

DOUGLAS HAN (SBN 232858)
SHUNT TATAVOS-GHARAJEH (SBN 272164)
TALIA LUX (SBN 336074)
JUSTICE LAW CORPORATION
751 North Fair Oaks Avenue, Suite 101
Pasadena, California 91103
Telephone: (818) 230-7502
Facsimile: (818) 230-7259

Attorneys for Plaintiff Alyssa Webb

[Counsel for Plaintiff Tamiko Brooks on the following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

TAMIKO BROOKS, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

v.

HOME CARE ASSISTANCE OF
CALIFORNIA, LLC, a Delaware Limited
Liability Company; HOME CARE
ASSISTANCE, INC., a California
Corporation; HOME CARE ASSISTANCE,
LLC, a Delaware Limited Liability Company,
and DOES 1 through 100,

Defendants.

Case No.: 21STCV06850

*[Case assigned for all purposes to the Hon.
Stephanie M. Bowick, Dept. 19]*

**DECLARATION OF DOUGLAS HAN IN
SUPPORT OF MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (LABOR
CODE § 2698, ET SEQ.) SETTLEMENT
AGREEMENT**

Complaint Filed: February 22, 2021
Trial Date: None Set

Paul K. Haines (SBN 248226)
Fletcher W. Schmidt (SBN 286462)
Andrew J. Rowbotham (SBN 301367)
HAINES LAW GROUP, APC
2155 Campus Drive, Suite 180
El Segundo, California 90245
Telephone: (424) 292-2350
Facsimile: (424) 292-2355

Attorneys for Plaintiff Tamiko Brooks

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I, **DOUGLAS HAN**, hereby declare as follows:

1. I am an attorney duly licensed to practice law before all courts of California. I am the founding member of Justice Law Corporation. I am the attorney of record for Plaintiff Alyssa Webb (“Plaintiff Webb-Bruner”). Haines Law Group, APC is the attorneys of record for Plaintiff Tamiko Brooks (“Plaintiff Brooks”). Plaintiff Webb-Bruner and Plaintiff Brooks are collectively known as “Plaintiffs”. Justice Law Corporation and Haines Law Group, APC are collectively known as “PAGA Counsel”. I have personal knowledge of the facts set forth below, and, if called to testify, I could and would do so competently.

WORK PERFORMED BY JUSTICE LAW CORPORATION

2. Justice Law Corporation actively engaged in this litigation since it was initially filed. Prior to the filing and continuing over the duration of this case, Justice Law Corporation conducted a thorough investigation of the factual and legal issues. This included Justice Law Corporation drafting and propounding form interrogatories, special interrogatories, requests for admission, and requests for production of documents and reviewing the responses. Pursuant to discovery, exchange of information, and in preparation for early mediation, Justice Law Corporation received, among other things, the following information and evidence with which to properly evaluate the claims: (a) personnel records; (b) Aggrieved Employees' demographic information; (c) documents pertaining to Defendant TheKey of California, LLC f/k/a Home Care Assistance of California, LLC's ("Defendant") relevant policies, practices, and procedures (*e.g.*, meal and rest breaks, timekeeping and payroll, reimbursement, etc.); and (d) sampling of time and payroll records. Using the information obtained, Justice Law Corporation determined: (i) Aggrieved Employees' average hourly rates of pay; (ii) number of Aggrieved Employees employed during the Private Attorney General Act of 2004 ("PAGA") Period; (iv) number of shifts worked by the Aggrieved Employees during the PAGA Period; (v) number of hours generally worked during most shifts; (vi) number, length, and timing of meal and rest breaks taken; and (vii) number of workweeks and pay periods within the PAGA Period.

///

1 3. Justice Law Corporation analyzed numerous documents produced from
2 Defendant and other sources. Justice Law Corporation also located, interviewed, and obtained
3 statements from putative aggrieved employees. These interviews enabled Justice Law
4 Corporation to determine the extent and frequency of the alleged violations, as well as learn
5 more about the day-to-day circumstances giving rise to the violations. This information better
6 prepared Justice Law Corporation for mediation, thereby increasing the likelihood of
7 negotiating a reasonable settlement.

8 4. The documents analyzed provided a critical understanding of the nature
9 of the work performed by the Aggrieved Employees and the policies, practices, and procedures
10 in place. The documents were used in analyzing liability and damages in connection with all
11 phases of the litigation and mediation process. The extensive document and data exchanges
12 allowed Justice Law Corporation to determine the strengths and weaknesses of the claims and
13 defenses. This included, among other things: (a) determining Plaintiffs' suitability as the
14 putative representatives through interviews and analyses of employment documents and related
15 records; (b) evaluating the potential claims and applicable defenses; (c) researching
16 representative PAGA actions similar to the claims alleged, nature of the positions, and type of
17 employer in the instant case; (d) locating and interviewing putative aggrieved employees to
18 obtain corroboration for the legal theories developed; (e) drafting and propounding the formal
19 discovery requests and reviewing the responses; (f) gathering the necessary documents and
20 information to respond to the formal discovery requests; (g) engaging in motions practice with
21 Defendant; (h) preparing for and attending Plaintiff Webb-Bruner's deposition; (i) frequently
22 communicating and coordinating with co-counsel to successfully settle this matter; (j) analyzing
23 the labor policies, practices, and procedures in place pursuant to the documents produced; (k)
24 researching manageability in similar cases; (l) estimating and calculating potential damages for
25 settlement purposes; (m) assisting with drafting the mediation brief and damages analysis; (n)
26 preparing for and participating in full day of mediation; and (o) assisting with drafting,
27 updating, and finalizing the Settlement Agreement.

