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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

OSTON JEMBA MADENGUE, HECTOR REYES, 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,

Plaintiffs,

vs.

GOORIN BROS., a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 19STCV23129

Honorable Maren E. Nelson
Department SSC17

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND ENHANCEMENT
PAYMENTS**

[Notice of Motion and Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payments; Declarations of Class Representatives (Oston Jemba Madengue and Hector Reyes); Declaration of Settlement Administrator (Eric Springer); and [Proposed] Final Approval Order and Judgment filed concurrently herein]

Date: July 15, 2022
Time: 9:00 a.m.
Department: SSC17

Complaint Filed: July 3, 2019
FAC Filed: October 24, 2019
SAC Filed: June 22, 2021
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, hereby declare as follows:

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

PRELIMINARY APPROVAL OF SETTLEMENT

2. On January 31, 2022, in Department SSC17 of the above-entitled Court, the Honorable Maren E. Nelson preliminarily approved the Second Amended Stipulation of Class and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant Goorin Bros., Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Oston Jemba Madengue and Hector Reyes as to represent the Class (together, “Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action and PAGA Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to handle the notice and settlement administration process.

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

WORK PERFORMED BY CLASS COUNSEL

4. I have been actively engaged in litigating the above-captioned action since prior to the commencement of the action on July 3, 2019, as have several other attorneys and members

1 in our firm.

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

14 6. Prior to reaching the Settlement, the parties used the pre-mediation time period to
15 investigate the veracity, strength, and scope of the claims, and were actively preparing the matter
16 for class certification and trial. The parties conducted formal and informal discovery and
17 investigation into the facts of the case, and exchanged a volume of information and data in
18 preparation for mediation. Class Counsel propounded multiple sets of formal written discovery
19 requests onto Defendant (specifically, Form Interrogatories-General (Set One), Requests for
20 Production of Documents (Sets One and Two), and Special Interrogatories (Sets One, Two, and
21 Three)) and served notices of deposition of Defendant's person(s) most knowledgeable
22 designees along with requests for production of documents. The volume of data and documents
23 that Class Counsel reviewed and analyzed included and were not limited to: Plaintiffs'
24 employment records and earning statements, a detailed sampling of Class Members' Timecard
25 Data and Payroll Data, company policy waivers (including, but not limited to, Meal Period
26 Waivers for Employee Working Six or Fewer Hours and Second Meal Period Waivers for
27 Employees Working More Than 10 Hours), internal memoranda, job descriptions, Defendant's
28 operations and employment practices (including, but not limited to, Employee Manual Time

1 Sheets and Merchant Performance Reviews), forms (including, but not limited to, Defendant's
2 New Hire Forms and Corrective Action Forms), various Goorin Bros., Inc. Policies &
3 Procedures (including, but not limited to, Defendant's Dress Code policy, Time and Attendance
4 policy, On Call Shifts policy, Timekeeping policy, Meal Breaks policy, and Rest Breaks policy,
5 as well as procedures for Clocking In/Out and to Manually Amend Hours), among other
6 information and documents. Class Counsel researched applicable law, developed
7 damages/valuation models in preparation for mediation, and met and conferred with
8 Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings,
9 discovery, and production of documents and data prior to mediation. Other work performed by
10 Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing,
11 and revising pleadings and the mediation brief; and preparing and appearing for court
12 proceedings, mediation, and settlement negotiations, among other tasks.

13 7. As outlined herein, the parties have conducted formal and informal discovery and
14 investigation during the course of litigating the case. Class Counsel analyzed a large volume of
15 documents and data obtained from Plaintiffs, Defendant, and other sources. These documents
16 and data provided a critical understanding of the nature of the work performed by the Class
17 Members, as well as Defendant's operations and employment policies, practices, and
18 procedures, and were used in analyzing liability, damages, and valuation issues in connection
19 with all phases of the litigation, and ultimately with the mediation and settlement negotiation
20 process. Class Counsel also performed significant research into the law concerning Defendant's
21 defenses.

