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Attorneys for Plaintiffs and the Class

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

RAMIRO PEREZ, individually, and on behalf of other members of the general public similarly situated; KIM BALLING, 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.

KAISER ALUMINUM CORPORATION, an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 18STCV06639

Honorable Carolyn B. Kuhl
Department SSC-12

CLASS ACTION

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

[Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Incentive Awards; Declaration of Class Representatives (Ramiro Perez and Kim Baling); Declaration of Settlement Administrator (Taylor Mitzner) and [Proposed] Final Approval Order and Judgment filed concurrently herewith]

Date: May 26, 2022
Time: 10:30 a.m.
Department: SSC-12

Complaint Filed: November 29, 2018
FAC Filed: April 16, 2021
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Ramiro Perez (“Plaintiff Perez”) and Kim Balling (Plaintiff Balling, together Plaintiff Perez and Plaintiff Balling are referred to as “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 thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On November 1, 2021, in Department SSC-12 of the above-entitled Court, the Honorable Carolyn B. Kuhl preliminarily approved the First Amended Stipulation and Agreement for Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant Kaiser Aluminum Corporation. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs as Class Representative. The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as 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 (“Settlement Administrator”) to handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval, no Class Members have objected to the Settlement or the request for Attorneys’ Fees and Costs, Class Representative Incentive Awards, Settlement Administration Costs, or allocation for the 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. I have been actively engaged in litigating the above-captioned action (“Action”) since prior to its commencement, as have several other attorneys and members in our firm.

5. Before initiating the Action, 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 our firm and Plaintiff Perez, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, the claims of Plaintiff Perez, and potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiff Perez were well-suited for class-wide 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 who worked for Defendant, who were not properly compensated for, *inter alia*, all hours worked, and non-compliant meal and rest periods.

6. The parties investigated the veracity, strength, and scope of the claims, and were actively preparing the action for class certification proceedings and trial, before reaching the settlement. The parties conducted significant investigation and formal and informal discovery regarding the facts of the case, including and not limited to, the exchange, review, and analysis of thousands of pages of documents and data obtained from Defendant, Plaintiffs, and other sources. The volume of data and documents that Class Counsel reviewed and analyzed included and was not limited to: Defendant’s collective bargaining agreement with Teamsters 986, Acknowledgement of Voluntary Meeting To Discuss A Pending Class Action Lawsuit, redacted versions of settlement agreements signed by putative class members in connection with the Action (including, and not limited to, Confidential Settlement Agreement and Release and Notice of Rights Regarding Kaiser Aluminum Fabricated Products, LLC’s (Kaiser) Early Voluntary Individual Settlement Option), Defendant’s Production Employee Handbook, company policies and policy acknowledgements (including, but not limited to, Defendant’s Acknowledgement of

Receipt, Employee Travel and Expense Reimbursement Policy, Corporate Purchasing Card Policy and Agreement, Foothill Ranch Breaks & Meal Period Policy and Acknowledgment, Breaks & Meal Periods Policy and Acknowledgement), internal memoranda, job descriptions, new hire orientation checklists, Defendant's operations and employment practices, and forms (including, but not limited to, Defendant's Voluntary Waiver of Meal Period Less Than Six (6) Hours Worked FHR, Voluntary Waiver of Second Meal Period Less Than Twelve (12) Hours Worked FHR, and Voluntary Waiver of Second Meal Period), among other information and documents. Class Counsel interviewed Plaintiffs and other Class Members to gather facts and to identify potential witnesses. Class Counsel propounded multiple sets of formal written discovery requests on Defendant and noticed, prepared for, and took multiple depositions of Defendant's Person Most Knowledgeable designees on May 19, 2020, May 20, 2020, June 16, 2020, June 17, 2020 and May 21, 2020. Counsel for the Parties also met and conferred on numerous occasions, e.g., to discuss issues relating to the pleadings, motion practice, discovery, and the production of documents and data prior to the mediations. Class Counsel also drafted Plaintiffs' mediation briefs and prepared for and attended court proceedings, settlement negotiations, and two formal full-day mediations, among other tasks.