28 ///

1 5. After the exchange of relevant information and evidence, the Parties
2 remotely participated in mediation. The mediator helped to manage the Parties' expectations
3 and provided a useful, neutral analysis of the issues and risks to both sides. Under the auspices
4 of the mediator, the Parties eventually reached a settlement via a mediator's proposal. At all
5 times, the negotiations were adversarial and non-collusive.

6 6. PAGA Counsel seek PAGA Counsel Fees Payment of \$1,233,333.33 (1/3
7 of the Gross Settlement Amount). This percentage award is commensurate with the: (a) risks
8 undertaken; (b) immense time, effort, and expense dedicated to this matter; (c) skill and
9 determination displayed along with the quality of work; (d) results achieved; and (e) other cases
10 turned down to devote time and efforts to this matter. This was not a clear-cut case because
11 several factors made this case challenging. These factors include, among others: (i) difficulties
12 in pinning down job responsibilities, wages paid, and meal and rest breaks taken; (ii) myriad of
13 documents that had to be reviewed and analyzed prior to mediation; (iii) shifting wage-and-hour
14 laws; (iv) drafting and propounding the formal discovery requests and reviewing the responses;
15 (v) gathering the necessary documents and information to respond to the formal discovery
16 requests; (vi) preparing for and attending Plaintiff Webb-Bruner's deposition; (vii) coordinating
17 with co-counsel to settle this matter; and (viii) Defendant's initial resistance to the relief.

18 7. I am aware the common and acceptable rate for contingency
19 representation in class action litigation is normally forty percent (40%) before trial, with the
20 range being from thirty-three and one-third percent (33.3%) up to fifty percent (50%).

21 8. The PAGA Counsel Fees Payment is in line with the awards in similar
22 cases in California and nationwide and is consistent with the market rates. Justice Law
23 Corporation have been routinely awarded at least thirty-five percent (35%) fee requests or more
24 in similar class action and representative matters throughout California, including Los Angeles
25 County. (See *Oswald v. Evoqua Water Technologies, LLC*, Los Angeles County Superior Court,
26 Case No. 22TRCV00412, final approval granted on August 30, 2024 granting 35% fee request;
27 *Aleksanyan v. Jet Delivery, Inc.*, Los Angeles County Superior Court, Case No. 22STCV27049,
28 final approval granted on March 20, 2024 granting 35% fee request; *Lantz v. Trio*

1 *Manufacturing, Inc.*, Los Angeles County Superior Court, Case No. 21STCV44007, final
2 approval granted on December 4, 2023 granting 35% fee request; *Sailas v. Health-Ade LLC*,
3 Los Angeles County Superior Court, Case No. 22TRCV00881, PAGA approval granted on July
4 19, 2023 granting 35% fee request; *Perez v. Arjo Inc. d/b/a ArjoHuntleigh Inc.*, Los Angeles
5 County Superior Court, Case No. 22STCV01261, final approval granted on June 22, 2023
6 granting 35% fee request; *Cordova v. Jakks Pacific, Inc.*, Los Angeles County Superior Court,
7 Case No. 22PSCV00149, PAGA approval granted December 16, 2022 granting 35% fee
8 request; *Monjaraz v. H & U, Inc. d/b/a Sun Noodle California, LLC*, Los Angeles County
9 Superior Court, Case No. 20MCV00285, PAGA approval granted on July 1, 2022 granting 38%
10 fee request; *Pena v. San Joaquin Supply dba Ernest Packaging*, Los Angeles County Superior
11 Court, Case No. 19STCV43500, final approval granted on June 1, 2022 granting 35% fee
12 request; *Diaz v. Roxbury Surgery Center, LLC, et al.*, Los Angeles County Superior Court Case
13 No. 20STCV46531, PAGA approval granted on March 22, 2022 granting 35% fee request;
14 *Burmayan v. Weck Analytical Environmental Services, Inc, et al.*, Los Angeles County Superior
15 Court, Case No. 20STCV30871, final approval granted on February 8, 2022 granting 35% fee
16 request; *Toribio v. ITT Aerospace Controls, LLC*, Los Angeles County Superior Court, Case
17 No. 19STCV17469, final approval granted on January 13, 2022 granting 35% fee request;
18 *Oswald v. L.A. Turbine*, Los Angeles County Superior Court, Case No. 20STCV33496, final
19 approval granted on December 16, 2021 granting 35% fee request; *Davidson v. Augusta*
20 *Financial, Inc.*, Los Angeles County Superior Court, Case No. 20CHCV00420, final approval
21 granted on August 16, 2021 granting 35% fee request; *Edwards v. Heartland Payment Systems,*
22 *Inc.*, Los Angeles County Superior Court, Case No. BC606083, final approval granted on June
23 28, 2021 granting 35% fee request; *Albanes v. Bank of Hope*, Los Angeles County Superior
24 Court, Case No. 19STCV30577, PAGA approval granted on January 13, 2021 granting 35% fee
25 request; *Woods v. Johanson Dielectrics, Inc.*, Los Angeles County Superior Court, Case No.
26 19STC11487, final approval granted on November 16, 2020 granting 35% fee request; *Luckett*
27 *v. King's Hawaiian Bakery West, Inc. et al.*, Los Angeles County Superior Court, Case No.
28 19TRCV00761, PAGA approval granted on October 21, 2020 granting 38% fee request;

