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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

CHUMANI BROWN, 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;
OSCAR MORALES, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiffs,

vs.

MED ONE GROUP, an unknown business
entity; MED ONE CAPITAL, INC., an
unknown business entity; MED ONE
CAPITAL FUNDING, LLC, an unknown
business; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: RG21095229

Honorable Han Tran
Department 22

CLASS ACTION

**DECLARATION OF TARA ZABEHI IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
COUNSEL FEES AND COSTS, AND
INCENTIVE PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement, Class
Counsel Fees and Costs, and Incentive
Payments; Declaration of Class Representative
(Chumani Brown); Declaration of Class
Representative (Oscar Morales); Declaration of
Settlement Administrator (Lindsay Romo); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Reservation: 156888415351
Date: July 22, 2025
Time: 3:00 p.m.
Department: 22

Complaint Filed: April 6, 2021
FAC Filed: January 23, 2023
SAC Filed: July 15, 2024
Trial Date: None Set

DECLARATION OF TARA ZABEHI

I, Tara Zabehe, 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 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 27, 2025, in Department 22 of the above-entitled Court, the Honorable Brad Seligman preliminarily approved the First Amended Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendants Med One Group, Med One Capital Funding, LLC, and Med One Capital, Inc. (“Defendants” or “Med One”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Chumani Brown and Oscar Morales to represent the Class (“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 Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) as the third-party administrator, to handle the notice and settlement administration process.

3. On or about January 30, 2025, Defendants provided the Settlement Administrator with the Class Data and on or about February 19, 2025, the Settlement Administrator completed processing the Class Data and reported that it had found that there were 112 Class Members who worked a rounded total of 5,794 Workweeks, triggering the escalator clause in the Settlement Agreement. On or around February 21, 2025, Defendants notified the Settlement Administrator that they were electing to increase the Gross Settlement Amount to \$515,317.59, thereby also increasing the Attorneys’ Fees which is 35% of the Gross Settlement Amount.

4. On or around March 4, 2025, the Parties filed a Joint Stipulation to Amend Class

1 Notice and to Continue Deadlines, informing the Court that the escalator clause in the Settlement
2 Agreement had been triggered, revising the Class Notice to reflect the increased Gross Settlement
3 Amount of \$515,317.59 and Attorneys' Fees of \$180,361.26, and seeking approval of the revised
4 Class Notice.

5 5. On or around March 4, 2025, the Honorable Brad Seligman issued an order granting
6 the Joint Stipulation to Amend Class Notice and to Continue Deadlines ("Amendment of Class
7 Notice").

8 6. On or around March 11, 2025, the Class Notice was mailed to all 112 Class
9 Members identified in the Class Data.

10 7. On or around March 19, 2025, Simpluris received Notice that an additional Class
11 Member should be added to the class. Their information was accepted on April 2, 2025 by
12 Defense Counsel and Simpluris mailed Notice to the additional Class Member on April 3, 2025.

13 8. On June 6, 2025, Simpluris was contacted by another individual requesting
14 inclusion in the Class. On June 10, 2025, Defense Counsel provided Simpluris with their
15 employment information and the individual was added as a Class Member. Simpluris mailed
16 Notice to the additional Class Member on June 12, 2025.

17 9. Plaintiffs' Counsel had requested Simpluris to inform them of any requests for
18 inclusion from the onset of the administration but was not informed of the requested inclusion of
19 both Additional Class Members until June 12, 2025.

20 10. On June 12, 2025, Simpluris notified the Parties that with the inclusion of the two
21 Additional Class Members, the total number of Workweeks further increased by 201.89
22 workweeks, there are now 114 Class members, and the total number of Workweeks during this
23 period is 5,996.35.

24 11. On June 13, 2025, Defense Counsel notified Simpluris and Plaintiffs' Counsel that
25 they had conducted an internal audit and concluded that there were no other individuals who were
26 inadvertently excluded from the settlement class.

27 12. On June 13, 2025, the Parties agreed to further increase the Gross Settlement
28 Amount to \$533,272.23 ("Escalated Gross Settlement Amount"), in light of the Escalator Clause

1 being triggered a second time.

2 13. On June 19, 2025, Simpluris was able to get in contact with both Additional Class
3 Members through a phone call. Thereafter, an email was sent to each Additional Class Member
4 including their Notice Packet and requesting they provide written confirmation of their intention
5 to participate in or opt-out of the Settlement. Both Additional Class Members responded via email
6 and confirmed they would like to participate in the Settlement.

7 14. The inclusion of the two Additional Class Members has increased the average
8 estimated Individual Settlement Payment to the Class Members.

