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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

MARCO RODRIGUEZ, 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.

NEW PENN FINANCIAL, LLC, a
Delaware corporation; NEWREZ, LLC, a
Delaware company; and DOES 2 through
100, inclusive,

Defendants.

Case No.: 34-2018-00233729-CU-OE-GDS

Honorable Shama H. Mesiwala
Department 53

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs Payment, and
Service Payment; Declaration of Class
Representative (Marco Rodriguez);
Declaration of Administrator (Zach Cooley);
and [Proposed] Final Approval Order and
Judgment filed concurrently herein]

Reservation No.: 2561826

Date: July 29, 2021
Time: 1:30 p.m.
Department: 53

Complaint Filed: May 25, 2018
FAC Filed: September 26, 2018
SAC Filed: April 19, 2021
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, 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 Marco Rodriguez (“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 July 29, 2021, in Department 53 of the above-entitled Court, the Honorable Shama H. Mesiwala preliminarily approved the Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant NewRez LLC (formerly known as “New Penn Financial, LLC”) (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Marco Rodriguez as Class Representative. The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as Class Counsel. The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Notice Packet”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris”) to serve as Administrator for handling the notice and settlement administration process.

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

WORK PERFORMED BY CLASS COUNSEL

4. I have been actively engaged in litigating this matter since prior to the commencement of the action on May 25, 2018, as have several other attorneys and members in our firm.

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1 5. Before initiating the action, Lawyers *for* Justice, PC investigated and researched
2 the facts and circumstances underlying the pertinent factual and legal issues and applicable law.
3 This required thorough discussions and interviews between attorneys at our firm and Plaintiff,
4 and research into the various legal issues involved in the case, namely, the current state of the
5 law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour
6 enforcement, the claims of Plaintiff, and potential defenses. After conducting initial
7 investigation, our firm determined that the claims of Plaintiff were well-suited for class-wide
8 adjudication owing to what appeared to be a common course of conduct affecting a similarly
9 situated group of current and former hourly-paid or non-exempt employees who worked for
10 Defendant, who were not properly compensated for, *inter alia*, all hours worked, and non-
11 compliant meal and rest periods.

12 6. Class Counsel used the pre-mediation time period to investigate the veracity,
13 strength, and scope of the claims, and also to prepare the matter for class certification,
14 representative adjudication, and trial. The parties conducted significant formal and informal
15 discovery and investigation into the facts of the case, and also informally exchanged information
16 and data in preparation for mediation. Class Counsel propounded multiple sets of written
17 discovery requests in various forms; reviewed Defendant's responses and supplemental thereto;
18 worked with Plaintiff to provide responses to multiple sets of discovery requests that were
19 propounded by Defendant; and prepared and served deposition notices. Class Counsel prepared
20 for and took the deposition of Defendant's Person Most Knowledgeable witness and prepared for
21 and defended the full-day deposition of Plaintiff. Class Counsel also interviewed and obtained
22 information from Plaintiff and other Class Members, including and not limited to the names of
23 potential witnesses, and reviewed and analyzed thousands of pages of documents and data
24 produced by Defendant and obtained through other sources. The documents and data reviewed
25 and analyzed by Class Counsel included, and were not limited to, employment records of
26 Plaintiff and other Class Members, a detailed sampling of Class Members' time and pay data,
27 multiple iterations of Defendant's employee handbooks, The Shellpoint Family of Companies
28 Employee Handbook and the California Addendum to the Shellpoint Family of Companies

1 Employee Handbook, various acknowledgements (including, but not limited to, Defendant's
2 Acknowledgement of Receipt of Employee Handbook and Code of Conduct acknowledgement)
3 and agreements (including, but not limited to, Defendant's Position Description
4 Acknowledgement & Agreement and Confidentiality and Non-Solicitation Agreement), internal
5 memoranda, job descriptions, checklists (including, but not limited to, Defendant's Employee
6 Separation Checklist), Defendant's operations and employment practices, forms (including, but
7 not limited to, Defendant's Compensation and Hours form, Recommendation for Termination
8 form, and Separation from Employment form), procedures (including, but not limited to,
9 Defendant's Timekeeping Process and Recording Time Worked procedures), and policies
10 (including, but not limited to, Defendant's Cell Phone policy, Overtime policy, Working Hours
11 policy, Attendance policy, detailed Business Casual Attired dress policy, Travel & Expense
12 Reimbursement policy, Meal & Rest policies, Wage and Salary policy, and Payment Upon
13 Termination policy), among other information and documents. Class Counsel researched
14 applicable law, developed damages/valuation models in preparation for mediation, and met and
15 conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the
16 pleadings, case management, discovery, and production of various documents and data prior to
17 mediation. Other work performed by Class Counsel included, and was not limited to, case
18 strategy and analysis; drafting, reviewing, and revising pleadings and mediation briefs; preparing
19 and appearing for court proceedings; and preparing for and attending mediations and settlement
20 negotiations.