1 *Rodriguez v. Square-H Brands, Inc.*, Los Angeles County Superior Court, Case No. BC719423,
2 final approval granted on January 10, 2020 granting 35% fee request; and *Lustig v. Skyline*
3 *Financial Corporation, et al.*, Los Angeles County Superior Court, Case No. JCCP4929, final
4 approval granted on October 15, 2019 granting 38% fee request.) Consequently, the fee request
5 is well within a reasonable range.

6 9. On April 17, 2024, Justice Law Corporation and Haines Law Group,
7 APC entered a Client Acknowledging of Joint Prosecution and Attorney Fee Division
8 Agreement. Under the Client Acknowledging of Joint Prosecution and Attorney Fee Division
9 Agreement, the PAGA Counsel Fees Payment will be divided eighty percent (80%) Haines Law
10 Group, APC and twenty percent (20%) to Justice Law Corporation. Attached hereto as **Exhibit**
11 **1** is a true and correct copy of the fully executed Client Acknowledging of Joint Prosecution and
12 Attorney Fee Division Agreement.

13 **ADEQUACY OF JUSTICE LAW CORPORATION**

14 10. In May 2004, I graduated from Pepperdine University School of Law
15 with a Juris Doctor degree. In May 2001, I obtained a Bachelor of Science degree in Political
16 Science with a minor in English from University of Houston.

17 11. Since its inception, our firm has almost exclusively focused on the
18 prosecution of consumer and employment class actions, involving wage-and-hour claims, unfair
19 business practices, or consumer fraud. Our firm has successfully litigated to conclusion over
20 three hundred (300) wage-and-hour class actions and representative matters. Currently, we are
21 the attorneys of record in over a dozen employment-related putative class actions in both state
22 and federal courts in California. During this time, in association with other law firms, we have
23 obtained millions of dollars on behalf of thousands of individuals in California.

24 12. Attached hereto as **Exhibit 2** is a list of some of the class action and
25 representative matters for which Justice Law Corporation have been appointed to serve as class
26 counsel and PAGA counsel that have been granted approval.

27 ///

28 ///

1 13. Our firm also has appellate experience that resulted in the following cases
2 being published that defined and clarified wage and hour law: (a) *Oswald v. Murray Plumbing*
3 & *Heating Corp.* (2022) 82 Cal.App.5th 938; (b) *Garner v. Inter-State Oil Co.* (2020) 52
4 Cal.App.5th 619; (c) *Brooks v. AmeriHome Mortgage Co., LLC* (2020) 47 Cal.App.5th 624; (d)
5 *Nieto v. Fresno Beverage Company, Inc.* (2019) 33 Cal.App.5th 274; and (e) *Esparza v. KSI*
6 *Industries, L. P.* (2017) 13 Cal.App.5th 1228.

7 14. Shunt Tatavos-Gharajeh is an Of Counsel at my office. Shunt received
8 his undergraduate degree from University of California, Los Angeles and earned a Juris Doctor
9 degree from Southwestern University School of Law. Shunt was admitted to practice in
10 California in December 2010. Shunt is admitted to practice in the Courts of California. The
11 focus of Shunt's practice is class action wage-and-hour law. Shunt has worked on multiple class
12 action cases and representative actions that have been granted approval, including *Keles v. The*
13 *Art of Shaving – FL, LLC*, Alameda County Superior Court, Case No. RG13687151; *Esters v.*
14 *HDB LTD. Limited Partnership*, Kern County Superior Court, Case No. S-1500-CV-
15 279879; *Guzman v. International City Mortgage, Inc.*, San Bernardino County Superior Court,
16 Case No. CIVDS1502516; *Davidson v. Lentz Construction General Engineering Contractor*,
17 Kern County Superior Court, Case No. S-1500-CV-279853; *Betancourt v. Hugo Boss USA,*
18 *Inc.*, Los Angeles County Superior Court, Case No. BC506988; *Porras v. DBI Beverage, Inc.*,
19 Santa Clara County Superior Court, Case No. 1-14-CV-266154; *Hartzell v. Truitt Oilfield*
20 *Maintenance Corporation*, Kern County Superior Court, Case No. S-1500-CV-
21 283011; *Navarro-Salas v. Markstein Beverage Co.*, Sacramento County Superior Court, Case
22 No. 34-2015-00174957-CU-OE-GDS; *White v. Pilot Travel Centers, LLC*, San Joaquin County
23 Superior Court, Case No. STK-CV-UOE-2013-0009098; *McKinnon v. Renovate America, Inc.,*
24 *et al.*, San Diego County Superior Court, Case No. 37-2015-00038150-CU-OE-CTL; *Antoine v.*
25 *Riverstone Residential CA, Inc.*, Sacramento County Superior Court, Case No. 34-2013-
26 00155974-CU-OE-GDS; *Pina v. Zim Industries, Inc.*, Kern County Superior Court, Case No. S-
27 1500-CV-284498; *Amaya v. Certified Payment Processing*, Sacramento County Superior Court,
28 Case No. 34-2015-00186623-CU-OE-GDS; *Burke v. Petrol Production Supply, Inc.*, Kern

