a global provider of products and services to the energy industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court granted approval of the PAGA representative action settlement. The Kern County Superior Court Case Number is S-1500-CV-280215-SDC.

ee) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class action against a parking company on behalf of non-exempt employees. On September 3, 2019, the court granted the plaintiff's motion for class certification and certified a class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding Number is 4886.

ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt employees. On September 27, 2019, the court granted the plaintiffs' motion for class certification in part and certified a class. The Alameda County Superior Court Case Number is RG15757606 and the Judicial Council Coordination Proceeding Number is 4921.

1 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a national retailer of apparel and
3 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted
4 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the
5 court granted final approval of the class and PAGA representative action settlement. The
6 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

7 hh) LFJ, in association with co-counsel therein, represents the plaintiff in a
8 wage-and-hour class and PAGA representative action against a medical equipment supplier on
9 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
10 for class certification and certified a class. The San Bernardino County Superior Court Case
11 Number is CIVDS1505744.

12 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
13 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
14 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
15 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
16 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
17 approval of the PAGA representative action settlement. The San Diego County Superior Court
18 Case Number is 34-2015-00175330.

19 jj) LFJ, in association with co-counsel therein, represented the plaintiff in a
20 wage-and-hour class and PAGA representative action against a large national drug testing
21 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
22 plaintiff's motion for class certification and certified a class. On October 28, 2022, the court
23 granted final approval of the class and PAGA representative action settlement. The San Diego
24 County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

25 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
27 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the
28 court granted in part the plaintiff's motion for class certification and certified a class. The

Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the Judicial Council Coordination Proceeding Number is 4930.

ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against manufacturer and supplier of power products and services on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion for class certification and certified a class. On August 27, 2021, the court granted final approval of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-00025968-CU-OE-CTL.

mm) LFJ represents the plaintiff in a wage-and-hour class action against a nutritional products manufacturer on behalf of non-exempt production line employees. On December 13, 2021, the court granted the plaintiff's motion for class certification in part and certified a class. The Solano County Superior Court Case Number is FCS051001.

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

20. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers for Justice, PC seeks reimbursement of **\$20,841.54** in litigation costs and expenses incurred in the Litigation, as reflected in **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

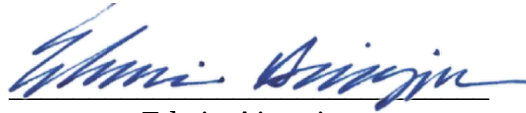
21. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Payment in the amount of \$9,000.00 to Plaintiff Theresa Bingham. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant documents and past employment records and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain information that would facilitate the pursuit of the class and PAGA claims. Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing her work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for

1 Plaintiff Theresa Bingham to receive \$9,000.00 as a reasonable Enhancement Payment, for her
2 services on behalf of the Class Member, State of California, and PAGA Group Members, in
3 addition to her Individual Settlement Payment and Individual PAGA Payment.

4 22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
5 Settlement is in the best interests of Plaintiff, other Class Members, the State of California, and
6 PAGA Group Members.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct.

9 Executed this 9th day of March 2023, at Glendale, California.

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13 Edwin Aiwasian
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EXHIBIT A

THERESA BINGHAM V. HERITAGE HEALTH CARE, INC.
(SAN BERNARDINO COUNTY SUPERIOR COURT CASE NO. CIVSB2029495) (CLASS ACTION)

THERESA BINGHAM V. HERITAGE HEALTH CARE, INC.
(SAN BERNARDINO COUNTY SUPERIOR COURT CASE NO. CIVSB2102827) (PAGA ACTION)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality	10.30
Pre-Lawsuit Investigation of the Merits of Plaintiff Theresa Bingham’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	9.50
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Heritage Health Care, Inc. (“Defendant”) with Respect to Plaintiff and the Putative Class Members	8.70
Pre-Notice Investigation of the Key Facts with a Focus on the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiff and the PAGA Members	8.50
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Alleged Labor Code and Industrial Welfare Commission Wage Order Violations with Respect to Plaintiff and the PAGA Members	9.70

Pre-Lawsuit Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, PAGA, and Class Certification Decisions and Law in California, Including all New and Relevant Enforcement Guidance and Division of Labor Standard Enforcement (DLSE) Materials	7.10
Investigation of Defendant, Defendant's Business Relationships, and the Industry in which Defendant Operates	5.30
Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members	4.50
Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity and Research and Analysis of Defendant's Past and Present Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	3.90
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	4.50
Research and Investigation Re: Location(s), Department(s), and/or Division(s) Owned, Managed, Serviced and/or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	5.70
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	7.30
Research and Investigation Re: Defendant's Written and Un-Written Policies, Practices, and Procedures Relating to Timekeeping, Staff Scheduling, Attendance, Patient Care and Customer Service Requirements, Daily Patient Care Schedule, Health and Safety, Team Meetings, Meal/Rest Breaks, On-Premises Breaks, Meal/Rest Premiums, Quarantining, COVID-19 Sick Time Pay, Overtime Compensation, Bonuses/Incentive/Shift Differential Pay, Dress Code/Uniform, Footwear, Supplies/Tools/ Equipment,	36.50