22 8. After conducting significant investigation of the facts and law during the
23 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
24 try to resolve the entire matter. These efforts included participating in a formal, full-day
25 mediation conducted by Mark D. Rudy, Esq., a well-regarded mediator experienced in
26 mediating complex labor and employment matters. During all settlement discussions, the parties
27 conducted their negotiations at arm's length in an adversarial position. Prior to and during
28 mediation and settlement discussions, the parties exchanged extensive information and data, and

discussed all aspects of the case, including the risks and delays of further litigation (including, but not limited to, due to Defendant's financial condition), the risks to the parties of proceeding with class certification and trial, the law relating to off-the-clock theory, meal and rest periods, representative PAGA claims, and wage-and-hour enforcement, the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the parties was not easy. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendant and its counsel felt very strongly about Defendant's ability to prevail on the merits and to obtain a denial of class certification, while Plaintiffs and Class Counsel believed that class certification would be obtained and that they would prevail at trial. With the aid of the mediator's evaluation, the parties agreed that the case was well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the parties that would attend further litigation. These risks of further litigation include, and are not limited to, failure to obtain class certification, a determination that the claims are unsuitable for representative adjudication, class decertification after certification of a class, allowing a jury to decide the claims asserted in the case, and the real possibility of no recovery after years of litigation.

9. As set forth more fully in the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$196,512.75, which is thirty-five percent (35%) of the Gross Settlement Amount of \$561,465.00, as set forth in the Settlement Agreement and the Class Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs and Class Counsel, Plaintiffs have each agreed to contingency fees of at least thirty-five percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved; and (6) the other cases that Class Counsel has turned down in order to devote its time and efforts to this matter.

1 10. I am aware that the common and acceptable rate for contingency representation in
2 wage and hour class action litigation is normally 40% before trial, with the range being from
3 33.3% up to 50%.

4 11. While not necessarily required to be demonstrated because the contingent fee is
5 proper for this settlement, Class Counsel has incurred many hours of work in connection with
6 prosecuting the case such that the award of attorneys' fees is also justified under a simple
7 lodestar analysis. Class Counsel has spent a total of **511.90 hours** performing tasks and
8 obtaining recovery on behalf of Plaintiffs, Class Members, the State of California, and PAGA
9 Employees. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets
10 forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC
11 and the time incurred in performing those services. These hours include work done by myself
12 and several other attorneys at the firm. Additionally, Lawyers for Justice, PC had litigation
13 support personnel actively engaged in assisting with the prosecution of this matter.

14 12. The work performed in this particular matter, the background of our firm, as well
15 as the individual backgrounds, training, and experience of the attorneys who worked on this
16 matter, in litigating complex wage-and-hour matters, and in particular, employment class
17 actions, support a reasonable hourly rate of compensation at the rate of \$600 for work performed
18 by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees,
19 compensating the firm at the rate of at least \$600 per hour for legal services performed, by courts
20 granting approval of wage-and-hour settlements in other cases: final approval of the class and
21 representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles
22 Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of
23 attorneys' fees involved an hourly rate of \$936.47; final approval of the class and representative
24 action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court
25 Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved
26 an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella*
27 *v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-
28 00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees

involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; 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 an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64; and final approval of the class and representative action settlement in *Kevin Coonce v. Ferguson Enterprises, Inc.* (Sacramento County Superior Court Case No. 34-2021-00136285) was granted on May 22, 2014, and the award of attorneys' fees involved an hourly rate of \$625.

ADEQUACY OF LAWYERS for JUSTICE, PC

EDUCATION

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

JUDICIAL EXTERNSHIPS

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

LITIGATION AND CLASS ACTION EXPERIENCE

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

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

17. Since its inception, in or around October of 2008, *Lawyers for Justice, PC* firm 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, we are the attorneys of record in over a dozen employment-related putative class actions in both state and federal courts in the State of California. Our firm has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During this relatively short time, in association with other law firms, we have recovered millions of dollars on behalf of thousands of individuals in California.