9 15. As of the date of filing the accompanying Motion for Final Approval of Class
10 Action Settlement, Class Counsel Fees and Costs, and Incentive Payments (“Motion for Final
11 Approval”), no Class Members have objected to the Class Settlement or the contemplated request
12 for Class Counsel Fees and Costs, Incentive Payments, Settlement Administration Costs, or
13 allocation for the penalties under the Private Attorneys General Act of 2004, California Labor
14 Code section 2698, *et seq.* (“PAGA”).

15 **WORK PERFORMED BY CLASS COUNSEL**

16 16. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged
17 in litigating the above-captioned putative class and PAGA action since prior to its commencement
18 on April 6, 2021.

19 17. Before initiating the action, Lawyers *for* Justice, PC investigated and researched
20 the facts and circumstances underlying the pertinent factual and legal issues and applicable law.
21 This required thorough discussions and interviews between attorneys at our firm and Plaintiffs,
22 and research into the various legal issues involved in the case, namely, the current state of the law
23 as it applied to class certification, off-the-clock theory, misclassification, meal and rest periods,
24 wage-and-hour law and enforcement, PAGA representative claims, Plaintiffs’ claims and
25 allegations, and potential defenses. After conducting initial investigation, our firm determined
26 that the claims of Plaintiffs were well-suited for class-wide and representative adjudication owing
27 to what appeared to be a common course of conduct affecting a similarly situated group of hourly-
28 paid or non-exempt employees and salaried customer relations specialist employees who worked

1 for Defendants within the State of California, who were not properly compensated for, *inter alia*,
2 all hours worked, non-compliant meal and rest periods, and business expenses.

3 18. Class Counsel investigated the veracity, strength, and scope of the claims, and was
4 preparing the matter for class certification and trial prior to reaching the Settlement. The parties
5 conducted significant investigation and formal and informal discovery regarding the facts of the
6 case, exchanging a large volume of documents, information, and data in the course of litigation
7 and in connection with mediation and settlement negotiations. Class Counsel served written
8 discovery requests (specifically, Special Interrogatories (Sets One)) and reviewed Defendants'
9 responses thereto. Class Counsel also reviewed and analyzed a large volume of information,
10 documents, and data obtained from Plaintiffs, Defendants, and other sources. The information,
11 documents, and data reviewed and analyzed by Class Counsel included, and were not limited to,
12 Plaintiffs' personnel records (including records of requests for business expense reimbursement,
13 mileage logs, mileage reimbursement requests, authorization for background investigation, and
14 paystubs, among other information and documents), wage and earnings statements for Plaintiff
15 and redacted wage statements and paystubs for a sampling of Class Members, job descriptions,
16 salary information for various positions at Defendants' locations, timesheets, meal and break
17 information, and overtime information for a sampling of Class Members, Defendants' Meal
18 Period Waiver Agreement, multiple iterations of the Med One Group Employee Handbook,
19 Defendants' policies regarding paid time off, paid holidays, and various forms of leave,
20 Defendants' procedures, including clocking in or out for a shift, payment of overtime, and regular
21 pay periods, Defendants' stated policies regarding appearance and attendance expectations,
22 among other policies and procedures and documents. Plaintiffs' Counsel interviewed Plaintiffs
23 and conducted investigations to gather facts and circumstances surrounding Plaintiffs and
24 putative class members' employment and to identify potential witnesses. Class Counsel
25 researched applicable law, developed liability, damages, and penalties valuation models in
26 connection with mediation and settlement negotiations, and met and conferred with Defendants'
27 counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management,
28 discovery, and the production of information, documents, and data in the course of litigation as

well as mediation and settlement negotiations. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising pleadings and the mediation brief; drafting formal discovery; preparing and appearing for court proceedings; and preparing for and attending mediation and settlement negotiations.

19. The Parties have conducted significant investigation and discovery during the course of litigating the case and in connection with mediation and settlement negotiations, and Class Counsel analyzed a volume of information, documents, and data obtained from Plaintiffs, Defendants, and other sources. The information, documents, and data provided a critical understanding of the nature of the work performed by the Class Members and PAGA Members, as well as Defendants' 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, off-the-clock theory, misclassification, meal and rest periods, PAGA representative claims, wage-and-hour law and enforcement, Plaintiffs' claims and damages, and Defendants' defenses thereto.

20. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve the entire matter. These efforts included participating in a formal, full-day mediation conducted by Jeffrey Krivis, Esq. (the "Mediator"), a well-regarded mediator experienced in mediating complex labor and employment matters. During all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and settlement negotiations, the parties exchanged information and data, and discussed all aspects of the case, including and not limited to, the risks and delays of further litigation, the risks to the Parties of proceeding with class certification and/or representative adjudication, the law relating to off-the-clock theory and misclassification, meal and rest periods, PAGA representative actions, and wage-and-hour law and enforcement, as well as the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a

1 settlement that was acceptable to the parties was not easy. Defendants contended that
2 individualized questions of fact predominate over any common issues and that these issues would
3 pose challenges to certification and representative adjudication. Defendants and its counsel felt
4 very strongly about Defendants' ability to prevail on the merits and to avoid class certification
5 and representative adjudication. Meanwhile, Plaintiffs and Class Counsel disagreed with these
6 contentions and believed that they would be able to obtain class certification and prevail at trial.
7 With the aid of the Mediator's evaluation, the parties agreed that the case was well-suited for
8 settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and
9 risks to the parties that would attend further litigation. These risks of further litigation include,
10 and are not limited to, a determination that the claims are unsuitable for class treatment and/or
11 representative adjudication, class de-certification after certification of a class, allowing a jury to
12 decide the claims asserted in the case, and the real possibility of no monetary recovery after years
13 of litigation.

