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Attorneys for Plaintiff Kailie Fagen and the Class

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

VERONICA BERNAL, individually, and on behalf of other members of the general public similarly situated; KAILIE FAGEN, 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.

A&E FAGEN, INC., a California corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. BC712866

Honorable Kenneth R. Freeman
Department SSC14

CLASS ACTION

**DECLARATION OF YASMIN HOSSEINI
IN SUPPORT OF PLAINTIFF’S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS’
FEES AND COSTS, AND
ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Payment; Declaration of Class Representative (Kailie Fagen); Declaration of Settlement Administrator (Taylor Mitzner); and [Proposed] Final Approval Order and Judgment filed concurrently herein]

Date: February 4, 2025
Time: 11:00 a.m.
Department: SSC14

Complaint Filed: July 5, 2018
FAC Filed: May 19, 2022
Trial Date: None Set

DECLARATION OF YASMIN HOSSEINI

I, Yasmin Hosseini, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Kailie Fagen (“Plaintiff”) and the Class in the above-captioned matter. 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 September 3, 2024, in Department SSC14 of the above-entitled Court, the Honorable Kenneth R. Freeman preliminarily approved the Amended Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”), entered into between Plaintiff and Defendant A&E Fagen, Inc. (“Defendant”) (together with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Kailie Fagen as the representative of the Class (“Class Representative”). 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 Phoenix Settlement Administrators (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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

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WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned action (“Action”) since prior to its commencement on July 5, 2018.

5. Before initiating the case, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and former plaintiffs Veronica Bernal and Franchessca Alvarez-Reyes (together, “Former Plaintiffs”) and Plaintiff, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour law and enforcement, Former Plaintiffs’ and Plaintiff’s claims and allegations, and potential defenses. After conducting initial investigation, Lawyers *for* Justice, PC determined that the claims of Former Plaintiffs were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses.

6. Class Counsel conducted significant investigation and formal and informal discovery into the facts of the case, to assess the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial prior to reaching the Settlement. The Parties exchanged a large volume of pages of information, documents, and data throughout the course of litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Former Plaintiffs, Plaintiff, and percipient witnesses, and reviewed and analyzed a volume of information, documents, and data obtained from Former Plaintiffs, Plaintiff, Defendant, and other sources. Class Counsel propounded Form Interrogatories – General (Set One), Special Interrogatories (Sets One and Two), and Requests for Production of Documents (Set One) onto Defendant and former defendant Whittier Grocery Outlet (“Former Defendant”), and served multiple notices of deposition of Former Defendant’s and Defendant’s Person Most Knowledgeable designees, along with

1 accompanying requests for production of documents. The volume of information, documents,
2 and data that Class Counsel reviewed and analyzed included and was not limited to: Plaintiff's
3 and other Class Members' employment records, a detailed sampling of Class Members' time data
4 and pay records, Defendant's Employee Handbook, Defendant's operations and employment
5 practices, forms, procedures, and policies (including, but not limited to, Defendant's policies
6 regarding Full-Time/Part-Time and Temporary Status, Paydays and Distribution of Paychecks,
7 Hours of Work/Work Schedules, Breaks/Lunches, Overtime, Recording Time Worked,
8 Attendance, Dress Code, and Lunch Room and Lockers), among other information and
9 documents. Class Counsel also developed liability, damages, violation, and penalties valuation
10 models in the course of litigation and in connection with mediation and settlement negotiations
11 and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues
12 relating to the pleadings, discovery, and the production of information, documents, and data in
13 the course of litigation and in connection with the mediation and settlement negotiations. Other
14 work performed by Class Counsel included, and was not limited to, case strategy and analysis;
15 drafting, reviewing, and revising pleadings, motion-related papers, mediation brief, and
16 settlement-related papers; and preparing for court proceedings, mediation and settlement
17 negotiations, among other tasks.