County Superior Court, Case No. BCV-15-101092; *Ceron v. Hydro Resources-West, Inc.*, Kern County Superior Court, Case No. BCV-15-101461; *Chavana v. Golden Empire Equipment, Inc.*, Kern County Superior Court, Case No. BCV-16-102796; *De La Torre v. Acuity Brands Lighting, Inc.*, San Bernardino County Superior Court, Case No. CIVDS1601800; *Dobbs v. Wood Group PSN, Inc.*, Kern County Superior Court, Case No. BCV-16-101078; *Gonzalez v. Matagrano, Inc.*, San Francisco County Superior Court, Case No. CGC-16-550494; *Harbabikian v. Williston Financial Group, LLC*, Ventura County Superior Court, Case No. 56-2016-004485186-CU-OE-VTA; *Prince v. Ponder Environmental Services, Inc.*, Kern County Superior Court, Case No. BCV-16-100784; *Ramirez v. Crestwood Operations, LLC*, Kern County Superior Court, Case No. BCV-17-100503; *Reyes v. Halliburton Energy Services, Inc.*, Kern County Superior Court, Case No. S-1500-CV-280215; *Rodriguez v. B&L Casing Serve, LLC*, Kern County Superior Court, Case No. S-1500-CV-282709; *Marketstar Wage and Hour Cases*, Alameda County Superior Court, Case No. JCCP004820; *Rodriguez v. Delta Sierra Beverage, LLC*, Sacramento County Superior Court, Case No. 34-2017-00206727-CU-OE-GDS; *Stuck v. Jerry Melton & Sons Construction, Inc.*, Kern County Superior Court, Case No. BCV-16-101516; *Blevins v. California Commercial Solar, Inc.*, Kern County Superior Court, Case No. BCV-17-100571; *Cisneros v. Wilbur-Ellis Company, LLC*, Kern County Superior Court, Case No. BCV-17-102836; and *Castro v. General Production Service of California, Inc.*, Kern County Superior Court, Case No. BCV-15-101164. Shunt was also certified as class counsel in *Fulmer v. Golden State Drilling, Inc.*, Kern County Superior Court, Case No. S-1500-CV-279707; *Manas v. Kenai Drilling Limited*, Los Angeles County Superior Court, Case No. BC546330; and *Nuncio v. MMI Services, Inc.*, Kern County Superior Court, Case No. S-1500-CV-282534, cases that were certified after a contested class certification. Shunt is handling class actions pending in California.

15. Talia Lux is an Associate Attorney at my office. Talia received her undergraduate degree in 2017 from the University of California, Santa Barbara, with a Global and International Studies B.A. and a double minor in French and Professional Writing. Talia earned her Juris Doctor degree in 2020 from Pepperdine University School of Law. Talia is