14 21. By way of the accompanying Motion for Final Approval, Class Counsel seeks
15 attorneys' fees in the amount of \$186,645.28, which is thirty-five percent (35%) of the Escalated
16 Gross Settlement Amount of \$533,272.23, as set forth in the Settlement Agreement and the Class
17 Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs and
18 Class Counsel, Plaintiffs have agreed to contingency fees of at least thirty-five percent (35%) of
19 the recovery.

20 22. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
21 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
22 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
23 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
24 has achieved; and (6) the other cases that Class Counsel has turned down in order to devote its
25 time and efforts to this matter. The nature of the work performed, skill exercised, and the outcome
26 in this matter support the percentage fee sought and the application of a lodestar multiplier. An
27 outstanding monetary recovery has been obtained in this matter, involving an *Escalated Gross*
28 *Settlement Amount of \$533,272.23* (with a Net Settlement Amount of at least approximately

1 \$214,187.05 to be paid to Settlement Class Members with an average payment of at least
2 approximately \$1,912.38 per Settlement Class Member, a payment of \$25,000.00 to PAGA
3 Members with an average payment of \$223.21 per PAGA Member, and payment of \$75,000.00
4 to the State of California).

5 23. While not necessarily required to be demonstrated because the percentage fee is
6 proper for this settlement, Class Counsel has incurred many hours of work in connection with
7 prosecuting the case such that the award of attorneys' fees is also justified under a simple lodestar
8 analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **311.10 hours** performing
9 tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney
10 Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys
11 at Lawyers *for* Justice, PC and the time incurred in performing those services. These hours
12 include work done by myself and several other attorneys at Lawyers *for* Justice, PC. Additionally,
13 separate from the hours referenced herein, Lawyers *for* Justice, PC had litigation support
14 personnel actively engaged in assisting with the prosecution of this matter.

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

16 ***EDUCATION***

17 24. I am an attorney duly licensed to practice before all courts of the State of California
18 and I am an attorney at Lawyers *for* Justice, PC. In May of 2016, I graduated from Pepperdine
19 University School of Law with a Juris Doctorate degree. I have extensive formal training in
20 dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its
21 Certificate in Dispute Resolution program. In June of 2013, I obtained a Bachelor of Arts degree
22 in History and graduated with college honors from University of California, Los Angeles. From
23 approximately August 2014 to approximately November 2014, I served as a Judicial Extern to
24 the Honorable James Kaddo of the Los Angeles Superior Court. In 2017, I obtained a license to
25 practice law from the California State Bar. Since 2017, I have worked at Lawyers *for* Justice, PC
26 and my practice has almost exclusively focused on the prosecution of employment class actions
27 and representative actions. At Lawyers *for* Justice, PC, I have worked on many wage-and-hour
28 class action and representative action cases, taking the lead in taking and defending depositions,

1 arguing motions, attending mediations, and preparing for trial. I have played an integral role in
2 preparing matters for class certification, including and not limited to, successful certification of a
3 class in *Davis v. Superior Med Surgical, Inc.* (San Bernardino County Superior Court Case No.
4 CIVDS1505744), *Tellez v. Harvest Container Co., Inc.* (Tulare County Superior Court Case No.
5 VCU64528), *Vilitchai v. Ametek Programmable Power, Inc., et al.* (San Diego County Superior
6 Court Case No. 37-2015-00025968-CU-OE-CTL), and *Sanchez, et al. v. Auto-Chlor System of*
7 *Washington, Inc.* (Los Angeles County Superior Court Case No. BC707670). I have worked on
8 over two hundred fifty (250) class action or representative action cases which have resulted in
9 settlement.

10 ***LITIGATION AND CLASS ACTION EXPERIENCE***

11 25. Since its inception, in or around October of 2008, Lawyers for Justice, PC has
12 almost exclusively focused on the prosecution of consumer and employment class actions,
13 involving wage-and-hour claims, race discrimination, unfair business practices or consumer
14 fraud. Currently, Lawyers for Justice, PC is the attorney of record in well over a dozen
15 employment-related putative class actions in both state and federal courts in the State of
16 California. Lawyers for Justice, PC has successfully litigated cases involving the executive,
17 administrative, and other overtime exemptions to the State of California and federal overtime
18 compensation requirements. During this relatively short time, in association with other law firms,
19 Lawyers for Justice, PC has recovered millions of dollars on behalf of thousands of individuals
20 in California.