18 7. As outlined herein, the Parties have conducted significant investigation and formal
19 and informal discovery during the course of litigating the case, the mediation, and extensive
20 settlement negotiations. Class Counsel analyzed a large volume of pages of information,
21 documents, and data obtained from Former Plaintiffs, Plaintiff, Defendant, and other sources that
22 provided a critical understanding of the nature of the work performed by Class Members and
23 PAGA Employees, as well as Defendant's operations and employment policies, practices, and
24 procedures. Class Counsel also conducted formal written discovery and noticed the depositions
25 of Former Defendant's and Defendant's Persons Most Knowledgeable designees. The
26 information, documents, and data were used in analyzing liability, damages, penalties, and other
27 valuation issues in connection with all phases of the litigation, and ultimately, in connection with
28 the mediation and settlement negotiation process. Class Counsel also performed significant

1 research regarding applicable law, which is evolving as it relates to class certification,
2 manageability, off-the-clock theory, meal and rest periods, representative PAGA claims and
3 penalties, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and
4 Defendant's defenses thereto, as well as facts discovered.

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

1 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
2 attorneys' fees in the amount of \$64,166.67, which is one-third (1/3) of the Total Settlement
3 Amount of \$192,500.00. Pursuant to the contingency-fee agreement entered into by and between
4 Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least one-third (1/3) of
5 the recovery.

6 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
7 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
8 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
9 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
10 has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to
11 devote its time and efforts to this matter.

12 11. While not necessarily required to be demonstrated because the percentage fee is
13 proper for this settlement, Class Counsel has incurred many hours of work in connection with
14 prosecuting the case such that the award of attorneys' fees is also justified under a lodestar
15 analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **327.10 hours** performing
16 tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney
17 Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys
18 at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These
19 hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the
20 hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel
21 actively engaged in assisting with the prosecution of this matter.

22 12. The work performed in this particular matter, the background of Lawyers *for*
23 Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who
24 worked on this matter, in litigating complex wage-and-hour actions, and in particular,
25 employment class action and representative action cases, support a reasonable blended hourly
26 rate of compensation of at least \$850 per hour for work performed by Lawyers *for* Justice, PC.
27 Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at
28 least \$850 per hour for legal services performed, by courts granting approval of settlements in

other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour.

EXPERIENCE AND ADEQUACY OF LAWYERS for JUSTICE, PC

13. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premium wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers for Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

14. Edwin Aiwarzian is the Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has

1 extensive formal training in dispute resolution and negotiation from the Straus Institute for
2 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
3 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
4 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
5 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
6 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
7 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
8 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
9 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
10 Appellate District. In December of 2004, he obtained a license to practice law from the California
11 State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he
12 has 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. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
15 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
16 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.
17 Together with other attorneys at the firm, and in many cases in conjunction with co-counsel, he
18 has successfully litigated cases involving the executive, administrative, and other overtime
19 exemptions to the State of California and federal overtime compensation requirements. Under
20 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested
21 motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000
22 class action or representative action cases.

23 15. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
24 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
25 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
26 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
27 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
28 From approximately August 2008 to approximately December 2008, he served as a Judicial

1 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the
2 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
3 before all courts of the State of California and all United States District Courts in the State of
4 California. He has worked on many wage-and-hour class action and representative action cases,
5 taking the lead in taking and defending depositions, arguing motions, and attending mediations.
6 He has played an integral role in preparing matters for class certification, including and not
7 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
8 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
9 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
10 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
11 representative action cases have resulted in settlements that have been granted court approval.
12 He has handled over one hundred and fifty (150) mediations and has worked on over two hundred
13 and fifty (250) class action or representative action cases which have resulted in settlement.

14 16. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a
15 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
16 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
17 Georgetown University Law Center in 2010. She is admitted to practice in California (since
18 2010) and in New York (since 2013) and is admitted to practice in all U.S. District Courts in
19 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
20 Court. She has taken and defended dozens of depositions and successfully handled motion
21 practice in class action cases regarding discovery (including and not limited to, regarding class
22 contact information), class certification (both contested class certification and stipulated class
23 certification), arbitration agreements, coordination, and intervention. She has successfully
24 handled briefing and oral argument on appeal and obtained notable decisions regarding the
25 Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Roberto*
26 *Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert.
27 denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*
28 (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited

1 to working on cases to obtain class certification through contested motion practice and working
2 on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical
3 sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving
4 a certified class consisting of approximately 2,600 individuals). She also has extensive experience
5 with class action and/or representative action settlements, and has handled this process in over
6 five hundred (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision,
7 Lawyers *for* Justice, PC has handled the class certification and court approval process for
8 hundreds of class action and/or representative action matters that have successfully resolved. She
9 is a member of the California Employment Lawyers Association, and, on several occasions, has
10 been a speaker regarding topics in wage and hour law at the organization's continuing legal
11 education events.