21 7. As outlined herein, the parties have conducted significant formal and informal
22 discovery and investigation during the course of litigating the case. Class Counsel analyzed
23 thousands of pages of documents and data either produced by Plaintiff and Defendant or
24 obtained by Class Counsel through other sources. These documents and data provided a critical
25 understanding of the nature of the work performed by the Class Members, as well as Defendant's
26 operations and employment policies, practices, and procedures, and were used in analyzing
27 liability, damages, and valuation issues in connection with all phases of the litigation, and
28 ultimately with the mediation and settlement negotiation process. Class Counsel also performed

1 significant research into the law concerning Defendant's defenses.

2 8. After conducting significant investigation of the facts and law during the
3 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
4 try to resolve the entire matter. These efforts included participating in a formal, full-day
5 mediation session and two half-day mediation sessions conducted by David Rotman, Esq., a
6 well-regarded mediator experienced in mediating complex labor and employment matters.
7 During all settlement discussions, the parties conducted their negotiations at arm's length in an
8 adversarial position. Prior to and during mediations, the parties exchanged information and data,
9 and discussed all aspects of the case, including the risks and delays of further litigation, the risks
10 to the parties of proceeding with class certification and trial, the law relating to off-the-clock
11 theory, meal and rest periods, representative PAGA actions, and wage-and-hour enforcement, the
12 evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at
13 a settlement that was acceptable to the parties was not easy. Defendant also contended that
14 individualized questions of fact predominate over any common issues, and these issues would
15 pose challenges to certification and representative adjudication. Defendant and its counsel felt
16 very strongly about Defendant's ability to prevail on the merits and to obtain a denial of class
17 certification, while Plaintiff and Class Counsel believed that class certification would be
18 obtained and that they would prevail at trial. With the aid of the mediator's evaluation, the
19 parties agreed that the case was well-suited for settlement given the legal issues relating to
20 Plaintiff's principal claims, as well as the costs and risks to the parties that would attend further
21 litigation. These risks of further litigation include, and are not limited to, a determination that
22 the claims are unsuitable for class treatment and/or representative adjudication, failure to obtain
23 certification, class de-certification after certification of a class, allowing a jury to decide the
24 claims asserted in the case, and the real possibility of no recovery after years of litigation.

25 9. As set forth more fully in the accompanying Motion for Final Approval, Class
26 Counsel seeks attorneys' fees in the amount of \$1,140,000.000, which is thirty-eight percent
27 (38%) of the Gross Settlement Fund of \$3,000,000.000, as set forth in the Settlement Agreement
28 and the Notice Packet. Pursuant to the contingency-fee agreement entered into by and between

1 Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-eight
2 percent (38%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk
3 that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class
4 Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4)
5 the results that Class Counsel has achieved throughout the litigation; (5) the value of the
6 settlement that Class Counsel has achieved for the Class Members; and (6) the other cases that
7 Class Counsel has turned down in order to devote its time and efforts to this matter.

8 10. I am aware that the common and acceptable rate for contingency representation in
9 wage and hour class action litigation is normally 40% before trial, with the range being from
10 33.3% up to 50%.

11 11. While not necessarily required to be demonstrated because the contingent fee is
12 proper for this settlement, Class Counsel has incurred many hours of work in connection with
13 prosecuting the case such that the award of attorneys' fees is also justified under a simple
14 lodestar analysis with a multiplier of 1.53. Lawyers *for* Justice, PC has spent a total of **953.70**
15 **hours**, performing tasks and obtaining recovery on behalf of Plaintiff and the Class Members.
16 Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time and Chart that sets forth in
17 detail the nature of the legal services provided by Class Counsel and the time incurred in
18 performing those services. These hours include work done by myself and several of the firm's
19 other members. We also had litigation support personnel actively engaged in assisting with the
20 prosecution of this matter.

21 12. 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 matters, and in particular, employment class actions,
24 support a reasonable hourly rate of compensation at the rate of \$785 for work performed by
25 Class Counsel. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm
26 at the rate of at least \$785 per hour for legal services performed, by courts granting final
27 approval in other cases: final approval of the class and representative action settlement in *Seth*
28 *Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted

on February 6, 2019, and the award of attorneys' fees involved a higher hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved a higher hourly rate of \$831.38; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved a higher hourly rate of \$845.64.

ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

13. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

JUDICIAL EXTERNSHIPS

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

LITIGATION AND CLASS ACTION EXPERIENCE

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

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

6 17. Since its inception, in or around October of 2008, our firm has almost exclusively
7 focused on the prosecution of consumer and employment class actions, involving wage-and-hour
8 claims, race discrimination, unfair business practices or consumer fraud. Currently, we are the
9 attorneys of record in over a dozen employment-related putative class actions in both state and
10 federal courts in the State of California. Our firm has successfully litigated cases involving the
11 executive, administrative, and other overtime exemptions to the State of California and federal
12 overtime compensation requirements. During this relatively short time, in association with other
13 law firms, we have obtained millions of dollars on behalf of thousands of individuals in
14 California.