21 ***EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND*** 22 ***REPRESENTATIVE ACTION CASES***

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

25 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against a major property management company involving allegations
27 of misclassification of various “manager” positions. On September 20, 2010, the court granted
28

1 final approval of the class action settlement. The Los Angeles County Superior Court Case
2 Number is BC400414.

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

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

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

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

23 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
24 wage-and-hour class and PAGA representative action against a national wholesale distributor of
25 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
26 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
27 representative action settlement. The Sacramento County Superior Court Case Number is 34-
28 2012-00136285.

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

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

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

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

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

27 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class action against a national retailer of apparel, accessories, and home products,

1 involving allegations of misclassification of the “Department Manager” position. On August 12,
2 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
3 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
4 County Superior Court Case Number is RG13680477.

5 m) LFJ represented the plaintiff in a PAGA representative action, against a real
6 estate and property management company, on behalf of non-exempt employees. On November
7 4, 2016, the court granted approval of the PAGA representative action settlement. The Orange
8 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

18 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
19 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
20 the employer’s motion to compel arbitration, which resulted in a published opinion by the
21 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
22 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
23 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
24 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
25 5046.

26 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a consumer packaging company,
28 on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the

1 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
2 Number is BC590429.

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

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

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

18 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
19 representative action against a food company on behalf of non-exempt employees. On June 30,
20 2017, the court granted final approval of the class and PAGA representative action settlement.
21 The Sacramento County Superior Court Case Number is 34-2015-00175871.

22 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
23 representative action against a chocolate company on behalf of non-exempt employees. On July
24 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
25 The Alameda County Superior Court Case Number is RG15764300.

26 w) LFJ represented the plaintiff in a PAGA representative action, against the
27 parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On
28

1 October 18, 2017, the court granted approval of the PAGA representative action settlement. The
2 Los Angeles County Superior Court Case Number is BC569664.

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

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

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

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

24 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
25 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
26 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.
27 The Tulare County Superior Court Case Number is VCU264528.
28

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

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

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

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

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

hh) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class and PAGA representative action against a medical equipment supplier on

1 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
2 for class certification and certified a class. The San Bernardino County Superior Court Case
3 Number is CIVDS1505744.

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

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

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

23 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class action against manufacturer and supplier of power products and services on
25 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
26 motion for class certification and certified a class. On August 27, 2021, the court granted final
27 approval of the class action settlement. The San Diego County Superior Court Case Number is
28 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 plaintiffs in a wage-and-hour class action against a manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The Los Angeles County Superior Court Case Number is BC707670.

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

27. 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 seeks reimbursement of \$11,516.90 in litigation costs and expenses incurred in this case, as reflected in "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement.

INCENTIVE PAYMENTS TO PLAINTIFFS

28. In recognition of their efforts and work in the case and serving as the Class Representatives, the Settlement provides for Incentive Payments in the amount of \$7,500.00 each to Plaintiffs Chumani Brown and Oscar Morales. The requested Incentive 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 their attorneys needed them and actively tried to obtain and provide information that would facilitate the pursuit of the class and PAGA claims. Plaintiffs spent numerous hours speaking with their attorneys about their claims, describing their work experiences with Defendants, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs to receive \$7,500.00 each as a reasonable Incentive Payment for their services on behalf of the Class, PAGA Members, and the State of California, in addition to their individual settlement payment.

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

San Felipe

Tara Zabehi

EXHIBIT A

CHUMANI BROWN, ET AL. V. MED ONE GROUP, ET AL.
Alameda Superior Court Case No. RG21095229

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Chumani Brown (“Plaintiff Brown”) during the Case [6 hours consulting with LFJ + 15 hours meeting with attorneys at LFJ + 14 additional hours speaking with attorneys at LFJ + 6.5 hours reviewing the settlement agreement + 5.4 hour asking questions about the settlement = 46.9 hours / service payment = \$7,500]	46.90
Meet and Communicate with Plaintiff Oscar Morales (“Plaintiff Morales”) during the Case [5 hours consulting with LFJ + 4 hours meeting with attorneys at LFJ + 6 additional hours speaking with attorneys at LFJ + 2 hours reviewing the settlement agreement + 1 hour asking questions about the settlement = 18 hours / service payment = \$7,500]	18.40
Investigate, Meet, Communicate with, and/or Interview Class Members, Aggrieved Employees and Percipient Witnesses	11.10
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Brown’s Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff Brown’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on April 6, 2021)	7.10
Review Court’s Notice of Assignment (filed on April 21, 2021)	0.10