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

18. What follows are just a few examples of the type of results *Lawyers for Justice, PC* ("LFJ") has achieved on behalf of our clients:

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

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

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

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

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

26 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 wage-and-hour class and PAGA representative action against a national wholesale distributor
28 of plumbing and builder supplies, involving allegations of misclassification of multiple salaried

1 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
2 representative action settlement. The Sacramento County Superior Court Case Number is 34-
3 2012-00136285.

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

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

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

20 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
21 wage-and-hour class and PAGA representative action against a national retailer of upscale
22 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
23 court granted final approval of the class and PAGA representative action settlement. The Los
24 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
25 Council Coordination Proceeding Number is 4794.

26 k) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class action against a national retailer of apparel and fashion accessories, on
28

1 behalf of non-exempt employees. On August 5, 2016, the court granted final approval of the
2 class action settlement. The Los Angeles County Superior Court Case Number is BC488069.

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

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

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

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

22 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
23 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
24 the employer’s motion to compel arbitration, which resulted in a published opinion by the
25 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
26 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
27 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
28

1 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
2 5046.

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

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

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

18 t) LFJ represented the plaintiff in a wage-and-hour class and PAGA
19 representative action against a property management company, on behalf of non-exempt
20 employees. On June 14, 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 BC586234.

23 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
24 representative action against a food company on behalf of non-exempt employees. On June 30,
25 2017, the court granted final approval of the class and PAGA representative action settlement.
26 The Sacramento County Superior Court Case Number is 34-2015-00175871.

27 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
28 representative action against a chocolate company on behalf of non-exempt employees. On July

1 19, 2017, the court granted final approval of the class and PAGA representative action
2 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

24 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
25 wage-and-hour class and PAGA representative action against a global provider of flexible office
26 space solutions. On February 15, 2018, the court entered an order granting final approval of the
27 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
28 Number is BC498401.

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

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

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

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

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

25 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a national retailer of apparel and
27 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted
28 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the

1 court granted final approval of the class and PAGA representative action settlement. The
2 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

3 hh) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
4 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
5 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
6 notable decision from the California Supreme Court clarifying the law and finding, in part, that
7 employer arbitration agreements are unenforceable where they block a PAGA claim from
8 proceeding, *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court
9 granted approval of the PAGA representative action settlement. The San Diego County Superior
10 Court Case Number is 34-2015-00175330.

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

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

21 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
22 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
23 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020,
24 the court granted in part the plaintiff's motion for class certification and certified a class. The
25 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
26 Judicial Council Coordination Proceeding Number is 4930.

27 ll) LFJ, in association with co-counsel therein, represents the plaintiffs in a
28 wage-and-hour class action against manufacturer and supplier of power products and services

on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion for class certification and certified a class. The San Diego County Superior Court Case Number is 37-2015-00025968-CU-OE-CTL.

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

nn) LFJ represents the plaintiff in a wage-and-hour class action against an iconic lifestyle accessories brand and retailer on behalf of non-exempt employees. On March 15, 2022, the court granted the plaintiff's motion for class certification in part and certified a class. The San Francisco Superior Court Case Number is CGC-16-550794.

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

19. To date, Class Counsel has borne all the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers for Justice, PC has incurred **\$22,623.41** in litigation costs and expenses as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement.

ENHANCEMENT PAYMENTS TO PLAINTIFFS

20. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for Enhancement Payments in the amount of \$7,000.00 each to Plaintiffs Oston Jemba Madengue and Hector Reyes to compensate Plaintiffs for the time and effort that they expended in this case. The requested Enhancement Payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort in producing relevant documents and information and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain information that would benefit the claims in this matter. Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs

Oston Jemba Madengue and Hector Reyes to each receive \$7,000.00 as reasonable Enhancement Payments, in addition to their Individual Settlement Payments and Individual PAGA Payments, for their services on behalf of the Class, State of California, and PAGA Employees.