PPE, Use of Personal Cell Phones and Other Equipment, and Reimbursement of Business-Related Expenses	
Research and Investigation Re: Various Software Programs and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Document and Information Management, Resource Management, Timekeeping, Patient Care, Secured Entry, and Surveillance Systems, with a Focus on What Records (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	5.30
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Exemption, Waiver, and Compliant Policies	8.20
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, Including Research Regarding Which Experts to Retain and For What Purpose	5.40
Prepare a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	4.80
Research and Investigation Regarding Impact of COVID-19 Pandemic on Defendant, Its Operations, Putative Class Members and PAGA Members' Work	8.50
Meet and Communicate with Plaintiff Theresa Bingham Throughout the Pendency of the Case	52.50
Investigate, Meet and Communicate with, and/or Interview Putative Class Members, PAGA Members, and Percipient Witnesses	20.50

Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on December 30, 2020) (Class Action)	7.20
Draft Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on January 22, 2021) (PAGA Action)	6.10
Review Court's Initial Case Management Conference Order (filed on February 17, 2021) (Class Action)	0.20
Review Court's Notice of Filing Fees Due (filed on March 2, 2021) (PAGA Action)	0.10
Review Court's Initial Status Conference Order and Guidelines for Complex Litigation (filed on March 4, 2021) (PAGA Action)	0.30
Draft Plaintiff's Notice of Posting Jury Fees (filed on April 16, 2021) (Class Action)	0.10
Review Defendant's Notice of General Appearance (filed on April 21, 2021) (Class Action)	0.10
Review Defendant's Notice of General Appearance (filed on April 21, 2021) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Report for Initial Case Management Conference (filed on April 27, 2021) (Class Action)	1.70
Review Defendant's Notice of Posting First Appearance Fee and Complex Fee (filed on April 29, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Initial Case Management Conference (filed on May 3, 2021) (Class Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Report for Initial Case Management Conference (filed on May 7, 2021) (PAGA Action)	1.50
Draft Plaintiff's Notice of Posting Jury Fees (filed on May 12, 2021) (PAGA Action)	0.10
Review Defendant's Notice of Posting Jury Fees (filed on May 12, 2021) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Continuing Further Case Management Conference and [Proposed] Order (filed on June 30, 2021) (Class Action)	1.30
Review Court's Order Granting Joint Stipulation Continuing Further Case Management Conference (filed on July 7, 2021) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Further Case Management Conference (filed on July 15, 2021) (PAGA Action)	1.10
Review Court's Minute Order Re: Case Management Conference Order (filed on July 22, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Continuing Further Case Management Conference and [Proposed] Order (filed on October 26, 2021) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Continuing Further Case Management Conference and [Proposed] Order (filed on October 26, 2021) (PAGA Action)	1.10
Review Court's Order Granting Joint Stipulation Continuing Further Case Management Conference (filed on October 29, 2021) (Class Action)	0.10
Review Court's Order Granting Joint Stipulation Continuing Further Case Management Conference (filed on October 29, 2021) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement and Notice of Settlement (filed on February 22, 2022) (Class Action)	0.80

Meet and Confer with Defendant's Counsel, and Draft Joint Further Case Management Conference Statement and Notice of Settlement (filed on February 22, 2022) (PAGA Action)	0.60
Draft Plaintiff's Case Management Conference Statement (filed on July 1, 2022) (Class Action)	0.90
Draft Plaintiff's Case Management Conference Statement (filed on July 1, 2022) (PAGA Action)	0.70
Draft First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on October 21, 2022); and Meet and Confer with Defendant's Counsel	5.20
Appearances	
Prepare for and Telephonically Attend Initial Case Management Conference (May 3, 2021) (Class Action)	1.10
Prepare for and Telephonically Attend Case Management Conference (May 13, 2021) (Class Action) (PAGA Action)	3.10
Prepare for and Telephonically Attend Case Management Conference (July 22, 2021) (PAGA Action)	0.50
Prepare for and Telephonically Attend Case Management Conference (March 4, 2022) (Class Action)	1.10
Prepare for and Telephonically Attend Case Management Conference (July 15, 2022) (Class Action)	0.30
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (October 21, 2022) (Class Action)	1.10
Prepare for Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Litigation Costs, and Enhancement Payment (April 3, 2022) (Anticipated)	1.50

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Theresa Bingham (served on October 2, 2020)	1.90
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Theresa Bingham (served on November 17, 2020)	2.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Theresa Bingham (served on December 14, 2020) (Class Action)	6.80
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (drafted on May 13, 2021) (Class Action)	1.50
Draft Plaintiff's Special Interrogatories (Set One) to Defendant (served on May 13, 2021) (Class Action)	1.80
Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Theresa Bingham for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on November 12, 2020)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	28.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (approximately 6,707 pages), and Other Sources Employee Handbooks, Organizational Chart, and Operations and Employment Policies, Practices, and Procedure Documents	66.50