1 admitted to practice law in California since January 2021 and is presently admitted to practice
2 in all state courts of California, including the Northern, Eastern, Southern, and Central District
3 courts in California. The focus of Talia's practice is wage-and-hour class action and
4 representative PAGA matters. Since joining Justice Law Corporation, Talia has worked on
5 several wage-and-hour class action and representative PAGA matters that have been granted
6 approval, including *Moreno v. TC Transcontinental U.S.A. Inc.*, Alameda County Superior
7 Court, Case No. RG21099845; *Salinas v. Claremont Retirement Management Services, Inc.*,
8 Sacramento County Superior Court, Case No. 34-2021-00294807; *Medrano v. G & J Heavy*
9 *Haul, Inc.*, Tulare County Superior Court, Case No. VCU292423 [Consolidated with Case No.
10 VCU292424]; *Ortiz v. Achieve Behavioral Associates, LLC*, Los Angeles County Superior
11 Court, Case No. 22STCV21990; *Manosh v. Four Wheel Campers, LLC*, Yolo County Superior
12 Court, Case No. CV2021-0808; *Llamas v. Steuber Corporation d/b/a AltaFoodcraft Coffee and*
13 *Refreshment Services*, Los Angeles County Superior Court, Case No. 21STCV25673; *Newberry*
14 *v. Napasport, LLC*, Napa County Superior Court, Case No. 22CV000521; *Tesene v. Cambria*
15 *Company, LLC*, Alameda County Superior Court, Case No. 22CV014439 [Consolidated with
16 Case No. 22CV014587]; *Evans, et al. v. Transcontinental Ontario, Inc., et al.*, San Bernardino
17 County Superior Court, Case No. CIVSB2317702 [Consolidated with Case No.
18 CIVSB2331552]; *Fenton v. Pratt Corrugated Holdings, Inc, et al.*, San Joaquin County
19 Superior Court, Case No. STK-CV-UOE-2019-14494; and *Lee v. Aquamor, LLC*, Riverside
20 County Superior Court, Case No. CVRI2305592. Talia also worked on several cases on appeal,
21 including *Ahlmann v. Forwardline Financial, LLC et al.*, Los Angeles County Superior Court,
22 Case No. 19VECV01352 (Second Appellate District Court of Appeal No. B304367); *Brooks v.*
23 *Amerihome Mortgage Company, LLC*, Ventura County Superior Court, Case No. 56-2019-
24 00524903-CU-OE-VTA (Second Appellate District Court of Appeal No. B313818); *Alcaraz, et*
25 *al, v. DMW Industries, Inc.*, Kern County Superior Court, Case No. BCV-15-100055-SDS
26 (Fifth Appellate District Court of Appeal No. F082417); *Oswald v. Murray Plumbing and*
27 *Heating Corporation, et al.*, Los Angeles County Superior Court, Case No. 20CMCV00328
28 (Second Appellate District Court of Appeal No. B312736); *LaCasse v. USANA Health Sciences,*

1 *Inc.*, Sacramento County Superior Court, Case No. 34-2020-00278413-CU-OE-GDS (Third
2 Appellate District Court of Appeal No. C094406); and *Young v. Axos Financial, Inc.*, San
3 Diego County Superior Court, Case No. 37-2021-00019535-CU-OE-CTL (Fourth Appellate
4 District Court of Appeal No. D080970). Talia is working on several wage-and-hour class action
5 and representative PAGA matters pending in various courts in California, including *Ferrer v.*
6 *Ameriflex, Inc.*, Riverside County Superior Court, Case No. RIC2002157; *Hernandez v. Delta*
7 *Star, Inc.*, San Mateo County Superior Court, Case No. 22-CIV-04380; *Espinoza v. Michel*
8 *Labor Services Inc.*, Yolo County Superior Court, Case No. CV2022-1108; *Magallon v. RBC*
9 *Bearings Incorporated, et al.*, Los Angeles County Superior Court, Case No. 23STCV25524;
10 *Han v. JL Restaurant Management, Inc.*, Orange County Superior Court, Case No. 30-2024-
11 01377375-CU-OE-CXC; *Barcenas v. The Garman Corporation*, Riverside County Superior
12 Court, Case No. CVRI2306594; *Negreros v. Accel Therapies Inc.*, Orange County Superior
13 Court, Case No. 30-2024-01420918-CU-OE-CXC; *Mora v. Groves Capital, Inc.*, San Diego
14 County Superior Court, Case No. 37-2024-00001675-CU-OE-CTL; *Sanchez v. Southwest Wine*
15 *& Spirits, LLC dba Wally's Wine & Spirits*, Los Angeles County Superior Court, Case No.
16 24STCV27821; and *L'Ecluse v. Electronic Waveform Lab, Inc.*, Orange County Superior Court,
17 Case No. 30-2024-01417578-CU-OE-CXC.

18 **PAGA REPRESENTATIVE SERVICE PAYMENTS**

19 16. The Settlement provides for the payment of the PAGA Representative
20 Service Payments of \$5,000 to each Plaintiff (totaling \$10,000) for the time and effort serving
21 as the PAGA representatives. Plaintiffs spent several hours (and days) producing relevant
22 documents and past employment records (*e.g.*, personnel records), as well as providing the facts
23 and evidence necessary to prove the allegations (*e.g.*, description of work experience and work
24 environment). Plaintiffs were accessible whenever needed by PAGA Counsel and actively tried
25 to obtain and provide as much information as possible to benefit the Aggrieved Employees
26 (*e.g.*, giving the names and contact information of several putative aggrieved employees,
27 discussing applicable legal theories, gathering information from putative aggrieved employees).
28 Plaintiffs even assisted PAGA Counsel with reviewing the documents produced by Defendant

1 and other sources, developing a strategy to obtain additional documents, determining the
2 importance of the documents produced, and reviewing the operative complaints, and formal
3 discovery requests and responses. Furthermore, Plaintiffs prepared for and made themselves
4 available to remotely attend mediation, provided their input on the negotiations, and reviewed
5 and approved the Settlement Agreement. Plaintiffs were also made aware of and accepted the
6 risks and sacrifices associated with serving as the PAGA representatives (e.g., providing a
7 broader release, risking an adverse judgment for attorneys' fees and costs, losing a potential
8 source of income). Overall, Plaintiffs' contributions were instrumental to the eventual
9 settlement of this matter. For these reasons, it is appropriate and just for Plaintiffs to receive the
10 PAGA Representative Service Payments, in addition to the settlement payments, for the
11 services on behalf of the Aggrieved Employees.