21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiffs, Class Members, the State of California, and PAGA Employees.

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

Executed this 22nd day of June 2022, at Glendale, California.



Edwin Aiwanian

EXHIBIT A

MADENGUE, ET AL. V. GOORIN BROS., INC.
(LOS ANGELES SUPERIOR COURT CASE NO. 19STCV23129)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, including Adequacy, Typicality, Superiority, and Commonality	10.30
Pre-Lawsuit Investigation of the Merits of Plaintiff Oston Jemba Madengue’s and Plaintiff Hector Reyes’s (collectively, “Plaintiffs”) Claims and the Merits of the Claims of the Putative Class Members	12.10
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Goorin Bros, Inc. (“Defendant”) with Respect to Plaintiffs and the Putative Class	9.70
Pre-Lawsuit Legal Research & Analysis of Latest Off-the-Clock, Meal and Rest Break Law, and Certification Decisions in California, including all New and Relevant DLSE Materials	8.10
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	3.40
Investigation of Defendant’s Organizational and Corporate Structure, and Executive Reporting Structure as It Relates to the Employment and Management of the Putative Class Members	4.10

Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	2.90
Analysis of Competitors within Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	3.50
Research and Investigation Re: Locations Owned, Managed, Serviced and/or Operated by Defendant in California During the Class Period, Including Differences Between the Various Locations to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	4.20
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members Worked Throughout California	5.90
Research and Investigation Re: Defendant's Policies, Practices, and Procedures Relating to Opening and Closing Procedures, Bag Checks, Attendance, Customer Service, Timekeeping, Meal/Rest Breaks, On Premises Breaks, Meal Waivers, Non-Discretionary Commission/Bonus/Performance Pay, Overtime Compensation, Merchandise Pickups, Personal Vehicle Use, Personal Cell Phone/Computing Device Use, Transportation, and Reimbursement of Business-Related Expenses	20.50
Research and Investigation Re: Software Programs, Applications, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Inventory, Sales, 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 During Meal Breaks	6.50
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	8.20

Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	6.90
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	2.80
Prepare a Discovery Strategy Plan of Action, including Topics of Inquiry Important to Certification, Liability, and Damages/ Penalties	3.50
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations and Store Closures, and Putative Class Members' Work	5.10
Meet and Communicate with Plaintiff Oston Jemba Madengue throughout the Pendency of the Case	37.50
Meet and Communicate with Plaintiff Hector Reyes throughout the Pendency of the Case	33.90
Meet and Communicate with Putative Class Members and Percipient Witnesses	58.50
Pleadings and Court Filings	
Draft Plaintiffs' Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on July 3, 2019)	7.90
Review Court's Notice of Case Assignment (filed on July 3, 2019)	0.10
Review Court's Initial Status Conference Order (Complex Cases and Class Actions) and Minute Order (filed on July 18, 2019)	0.30
Review Defendant's Notice of Appearance of Counsel (served on August 15, 2019)	0.20

Meet and Confer with Defense Counsel, and Draft Joint Initial Status Conference Statement (submitted on August 22, 2019)	1.90
Review Court's Order Authorizing Electronic Service and Minute Order (filed on August 29, 2019)	0.20
Draft Plaintiffs' Notice of Ruling at Initial Status Conference (filed on September 5, 2019)	0.20
Draft Plaintiffs' Notice of Posting Jury Fees (filed on September 30, 2019)	0.20
Meet and Confer with Defense Counsel, and Draft Joint Status Report (submitted on October 16, 2019)	1.70
Review Court's Minute Order (filed on October 23, 2019)	0.10
Draft Plaintiffs' First Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on October 24, 2019)	4.30
Draft Plaintiffs' Notice of Ruling at Further Status Conference (filed on October 31, 2019)	0.30
Review and Analyze Defendants' Answer to Plaintiff's First Amended Complaint and Research Affirmative Defenses in Answer (served on November 22, 2019)	2.50
Meet and Confer with Defense Counsel, and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on February 14, 2020)	1.60
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (filed on February 21, 2020)	0.10
Review Court's Minute Order (filed on February 24, 2020)	0.10
Draft Plaintiffs' Notice of Ruling at Further Status Conference (filed on February 26, 2020)	0.30

Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on March 5, 2020)	0.20
Meet and Confer with Defense Counsel, and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on June 16, 2020)	1.50
Review Court's Order Denying Joint Stipulation to Continue Case Management Conference (filed on June 26, 2020)	0.10
Review Court's Minute Order (filed on June 29, 2020)	0.10
Draft Plaintiffs' Notice of Ruling at Post-Mediation Status Conference (filed on June 30, 2020)	0.20
Review Court's Notice re Continuance of Hearing and Order (filed on December 7, 2020)	0.10
Meet and Confer with Defense Counsel, and Draft Joint Notice of Settlement and Post-Mediation Status Conference (submitted on January 7, 2021)	1.30
Review Court's Minute Order (filed on January 14, 2021)	0.10
Draft Plaintiffs' Notice of Ruling at Post-Mediation Status Conference (filed on January 15, 2021)	0.30
Meet and Confer with Defense Counsel, and Draft Joint Status Report (submitted on June 1, 2021)	1.20
Review Court's Minute Order (filed on June 2, 2021)	0.10
Draft Plaintiff's Second Amended Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on June 22, 2021); Meet and Confer with Defense Counsel, and Draft	5.90

Joint Stipulation Granting Plaintiff Leave to File Second Amended Complaint; [Proposed] Order Thereon (submitted on June 8, 2021)	
Review Court's Order Granting Joint Stipulation Granting Plaintiff Leave to File Second Amended Complaint (filed on June 11, 2021)	0.10
Review and Analyze Defendant's Answer to Second Amended Complaint (served on July 26, 2021)	1.50
Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on February 2, 2022)	0.20
Appearances	
Prepare for, Travel to/from, and Attend Initial Status Conference (August 29, 2019)	2.10
Prepare for, Travel to/from, and Attend Further Status Conference (October 23, 2019)	2.70
Prepare for and Telephonically Attend Further Status Conference (February 24, 2020)	0.80
Prepare for and Telephonically Attend Post-Mediation Status Conference (June 29, 2020)	0.50
Prepare for and Telephonically Attend Post-Mediation Status Conference (January 14, 2021)	.0.70
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (April 21, 2021)	0.80
Prepare for and Telephonically Attend Informal Status Conference (June 2, 2021)	1.10
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (January 31, 2022)	1.50

Prepare for and Telephonically and Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Class Representative Service Awards (July 15, 2022) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Oston Jemba Madengue (served on April 10, 2019)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Hector Reyes (May 1, 2019)	1.80
Review and Analyze Documents Produced by Defendant in Response to Request for Personnel Files, Pay Stubs, and Time Records for Plaintiff Oston Jemba Madengue (served on May 2, 2019) (served on May 15, 2019)	3.20
Review and Analyze Documents Produced by Defendants in Response to Request for Personnel Files, Pay Stubs, and Time Records for Plaintiff Hector Reyes (served on May 30, 2019)	3.50
Draft Plaintiffs' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Goorin Bros, Inc. (served on October 31, 2019)	8.30
Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Goorin Bros., Inc. and Requests for Production of Documents (Organizational Structure; January 16, 2020) (served on October 31, 2019)	4.50
Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Goorin Bros., Inc. and Requests for Production of Documents (Wage and Hour Practices; January 17, 2020) (served on October 31, 2019)	6.10