7. After conducting investigation of the facts and law during the litigation of the case, the Parties engaged in extensive settlement negotiations to try to resolve the Action. These efforts included participating in two formal, full-day mediations conducted by Deborah Crandall Saxe, Esq., a well-respected 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. Prior to and during the mediation and settlement discussions, the parties exchanged class information and engaged in an extensive discussion regarding their evaluations of the case and various aspects of the case, including but 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, meal and rest periods, PAGA representative actions, and wage-and-hour enforcement, as well as the evidence produced and analyzed, and the

possibility of appeals, among other things. Arriving at a settlement that was acceptable to all parties was not easy. Defendant and its counsel felt strongly about their ability to prevail on the merits and to obtain a denial of class certification (in fact, Defendant had already filed a Motion for an Order Denying Class Certification, which was pending at the time of the second mediation), and Plaintiffs and Class Counsel believed that they would be able to obtain class certification and prevail at trial. After conducting investigations, formal and informal discovery, and exchange of information, extensive settlement negotiations (which included two mediations), with the aid of the mediator's evaluation, the parties have agreed that the matter is well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to both sides that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, failure to obtain certification, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the case, and the real possibility of no recovery after years of litigation. As set forth more fully in the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees up to twenty-seven and one-half percent (27.50%) of the Gross Settlement Amount (i.e., \$202,125.00), as set forth in the Settlement Agreement and the Class Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs and Class Counsel, Plaintiffs have agreed to contingency fees of more than twenty-seven and one half percent (27.50%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value recovered for the Class Members and State of California; and (6) the other cases that Class Counsel has turned down in order to devote its time and efforts to the case.

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

9. While not necessarily required to be demonstrated because the percentage fee sought in this matter is proper, Class Counsel has incurred so many hours of work in connection with prosecuting the case such that the attorneys' fees request is also justified under a lodestar analysis. Lawyers for Justice, PC has spent a total of **595.60 hours** performing tasks on behalf of Plaintiffs, Class Members, and the State of California. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart for Lawyers for Justice, PC describing in detail the nature of the legal services provided by attorneys at the firm, and the time incurred performing those services. The hours attributable to Lawyers for Justice, PC include work done by myself and several other attorneys. Additionally, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of the case.

10. The work performed in the case, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on the case, in litigating complex wage-and-hour class and representative actions, support a reasonable hourly rate of compensation at the rate of at least \$600 for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$600 per hour for legal services performed, by courts granting final approval in other 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 an hourly rate of \$936.47; 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 an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees

involved an hourly rate of \$764.82; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved a higher hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved a higher hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved a higher hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved a higher hourly rate of \$845.64.

ADEQUACY OF LAWYERS for JUSTICE, PC

EDUCATION

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

JUDICIAL EXTERNSHIPS

12. From approximately September 2002 to approximately December 2002, I served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002,

I served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal for the Second Appellate District*.

LITIGATION AND CLASS ACTION EXPERIENCE

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

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

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

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

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

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

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 of
15 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
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1 representative action settlement. The Sacramento County Superior Court Case Number is 34-
2 2012-00136285.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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1 v. LFJ represented the plaintiffs in a wage-and-hour class and PAGA
2 representative action against a chocolate company on behalf of non-exempt employees. On July
3 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
4 The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4 ll. LFJ, in association with co-counsel therein, represents the plaintiffs in a
5 wage-and-hour class and PAGA representative action against a plastic packaging company on
6 behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs' motion
7 for class certification and certified a class. On November 8, 2021, the court granted approval of
8 the partial settlement of the action. The San Bernardino County Superior Court Case Number is
9 CIVDS1507361.

10 mm. LFJ, in association with co-counsel therein, represents the plaintiffs in a
11 wage-and-hour class action against manufacturer and supplier of power products and services on
12 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
13 for class certification and certified a class. The San Diego County Superior Court Case Number
14 is 37-2015-00025968-CU-OE-CTL.

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

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

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

24 17. Lawyers *for* Justice, PC has incurred **\$38,418.86** in litigation costs and expenses in
25 the Action, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and
26 necessary in the prosecution of the Action and to obtain recovery for the Class. It should be noted
27 that, to date, Class Counsel has borne all of the risks and costs of litigation and will not receive
28

any compensation until the Court awards payment to Class Counsel pursuant to the Settlement.