12 **LITIGATION COSTS AND EXPENSES INCURRED BY**
13 **JUSTICE LAW CORPORATION**

14 17. Justice Law Corporation incurred \$22,004.29 in costs and litigation
15 expenses as reflected in **Exhibit 3**. These costs and expenses were reasonable and necessary.

16 18. I submit that the Settlement reached herein is fair, reasonable, and
17 adequate and is in the best interest of Plaintiffs and Aggrieved Employees.

18
19 I declare that under the penalty of perjury under the laws of California the foregoing is
20 true and correct. Executed on this 19th day of March 2025 at Pasadena, California.

21 
22 Douglas Han

EXHIBIT 1

**CLIENT ACKNOWLEDGEMENT OF JOINT PROSECUTION AND
ATTORNEY FEE DIVISION AGREEMENT**

Client Consent Pursuant to California Rules of Professional Conduct Rule 1.5.1

1. I have been advised in writing that my attorneys have entered into a proposed Joint Prosecution and Attorney Fee Division Agreement (“the Agreement”) in connection with litigation of the lawsuits titled *Tamiko Brooks v. Home Care Assistance of California, LLC*, Los Angeles Superior Court Case No. 21STCV06850 (“*Brooks*”) and *Alyssa Webb v. Home Care Assistance, Inc.*, Santa Clara County Superior Court Case No. 20CV373703 (“*Webb*”) (*Brooks* and *Webb* are collectively referred to herein as “the Actions”).
2. I understand that my attorneys will divide any fee award resulting from the litigation and settlement of the Actions, including any multiplier (i.e. premium above the lodestar) as follows: 80% to Haines Law Group, APC (“HLG”) and 20% to Justice Law Corporation (“JLC”).
3. I agree that, subject to ultimate Court approval, Attorneys will take steps necessary to consolidate, coordinate and/or jointly prosecute the Actions.
4. I understand that the Agreement does not alter the attorney retainer agreement that I previously signed with my attorneys. I also understand that I will be jointly represented in this action by the attorneys of HLG and JLC. I agree that the same terms and conditions of the retainer agreement that I signed with HLG or JLC will apply to the other attorneys representing me in this action who were not parties to the retainer agreement that I signed.
5. I have been advised in writing and understand that if there is a PAGA Settlement, class action settlement or judgment in the Actions, any Court-approved award of fees and costs will be paid to HLG and JLC as set forth in the Agreement.
6. I have further been advised in writing and understand that the total fee charged will not be increased solely by reason of the division of fees.
7. I understand and agree to the terms of the Agreement, including the joint representation and the internal attorneys’ fees split.

I hereby consent to this proposed fee division.

