

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Brian J. St. John (SBN 304112)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

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

JEANNETTE SALAZAR, 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,

v.

AMERISOURCEBERGEN DRUG
CORPORATION, a Delaware corporation;
and DOES 1 through 100, inclusive,

Defendant.

Case No.: 34-2021-00301017-CU-OE-GDS

Honorable Jill H. Talley
Department 23

CLASS ACTION

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

[Plaintiff's Motion for Final Approval of Class
Action Settlement, Attorneys' Fees and Costs,
and Service Payment; Declaration of Class
Representative (Jeannette Salazar); Declaration
of Settlement Administrator (Yami Burns);
and [Proposed] Order and Judgment filed
concurrently herewith]

Date: February 23, 2024
Time: 10:30 a.m.
Department: 23

Complaint Filed: May 18, 2021
FAC Filed: August 16, 2023
Trial Date: None Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, 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 Jeannette Salazar (“Plaintiff”) and the Class in the above-captioned action. 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 thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On October 3, 2023, in Department 27 of the above-entitled Court, the Honorable Jill H. Talley preliminarily approved the Class Action and PAGA Settlement Agreement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between the Plaintiff and Defendant AmerisourceBergen Drug Corporation (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Jeannette Salazar to represent the Class (“Class Representative”). The Court also preliminarily appointed Lawyers *for* Justice, PC, as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action and PAGA Settlement (“Class Notice”), and adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix” or “Settlement Administrator”) to serve as the third-party 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 and Costs, and Service Payment (“Motion for Final Approval”), no Class Members have objected to the Class Settlement or the request for Attorneys’ Fees and Costs, Service Payment, Settlement Administration Costs, or allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

///

///

WORK PERFORMED BY LAWYERS FOR JUSTICE, PC

4. Several attorneys at Lawyers for Justice, PC have been actively engaged in litigating the above-captioned putative class action since prior to its commencement on May 18, 2021.

5. Before initiating the matter, Lawyers for Justice, PC conducted extensive investigation and research into 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 former Plaintiff Sarah Andrews (“Former Plaintiff Andrews”), and research into the various legal issues involved in the case, namely, the current state of the law as it applied to, *inter alia*, manageability, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour enforcement and penalties, exemption, Former Plaintiff Andrew’s claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that Former Plaintiff Andrew’s claims were well-suited for representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former employees of Defendant in the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed expenses.

6. Class Counsel conducted significant formal and informal discovery and investigated into the facts of the case, to assess the veracity, strength, and scope of the claims, and worked on preparing the case for class certification and trial prior to reaching the Settlement. The Parties exchanged a volume of information, documents, and data throughout the course of litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Former Plaintiff Andrews, Plaintiff, and other Class Members and reviewed and analyzed a volume of information, documents, and data obtained from Former Plaintiff Andrews, Plaintiff, Defendant, and other sources. Class Counsel propounded multiple sets of written discovery requests on Defendant (including but not limited to: Form Interrogatories – General (Set One), Special Interrogatories (Sets One and Two), Requests for Production of Documents (Set One)), and prepared and served numerous deposition notices with requests for production of documents. The information, documents, and data reviewed and

analyzed by Class Counsel included, and were not limited to, Former Plaintiff Andrews and Plaintiff's employment records, a detailed sampling of Class Members' time and pay data, including Timesheets, Payroll Records, Earning Statements, Defendant's Employee Handbook, company policy acknowledgements, internal memoranda, job descriptions, new hire orientation checklists, and operations and employment practices, forms, procedures, and policies (including but not limited to Wage and Salary Administration Policy, Attendance Policy, Standards of Performance and Conduct, and Information Technology Policy), among other information and documents. Class Counsel also met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, court proceedings, discovery and production of various information, documents, and data in the course of litigation and mediation and settlement negotiations, and mediation and settlement negotiations. Other work that Class Counsel performed included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings, the mediation brief, and settlement documents; case management; claims assessment and evaluation; and preparing for and attending court proceedings and mediation and settlement negotiations, among other tasks.

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

1 information has taken place in order for the parties to be adequately informed of the nature and
2 extent of the claims, and to enable all parties to fully evaluate the Settlement for its fairness,
3 adequacy, and reasonableness.