Review Court's Notice of Case Management Conference and Order (filed on April 22, 2021)	0.10
Review and Analyze Defendant Med One Capital Funding, LLC's Answer to Plaintiff Brown's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (served on June 4, 2021), and Research Affirmative Defenses in Defendant's Answer	2.60
Review Court's Tentative Ruling on Defendant Med One Capital Funding, LLC's Motion to Transfer Venue (filed on July 7, 2021)	0.10
Review Court's Minute Order Re: Motion for Change of Venue Denied (filed on July 8, 2021)	0.10
Review Court's Order Re: Motion for Change of Venue Denied (filed on July 8, 2021)	0.10
Review Court's Notice of Case Management Conference and Order (Amended) (filed on September 16, 2021)	0.10
Draft Plaintiff Brown's Case Management Statement (filed on March 4, 2022)	0.30
Review Court's Minute Order Re: Initial Case Management Conference (filed on March 21, 2022)	0.10
Review Court's Order Re: Initial Case Management Conference (filed March 21, 2022)	0.10
Draft Plaintiff's Case Management Statement (filed on May 5, 2022)	0.20
Review Court's Minute Order Re: Compliance Hearing (filed on May 11, 2022)	0.10
Review Court's Order Re: Compliance Hearing (filed on May 11, 2022)	0.10
Draft Plaintiff's Case Management Statement (filed on September 20, 2022)	0.10
Review Court's Tentative Ruling Re: Case Management (filed on September 26, 2022)	0.10

Review Court's Minute Order Re: Compliance Hearing (filed September 26, 2022)	0.10
Review Court's Order Re: Case Management (filed September 26, 2022)	0.10
Review Court's Amended Minute Order Re: Compliance Hearing (filed September 26, 2022)	0.10
Review Court's Amended Order Re: Case Management (filed September 26, 2022)	0.10
Draft Plaintiff Brown's Case Management Statement (filed on November 23, 2022)	0.20
Review Court's Tentative Ruling Re: Compliance Hearing (filed on December 6, 2022)	0.10
Review Court's Minute Order Re: Compliance Hearing (filed on December 7, 2022)	0.10
Review Court's Order Re: Compliance Hearing (filed on December 7, 2022)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order Thereon (filed on December 7, 2022)	0.80
Review Court's Order Re: Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint (filed December 11, 2022)	0.20
Research and Draft Plaintiff Brown's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on January 23, 2023)	3.80
Review Defendant Med One Capital Funding, LLC's Answer to Plaintiff Chumani Brown's First Amended Class Action Complaint (served on February 22, 2023)	1.90
Review Defendant Med One Capital Funding, LLC's Substitution of Attorney (served on May 11, 2023)	0.10
Review Court's Notice of Case Rescheduling or Relocation (filed on May 22, 2023)	0.10

Review Court's Tentative Ruling Re: Case Management Conference (filed on June 5, 2023)	0.10
Draft Plaintiff Brown's Case Management Statement (filed on June 6, 2023)	0.20
Review Defendants' Notice of Remote Appearance (served on June 9, 2023)	0.10
Review Court's Minute Order Re: Case Management (filed on June 12, 2023)	0.20
Review Court's Order Re: Case Management (filed on June 12, 2023)	0.20
Draft Plaintiff Brown's Notice of Settlement of Entire Case (filed on June 26, 2023)	0.20
Review Defendant Med One Capital Funding, LLC's Substitution of Attorney (served on July 31, 2023)	0.10
Review Court's Tentative Ruling Re: Other Motion for Preliminary Approval (filed on October 10, 2023)	0.10
Review Defendants' Notice of Remote Appearance (served on October 11, 2023)	0.10
Review Defendants' Notice of Remote Appearance (served on October 11, 2023)	0.10
Review Court's Minute Order Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on October 12, 2023)	0.10
Review Court's Order Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on October 12, 2023)	0.10
Draft Plaintiff Brown's Case Management Statement (filed on October 19, 2023)	0.10
Review Court's Order Re: Remote Appearance (filed on October 24, 2023)	0.10
Review Court's Order Re: Remote Appearance (filed on October 24, 2023)	0.10

Review Court's Tentative Ruling Re: Compliance Hearing re: Dismissal (filed on October 24, 2023)	0.10
Review Court's Minute Order Re: Compliance Hearing re: Dismissal (filed on October 25, 2023)	0.10
Review Court's Order Re: Case Management (filed on October 25, 2023)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Hearing on Plaintiff Brown's Motion for Preliminary Approval of Class Action Settlement, and Deadline to File Supplemental Papers in Support Thereof; [Proposed] Order Thereon (filed on October 30, 2023)	0.40
Draft Plaintiff Brown's Case Management Statement (filed on November 3, 2023)	0.10
Review Court's Order Re: Joint Stipulation to Continue Hearing on Plaintiff Brown's Motion for Preliminary Approval of Class Action Settlement, and Deadline to File Supplemental Papers in Support Thereof (filed on November 6, 2023)	0.30
Draft Plaintiff's Notice of Entry of Judgement or Order (filed on November 6, 2023)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement (filed on November 28, 2023)	0.30
Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on December 4, 2023)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (filed on December 4, 2023)	0.10
Review Court's Minute Order Re: Case Management Conference; Hearing on Motion – Other Motion for Preliminary Approval (filed on December 5, 2023)	0.10
Review Court's Order Re: Case Management Conference; Hearing on Motion – Other Motion for Preliminary Approval (filed on December 5, 2023)	0.10