12 17. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree
13 from University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from
14 Pepperdine University School of Law in 2017. I was admitted to practice law in California in
15 2019. I was admitted to practice before all courts of the State of California and all federal district
16 courts in the State of California. I have worked on many wage and hour class action and PAGA
17 representative matters, and my work has included, *inter alia*, researching and drafting pleadings,
18 administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement
19 agreements, engaging in motion practice, claims evaluation and analysis, and making court
20 appearances. Prior to working at Lawyers *for* Justice, PC, I represented filmmakers and talent,
21 negotiating and structuring various types of agreements on their behalf. I am a member of the
22 California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian
23 American Bar Association.

24 18. Selena Matavosian is a Member of Lawyers *for* Justice, PC. She received a
25 Bachelor of Science degree from California State University, Northridge in 2019 and earned a
26 Juris Doctor degree from Southwestern Law School in 2022. She was admitted to practice law
27 in California in 2022. She is admitted to practice before all courts of the State of California and
28 all federal district courts in the State of California. She has worked on many wage-and-hour class

1 action and PAGA representative cases, and her work on these cases has included researching and
2 drafting pleadings and motions, administrative notice exhaustion, drafting, negotiating, and
3 finalizing stipulations and settlement agreements, claims evaluation and analysis, and making
4 court appearances.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative action against a foodservice distributor, on behalf of non-exempt employees. On

January 26, 2017, the court granted final approval of the class and PAGA representative action settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

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

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

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

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

t) LFJ represented the plaintiff in a wage-and-hour class and PAGA representative action against a property management company, on behalf of non-exempt employees. On June 14, 2017, the court granted final approval of the class and PAGA

1 representative action settlement. The Los Angeles County Superior Court Case Number is
2 BC586234.

3 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
4 representative action against a food company on behalf of non-exempt employees. On June 30,
5 2017, the court granted final approval of the class and PAGA representative action settlement.
6 The Sacramento County Superior Court Case Number is 34-2015-00175871.

7 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
8 representative action against a chocolate company on behalf of non-exempt employees. On July
9 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
10 The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

Superior Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding Number is 4819.

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

bb) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class action against a container manufacturer, on behalf of non-exempt employees. On March 10, 2023, the court granted final approval of the class action settlement. On October 15, 2018, the court granted the plaintiff's motion for class certification. The Tulare County Superior Court Case Number is VCU264528.

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.

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

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

12 hh) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
13 and-hour class and PAGA representative action against a plastic packaging company on behalf
14 of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs' motion for
15 class certification and certified a class. On November 8, 2021, the court granted approval of the
16 partial settlement of the action. On April 22, 2024, the court granted approval of the PAGA
17 settlement and entered an order dismissing the action. The San Bernardino County Superior
18 Court Case Number is CIVDS1507361.

19 ii) LFJ, in association with co-counsel therein, represented the plaintiff in a
20 wage-and-hour class and PAGA representative action against a medical equipment supplier on
21 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
22 for class certification and certified a class. On November 2, 2023, the court granted final approval
23 of the class and PAGA representative action settlement. The San Bernardino County Superior
24 Court Case Number is CIVDS1505744.

25 jj) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
26 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
27 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
28 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,

1 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
2 approval of the PAGA representative action settlement. The San Diego County Superior Court
3 Case Number is 34-2015-00175330.

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

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

16 mm) LFJ, in association with co-counsel therein, represented the plaintiffs in a
17 wage-and-hour class action against manufacturer and supplier of power products and services on
18 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
19 for class certification and certified a class. On August 27, 2021, the court granted final approval
20 of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-
21 00025968-CU-OE-CTL.

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

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oo) LFJ represented 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.

pp) LFJ represents the plaintiffs in a wage-and-hour class action against a chain of restaurants on behalf of non-exempt employees. On July 22, 2024, the court granted in part the plaintiffs' motion for class certification and certified a class. The San Francisco Superior Court Case Number is CGC-20-582809.

**LITIGATION COSTS AND EXPENSES INCURRED BY
LAWYERS *FOR* JUSTICE, PC**

20. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this case. Lawyers *for* Justice, PC seeks reimbursement of **\$14,874.07** in litigation costs and expenses incurred in the case, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of the case and to obtain the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

21. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for an enhancement payment in the amount of \$7,500.00 to Plaintiff. The requested enhancement payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort to produce relevant documents and information, and provided facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would facilitate the pursuit of the case. Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing her work experiences with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff to receive \$7,500.00 as a reasonable enhancement payment for her services in the case, in addition to her individual settlement payments.