15 **EXAMPLES OF CLASS ACTION RESULTS**

16 18. What follows are just a few examples of the type of results we have achieved on
17 behalf of our clients:

18 a) Our firm, in association with co-counsel, represented the plaintiffs in a
19 wage-and-hour class and representative action against a major property management company
20 involving allegations of misclassification of various “manager” positions. On September 20,
21 2010, the court granted final approval of the class and representative action settlement. The Los
22 Angeles County Superior Court Case Number is BC400414.

23 b) Our firm, in association with co-counsel, represented the plaintiffs in a
24 wage-and-hour class action against a national retailer involving allegations of misclassification
25 of the “Assistant Store Manager” position. On October 28, 2010, the court granted final
26 approval of the class action settlement. The Los Angeles County Superior Court Case Number is
27 BC413498.

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1 c) Our firm, in association with co-counsel, represented the plaintiffs in a
2 wage-and-hour class and representative action against a national property management company
3 involving allegations of misclassification of the “Property Manager” position. On May 23, 2012,
4 the court granted final approval of the class and representative action settlement. The Los
5 Angeles County Superior Court Case Number is BC430918.

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

11 e) Our firm, in association with co-counsel, represented the plaintiffs in a
12 wage-and-hour class and representative action against a bank, involving allegations of
13 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
14 granted final approval of the class and representative action settlement. The Kern County
15 Superior Court Case Number is S-1500-CV-273194-LHB.

16 f) Our firm, in association with co-counsel, represented the plaintiffs in a
17 wage-and-hour class and representative action against a national wholesale distributor of
18 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
19 “manager” positions. On May 22, 2014, the court granted final approval of the class and
20 representative action settlement. The Sacramento County Superior Court Case Number is 34-
21 2012-00136285.

22 g) Our firm, in association with co-counsel, represented the plaintiffs in a
23 wage-and-hour class action involving allegations of misclassification of the “Operations
24 Manager” position. On September 16, 2014, the court granted plaintiffs’ motion for class
25 certification. The Los Angeles County Superior Court Case Number is BC478769.

26 h) Our firm, in association with co-counsel, represented the plaintiffs in a
27 wage-and-hour class and representative action against a national retailer of household items, on
28 behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted final

1 approval of the class and representative action settlement. The San Francisco County Superior
2 Court Case Number is CGC-13-532344.

3 i) Our firm, in association with co-counsel, represented the plaintiffs in a
4 wage-and-hour class action involving allegations of misclassification of the salaried residential
5 “Property Manager” position. On September 17, 2015, the court granted plaintiffs’ motion for
6 class certification. The Los Angeles County Superior Court Case Number is BC474784.

7 j) Our firm, in association with co-counsel, represented the plaintiffs in a
8 wage-and-hour class and representative action against a national retailer of upscale hardware and
9 home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted
10 final approval of the class and representative action settlement. The Los Angeles County
11 Superior Court Case Number is JCCP4794.

12 k) Our firm, in association with co-counsel, represented the plaintiffs in a
13 wage-and-hour class and representative action against a national retailer of apparel and fashion
14 accessories, on behalf of non-exempt employees. On August 5, 2016, the court granted final
15 approval of the class and representative action settlement. The Los Angeles County Superior
16 Court Case Number is BC488069.

17 l) Our firm, in association with co-counsel, represented the plaintiffs in a
18 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
19 involving allegations of misclassification of the “Department Manager” position. On August 12,
20 2016, the court granted plaintiffs’ motion for class certification in part and certified a class. The
21 Alameda County Superior Court Case Number is RG13680477.

22 m) Our firm represented the plaintiff in a representative action under the
23 Private Attorneys General Act, against a real estate and property management company, on
24 behalf of non-exempt employees. On November 4, 2016, the Court granted approval of the
25 settlement. The Orange County Superior Court Case Number is 30-2015-00775439-CU-OE-
26 CXC.

27 n) Our firm, in association with co-counsel, represented the plaintiffs in a
28 wage-and-hour class action against a full-service bank, on behalf of non-exempt employees. On

1 November 18, 2016, the court granted final approval of the class action settlement. The San
2 Francisco County Superior Court Case Number is CJC-13-004839.

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

7 p) Our firm, on behalf of the plaintiff and respondent in a PAGA
8 representative action, successfully opposed in the trial court, and briefed and argued an appeal
9 with respect to the employer's motion to compel arbitration, which resulted in a published
10 opinion by the California Court of Appeal in favor of employees. *Roberto Betancourt v.*
11 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. App. 4th Dist., Mar. 7, 2017), review denied,
12 cert. denied (U.S. Supreme Court Docket No. 17-254).

13 q) Our firm, in association with co-counsel, represented the plaintiffs in a
14 wage-and-hour class and representative action against a consumer packaging company, on behalf
15 of non-exempt employees. On March 10, 2017, the court granted final approval of the class and
16 representative action settlement. The Los Angeles County Superior Court Case Number is
17 BC590429.

18 r) Our firm, in association with co-counsel, represented the plaintiffs in a
19 wage-and-hour class action and representative action against a manufacturer of food service
20 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final
21 approval of the class and representative action settlement. The Orange County Superior Court
22 Case Number is 30-2015-00810013-CU-OE-CXC.