4 8. After conducting significant investigation of the facts and law during the prosecution
5 of the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve
6 the case. These efforts included participating in a formal, full-day mediation conducted by Mark
7 Rudy, Esq., a well-regarded mediator experienced in mediating complex labor and employment
8 matters. Prior to and during mediation and settlement discussions, the parties exchanged
9 information and data, and discussed various aspects of the case, including and not limited to, the
10 risks and delays of further litigation, the risks to the parties of proceeding with class certification
11 and trial, the law relating to class certification, manageability, off-the-clock theory, meal and rest
12 periods, representative PAGA claims, wage-and-hour law and enforcement, exemption, as well as
13 the evidence produced and analyzed, and the possibility of appeals, among other things. During
14 all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial
15 position. Arriving at a settlement that was acceptable to the parties was not easy. Defendant and
16 its counsel felt very strongly about Defendant's ability to prevail on the merits, and to obtain a
17 denial of class certification, while Plaintiff and Class Counsel believed that the release agreements
18 would not be enforced and arbitration would not be compelled, that class certification would be
19 obtained, and that Plaintiff would prevail at trial. After conducting significant formal and informal
20 discovery and investigations and extensive settlement negotiations, with the aid of the mediator's
21 evaluation, the parties agreed that the case was well-suited for settlement given the legal issues
22 relating to Plaintiff's principal claims, as well as the costs and risks to the parties that would attend
23 further litigation. These risks of further litigation include, and are not limited to, a determination
24 that the claims are unsuitable for class treatment and/or representative adjudication, class de-
25 certification after certification of a class, allowing a jury to decide the claims, and the real
26 possibility of no monetary recovery after years of litigation. The Settlement takes into account the
27 strengths and weaknesses of each side's position and the uncertainty of how the case might have
28 concluded at certification, trial, and/or appeals.

1 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
2 attorneys' fees in the amount of \$819,666.67, which is one-third (1/3) of the Maximum Settlement
3 Amount of \$2,459,000.00. Pursuant to the contingency-fee agreements entered into by and
4 between Plaintiff and Lawyers for Justice, PC, Plaintiff has agreed to a contingency fee of at least
5 one-third (1/3) of the recovery.

6 10. The attorneys' fees that are sought are commensurate with: (1) the risk that Class
7 Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel
8 dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results
9 that Class Counsel has achieved throughout the litigation of the case; (5) the value of the settlement
10 that Class Counsel has achieved; and (6) the other cases that Class Counsel has turned down in
11 order to devote their time and efforts to the case. The nature of the work performed, skill exercised,
12 and the outcome in this matter—which involves an outstanding monetary recovery involving a
13 **Maximum Settlement Amount of \$2,459,000.00** (with a Net Settlement Amount of **at least**
14 **\$1,288,947.69 to be paid to Settlement Class Members** with an average payment of approximately
15 \$846.42 per Settlement Class Member, a **payment of \$62,500.00 to PAGA Members** with an
16 average payment of \$42.43 per PAGA Member, and **payment of \$187,500.00 to the State of**
17 **California**)—support the percentage fee sought and the application of a lodestar multiplier.

18 11. While not necessarily required to be demonstrated because the percentage fee is
19 proper for this settlement, Class Counsel has incurred many hours of work in connection with
20 prosecuting the case, such that the award of attorneys' fees is also justified under a lodestar
21 analysis. Attorneys at Lawyers for Justice, PC have spent a total of **460.40 hours** performing tasks
22 and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and
23 Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers
24 for Justice, PC, and the time incurred in performing those services. The hours include work done
25 by myself and several other attorneys at Lawyers for Justice, PC. Additionally, separate from the
26 hours of work referenced herein and in the attached chart, Lawyers for Justice, PC had litigation
27 support personnel actively engaged in assisting with the prosecution of this matter.

28 ///

12. The work performed in this matter, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate of at least \$800 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$800 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and/or representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final approval of the class and representative action settlement in *Seth 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 compensation at the rate of \$855.96 per hour.

**EXPERIENCE AND ADEQUACY OF
LAWYERS for JUSTICE, PC**

13. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is attorney of record in dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of

1 compliant wage statements, reimbursement of business expenses, executive, administrative, and
2 other overtime exemptions to the State of California and federal overtime compensation
3 requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has
4 recovered (sometimes in association with other law firms) millions of dollars on behalf of
5 thousands of individuals in California.