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

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

Executed this 3rd day of January 2025, at Glendale, California.



Yasmin Hosseini

EXHIBIT A

VERONICA BERNAL, ET AL. VS. A&E FAGEN, INC.
Los Angeles County Superior Court, Case No. BC712866

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Kailie Fagen (“Plaintiff”) during the Case	40.10
Meet and Communicate with Former Plaintiff Veronica Bernal during the Case	20.30
Meet and Communicate with Former Plaintiff Franchessca Alvarez-Reyes during the Case	14.60
Investigate, Communicate with, and/or Interview Class Members, Aggrieved Employees, and/or Percipient Witnesses	18.50
Pleadings and Court Filings	
Investigate the Merits of Former Plaintiffs Veronica Bernal and Franchessca Alvarez-Reyes’ Claims (together, “Former Plaintiffs”), Conduct Legal Research and Analysis of All Claims Involved, and Draft Former Plaintiffs’ Class Action Complaint for Damages (filed on July 5, 2018)	7.50
Review Court’s Order Regarding Newly Filed Class Action (filed on July 23, 2018)	0.10
Review Court’s Initial Status Conference Order (Complex Litigation Program) (filed on July 23, 2018)	0.20
Review and Analyze Defendant A&E Fagen Inc.’s (“Defendant”) Answer to Class Action Complaint and Research Affirmative Defenses in Defendant’s Answer (filed on August 20, 2018)	1.60

Meet and Confer with Defendant's Counsel and Draft Joint Initial Status Conference Class Action Response Statement (filed on October 9, 2018)	1.10
Review Court's Order Re: Notice of Continuance of Initial Status Conference (filed on October 16, 2018)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on November 16, 2018)	0.10
Review Court's Case Management Order (filed on November 16, 2018)	0.10
Review Court's Order Authorizing Electronic Service (filed on November 16, 2018)	0.10
Draft Former Plaintiffs' Request for Dismissal of Defendant Whittier Grocery Outlet Without Prejudice, Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Order Thereon (filed on November 5, 2019)	2.50
Review Court's Order Granting Dismissal of Defendant Whittier Grocery Outlet Without Prejudice (filed on November 12, 2019)	0.10
Draft Former Plaintiffs' Notice of Entry of Dismissal and Proof of Service (filed on November 15, 2019)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Motion for Class Certification Deadline; and [Proposed] Order (filed on November 15, 2019)	1.10
Review Court's Order Granting Joint Stipulation to Continue Motion for Class Certification Deadline (filed on November 25, 2019)	0.10
Draft Former Plaintiffs' Notice of Entry of Judgment or Order (filed on December 4, 2019)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Motion for Class Certification Deadline; and [Proposed] Order (filed on March 13, 2020)	1.10
Review Court's Notice Re: Continuance of Hearing and Order (filed on March 23, 2020)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Letter in Support of Joint Stipulation to Continue Motion for Class Certification Deadline and [Proposed] Order (filed on April 8, 2020)	1.10
Review Court's Order Granting Joint Stipulation to Continue Motion for Class Certification Deadline (filed on June 15, 2020)	0.20
Draft Former Plaintiffs' Notice of Entry of Judgment or Order (filed on July 2, 2020)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Motion for Class Certification Deadline; and [Proposed] Order (filed on July 21, 2020)	1.10
Review Court's Order Granting Joint Stipulation to Continue Motion for Class Certification Deadline (filed on July 27, 2020)	0.10
Draft Former Plaintiffs' Notice of Entry of Judgment or Order (filed on August 5, 2020)	0.10
Draft Former Plaintiffs' Request for Dismissal of Plaintiff Franchessca Alvarez-Reyes Without Prejudice, Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Order Thereon (filed on December 4, 2020)	3.20
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Vacate Class Certification Deadline and Non-Appearence Case Review; and [Proposed] Order (filed on December 10, 2020)	1.10
Review Court's Order Granting Joint Stipulation to Vacate Class Certification Deadline and Non-Appearence Case Review (filed on December 17, 2020)	0.10
Draft Former Plaintiffs' Notice of Entry of Judgment or Order (filed on December 24, 2020)	0.10
Review Court's Order Granting Request for Dismissal of Plaintiff Franchessca Alvarez-Reyes Without Prejudice (filed on January 11, 2021)	0.10

Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Preliminary Approval Motion (filed on March 12, 2021)	0.10
Draft Former Plaintiff Veronica Bernal's Request to Continue Deadline to File Motion for Preliminary Approval and Response to Order to Show Cause Regarding Why Sanctions Should Not Be Imposed Against Counsel for Plaintiff for Failure to File the Motion for Preliminary Approval of Class Action Settlement; and [Proposed] Order Thereon (filed on April 30, 2021)	2.10
Review Court's Order Granting Former Plaintiff Veronica Bernal's Request to Continue Deadline to File Motion for Preliminary Approval and Response to Order to Show Cause Regarding Why Sanctions Should Not Be Imposed Against Counsel for Plaintiff for Failure to File the Motion for Preliminary Approval of Class Action Settlement (filed on May 10, 2021)	0.10
Meet and Confer with Defendant's Counsel and Draft Non-Appearance Case Review Report (filed on June 4, 2021)	1.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval (filed on June 11, 2021)	0.10
Meet and Confer with Defendant's Counsel and Draft Non-Appearance Case Review Report (filed on September 8, 2021)	1.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval (filed on September 10, 2021)	0.10
Meet and Confer with Defendant's Counsel and Draft Non-Appearance Case Review Report (filed on December 3, 2021)	1.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval (filed on December 13, 2021)	0.10

Meet and Confer with Defendant's Counsel and Draft Non-Appearance Case Review Report (filed on March 16, 2022)	1.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval (filed on March 18, 2022)	0.10
Research and Draft Former Plaintiff Veronica Bernal and Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on May 19, 2022); Meet and Confer with Defendant's Counsel and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint and [Proposed] Order Thereon (submitted on May 13, 2022)	2.70
Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed on May 17, 2022)	0.10
Draft Former Plaintiff Veronica Bernal's Notice of Entry of Judgment or Order (filed on May 19, 2022)	0.10
Review and Analyze Defendant's Answer to Plaintiffs' First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act and Research Affirmative Defenses in Defendant's Answer (filed on June 3, 2022)	1.50
Meet and Confer with Defendant's Counsel and Draft Non-Appearance Case Review Report (filed on July 7, 2022)	1.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval (filed on July 8, 2022)	0.10
Draft Former Plaintiff Veronica Bernal and Plaintiff's Request for Dismissal of Claims of Plaintiff Veronica Bernal Without Prejudice, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Order Thereon (filed on August 24, 2022)	2.40

Review Court's Order Granting Request for Dismissal of Claims of Plaintiff Veronica Bernal Without Prejudice (filed on August 31, 2022)	0.10
Meet and Confer with Defendant's Counsel and Draft Non-Appearance Case Review Report (filed on September 15, 2022)	1.10
Appearances	
Prepare for, Travel to/from, and Attend Initial Status Conference Hearing (November 16, 2018)	1.90
Prepare for and Telephonically Attend Motion for Preliminary Approval of Class Action Settlement Hearing (April 9, 2024)	0.70
Prepare for and Telephonically Attend Motion for Preliminary Approval of Class Action Settlement Hearing (April 30, 2024)	0.60
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Former Plaintiff Franchessca Alvarez-Reyes (served on May 17, 2018)	2.10
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member Tanya Myers (served on May 23, 2018)	2.10
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member Ashlee Reed (served on May 30, 2018)	2.10
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Former Plaintiff Veronica Bernal (served on June 1, 2018)	2.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member Tanya Myers (served on June 15, 2018)	2.60

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Former Plaintiff Franchessca Alvarez-Reyes (served on June 18, 2018)	1.40
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Former Plaintiff Veronica Bernal (served on June 18, 2018)	1.30
Draft Follow Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Ashlee Reed (served on July 6, 2018)	1.90
Draft Former Plaintiffs' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant A&E Fagen, Inc. (served on December 3, 2018)	2.80
Draft Former Plaintiffs' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Former Defendant Whittier Grocery Outlet (served on December 3, 2018)	2.80
Draft Former Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant A&E Fagen, Inc. and Requests for Production of Documents (Organizational Structure) (served on December 3, 2018)	3.20
Draft Former Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant A&E Fagen, Inc. and Requests for Production of Documents (Job Duties) (served on December 3, 2018)	3.90
Draft Former Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Whittier Grocery Outlet and Requests for Production of Documents (Organizational Structure) (served on December 3, 2018)	3.20
Draft Former Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Whittier Grocery Outlet and Requests for Production of Documents (Job Duties) (served on December 3, 2018)	3.90