Draft Plaintiffs' Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant Goorin Bros., Inc. (served on January 26, 2021)	4.30
Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Goorin Bros., Inc. (Confirmatory Discovery; March 26, 2021) (served on January 26, 2021)	2.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency re: Claims of Plaintiff Oston Jemba Madengue for Penalties Under California Labor Code section 2698, <i>et seq.</i> ("PAGA") (served on January 29, 2021)	3.50
Draft Notice to California Labor and Workforce Development Agency re: Claims of Plaintiff Hector Reyes for Penalties Under California Labor Code section 2698, <i>et seq.</i> ("PAGA") (served on January 29, 2021)	2.10
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defense Counsel	28.50
Mediation/Settlement	
Review and Analyze Mediation Documents Produced by Defendant • Employee Handbooks and Policies • Employee Time Records • Employee Payroll Records	36.50
Prepare for Mediation Session, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiffs' Mediation Brief, Preparing PowerPoint Presentation, and Performing Damages and Penalties Analysis/Calculations (submitted on November 30, 2020)	21.50
Attend Mediation Session (December 3, 2020; Zoom Video Conference)	8.50

Review and Consider Declaration of Michael Molina Regarding Payment of Break Premiums and Exhibit A Thereto (dated February 16, 2021)	1.50
Review, Revise, Negotiate, and Finalize Stipulation of Class and PAGA Settlement (fully executed on April 5, 2021)	16.50
Review, Revise, Negotiate, and Finalize First Amended Stipulation of Class and PAGA Settlement (fully executed on July 26, 2021)	3.90
Review, Revise, Negotiate, and Finalize Second Amended Stipulation of Class and PAGA Settlement (fully executed on January 7, 2022)	1.80
Law and Motion	
Meet and Confer with Defense Counsel, and Draft Joint Stipulation to Continue Hearing Date and Deadline for Plaintiffs' Motion for Preliminary Approval; and [Proposed] Order Thereon (submitted on April 15, 2021)	1.50
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on April 21, 2021)	0.10
Draft Plaintiffs' Notice Regarding April 21, 2021 Hearing on Motion for Preliminary Approval of Settlement (filed on April 26, 2021)	0.30
Research and Draft Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Oston Jemba Madengue in Support Thereof, Declaration of Hector Reyes in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on July 28, 2021)	20.50
Review Court's Minute Order and Motion for Preliminary Approval Checklist (filed on August 19, 2021)	0.30

Review Declaration of Noah Levin in Support Thereof, Declaration of Michael Molina in Support Thereof, and Declaration of Eric Springer on Behalf of Simpluris, Inc. (Proposed Settlement Administrator) (filed on January 13, 2022)	2.50
Research, Draft, Review, and/or Revise Plaintiffs' Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Edwin Aiwasian in Support Thereof, Supplemental Declaration of Oston Jemba Madengue in Support Thereof, Supplemental Declaration of Hector Reyes in Support Thereof, and [Revised Proposed] Granting Order Granting Preliminary Approval of Class Action Settlement (filed on January 13, 2022)	12.50
Draft Plaintiffs' Notice of Errata re Supplemental Declaration of Edwin Aiwasian in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on January 31, 2022)	0.50
Review Court's Order Granting Motion for Preliminary Approval of Settlement and Minute Order (filed on January 31, 2022)	0.30
Research, Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Class Representative Service Awards, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Oston Jemba Madengue in Support Thereof, Declaration of Hector Reyes in Support Thereof, and [Proposed] Final Approval Order and Judgment; and Review Declaration of Settlement Administrator in Support Thereof (filed on June 22, 2022)	19.50
Total Hours:	511.90