6 14. Edwin Aiwasian is a Managing Member and Shareholder of Lawyers *for* Justice,
7 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
8 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
9 extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute
10 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
11 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October
12 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During
13 the summer of 2000, he studied Legal Writing at Harvard University. From approximately
14 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable
15 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From
16 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the
17 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
18 In December of 2004, he obtained a license to practice law from the California State Bar. Since
19 in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost
20 exclusively focused on the prosecution of consumer and employment class actions. While
21 employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or
22 defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for
23 deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with
24 other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully
25 litigated cases involving the executive, administrative, and other overtime exemptions to the State
26 of California and federal overtime compensation requirements. Under his supervision, Lawyers
27 *for* Justice, PC has successfully obtained class certification by contested motion practice in
28 approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or

1 representative action cases.

2 15. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He
3 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
4 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
5 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
6 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
7 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
8 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
9 He was admitted to practice law in California in 2010. He is admitted to practice before all courts
10 of the State of California and all United States District Courts in the State of California. He has
11 worked on many wage-and-hour class action and representative action cases, taking the lead in
12 taking and defending depositions, arguing motions, and attending mediations. He has played an
13 integral role in preparing matters for class certification, including and not limited to, successful
14 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
15 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
16 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
17 RG13680477). Under his supervision, dozens of class action or representative cases have resulted
18 in settlements that have been granted court approval, including and not limited to, those listed in
19 paragraph 18 herein. He has handled over one hundred and fifty (150) mediations and worked on
20 over two hundred and fifty (250) class action or representative action cases which have resulted
21 in settlement.

22 16. Brian J. St. John is a Member of Lawyers *for* Justice, PC. He received his
23 Bachelor's degree from the University of California, San Diego in 2010 and earned his Juris
24 Doctor degree from the University of California, Berkeley, School of Law in 2013. He was
25 admitted to practice law in California in 2015. He is admitted to practice before all courts of the
26 State of California and the Northern and Southern federal district courts in the State of California.
27 He has worked on many wage and hour class action and PAGA representative matters, and his
28 work has included, *inter alia*, researching and drafting pleadings, administrative notice

1 exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging
2 in motion practice, claims evaluation and analysis, and making court appearances. Prior to
3 working at Lawyers for Justice, PC, he spent several years working for a boutique employment
4 and labor law firm representing employers, and, in 2019 and 2020, he was employed as general
5 counsel for a DMHC licensed discount dental plan. He has successfully overseen the settlement
6 of dozens of class action and PAGA cases, and supervises a team of attorneys

7 17. I am a Managing Member of Lawyers for Justice, PC. I received a Bachelor of Arts
8 degree from California State University, Los Angeles in 2006, a Master of Science degree from
9 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University
10 Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since
11 2013) and am admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy
12 Court for the Central District of California, and the U.S. Supreme Court. I have taken and
13 defended dozens of depositions and successfully handled motion practice in class action cases
14 regarding discovery (including and not limited to, regarding class contact information), class
15 certification (both contested class certification and stipulated class certification), arbitration
16 agreements, coordination, and intervention. I have successfully handled briefing and oral
17 argument on appeal and obtained notable decisions regarding the Private Attorneys General Act
18 and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9
19 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied
20 (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). I have significant
21 experience with class actions, including and not limited to working on cases to obtain class
22 certification through contested motion practice and working on cases in the post-certification stage
23 (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation
24 in conjunction with co-counsel in a case involving a certified class consisting of approximately
25 2,600 individuals). I also have extensive experience with class action and/or representative action
26 settlements, and have handled this process in over three hundred (300) cases. Under Edwin
27 Aiwasian, Arby Aiwasian, and my supervision, Lawyers for Justice, PC has handled the class
28 certification and court approval process for hundreds of class action and/or representative action

1 matters that have successfully resolved. I am a member of the California Employment Lawyers
2 Association.

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

5 18. What follows are just a few examples of the type of results Lawyers *for* Justice, PC
6 (“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 of
24 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 ///

28 ///

1 e) LFJ, in association with co-counsel therein, represented the plaintiff in a
2 wage-and-hour class and PAGA representative action against a bank, involving allegations of
3 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
4 granted final approval of the class and PAGA representative action settlement. The Kern County
5 Superior Court Case Number is S-1500-CV-273194-LHB.