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

27 t) Our firm represented the plaintiffs in a wage-and-hour class action and
28 representative action against a food company on behalf of non-exempt employees. On June 30,

1 2017, the court granted final approval of the class and representative action settlement. The
2 Sacramento County Superior Court Case Number is 34-2015-00175871.

3 u) Our firm represented the plaintiffs in a wage-and-hour class action and
4 representative action against a chocolate company on behalf of non-exempt employees. On July
5 19, 2017, the court granted final approval of the class and representative action settlement. The
6 Alameda County Superior Court Case Number is RG15764300.

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

11 w) Our firm, in association with co-counsel, represented the plaintiffs in a
12 wage-and-hour class action and representative action against a property management company
13 on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court entered an
14 order granting final approval of the class and representative action settlement. The Los Angeles
15 County Superior Court Case Number is JCCP 4819.

16 x) Our firm, in association with co-counsel, represented the plaintiffs in a
17 wage-and-hour class action and representative action against a global provider of flexible office
18 space solutions. On February 15, 2018, the court entered an order granting final approval of the
19 class and representative action settlement. The Los Angeles County Superior Court Case
20 Number is BC498401.

21 y) Our firm, in association with co-counsel, represented the plaintiff in a
22 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
23 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.
24 The Tulare County Superior Court Case Number is VCU264528.

25 z) Our firm represented the plaintiffs in a wage-and-hour class and
26 representative action against a behavioral health service provider on behalf of non-exempt
27 employees. On November 13, 2018, the court granted final approval of the class and
28 representative action settlement. The Alameda County Superior Court Case Number is

1 RG16811450.

2 aa) Our firm, in association with co-counsel, represented the plaintiff in a
3 representative action under the Private Attorneys General Act, against a global provider of
4 products and services to the energy industry, on behalf of hourly-paid and non-exempt
5 employees. On November 19, 2018, the Court granted approval of the settlement. The Kern
6 County Superior Court Case Number is S-1500-CV-280215-SDC.

7 bb) Our firm represented the plaintiff in a wage-and-hour class action against
8 a parking company on behalf of non-exempt employees. On September 3, 2019, the court
9 granted the plaintiff's motion for class certification and certified a class. The Santa Clara County
10 Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding
11 Number is JCCP 4886.

12 cc) Our firm, in association with co-counsel, 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 and finding, in part, that
16 employer arbitration agreements are unenforceable where they block a PAGA claim from
17 proceeding, *ZB, N.A. v. Superior Court*, 8 Cal.5th 175 (2019).

18 dd) Our firm represented the plaintiffs in a wage-and-hour class and
19 representative action against a bank on behalf of non-exempt employees. On September 27,
20 2019, the court granted the plaintiffs' motion for class certification in part and certified a class.
21 The Alameda County Superior Court Case Number is RG15757606 and the Judicial Council
22 Coordination Proceeding Number is JCCP 4921.

23 ee) Our firm represented the plaintiffs in a wage-and-hour class and
24 representative action against a national retailer of apparel and fashion accessories, on behalf of
25 non-exempt employees. On October 9, 2019, the court granted the plaintiffs' motion for class
26 certification in part and certified a class. The Sacramento County Superior Court Case Number
27 is 34-2015-00175330-CU-OE-GDS.

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1 ff) Our firm represented the plaintiff in a wage-and-hour class and
2 representative action against a medical equipment supplier on behalf of non-exempt employees.
3 On February 13, 2020, the court granted the plaintiff's motion for class certification and certified
4 a class. The San Bernardino County Superior Court Case Number is CIVDS1505744.

5 gg) Our firm, in association with co-counsel, represented the plaintiff in a
6 wage-and-hour class and PAGA representative action against a large national drug testing
7 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
8 plaintiff's motion for class certification and certified a class. The San Diego County Superior
9 Court Case Number is 37-2018-00019611-CU-OE-CTL.

10 hh) Our firm represented the plaintiffs in a wage-and-hour class and
11 representative action against a national retailer of sportswear, footwear, and camping equipment
12 on behalf of non-exempt employees. On March 16, 2020, the court granted in part the plaintiff's
13 motion for class certification and certified a class. The Riverside County Superior Court Case
14 Number is RICJCCP4930.

15 ii) Our firm represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a plastic packaging company on behalf of non-exempt employees.
17 On June 8, 2020, the court granted in part the plaintiffs' motion for class certification and
18 certified a class. The San Bernardino County Superior Court Case Number is CIVDS1507361.

19 jj) Our firm, in association with co-counsel, represented the plaintiffs in a
20 wage-and-hour class action against manufacturer and supplier of power products and services on
21 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
22 motion for class certification and certified a class. The San Diego County Superior Court Case
23 Number is 37-2015-00025968-CU-OE-CTL.

24 **LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL**

25 19. To date, Class Counsel has borne all the risks and costs of litigation and will not
26 receive any compensation until recovery is obtained by Plaintiff and the Class Members.
27 Lawyers for Justice, PC has incurred **\$49,995.38** in litigation costs and expenses as reflected in
28 **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the

1 prosecution of this matter and to obtain the Settlement. It should be noted that Class Counsel has
2 borne all of the risks and costs of litigation and will not receive any compensation until recovery
3 is obtained under the Settlement.