Dated: 04/17/24


Tamiko Brooks (Apr 17, 2024 11:53 PDT)
Tamiko Brooks

Dated: 04/08/2024


Alyssa Webb
Alyssa Webb

EXHIBIT 2

Cases	Court	Case Number	Judge
Rodney Hoffman v. Blattner Energy Inc.	United States District Court of California Central District	ED CV 14-2195-DMG (DTBx)	Dolly Gee
Nabor Navarro v. Trans-West Intermodal, Inc.	San Bernardino County Superior Court	CIVDS1700850	Brian McCarville
Caryn Rafferty et al. v. Academy Mortgage Corporation	Sacramento County Superior Court	34-2016-00191285-CU-OE-GDS	David Brown
Carrie Baker v. Central Coast Home Health	San Luis Obispo County Superior Court	17CV-0219	Tana Coates
Jamar Farmer v. Cooks Collision, Inc.	Napa County Superior Court	17CV000969	Diane Price
Ricardo Ortega et al. v. Nestle Waters North America, Inc.	Los Angeles County Superior Court	BC623610	Carolyn Kuhl
Landon Fulmer, Jr. et al. v. Golden State Drilling, Inc.	Kern County Superior Court	S-1500-CV0279707-SDS	Stephen Schuett
Carlos McCollum et al. v. Delta Tech Service, Inc.	Solano County Superior Court	FCS049504	Scott Daniels
Carl Morel et al. v. Aseptic Solutions USA Ventures, LLC	Riverside County Superior Court	RIC1711383	Craig Riemer
Genio Chuen v. 911 Mobile Mechanic, LLC	Orange County Superior Court	30-2017-00943421-CU-OE-CXC	Glenda Sanders
Elbern Gentry v. Eugene Burger Management Corporation	Sacramento County Superior Court	34-2015-00182515-CU-OE-GDS	David Brown
Maurice Bunche et al. v. Mettler-Toledo Rainin, LLC	Alameda County Superior Court	RG18899279	Winifred Smith
Carlos Koreisz et al. v. On Q Financial, Inc	Ventura County Superior Court	56-2018-00511 126-CU-OE-VTA	Mark Borrell
Jason Manas et al. v. Kenai Drilling Limited	Los Angeles County Superior Court	BC546330	Daniel Buckley
Michelle Xiong et al. v. Hilltop Ranch, Inc.	Merced County Superior Court	18CV-01340	Brian McCabe
Karen Morgan v. Childtime Childcare, Inc.	United States District Court of California Central District	8:17-cv-01641 AG (KESx)	Andrew Guilford
Daniel Flores v. Wilmar Oils & Fats (Stockton), LLC	San Joaquin County Superior Court	STK-CV-UOE-2018-0012758	Barbara Kronlund
Jordan Dahlberg et al. v. Fresno Beverage Company dba Valley Wide Beverage	Tulare County Superior Court	VCU279083	Bret Hillman
Jorge Proctor v. Helena Agri Enterprises, LLC	San Diego County Superior Court	37-2018-00057894-CU-OE-CTL	Joel Wohlfeil
Christine Arman v. Circor Aerospace, Inc.	Riverside County Superior Court	RIC1613578	Sunshine Sykes
Anthony Nuncio et al. v. MMI Services, Inc.	Kern County Superior Court	S-1500-CV-282534	David R. Lampe
Mario R. Guerrero et al. v. Plaza Home Mortgage, Inc.	Imperial County Superior Court	ECU001150	L. Brooks Anderholt
Mansour Nije v. Lucira Health, Inc. f/k/a Diassess, Inc.	Alameda County Superior Court	RG20055890	Julia A. Spain
Patricial Alcantar et al v. Bay Equity, LLC	Marin County Superior Court	CIV1903376	James Chou
Efrain Perez v. Freedom Medical, Inc.	San Bernardino County Superior Court	CIVDS1903517	Bryan F. Foster
Beverly Saolom v. Pulmonox Corporation	San Mateo County Superior Court	19-CIV-05070	Nancy Fineman
Matthew Tucker v. BYD Coach & Bus, LLC	Los Angeles County Superior Court	BC698921	Amy Hogue
Jose Duval v. Dawson Oil Company	Sacramento County Superior Court	34-2020-00276862-CU-OE-GDS	Shama H. Mesiwala
Steven DelCorso v. Westland Technologies, Inc.	Stanislaus County Superior Court	CV-20-002807	John R. Mayne
Priscilla Ramirez v. Amphastar Pharmaceuticals, Inc.	San Bernardino County Superior Court	CIVDSZO11327	David Cohn
Jose Zuniga v. Central Valley Concrete, Inc.	Merced County Superior Court	20CV-00490	Brian McCabe
Robert Enriquez v. MCE Corporation	Contra Costa County Superior Court	MSC20-01744	Edward Weil
Amanda Cunningham v. Cottonwood H.C., Inc. dba Cottonwood Post-Acute Rehab	Yolo County Superior Court	CV2021-1375	Daniel M. Wolk
Nguyen Ngo, et al. v. Medimpact Healthcare Systems, Inc.	San Diego County Superior Court	37-2020-00015657-CU-OE-CTL	Keri Katz
Steven Jefferson v. McCormack Baron Management, Inc.	San Francisco County Superior Court	CGC-20-588162	Richard B. Ulmer Jr.
Allen Morgan v. Wehah Farm, Inc dba Lundberg Family Farms	Butte County Superior Court	20CV02554	Stephen E. Benson
Earl Rhodes, et al. v. Cavotec Dabico US Inc., et al.	Orange County Superior Court	30-2021-01177305-CU-OE-CXC	Peter Wilson
Alexandra Pelgrift v. The 21st Amendment Brewery Cafe	San Francisco County Superior Court	CGC-20-585227	Ethan P. Schulman
Beverly Salom, et al. v. Lumentum Operations LLC, et al.	Santa Clara County Superior Court	19CV354198	Sunil R. Kulkarni
Leroy Rost v. Lehigh Hanson, Inc. et al.	San Luis Obispo County Superior Court	20CV-0225	Tana L. Coates
Suleni Itzep, et al. v. Axonics Modulation Technologies, Inc.	Orange County Superior Court	30-2020-01140962-CU-OE-CXC	Lon F. Hurwitz
Earl Gandionco v. Allergan, Inc. et al.	San Joaquin County Superior Court	STK-CV-UOE-2022-0003077	Robert T. Waters
Kris Brehm, et al. v. Platinum Living Services, Inc. dba Oakwood Village	Placer County Superior Court	S-CV-0046296 (Consolidated with S-CV-0046676)	Michael Jones
Jarid Gomez, et al. v. Parker-Hannifin Corporation	Ventura County Superior Court	56-2022-00563952-CU-OE-VTA	Benjamin Coats
Ana Vargas, et al. v. Spates Fabricators, Inc.	Riverside County Superior Court	CVR12100462	Harold W. Hopp
Jacob Blea v. Pacific Groservice Inc., et al.	Santa Clara County Superior Court	20CV275150	Sunil R. Kulkarni
Anthony Penca v. Sierra Nevada Brewing Co.	Butte County Superior Court	21CV02883	Tamara L. Mosbarger
Armoni Lloyd v. National Warehouse Management, LLC	Kern County Superior Court	BCV-22-102213	David R. Zulfa
Edgar Mata, et al. v. Day-Lee Foods Inc.	Los Angeles County Superior Court	20STCV21663	Kenneth R. Freeman
Samyra McCrea v. Rockridge Market Hall, LLC dba Market Hall Foods, et al.	Alameda County Superior Court	22CV005647	Evelio Grillo