6 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
7 wage-and-hour class and PAGA representative action against a national wholesale distributor of
8 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
9 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
10 representative action settlement. The Sacramento County Superior Court Case Number is 34-
11 2012-00136285.

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

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

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

28 ///

1 j) 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 upscale
3 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court
4 granted final approval of the class and PAGA representative action settlement. The Los Angeles
5 County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial Council
6 Coordination Proceeding Number is 4794.

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

11 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
12 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
13 involving allegations of misclassification of the “Department Manager” position. On August 12,
14 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class. On
15 August 6, 2019, the court granted final approval of the class action settlement. The Alameda
16 County Superior Court Case Number is RG13680477.

17 m) LFJ represented the plaintiff in a PAGA representative action against a real
18 estate and property management company, on behalf of non-exempt employees. On November 4,
19 2016, the court granted approval of the PAGA representative action settlement. The Orange
20 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

26 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
27 representative action against a foodservice distributor, on behalf of non-exempt employees. On
28 January 26, 2017, the court granted final approval of the class and PAGA representative action

1 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

2 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
3 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the
4 employer's motion to compel arbitration, which resulted in a published opinion by the California
5 Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall Supply* (Cal.
6 App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S. Supreme Court
7 Docket No. 17-254). The Riverside County Superior Court Case Numbers are RIC1503952 and
8 RICJCCP5046, and the Judicial Council Coordination Proceeding Number is 5046.

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

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

19 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
20 wage-and-hour class and PAGA representative action against a lumber and hardware company on
21 behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class
22 and PAGA representative action settlement. The Orange County Superior Court Case Number is
23 30-2014-00747750-CU-OE-CXC.

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

1 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
2 representative action against a food company on behalf of non-exempt employees. On June 30,
3 2017, the court granted final approval of the class and PAGA representative action settlement. The
4 Sacramento County Superior Court Case Number is 34-2015-00175871.

5 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
6 representative action against a chocolate company on behalf of non-exempt employees. On July
7 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
8 The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

1 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a global provider of flexible office
3 space solutions. On February 15, 2018, the court granted final approval of the class and PAGA
4 representative action settlement. The Los Angeles County Superior Court Case Number is
5 BC498401.

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

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

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

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

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

1 and the Judicial Council Coordination Proceeding Number is 4921.

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

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

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

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

26 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
28 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the

1 court granted in part the plaintiff's motion for class certification and certified a class. The
2 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
3 Judicial Council Coordination Proceeding Number is 4930.

4 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
5 wage-and-hour class action against manufacturer and supplier of power products and services on
6 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
7 for class certification and certified a class. On August 27, 2021, the court granted final approval
8 of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-
9 00025968-CU-OE-CTL.

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

14 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
15 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the
16 restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July
17 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The
18 Los Angeles County Superior Court Case Number is BC707670.

19 **LITIGATION COSTS AND EXPENSES INCURRED BY**

20 **LAWYERS FOR JUSTICE, PC**

21 19. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation and
22 will not receive any compensation until a recovery is obtained in this matter. Lawyers *for* Justice,
23 PC seeks reimbursement of **\$15,966.54** in litigation costs and expenses incurred in the case, as
24 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the
25 prosecution of the case and to obtain the Settlement.

26 ///

27 ///

28 ///

SERVICE PAYMENT TO PLAINTIFF

20. In recognition of her efforts and work expended in the case and serving as the Class Representative, Plaintiff seeks a Service Payment in the amount of \$5,000.00. The requested Service Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in providing relevant documents, past employment records, and the facts and evidence necessary to attempt to prove the allegations in the case. Plaintiff was available whenever her attorneys needed her and actively tried to obtain and provide information that would facilitate the pursuit of the case. Accordingly, it is appropriate and just for Plaintiff to receive \$5,000.00 as a reasonable Service Payment for her services performed in the matter.

21. I submit that the settlement is fair, reasonable, and adequate, and in the best interests of Plaintiff, the Class Members, PAGA Members, and the State of California.

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

Executed this 8th day of February 2024, at Glendale, California.