4 **SERVICE PAYMENT TO PLAINTIFF**

5 20. In recognition of his efforts and work serving as the Class Representative, the
6 Settlement provides for a Service Payment in the amount of \$15,000.00 to Plaintiff Marco
7 Rodriguez to compensate Plaintiff for the time and effort that he expended on behalf of the
8 Class. The requested Service Payment is fair and appropriate. Plaintiff spent a substantial
9 amount of time and effort in producing relevant documents and past employment records and
10 provided the facts and evidence necessary to attempt to prove the allegations, including and not
11 limited to, by way of working with Class Counsel to provide responses to discovery requests that
12 were propounded by Defendant, preparing for and attending a full-day deposition, and reviewing
13 his deposition transcript. Plaintiff was available whenever Class Counsel needed him and
14 actively tried to obtain information that would benefit the Class. Plaintiff spent numerous hours
15 speaking with Class Counsel about his claims, describing his work experience with Defendant,
16 and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Marco
17 Rodriguez to receive \$15,000.00 as a reasonable Service Payment, in addition to his Individual
18 Settlement Payment, for his services on behalf of the Class.

19 21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
20 Settlement is in the best interests of Plaintiff and other Class Members.

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

23 Executed this 28th day of June 2021, at Glendale, California.

24
25 
26 Edwin Aiwasian
27
28

EXHIBIT A

RODRIGUEZ V. NEW PENN FINANCIAL, LLC., ET AL
(SACRAMENTO COUNTY SUPERIOR COURT CASE NO. 34-2018-00233729-CU-OE-GDS)
ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>FOR</i> 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	17
Pre-Lawsuit Investigation of the Merits of Plaintiff Marco Rodriguez’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	23.50
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant NewRez LLC (formerly known as “New Penn Financial, LLC”) (“Defendant”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members	23
Pre-Lawsuit Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Overtime Exemption, Commission, Representative PAGA, and Certification Decisions in California, Including All New Relevant DLSE Materials	12
Investigation of Defendant, Defendant’s Licenses and Registrations, Defendant’s Business Relationships, Joint Venture Partners, and the Industry in which Defendant Operates	16
Investigation of Defendant’s Loan Products and Lending Channels, including Wholesale, Correspondent Lending, Direct-to-Consumer, and Retail	11
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	10

Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	11
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	14
Research and Investigation Re: Locations Owned, Managed, or Operated by Defendant in California During the Class Period, Including Differences Between the Various Locations to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	8
Comparative Analysis and Cross-Checking of All Available Job Postings by Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would Be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	17
Research and Investigation Re: Staffing Models and Staffing Levels at Defendant's Locations at Which Putative Class Members Worked Throughout California	6
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Commissions/Bonuses/Incentive/Shift Differential Pay, Other Non-Discretionary Compensation (e.g., Giftcards), Variable Compensation Plan, Timekeeping, Appraisals, Meal/Rest Breaks, Overtime Compensation, Scheduling, Reimbursement of Business-Related Expenses, Complaint Procedures and Anonymous Reporting Hotline, and Wage-and-Hour Compliance	29
Research and Investigation Re: Various Software Programs and Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping Software and Web-Based Applications, with a Focus on What Documents (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	18
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	9

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	13
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	10
Prepare a Discovery Strategy Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	15
Meet and Communicate with Plaintiff Marco Rodriguez Throughout the Pendency of the Case	76
Investigate Potential Putative Class Member Witnesses and Communicate with Putative Class Members	48
Pleadings and Court Filings	
Research and Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on May 25, 2018)	11.50
Review Court's Notice of Case Assignment to Department 35 for Complex Case Management Determination (filed on July 10, 2018)	0.25
Research and Draft Plaintiff's First Amended Class Action Complaint for Damages (filed on September 26, 2018)	6.50
Draft Plaintiff's Case Management Statement (filed on October 9, 2018)	2.25
Review Court's Minute Order Re: Case Management Conference Complex Designation (filed on October 17, 2018)	0.10
Draft Plaintiff's Notice of Posting Jury and Complex Fees (filed on November 5, 2018)	0.25
Draft Plaintiff's Notice and Acknowledgement of Receipt (filed on November 6, 2018)	0.25