Review Court's Notice of Case Rescheduling or Relocation (filed on December 15, 2023)	0.10
Review Court's Notice of Case Rescheduling or Relocation (filed on December 15, 2023)	0.10
Review Court's Notice of Case Rescheduling or Relocation (filed on December 20, 2023)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff Brown's Hearing and Deadline to File Supplemental Papers in Support of Plaintiff's Motion for Preliminary Approval; [Proposed] Order Thereon (filed on January 3, 2024)	0.30
Review Court's Tentative Ruling Re: Case Management Conference (filed on January 3, 2024)	0.10
Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on January 4, 2024)	0.10
Review Court's Minute Order Re: Case Management Conference; Hearing on Motion – Other Motion for Preliminary Approval (filed on January 9, 2024)	0.10
Review Court's Order Re: Case Management Conference; Hearing on Motion – Other Motion for Preliminary Approval (filed on January 9, 2024)	0.10
Draft Plaintiff Brown's Case Management Statement (filed on January 23, 2024)	0.20
Review Defendant Med One Capital Funding, LLC's Case Management Statement (served on January 23, 2024)	0.10
Review Court's Notice of Case Reassignment (filed on January 25, 2024)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (filed on January 25, 2024)	0.10
Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on January 25, 2024)	0.10

Review Court's Minute Order Re: Case Management Conference; Hearing on Motion – Other Motion for Preliminary Approval (filed on January 30, 2024)	0.10
Review Court's Order Re: Case Management Conference; Hearing on Motion – Other Motion for Preliminary Approval (filed on January 30, 2024)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Status Conference Statement (filed on February 9, 2024)	0.20
Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on February 14, 2024)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (filed on February 15, 2024)	0.10
Review Court's Minute Order Re: Case Management Conference; Hearing on Motion – Other Motion for Preliminary Approval (filed on February 20, 2024)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Conference Statement (filed on April 16, 2024)	0.30
Review Court's Tentative Ruling Re: Case Management Conference (filed on April 18, 2024)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on April 23, 2024)	0.10
Review Court's Order Re: Case Management Conference (filed on April 23, 2024)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (filed on June 17, 2024)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Conference Statement (filed on June 17, 2024)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on June 25, 2024)	0.10

Review Court's Order Re: Case Management Conference (filed on June 25, 2024)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and [Proposed] Order Granting Plaintiff's Leave to File [Proposed] Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on July 10, 2024)	3.30
Review Court's Order Re: Joint Stipulation and [Proposed] Order Granting Plaintiff's Leave to File [Proposed] Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on July 12, 2024)	0.20
Investigate the Merits of Plaintiff Morales's Claims, Legal Research and Analysis of All Claims Involved, and Draft Plaintiffs' Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on July 15, 2024)	5.60
Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on July 17, 2024)	0.10
Review Defendants' Case Management Statement (served on July 30, 2024)	0.10
Draft Plaintiffs' Case Management Statement (filed on July 30, 2024)	0.20
Review Defendants' Answer to Plaintiffs' Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (served on August 13, 2024)	1.30
Review Court's Tentative Ruling Re: Case Management Conference (filed on August 15, 2024)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on August 20, 2024)	0.10
Review Court's Order Re: Case Management Conference (filed on August 20, 2024)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (filed on October 15, 2024)	0.10

Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval of Settlement (filed on October 15, 2024)	0.10
Review Court's Minute Order Re: Case Management Conference; Hearing on Motion – Other Motion for Preliminary Approval of Settlement (filed on October 22, 2024)	0.10
Review Court's Order Re: Case Management Conference; Hearing on Motion – Other Motion for Preliminary Approval of Settlement (filed on October 22, 2024)	0.10
Review Defendants' Case Management Statement (served on November 7, 2024)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (filed on November 21, 2024)	0.10
Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval of Settlement (filed on November 21, 2024)	0.10
Review Court's Minute Order Re: Case Management Conference; Hearing on Motion – Other Motion for Preliminary Approval of Settlement (filed on November 22, 2024)	0.10
Review Court's Order Re: Case Management Conference; Hearing on Motion – Other Motion for Preliminary Approval of Settlement (filed on November 22, 2024)	0.10
Review Court's Notice of Case Rescheduling or Relocation (filed on December 17, 2024)	0.10
Draft Plaintiffs' Notice of Change of Address (filed on December 18, 2024)	0.10
Review Court's Tentative Ruling Re: Non-Appearance Case Review (filed on January 17, 2025)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review (filed on January 24, 2025)	0.10
Review Court's Order Re: Non-Appearance Case Review (filed on January 24, 2025)	0.10

Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Amend Class Notice and to Continue Deadlines; [Proposed] Order Thereon (filed March 4, 2025)	2.20
Review Court's Order Granting Joint Stipulation to Amend Class Notice and to Continue Deadlines (filed on March 4, 2025)	0.20
Draft Plaintiff's Notice of Entry of Judgement or Order (filed March 5, 2025)	0.10
Review Defendants' Notice of Unavailability of Counsel (served on May 12, 2025)	0.10
Appearances	
Prepare for and Telephonically Attend Hearing on Defendant Med One Capital Funding, LLC's Motion to Transfer Venue (July 8, 2021)	1.00
Prepare for and Telephonically Attend Case Management Conference (March 21, 2022)	0.50
Prepare for and Telephonically Attend Case Management Conference (August 20, 2024)	1.10
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (November 15, 2024)	2.80
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement (July 22, 2025) (Anticipated)	3.10
Discovery and Deposition	
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Brown (served on September 25, 2020)	1.10
Draft Follow-Up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Brown (served on November 23, 2020)	0.50

Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Brown (served on December 30, 2020)	0.80
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Brown	2.10
Draft Plaintiff Brown's Special Interrogatories (Set One) to Defendant Med One Group (served on March 20, 2024)	1.10
Draft Plaintiff Brown's Special Interrogatories (Set One) to Defendant Med One Capital, Inc. (served on March 20, 2024)	0.30
Draft Plaintiff Brown's Special Interrogatories (Set One) to Defendant Med One Capital Funding, LLC (served on March 20, 2024)	0.30
Review Defendant Med One Group's Responses to Plaintiff Chumani Brown's Special Interrogatories (Set One) (served on April 23, 2024)	0.60
Review Defendant Med One Capital, Inc.'s Responses to Plaintiff Chumani Brown's Special Interrogatories (Set One) (served on April 23, 2024)	0.60
Review Defendant Med One Funding, LLC.'s Responses to Plaintiff Chumani Brown's Special Interrogatories (Set One) (served on April 23, 2024)	0.60
Letters and Correspondence	
Draft Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff Chumani Brown under the Private Attorneys General Act (served on January 28, 2021)	2.20
Draft Correspondence to, and Respond to Correspondence from, Defense Counsel	12.60
Mediation/Settlement	

Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	32.60
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages Analysis/Calculations (submitted on February 3, 2022)	16.30
Attend Mediation Session (February 9, 2022; Zoom)	12.10
Review and Analyze Mediator's Proposal	1.60
Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement (executed on February 6, 2023), and Draft Notice of Class Action Settlement	16.20
Review, Revise, Negotiate, and Finalize First Amended Stipulation of Class Action and PAGA Settlement (executed on September 6, 2024)	4.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	5.70
Law and Motion	
Review Defendant Med One Capital Funding, LLC's Notice of Motion and Motion to Transfer Venue; Memorandum of Points and Authorities in Support Thereof, Declaration of Grady Brown in Support Thereof, Request for Judicial Notice in Support Thereof, and [Proposed] Order Granting Defendant's Motion to Transfer Venue (served on June 4, 2021)	3.20
Research and Draft Plaintiff Brown's Opposition to Defendant Med One Capital Funding, LLC's Motion to Transfer Venue and Declaration of Tara Zabehe in Support Thereof (filed on June 24, 2021)	3.90

Review Defendant Med One Capital Funding, LLC's Reply to Plaintiff's Opposition to Defendant's Motion to Transfer Venue; Memorandum of Points and Authorities in Support Thereof (served on June 29, 2021)	0.70
Research and Draft Plaintiff Brown's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Chumani Brown in Support Thereof, Declaration of Annabel Blanchard in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on August 2, 2023)	14.30
Draft Plaintiff Brown's Supplemental Declaration of Annabel Blanchard in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on November 28, 2023)	11.10
Review Defendants' Declaration of Katherine C. Den Bleyker in Support of Plaintiff's Motion for Preliminary Approval (filed on November 28, 2023)	0.30
Draft Plaintiff Brown's Declaration of Yasmin Hosseini in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement and [Further Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on January 23, 2024)	3.40
Review Defendants' Declaration of Katherine C. Den Bleyker in Support of Plaintiffs' Motion for Preliminary Approval of Class Action (served on February 6, 2024)	1.40
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Chumani Brown in Support Thereof, Declaration of Oscar Morales in Support Thereof, Declaration of Tara Zabehi in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on September 30, 2024)	8.20
Research and Draft Plaintiffs' Supplemental Declaration of Tara Zabehi in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on November 15, 2024)	2.40