Joanna Ghosh

EXHIBIT A

JEANNETTE SALAZAR V. AMERISOURCEBERGEN DRUG CORPORATION
Sacramento Superior Court Case No. 34-2021-00301017-CU-OE-GDS

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Filing Investigation of the Merits of the Alleged California Labor Code and Industrial Welfare Commission Wage Orders Violations and the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Aggrieved Employees	10.80
Pre-Filing Investigation of Potential Civil Penalties Exposure of Defendant AmerisourceBergen Drug Corporation (“Defendant”) With Respect to Aggrieved Employees	8.50
Investigation of the Key Facts with a Focus on Manageability and Class Certification-Related Elements, Including Adequacy, Typicality, Superiority, and Commonality.	9.10
Investigation of the Merits of the Claims of Plaintiff Jeannette Salazar (“Plaintiff Salazar”) and the Putative Class Members	7.90
Investigation of Potential Damages Exposure of Defendant AmerisourceBergen Drug Corporation (“Defendant”) With Respect to Plaintiff Salazar and the Putative Class Members	8.30
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock Work, Misclassification, Meal and Rest Breaks, Representative PAGA Actions, and Class Certification in California, Including all New and Relevant DLSE Materials	7.50

Investigation of Defendant, Mergers and Acquisitions, Its Products and Services, Its SEC and Other Governmental and Public Reports and Filings, Its Contracts and Business Relationships, Its Customers and Vendors, Its Permits/Licenses/Registrations, and the Industry in Which Defendant Operates	11.50
Investigation of Defendant's Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	4.30
Investigation of Defendant's Executives, Officers, and Leadership With a Focus on Involvement in Wage-and-Hour Issues and Court Litigation, Government Enforcement, and Agency Proceeding History Involving Wage-and-Hour Issues and Other Related Issues, to Evaluate Willfulness and Uniformity	6.50
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 Its Competitors	4.10
Research and Investigation Re: Location(s), Division(s), and/or Departments(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Layout and Any Differences Between Them to Determine Whether Individual Issues Predominate Over Common Issues	4.50
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Consumer and Other Reviews Regarding 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	7.90
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California	4.80

Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Standard Operating Procedures, Opening and Closing Procedures, Trainings, Meetings, Customer Service, Daily Orders and Quotas, Non-Discretionary Bonus/Incentive/Performance/Shift Differential Pay, Timekeeping, Regular Rate, Scheduling and Attendance, Break Areas, Meal and Rest Breaks, On Premises Breaks, Meal and Rest Premiums, Overtime Compensation, On-Call, Donning and Doffing, Uniform/Dress Code, Footwear, PPE/Supplies/Equipment, Company-Provided Phones and Devices, Use of Personal Cell Phones, Use of Personal Vehicles, Mileage Reimbursement, Credentials and Licensing, and Reimbursement of Business-Related Expenses	29.50
Research and Investigation Re: Various Software Programs and Other Technology That Defendant Uses to Conduct Everyday Business, Including Timekeeping, Payroll, Sales, Delivery, Inventory, Distribution, Production, Resource Management, Quality Control, Order Management, Communication, Information and Document Management, Surveillance, Alarm, Controlled Access, and Security Systems, 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	4.10
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	8.30
Research and Investigation Re: Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.40
Research and Investigation on the Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' and Aggrieved Employees' Work	6.50
Meet and Communicate With Plaintiff Salazar During the Pendency of the Case	25.50
Investigate, Meet, Communicate with, and/or Interview Putative Class Members and/or Percipient Witnesses	18.50

Pleadings and Court Filings	
Draft Former Plaintiff Sarah Andrews' ("Former Plaintiff Andrews") Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed May 18, 2021)	7.20
Review Court's Notice of Delay in Scheduling Initial Case Management Conference (filed May 18, 2021)	0.10
Review and Analyze Defendant's Answer to Former Plaintiff Andrews' Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Research Affirmative Defenses in Answer (Served on July 1, 2021)	1.60
Review Court's Notice and Order of Complex Determination (filed August 9, 2021)	0.10
Review Court's Notice of Case Management Conference and Complex Case Management Procedures Including COVID-19 Protocols (filed September 22, 2021)	0.20
Draft Former Plaintiff Andrews' Notice of Posting Jury Fees (filed October 8, 2021)	0.10
Review Court's Minute Order Re: Notice Re-Assigning Case (filed January 27, 2022)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed February 17, 2022)	1.60
Meet and Confer With Defendant's Counsel, and Draft Stipulation to Continue Initial Case Management Conference, and [Proposed] Order Thereon (filed February 17, 2022)	1.20
Review Court's Minute Order (filed March 4, 2022)	0.10
Review Court's Minute Order (filed March 30, 2022)	0.10