Review and Analyze Defendant New Penn Financial, LLC's Answer to Plaintiff's First Amended Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on November 30, 2018)	5.50
Draft Plaintiff's Case Management Statement (filed on March 21, 2019)	2.25
Review Defendant's Case Management Statement (served on March 28, 2019)	0.25
Review Court's Minute Order Re: Case Management Conference - Complex (filed on April 5, 2019)	0.10
Review Defendant's Notice of Unavailability (served on October 25, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Status Conference; and [Proposed] Order (submitted on October 31, 2019)	1.50
Review Court's Order Re: Joint Stipulation to Continue Status Conference; and Order (filed on November 13, 2019)	0.25
Review Court's Minute Order Re: Order and Notice of Re-Assignment of Complex Civil Case (filed on January 13, 2020)	0.25
Review Court's Minute Order Re: Case Management Conference - Complex (filed on January 27, 2020)	0.10
Review Court's Minute Order (filed on March 30, 2020)	0.10
Review Court's Minute Order Re: Order Setting Complex Civil Case Management Conference (filed on May 29, 2020)	0.10
Review Defendant's Notice of Unavailability (served on June 9, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Status Conference; and [Proposed] Order (submitted on June 9, 2020)	1.50
Review Court's Order Re: Joint Stipulation to Continue Status Conference; and Order (filed on June 9, 2020)	0.25

Review Court's Minute Order Re: Notice of Change in Court's Department Number (filed on August 5, 2020)	0.10
Draft Amendment to Complaint (filed August 17, 2020)	0.25
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Report (filed on August 19, 2020)	1.25
Review Court's Tentative Ruling Re: Status Conference and Minute Order Re: Status Conference (filed on August 28, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (submitted on December 7, 2020)	1.50
Review Court's Tentative Ruling Re: Case Management Conference on December 18, 2020 (filed on December 16, 2020)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on December 18, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on March 5, 2021)	2
Review Court's Tentative Ruling Re: Case Management Conference set on March 19, 2021 (filed on March 17, 2021)	0.10
Review Court's Minute Order Re: Case Management Conference - Complex (filed on March 19, 2021)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on March 26, 2021)	0.10
Research and Draft Plaintiff's Second Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, Cal. Labor Code § 2698, Et Seq. (filed on April 19, 2021)	7
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on May 26, 2021)	0.10
Appearances	

Prepare for and Telephonically Attend Case Management Conference (October 17, 2018)	0.75
Prepare for and Telephonically Attend Case Management Conference (April 5, 2019)	0.75
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs Payment, and Service Payment (July 29, 2021) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for David Bartolini (served on February 28, 2018)	1.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Jennifer Carver (served on March 5, 2018)	1.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Marco Rodriguez (served on March 14, 2018)	1.50
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs and Time Records for Jennifer Carver (served on March 20, 2018)	1
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for David Bartolini (served on March 25, 2018)	5
Review Defendant's Reply Letter in Response to Follow Up Letter to the Request for Personnel File, Pay Stubs, and Time Records for Jennifer Carver (served on March 28, 2018)	0.25
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Marco Rodriguez (served on April 4, 2018)	3.75
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Jennifer Carver (served on April 6, 2018)	6

Draft Plaintiff Marco Rodriguez's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on November 27, 2018)	9.75
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant New Penn Financial, LLC and Requests for Production of Documents (January 1, 2019; Job Duties) (served on November 27, 2018)	4
Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant New Penn Financial, LLC and Requests for Production of Documents (January 2, 2019; Organizational Structure) (served on November 27, 2018)	3.75
Review and Analyze Defendant New Penn Financial, LLC's Form Interrogatories- General (Set One) and Special Interrogatories (Set One) (served on December 18, 2018)	5
Review and Analyze Defendant New Penn Financial, LLC's Notice of Deposition of Plaintiff Marco Rodriguez and Production of Documents (December 28, 2018) (served on December 18, 2018)	2
Draft Plaintiff's Objection to Defendant New Penn Financial, LLC's Notice of Deposition of Plaintiff Marco Rodriguez and Production of Documents (December 28, 2018) (served on December 21, 2018)	9
Review and Analyze Defendant Newrez, LLC's Responses to Plaintiff's Request for Production of Documents (Set One), Form Interrogatories - General (Set One), Special Interrogatories (Set One) and Special Interrogatories (Set Two) (served on January 22, 2019)	11
Draft Plaintiff's Responses to Defendant's Special Interrogatories (Set One), Form Interrogatories - General (Set One), and Request for Production of Documents (Set One) (served on February 7, 2019)	17
Draft Plaintiff's Special Interrogatories (Set Three), Request for Production of Documents (Set Two); (served on February 11, 2019)	7
Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant New Penn Financial, LLC and Requests for Production of Documents (March 14, 2019; Affirmative Defenses) (served on February 11, 2019)	4

Review and Analyze Defendant Newrez, LLC's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant New Penn Financial, LLC and Requests for Production of Documents Responses (served on March 6, 2019)	8
Review and Analyze Defendant Newrez LLC's Responses to Plaintiff's Special Interrogatories (Set Three) and Responses to Plaintiff's Request for Production of Documents (Set Two); (served on April 8, 2019)	10.25
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Maricela Hernandez (served on May 6, 2019)	1.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Mary Ann Wheeler (served on May 6, 2019)	1.50
Review and Analyze Defendant New Penn Financial, LLC's Second Notice of Taking Deposition of Plaintiff Marco Rodriguez and Production of Documents (June 28, 2019) (served on May 31, 2019)	3.25
Draft Plaintiff's Objection to Defendant New Penn Financial, LLC's Second Notice of Taking Deposition of Plaintiff Marco Rodriguez and Production of Documents (June 28, 2019) (served on June 20, 2019)	7
Review and Analyze Defendant New Penn Financial, LLC's Third Notice of Taking Deposition of Plaintiff Marco Rodriguez and Request for Production of Documents (July 9, 2019) (served on June 25, 2019)	3
Draft Plaintiff's Responses to Defendant New Penn Financial, LLC's Third Notice of Taking Deposition of Plaintiff Marco Rodriguez and Production of Documents (July 9, 2019) (served on July 3, 2019)	12
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Marco Rodriguez (July 9, 2019; San Francisco, California) and Review Deposition Transcript	19.25
Draft Follow-Up Letter to Defendant Re: Personnel File, Pay Stubs, and Time Records for Maricela Hernandez (served on July 31, 2019)	1