Review and Analyze Defendant's Objection to Plaintiffs' Notice of Deposition of Person Most Knowledgeable at A&E Fagen Inc. and Requests for Production of Documents (Job Duties) (served on January 3, 2019)	1.20
Review and Analyze Defendant's Objection to Plaintiffs' Notice of Deposition of Person Most Knowledgeable at A&E Fagen Inc. and Requests for Production of Documents (Organizational Structure) (served on January 3, 2019)	0.90
Review and Analyze Defendant's Responses to Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on January 4, 2019)	4.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kailie Fagen (served on December 7, 2021)	2.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on December 28, 2021)	4.20
Letters and Correspondence	
Draft Notice of California Labor and Workforce Development Agency Re: Claims of Former Plaintiff Veronia Bernal for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> ("PAGA") (served on January 26, 2021)	4.50
Draft Notice of California Labor and Workforce Development Agency Re: Claims of Plaintiff Kailie Fagen for Penalties Under the PAGA (served on February 10, 2022)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	17.60
Mediation/Settlement	

Review and Analyze Information, Data, and Documents Obtained from Former Plaintiffs, Plaintiff, Former Defendant Whittier Grocery Outlet, Defendant, and Other Sources Prior to Mediation	21.30
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on July 27, 2020)	17.80
Attend Mediation Session (July 30, 2020; Zoom Video Conference)	10.50
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding – Class Action Settlement (fully executed on December 18, 2020)	4.10
Draft, Review, Revise, Negotiate, and/or Finalize Joint Stipulation of Class Action and PAGA Settlement (fully executed on May 12, 2023), and Notice of Class Action Settlement	17.50
Draft, Review, Revise, Negotiate, and/or Finalize Amended Joint Stipulation of Class Action and PAGA Settlement (fully executed on March 21, 2024), and Revised Notice of Class Action Settlement	4.20
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Selena Matavosian in Support Thereof, Declaration of Plaintiff in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on August 16, 2023)	17.80
Review Court's Los Angeles Superior Court, Complex Civil Department Checklist for Preliminary Approval of Class Action Settlement (filed on September 12, 2023)	0.20
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on September 12, 2023)	0.10

Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Plaintiffs' Deadline to File Supplemental Papers in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (filed on March 11, 2024)	1.10
Review Declaration of Edgar L. Fagen, and Research and Draft Plaintiff's Supplemental Brief in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Selena Matavosian in Support Thereof, and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on March 18, 2024)	5.30
Review Court's Order Granting Joint Stipulation to Continue Plaintiffs' Deadline to File Supplemental Papers in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on March 20, 2024)	0.10
Draft Further Supplemental Declaration of Selena Matavosian in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on March 22, 2024)	1.20
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on April 9, 2024)	0.10
Draft Further Supplemental Declaration of Selena Matavosian in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on April 26, 2024)	1.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on April 30, 2024)	0.10
Draft [Further Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on July 11, 2024)	0.20
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed September 3, 2024)	0.20

Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payment, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on January 3, 2025) (Anticipated)	19.20
Total Hours:	327.10