Meet and Confer With Defendant's Counsel, and Draft Stipulation to Continue Initial Case Management Conference and [Proposed] Order Thereon (submitted May 6, 2022)	1.50
Review Order Granting Stipulation to Continue Case Management Conference to June 3, 2022 (filed May 17, 2022)	0.10
Meet and Confer With Defendant's Counsel and Draft Joint Case Management Conference Statement and Notice of Settlement (submitted December 21, 2022)	1.10
Meet and Confer With Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference and [Proposed] Order Thereon (submitted December 21, 2022)	1.30
Review Court's Tentative Ruling/Minute Order Re: Case Management Conference (filed January 5, 2023)	0.10
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference of January 5, 2023 (filed January 11, 2023)	0.10
Review Defendant's Notice of Related Case (served on February 22, 2023) and Court Documents Filed in <i>Maria Wiley v. AmerisourceBergen Drug Corporation, et al.</i> , United States District Court for the Central District of California, Case No. 5:23-cv-00116-DOC-SP/Riverside Superior Court Case No. CVRI2205081	2.20
Meet and Confer With Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed March 22, 2023)	1.20
Review Court's Minute Order Re: Notice of Change in Departments (filed March 23, 2023)	0.10
Review Court's Tentative Ruling/Minute Order Re: Case Management Conference (filed April 6, 2023)	0.10

Meet and Confer With Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed July 12, 2023)	1.20
Draft Plaintiff Salazar's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed August 16, 2023); Meet and Confer With Defendant's Counsel, and Draft Stipulation and [Proposed] Order Granting Plaintiff Leave to File First Amended Complaint (filed July 27, 2023)	4.50
Review Court's Tentative Ruling/Minute Order Re: Case Management Conference (filed July 27, 2023)	0.10
Review Order Granting Leave to File First Amended Complaint (filed August 14, 2023)	0.10
Review Court's Minute Order Re: Complex Determination (filed August 28, 2023)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Case Management Conference Statement (of September 29, 2023) (filed September 12, 2023)	1.10
Review Court's Notice of Department Relocation (filed January 10, 2024)	0.10
Appearances	
Prepare for and Telephonically Attend Case Management Conference (July 27, 2023)	0.90
Prepare for Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (scheduled for September 29, 2023)	0.80
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Service Payment (February 23, 2023) (Anticipated)	1.50

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Former Plaintiff Andrews (served on June 24, 2020)	1.90
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Former Plaintiff Andrews (served on September 16, 2020)	1.80
Review and Analyze Documents Produced by Defendant in Response to Request for Personnel Files, Pay Stubs, and Time Records for Former Plaintiff Andrews (served on October 9, 2020)	3.60
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Former Plaintiff Andrews (served on October 26, 2020)	1.80
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Aggrieved Employee/Putative Class Member (served on May 3, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Salazar (served on November 28, 2022)	1.90
Review and Analyze Documents Produced by Defendant in Response to Request for Personnel Files, Pay Stubs, and Time Records for Plaintiff Salazar (served on December 16, 2022)	5.30
Draft Former Plaintiff Andrews' Form Interrogatories – General (Set One), Special Interrogatories (Sets One and Set Two), and Requests for Production of Documents (Set One) to Defendant AmerisourceBergen Drug Corporation (served on February 3, 2022)	6.10
Draft Former Plaintiff Andrews' Notice of Deposition of Person Most Knowledgeable at Defendant AmerisourceBergen Corporation and Requests for Production of Documents (noticed for March 7, 2022; Organizational Structure) (served on February 3, 2022)	2.20