• Sampling of Employee Time Records Data • Sampling of Employee Pay Records Data	
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Violation, Damages, and Penalties Analysis and Calculations (submitted on October 15, 2021)	45.60
Remotely Attend Mediation Session (October 22, 2021; Zoom Video Conference)	12.50
Review and Analyze Mediator's Proposal (issued October 22, 2021; accepted January 24, 2022)	7.50
Review and Analyze Financial Documents Produced by Defendant (received November 29, 2021)	12.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on September 30, 2022) and Notice of Class Action Settlement (Class Action)	18.50
Review and Monitor Settlement Administration Process and Weekly Reports	7.50
Law and Motion	
Review Defendant's Statement in Support of Consolidating Plaintiff's Class and PAGA Action Cases (filed on May 7, 2021) (Class Action)	1.50
Draft Plaintiff's Opposition to Defendant's Statement in Support of Consolidating Plaintiff's Class and PAGA Claims (filed on May 12, 2021) (Class Action) •	4.50
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Theresa Bingham in Support Thereof, and [Proposed] Order Thereon (filed on September 30, 2022) (Class Action)	19.30

Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on October 20, 2022) (Class Action)	0.40
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on October 21, 2022) (Class Action)	0.50
Review Declaration of Settlement Administrator; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Litigation Costs, and Enhancement Payment, Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on March 9, 2023) (Anticipated)	20.50
Total Hours:	530.80

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Bingham v. Heritage Health Care, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/2/2020	U.S. Postmaster	Postage	6.95
11/17/2020	U.S. Postmaster	Postage	7.10
12/30/2020	Legal Document Server, Inc.	Attorney Service	200.23
12/30/2020	San Bernardino Superior Court	Filing Fee	435.00
12/30/2020	San Bernardino Superior Court	Complex Fee	1,000.00
3/26/2021	Legal Document Server, Inc.	Attorney Service	110.00
4/16/2021	Legal Document Server, Inc.	Attorney Service	130.00
4/16/2021	Legal Document Server, Inc.	Attorney Service	135.25
4/16/2021	San Bernardino Superior Court	Jury Fee	150.00
4/27/2021	Legal Document Server, Inc.	Attorney Service	130.00
5/4/2021	CourtCall, LLC	Attorney Service	94.00
5/12/2021	Legal Document Server, Inc.	Attorney Service	130.00
5/14/2021	CourtCall, LLC	Attorney Service	94.00
9/30/2021	Paul Hastings LLP	Mediation Fee	14,000.00
10/26/2021	Legal Document Server, Inc.	Attorney Service	130.85
10/26/2021	San Bernardino Superior Court	Filing Fee	20.00
2/22/2022	Legal Document Server, Inc.	Attorney Service	195.00
3/7/2022	CourtCall, LLC	Attorney Service	94.00
7/1/2022	Legal Document Server, Inc.	Attorney Service	130.00
7/18/2022	CourtCall, LLC	Attorney Service	94.00
10/3/2022	San Bernardino Superior Court	Filing Fee	90.00
10/3/2022	Legal Document Server, Inc.	Attorney Service	251.33
10/25/2022	CourtCall, LLC	Attorney Service	94.00
10/25/2022	San Bernardino Superior Court	Document Download Fee	26.00
Total:			17,747.71

LAWYERS for JUSTICE PC CASE COST DETAIL
Bingham v. Heritage Health Care, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/12/2020	U.S. Postmaster	Postage	27.80
1/22/2021	Legal Document Server, Inc.	Attorney Service	255.23
1/22/2021	San Bernardino Superior Court	Filing Fee	435.00
1/22/2021	San Bernardino Superior Court	Complex Fee	1,000.00
3/26/2021	Legal Document Server, Inc.	Attorney Service	110.00
4/26/2021	Legal Document Server, Inc.	Attorney Service	130.00
5/7/2021	Legal Document Server, Inc.	Attorney Service	130.00
5/12/2021	Legal Document Server, Inc.	Attorney Service	135.25
5/12/2021	San Bernardino Superior Court	Jury Fee	150.00
7/16/2021	Legal Document Server, Inc.	Attorney Service	130.70
7/16/2021	San Bernardino Superior Court	Filing Fee	20.00
7/23/2021	CourtCall, LLC	Attorney Service	94.00
10/26/2021	Legal Document Server, Inc.	Attorney Service	130.85
10/26/2021	San Bernardino Superior Court	Filing Fee	20.00
2/22/2022	Legal Document Server, Inc.	Attorney Service	195.00
7/1/2022	Legal Document Server, Inc.	Attorney Service	130.00
Total:			3,093.83