Draft Plaintiffs' Declaration of Brian J. St. John in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on January 7, 2025)	3.10
Draft Plaintiffs' [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on January 24, 2025)	0.30
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on January 27, 2025)	0.20
Draft Plaintiffs' Notice of Entry of Judgement or Order (filed on January 28, 2025)	0.10
Research and Draft Plaintiff's Notice of Motion and Motion for Final Approval of Class Action Settlement, Declaration of Chumani Brown in Support Thereof, Declaration of Oscar Morales in Support Thereof, Declaration of Tara Zabehi in Support Thereof, and [Proposed] Final Approval Order and Judgment; and Review Declaration of Settlement Administrator in Support Thereof (filed on June 27, 2025)(Anticipated)	20.30
Total Hours:	311.10

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Brown vs. Med One Group, et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/24/2020	U.S. Postmaster	Postage	\$7.00
11/23/2020	U.S. Postmaster	Postage	\$7.00
12/31/2020	U.S. Postmaster	Postage	\$7.10
1/28/2021	U.S. Postmaster	Postage	\$14.32
1/28/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
4/8/2021	Legal Document Server, Inc.	Attorney Service	\$165.23
4/8/2021	Alameda Superior Court	Complaint Filing Fee	\$435.00
5/7/2021	Legal Document Server, Inc.	Attorney Service	\$220.00
5/17/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
5/18/2021	Legal Document Server, Inc.	Attorney Service	\$60.00
5/19/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
6/18/2021	First Mediation Corporation	Mediation Fee	\$8,000.00
6/24/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
6/24/2021	General Logistics Systems US, Inc.	Courier Service	\$20.28
9/22/2021	One Legal	Attorney Service	\$69.49
1/31/2022	San Bernardino Superior Court	Document Download Fee	\$35.00
3/7/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
4/5/2022	Alameda Superior Court	Document Download Fee	\$2.00
5/5/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
9/20/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
11/23/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
12/7/2022	Legal Document Server, Inc.	Attorney Service	\$77.43
12/7/2022	Alameda Superior Court	Complaint Filing Fee	\$435.00
1/24/2023	Legal Document Server, Inc.	Attorney Service	\$11.75
1/25/2023	Legal Document Server, Inc.	Attorney Service	\$18.70
6/7/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
6/27/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
8/3/2023	Legal Document Server, Inc.	Attorney Service	\$250.82
8/3/2023	Alameda Superior Court	Attorney Service	\$60.00
10/19/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
10/31/2023	Legal Document Server, Inc.	Attorney Service	\$20.29
10/31/2023	Alameda Superior Court	Stipulation & Order Fee	\$20.00
11/1/2023	Alameda Superior Court	Document Download Fee	\$1.00
11/3/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
11/6/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
11/28/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
11/29/2023	Legal Document Server, Inc.	Attorney Service	\$37.80
1/3/2024	Legal Document Server, Inc.	Attorney Service	\$20.29
1/3/2024	Alameda Superior Court	Stipulation & Order Fee	\$20.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Brown vs. Med One Group, et al.

1/23/2024	Alameda Superior Court	Document Download Fee	\$2.00
1/24/2024	Legal Document Server, Inc.	Attorney Service	\$37.80
2/20/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
3/20/2024	General Logistics Systems US, Inc.	Courier Service	\$20.15
4/17/2024	Legal Document Server, Inc.	Attorney Service	\$173.90
6/17/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
7/11/2024	Legal Document Server, Inc.	Attorney Service	\$20.29
7/16/2024	Legal Document Server, Inc.	Attorney Service	\$37.80
7/18/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
7/30/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
8/22/2024	Alameda Superior Court	Document Download Fee	\$6.00
10/1/2024	Legal Document Server, Inc.	Attorney Service	\$221.00
10/7/2024	Legal Document Server, Inc.	Attorney Service	\$24.62
10/7/2024	Alameda Superior Court	Motion Fee	\$60.00
11/20/2024	Legal Document Server, Inc.	Attorney Service	\$20.45
12/18/2024	Legal Document Server, Inc.	Attorney Service	\$20.45
1/9/2025	Legal Document Server, Inc.	Attorney Service	\$21.45
1/21/2025	Alameda Superior Court	Document Download Fee	\$1.00
1/27/2025	Legal Document Server, Inc.	Attorney Service	\$21.45
1/29/2025	Legal Document Server, Inc.	Attorney Service	\$21.45
3/4/2025	Legal Document Server, Inc.	Attorney Service	\$22.84
3/4/2025	Alameda Superior Court	Stipulation & Order Fee	\$20.00
3/6/2025	Legal Document Server, Inc.	Attorney Service	\$21.45
Total:			<u>\$11,516.90</u>