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Madengue v. Goorin Bros., Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/3/2019	Los Angeles Superior Court	Filing Fee	435.00
7/3/2019	Los Angeles Superior Court	Complex Fee	1,000.00
7/3/2019	Pure Legal, Inc.	Attorney Service	199.50
7/15/2019	Legal Document Server, Inc.	Attorney Service	150.00
8/2/2019	Pure Legal, Inc.	Attorney Service	196.20
8/13/2019	Golden State Overnight	Courier Service	19.18
8/22/2019	Golden State Overnight	Courier Service	19.18
8/22/2019	Legal Document Server, Inc.	Attorney Service	135.00
8/29/2019	Daniel Kramer	Travel Reimbursement	33.60
9/5/2019	Pure Legal, Inc.	Attorney Service	195.90
9/30/2019	Los Angeles Superior Court	Jury Fee	150.00
9/30/2019	Pure Legal, Inc.	Attorney Service	195.90
10/16/2019	Pure Legal, Inc.	Attorney Service	196.50
10/23/2019	Daniel Kramer	Travel Reimbursement	33.60
10/24/2019	Pure Legal, Inc.	Attorney Service	203.40
10/30/2019	Pure Legal, Inc.	Attorney Service	195.90
12/3/2019	Case Anywhere LLC	Attorney Service	172.80
2/14/2020	Los Angeles Superior Court	Filing Fee	20.00
2/19/2020	CourtCall, LLC	Attorney Service	94.00
3/12/2020	Case Anywhere LLC	Attorney Service	132.00
6/3/2020	Case Anywhere LLC	Attorney Service	126.00
6/17/2020	Legal Document Server, Inc.	Attorney Service	110.00
6/18/2020	Los Angeles Superior Court	Filing Fee	20.00
6/25/2020	CourtCall, LLC	Attorney Service	94.00
6/26/2020	CourtCall, LLC	Attorney Service	94.00
7/1/2020	Legal Document Server, Inc.	Attorney Service	175.00
9/3/2020	Case Anywhere LLC	Attorney Service	138.00
11/12/2020	Mark S. Rudy	Mediation Fee	10,000.00
11/27/2020	Codici	Analysis of Sampling of Time Records	3,425.00
12/2/2020	Case Anywhere LLC	Attorney Service	120.00
12/3/2020	John Sliney	Damages Consulting Expert	1,800.00
1/7/2021	Legal Document Server, Inc.	Attorney Service	95.00
1/7/2021	Legal Document Server, Inc.	Attorney Service	110.00
1/15/2021	Legal Document Server, Inc.	Attorney Service	175.00
1/19/2021	Los Angeles Superior Court	Remote Hearing Fee	15.00
2/18/2021	Labor & Workforce Development Agency	Filing Fee	75.00
3/3/2021	Case Anywhere LLC	Attorney Service	156.00
4/16/2021	Los Angeles Superior Court	Filing Fee	20.00
4/16/2021	Legal Document Server, Inc.	Attorney Service	205.70
4/26/2021	Legal Document Server, Inc.	Attorney Service	110.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Madengue v. Goorin Bros., Inc.

6/1/2021	Legal Document Server, Inc.	Attorney Service	95.00
6/1/2021	Legal Document Server, Inc.	Attorney Service	110.00
6/3/2021	Case Anywhere LLC	Attorney Service	132.00
6/8/2021	Legal Document Server, Inc.	Attorney Service	130.70
6/8/2021	Los Angeles Superior Court	Filing Fee	20.00
6/8/2021	Legal Document Server, Inc.	Attorney Service	65.00
6/17/2021	Los Angeles Superior Court	Remote Hearing Fee	15.00
6/22/2021	Los Angeles Superior Court	Document Download Fee	17.40
6/22/2021	Legal Document Server, Inc.	Attorney Service	130.00
7/28/2021	Legal Document Server, Inc.	Attorney Service	244.10
7/28/2021	Los Angeles Superior Court	Filing Fee	60.00
9/2/2021	Case Anywhere LLC	Attorney Service	174.00
12/7/2021	Case Anywhere LLC	Attorney Service	120.00
1/14/2022	Legal Document Server, Inc.	Attorney Service	117.25
1/14/2022	Legal Document Server, Inc.	Attorney Service	15.20
2/1/2022	Legal Document Server, Inc.	Attorney Service	15.20
2/2/2022	Legal Document Server, Inc.	Attorney Service	15.20
3/3/2022	Case Anywhere LLC	Attorney Service	186.00
6/6/2022	Case Anywhere LLC	Attorney Service	120.00
Total:			22,623.41