Draft Former Plaintiff Andrews' Notice of Deposition of Person Most Knowledgeable at Defendant AmerisourceBergen Corporation and Requests for Production of Documents (noticed for March 8, 2022; Wage and Hour Practices) (served on February 3, 2022)	2.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Former Plaintiff Andrews for Penalties Under California Labor Code Section 2698, <i>Et Seq.</i> (served on November 6, 2020)	4.50
Draft Additional Notice to California and Workforce Development Agency Re: Claims of Former Plaintiff Andrews for Penalties Under California Labor Code Section 2698, <i>Et Seq.</i> (served on March 12, 2021)	4.10
Draft Notice to California and Workforce Development Agency Re: Claims of Plaintiff Salazar for Penalties Under California Labor Code Section 2698, <i>Et Seq.</i> (served on April 18, 2023)	4.50
Meet With, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	18.50
Mediation/Settlement	
Review and Analyze Documents, Data, and Information Obtained from Former Plaintiff Andrews, and Plaintiff Salazar, Defendant (approximately 21,411 pages), and Other Sources Prior to Mediation	64.50
Prepare for Mediation Session, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling Exhibits to the Mediation Brief, Performing Damages and Penalties Analysis and Calculations, and Preparing Mediation PowerPoint Presentation (submitted on November 1, 2022)	32.50
Remotely Attend Mediation Session (November 8, 2022; Zoom Video Conference)	8.50

Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding (executed on January 26, 2023)	2.60
Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on August 9, 2023) and Notice of Class Action and PAGA Settlement	19.50
Monitor Settlement Notice Administration Process, Confer with Settlement Administrator, and Review Settlement Administrator's Weekly Reports	6.50
Law and Motion	
Research and Draft Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Brian J. St. John in Support Thereof, Declaration of Jeanette Salazar in Support Thereof; and [Proposed] Order Thereon (filed September 7, 2023)	19.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Settlement (filed September 28, 2023)	0.40
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed September 29, 2023)	0.10
Review Order Granting Preliminary Approval of Class Settlement (filed October 3, 2023)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; Research and Draft Plaintiff Salazar's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Service Payment, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (Anticipated)	21.50
Total Hours:	460.40

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Andrews v. Amerisourcebergen Drug Corporation (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
6/24/2020	U.S. Postmaster	Postage	6.95
9/16/2020	U.S. Postmaster	Postage	7.10
10/26/2020	U.S. Postmaster	Postage	6.95
11/6/2020	U.S. Postmaster	Postage	7.50
11/6/2020	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
3/12/2021	U.S. Postmaster	Postage	7.50
5/18/2021	Legal Document Server, Inc.	Attorney Service	145.23
5/18/2021	Sacramento Superior Court	Court Filing Fee	435.00
6/7/2021	ProLegal	Attorney Service	127.13
10/7/2021	Legal Document Server, Inc.	Attorney Service	110.00
10/8/2021	Legal Document Server, Inc.	Attorney Service	116.38
10/8/2021	Sacramento Superior Court	Jury Fee	150.00
2/3/2022	General Logistics Systems US, Inc.	Courier Service	32.95
4/11/2022	Legal Document Server, Inc.	Attorney Service	120.00
4/21/2022	Mark S. Rudy	Mediation Fee	12,500.00
5/3/2022	Legal Document Server, Inc.	Attorney Service	100.00
12/21/2022	Legal Document Server, Inc.	Attorney Service	341.35
12/21/2022	Sacramento Superior Court	Filing Fee	20.00
12/30/2022	Legal Document Server, Inc.	Attorney Service	170.00
3/22/2023	Legal Document Server, Inc.	Attorney Service	125.00
4/18/2023	U.S. Postmaster	Postage	10.44
7/13/2023	Legal Document Server, Inc.	Attorney Service	125.00
7/27/2023	Legal Document Server, Inc.	Attorney Service	146.39
7/27/2023	Sacramento Superior Court	Stipulation & Order Fee	20.00
8/16/2023	Legal Document Server, Inc.	Attorney Service	145.00
8/21/2023	Legal Document Server, Inc.	Attorney Service	125.00
8/28/2023	Legal Document Server, Inc.	Attorney Service	145.00
9/7/2023	Legal Document Server, Inc.	Attorney Service	335.67
9/7/2023	Sacramento Superior Court	Motion Fee	60.00
9/12/2023	Legal Document Server, Inc.	Attorney Service	125.00
10/26/2023	Legal Document Server, Inc.	Attorney Service	125.00
Total:			15,966.54