EXHIBIT 3

JUSTICE LAW CORPORATION CASE COST DETAIL
Home Care Assistance of California, LLC adv. Webb

<u>Date</u>	<u>Payee</u>	<u>Activity</u>	<u>Amount</u>
8/19/2020	SignNow	Attorney Services	\$ 5.00
8/21/2020	United States Postal Service	Mailing Correspondence	\$ 16.40
8/21/2020	Labor and Workforce Development Agency	PAGA Filing Fee	\$ 75.00
9/22/2020	United States Postal Service	Mailing Correspondence	\$ 8.05
10/23/2020	United States Postal Service	Mailing Correspondence	\$ 8.20
12/9/2020	OneLegal	Service of Process	\$ 130.00
12/14/2020	OneLegal	Filing & Initial Filing Fee	\$ 155.50
12/16/2020	Odyssey	Filing	\$ 5.72
2/9/2021	Odyssey	Filing & Jury Fees	\$ 453.77
2/19/2021	Odyssey	Filing & Complex Fees	\$ 1,035.72
2/19/2021	United States Postal Service	Service of Documents	\$ 5.30
4/22/2021	CourtCall	Court Hearing	\$ 94.00
4/23/2021	Odyssey	Filing	\$ 5.72
5/28/2021	United States Postal Service	Service of Documents	\$ 2.85
6/18/2021	CourtCall	Court Hearing	\$ 94.00
6/18/2021	Odyssey	Filing	\$ 5.72
6/18/2021	United States Postal Service	Service of Documents	\$ 2.45
6/28/2021	Odyssey	Filing	\$ 5.52
7/2/2021	Odyssey	Filing	\$ 5.72
7/9/2021	Odyssey	Filing	\$ 5.72
7/9/2021	United States Postal Service	Service of Documents	\$ 1.55
8/13/2021	Veritext Legal Solutions	Transcript Fees - Deposition	\$ 2,062.53
9/2/2021	SignNow	Attorney Services	\$ 5.00
9/15/2021	United States Postal Service	Mailing Correspondence	\$ 8.73
10/11/2021	Los Angeles County Superior Court	Document Retrieval	\$ 9.00
10/14/2021	General Logistics System	Mailing Correspondence	\$ 16.48
5/31/2022	SignNow	Attorney Services	\$ 5.00
6/1/2022	SignNow	Attorney Services	\$ 80.00
6/3/2022	Ortman Mediation, Inc.	Mediation Fees	\$ 10,000.00
6/3/2022	SignNow	Attorney Services	\$ 15.00
6/7/2022	Berger Consulting Group	Exper Review and Analysis of Payroll Records	\$ 4,593.75
6/24/2022	OneLegal	Filing	\$ 18.76
6/27/2022	United States Postal Service	Mailing Correspondence	\$ 8.53
7/6/2022	United States Postal Service	Mailing Correspondence	\$ 8.53
7/13/2022	CourtCall	Court Hearing	\$ 94.00
7/14/2022	Odyssey	Filing	\$ 5.72
8/8/2022	SignNow	Attorney Services	\$ 5.00
8/11/2022	Odyssey	Filing	\$ 5.72
9/15/2022	Odyssey	Filing & Filing Fee	\$ 67.52
9/29/2022	Odyssey	Filing	\$ 5.72
10/13/2022	Odyssey	Filing	\$ 5.72
11/10/2022	SignNow	Attorney Services	\$ 25.00
11/14/2022	United States Postal Service	Mailing Correspondence	\$ 9.31
12/2/2022	SignNow	Attorney Services	\$ 5.00
2/14/2023	United States Postal Service	Mailing Correspondence	\$ 1.63
2/14/2023	SignNow	Attorney Services	\$ 10.00
2/21/2023	SignNow	Attorney Services	\$ 5.00
3/17/2023	United States Postal Service	Mailing Correspondence	\$ 3.26
4/3/2024	SignNow	Attorney Services	\$ 5.00
8/12/2024	Odyssey	Filing	\$ 5.72
3/17/2025	SignNow	Attorney Services	\$ 5.00
	LexisNexis	Legal Research	\$ 2,600.00
	Justice Law Corporation (In House)	Photocopies (1245 @ \$0.15 per page)	\$ 186.75
		Total Cost	\$ 22,004.29