Draft Follow-Up Letter to Defendant Re: Personnel File, Pay Stubs, and Time Records for Mary Ann Wheeler (served on July 31, 2019)	1
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Mary Ann Wheeler (served on September 4, 2019)	7
Draft Follow-Up Letter to Defendant Re: Personnel File, Pay Stubs, and Time Records for MariCela Hernandez (served on September 10, 2019)	1
Draft Plaintiff's Re-Notice of Deposition of Person Most Knowledgeable at Defendant New Penn Financial, LLC and Requests for Production of Documents (September 19, 2019; Job Duties) (served on September 12, 2019)	3
Review and Analyze Defendant NewRez Financial, LLC's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant NewRez Financial, LLC and Request for Production of Documents (September 19, 2019) (served on September 16, 2019)	3.25
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Maricela Hernandez (served on September 17, 2019)	2.50
Prepare for, Travel to/from, and Take the Deposition of Person Most Knowledgeable Olmer Cantillo (September 19, 2019; Sacramento, California) and Review Deposition Transcript	19
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Marco Rodriguez for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on November 12, 2020)	4
Meet with Defendant's Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	52
Mediation/Settlement	

Review and Analyze Mediation Data and Documents Produced by Defendants (served on September 16, 2019) (served on September 17, 2019) (served on September 18, 2019) (served on October 2, 2019) (served on March 3, 2020) (served on July 30, 2020) ● Employee Handbooks and Policies ● Job Descriptions ● Sampling of Employee Time Data ● Sampling of Employee Pay Data ● Class List	46
Prepare for First Mediation Session, Including Researching Settlement-Related Issues and Merits of Claims, Drafting Plaintiff's Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages and Penalties Analysis/Calculations (submitted on March 17, 2020)	34
Review and Analyze Defendant's Mediation Brief in Advance of First Mediation (received on March 13, 2020)	2
Travel to/from and Attend First Mediation Session (March 17, 2020; San Francisco, California)	14
Prepare for Second Mediation Session, Including Researching Settlement-Related Issues and Merits of Claims, Drafting Plaintiff's Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages and Penalties Analysis/Calculations (submitted on June 30, 2020)	30
Review and Analyze Defendant's Mediation Brief in Advance of Second Mediation (received on June 29, 2020)	2
Attend Second Mediation Session (June 30, 2020; Zoom Video Conference)	8

Prepare for Third Mediation Session, Including Researching Settlement-Related Issues and Merits of Claims, Drafting Plaintiff's Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages and Penalties Analysis/Calculations (submitted on August 10, 2020)	28
Review and Analyze Defendant's Materials Provided in Advance of Third Mediation (received on July 30, 2020)	2
Attend Third Mediation Session (August 10, 2020; Zoom Video Conference)	8
Draft, Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement and Release (executed on February 10, 2021) and Draft Exhibits	18
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Marco Rodriguez in Support Thereof, and [Proposed] Order (filed on February 18, 2021)	32
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on March 9, 2021)	0.10
Re-file Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Marco Rodriguez in Support Thereof, and [Proposed] Order (re-filed on March 18, 2021)	3
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on April 15, 2021)	0.25
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on April 15, 2021)	0.10
Review Declaration of Zach Cooley Regarding Notice and Settlement Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Settlement, Attorneys' Fees and Costs Payment, and Service Payment, and Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on June 28, 2021)	38
Total Hours:	953.70

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Rodriguez v. New Penn Financial, LLP