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Bernal vs. Whittier Grocery Outlet, et al. (A Fagen, Inc.)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/23/2018	U.S. Postmaster	Postage	\$6.70
5/30/2018	U.S. Postmaster	Postage	\$13.76
6/1/2018	U.S. Postmaster	Postage	\$6.88
6/14/2018	U.S. Postmaster	Postage	\$27.52
7/5/2018	Los Angeles Superior Court	Jury Fee	\$150.00
7/5/2018	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
7/5/2018	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
7/6/2018	ProLegal	Attorney Service	\$246.70
7/6/2018	U.S. Postmaster	Postage	\$7.83
10/9/2018	ProLegal	Attorney Service	\$58.51
11/16/2018	Cinela Aziz	Travel Reimbursement	\$35.03
12/3/2018	General Logistics Systems US, Inc.	Courier Service	\$28.43
2/6/2019	Case Anywhere LLC	Attorney Service	\$94.80
5/13/2019	Case Anywhere LLC	Attorney Service	\$120.00
8/5/2019	Case Anywhere LLC	Attorney Service	\$120.00
10/18/2019	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
11/5/2019	Case Anywhere LLC	Attorney Service	\$126.00
11/15/2019	Los Angeles Superior Court	Document Download Fee	\$2.00
12/3/2019	Los Angeles Superior Court	Document Download Fee	\$4.00
1/8/2020	Lynn S. Frank	Mediation Fee	\$7,000.00
2/6/2020	Case Anywhere LLC	Attorney Service	\$162.00
3/13/2020	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
3/30/2020	Los Angeles Superior Court	Document Download Fee	\$2.00
5/4/2020	Case Anywhere LLC	Attorney Service	\$132.00
6/26/2020	Los Angeles Superior Court	Document Download Fee	\$4.00
7/2/2020	Legal Document Server, Inc.	Attorney Service	\$175.00
7/13/2020	Legal Document Server, Inc.	Attorney Service	\$175.00
7/21/2020	Legal Document Server, Inc.	Attorney Service	\$205.70
7/21/2020	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
8/4/2020	Los Angeles Superior Court	Document Download Fee	\$4.00
8/5/2020	Legal Document Server, Inc.	Attorney Service	\$205.00
8/5/2020	Case Anywhere LLC	Attorney Service	\$132.00
10/21/2020	FedEx Express	Courier Service	\$26.91
10/21/2020	General Logistics Systems US, Inc.	Courier Service	\$21.32
11/6/2020	Case Anywhere LLC	Attorney Service	\$126.00
12/4/2020	Legal Document Server, Inc.	Attorney Service	\$145.00
12/10/2020	Legal Document Server, Inc.	Attorney Service	\$205.70
12/10/2020	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
12/24/2020	Legal Document Server, Inc.	Attorney Service	\$205.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Bernal vs. Whittier Grocery Outlet, et al. (A Fagen, Inc.)

1/26/2021	U.S. Postmaster	Postage	\$8.65
1/26/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
2/3/2021	Case Anywhere LLC	Attorney Service	\$156.00
4/30/2021	Legal Document Server, Inc.	Attorney Service	\$110.70
4/30/2021	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
5/4/2021	Case Anywhere LLC	Attorney Service	\$126.00
6/4/2021	Legal Document Server, Inc.	Attorney Service	\$205.00
8/4/2021	Case Anywhere LLC	Attorney Service	\$126.00
9/8/2021	Legal Document Server, Inc.	Attorney Service	\$175.00
11/5/2021	Case Anywhere LLC	Attorney Service	\$126.00
12/3/2021	Legal Document Server, Inc.	Attorney Service	\$15.20
2/1/2022	Case Anywhere LLC	Attorney Service	\$126.00
3/16/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
5/5/2022	Case Anywhere LLC	Attorney Service	\$126.00
5/16/2022	Legal Document Server, Inc.	Attorney Service	\$16.55
5/16/2022	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
5/18/2022	Los Angeles Superior Court	Document Download Fee	\$19.00
5/20/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
7/8/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
8/4/2022	Case Anywhere LLC	Attorney Service	\$150.00
8/24/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
9/15/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
11/7/2022	Case Anywhere LLC	Attorney Service	\$150.00
12/6/2022	General Logistics Systems US, Inc.	Courier Service	\$33.82
2/6/2023	Case Anywhere LLC	Attorney Service	\$120.00
5/8/2023	Case Anywhere LLC	Attorney Service	\$120.00
8/4/2023	Case Anywhere LLC	Attorney Service	\$120.00
8/17/2023	Legal Document Server, Inc.	Attorney Service	\$227.32
8/17/2023	Los Angeles Superior Court	Motion Fee	\$60.00
8/18/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
11/1/2023	Case Anywhere LLC	Attorney Service	\$120.00
2/2/2024	Case Anywhere LLC	Attorney Service	\$120.00
3/12/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
3/12/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
3/19/2024	Legal Document Server, Inc.	Attorney Service	\$231.65
3/25/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
4/26/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
5/3/2024	Case Anywhere LLC	Attorney Service	\$174.00
7/12/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
8/1/2024	Case Anywhere LLC	Attorney Service	\$126.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Bernal vs. Whittier Grocery Outlet, et al. (A Fagen, Inc.)

Total: 14,874.07