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/23/2018	General Logistics Systems US, Inc.	Courier Service	32.31
2/26/2018	FedEx Express	Courier Service	29.95
2/28/2018	U.S. Postmaster	Postage	6.70
3/14/2018	U.S. Postmaster	Postage	6.70
3/20/2018	U.S. Postmaster	Postage	6.93
4/5/2018	General Logistics Systems US, Inc.	Courier Service	17.03
5/14/2018	General Logistics Systems US, Inc.	Courier Service	23.85
5/31/2018	One Legal	Attorney Service	123.31
5/31/2018	Sacramento Superior Court	Filing Fee	435.00
6/20/2018	ProLegal	Attorney Service	217.20
7/20/2018	ProLegal	Attorney Service	114.95
7/26/2018	ProLegal	Attorney Service	159.95
9/26/2018	ProLegal	Attorney Service	123.20
10/11/2018	U.S. Postmaster	Postage	2.47
10/12/2018	CourtCall, LLC	Attorney Service	86.00
10/29/2018	ProLegal	Attorney Service	114.95
11/5/2018	ProLegal	Attorney Service	214.95
11/5/2018	Sacramento Superior Court	Complex Fee	1,000.00
11/5/2018	Sacramento Superior Court	Jury Fee	150.00
11/6/2018	ProLegal	Attorney Service	99.95
11/27/2018	General Logistics Systems US, Inc.	Courier Service	25.81
12/19/2018	General Logistics Systems US, Inc.	Courier Service	17.10
12/21/2018	ProLegal	Attorney Service	171.45
12/26/2018	General Logistics Systems US, Inc.	Courier Service	17.10
2/7/2019	General Logistics Systems US, Inc.	Courier Service	44.34
2/11/2019	General Logistics Systems US, Inc.	Courier Service	25.18
2/14/2019	General Logistics Systems US, Inc.	Courier Service	17.80
3/21/2019	ProLegal	Attorney Service	114.95
4/3/2019	CourtCall, LLC	Attorney Service	94.00
4/17/2019	General Logistics Systems US, Inc.	Courier Service	18.03
5/6/2019	U.S. Postmaster	Postage	6.85
5/6/2019	U.S. Postmaster	Postage	6.85
5/23/2019	General Logistics Systems US, Inc.	Courier Service	18.48
7/3/2019	General Logistics Systems US, Inc.	Courier Service	26.79
7/7/2019	Benjamin Haber	Travel Reimbursement	342.19
7/9/2019	Zandonella Reporting Service, Inc.	Court Reporter	1,001.33
7/10/2019	Benjamin Haber	Travel Reimbursement	1,793.38
7/31/2019	U.S. Postmaster	Postage	7.00
7/31/2019	U.S. Postmaster	Postage	7.00
9/10/2019	U.S. Postmaster	Postage	7.00

LAWYERS for JUSTICE PC CASE COST DETAIL

Rodriguez v. New Penn Financial, LLP

9/12/2019	General Logistics Systems US, Inc.	Courier Service	17.00
9/19/2019	Tara Zabehi	Travel Reimbursement	1,499.47
9/19/2019	Esquire Deposition Solutions, LLC	Videography Service	1,337.95
9/19/2019	Esquire Deposition Solutions, LLC	Court Reporter	2,924.33
10/31/2019	Legal Document Server, Inc.	Attorney Service	130.00
11/12/2019	Sacramento Superior Court	Document Download Fee	1.00
11/13/2019	Legal Document Server, Inc.	Attorney Service	195.00
11/18/2019	CourtCall, LLC	Attorney Service	94.00
3/2/2020	General Logistics Systems US, Inc.	Courier Service	17.86
3/2/2020	David A. Rotman	Mediation Fee	13,250.00
3/3/2020	Stats Company	Damages Consulting Fee	90.00
3/6/2020	Robert A. Parris	Expert	5,100.00
3/30/2020	CourtCall, LLC	Attorney Service	54.00
4/13/2020	General Logistics Systems US, Inc.	Courier Service	55.95
6/9/2020	Legal Document Server, Inc.	Attorney Service	130.70
6/9/2020	Sacramento Superior Court	Filing Fee	20.00
6/10/2020	General Logistics Systems US, Inc.	Courier Service	19.39
6/22/2020	David A. Rotman	Mediation Fee	6,625.00
6/30/2020	Robert A. Parris	Expert	3,900.00
8/10/2020	Arby Aiwazian	Travel Reimbursement	338.57
8/10/2020	Robert A. Parris	Expert	3,300.00
8/17/2020	General Logistics Systems US, Inc.	Courier Service	48.08
8/17/2020	Legal Document Server, Inc.	Attorney Service	130.00
8/19/2020	General Logistics Systems US, Inc.	Courier Service	41.67
8/19/2020	Legal Document Server, Inc.	Attorney Service	130.00
8/21/2020	General Logistics Systems US, Inc.	Courier Service	29.48
8/21/2020	Legal Document Server, Inc.	Attorney Service	130.00
9/11/2020	Legal Document Server, Inc.	Attorney Service	130.00
12/7/2020	Legal Document Server, Inc.	Attorney Service	120.70
12/7/2020	Sacramento Superior Court	Filing Fee	20.00
2/17/2021	Legal Document Server, Inc.	Attorney Service	172.75
2/25/2021	Legal Document Server, Inc.	Attorney Service	2.10
2/25/2021	Sacramento Superior Court	Filing Fee	60.00
3/5/2021	Legal Document Server, Inc.	Attorney Service	90.00
3/18/2021	Legal Document Server, Inc.	Attorney Service	154.85
3/18/2021	Sacramento Superior Court	Filing Fee	60.00
4/2/2021	Legal Document Server, Inc.	Attorney Service	110.00
4/16/2021	Sacramento Superior Court	Document Download Fee	6.00
	LFJ (In-House)	Photocopies (18,210 @ \$0.15 per page)	2,731.50
			Total:
			49,995.38