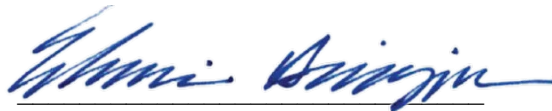
INCENTIVE AWARDS TO PLAINTIFFS

18. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for an Incentive Award in the amount of \$7,500.00 to Plaintiff Ramiro Perez and an Incentive Award in the amount of \$5,000.00 to Plaintiff Kim Balling to compensate Plaintiffs for the time and effort they expended in the Action. The requested Incentive Awards are fair and appropriate. Plaintiffs spent a substantial amount of time and effort in producing relevant documents and past employment records and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain information that would facilitate the pursuit of the class and PAGA claims. Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs to receive reasonable Incentive Awards, in addition to their Individual Settlement Payments, for their services on behalf of the Class.

19. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiff, the Class, and 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 on this 4th day of May, 2022 at Glendale, California.



Edwin Aiwanian

EXHIBIT A

PEREZ V. KAISER ALUMINUM CORPORATION
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. 18STCV06639)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Investigation of the Key Facts with a Focus on Class Certification Elements, including Adequacy, Typicality, Superiority, and Commonality	6.80
Investigation of the Merits of Plaintiff Ramiro Perez’s (“Plaintiff Perez”) Claims and the Merits of the Claims of the Putative Class Members	4.10
Investigation of Potential Damages Exposure of Defendant Kaiser Aluminum Fabricated Products, LLC, erroneously named as Kaiser Aluminum Corporation (“Defendant”) with Respect to the Damages and Penalties in Connection with Plaintiff Perez and the Putative Class Members	5.50
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Certification Decisions in California, Including all New and Relevant DLSE Materials	4.20
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in Which Defendant Operates	3.10
Investigation of Defendant’s Organizational and Corporate Structure, and Executive Reporting Structure as It Relates to the Employment and Management of the Putative Class Members	2.90
Investigation of Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	3.60

Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	4.40
Research and Investigation Re: Locations Owned, Managed or Operated by Defendant in California During the Class Period, Including Differences Between the Various Locations to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	3.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members Worked Throughout California	2.20
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Timekeeping, Attendance, Schedules, Clocking In/Out, Meal/Rest Breaks, On-Premises Breaks, Overtime Compensation, Non-Discretionary Incentive/Bonus/Performance Pay, Rounding, Donning and Doffing Uniforms, Safety Shoes, Personal Protective Equipment (PPE), and Tools/Gear, and Reimbursement of Business-Related Expenses	11.80
Research and Investigation Re: Various Software Programs, Systems, and Other Technologies Defendant Uses to Conduct Its Everyday Business, Including Timekeeping and Computer Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	2.40
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waivers, and Compliant Policies	7.20
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	6.50
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	2.80
Research and Outline Contemplated Motion for Class Certification and Trial Plan	23.50

Meet and Communicate with Plaintiff Ramiro Perez throughout the Pendency of the Case	41.50
Meet and Communicate with Plaintiff Kim Balling throughout the Pendency of the Case	28.50
Meet and Communicate with Putative Class Members	22.50
Pleadings and Court Filings	
Research and Draft Plaintiff Perez's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on November 29, 2018)	8.70
Review Court's Notice of Case Assignment (filed on November 29, 2018)	0.10
Review Court's Minute Order (filed on December 19, 2018)	0.10
Review Defendant's Notice of Appearance of Counsel (served on January 15, 2019)	0.10
Draft Plaintiff Perez's Notice of Continuance of Hearing (filed on February 13, 2019)	0.50
Meet and Confer with Defendant's Counsel, and Draft Initial Joint Status Conference Statement (submitted on March 6, 2019)	2.20
Review Court's Minute Order and Order Authorizing Electronic Service (Case Anywhere) (filed on March 15, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (submitted on July 2, 2019)	1.90
Review Defendant's Notice of Change of Handling Attorney Within Firm (served on July 8, 2019)	0.10
Review Court's Minute Order and Case Management Order (filed on July 10, 2019)	0.20

Review and Analyze Defendant's Answer to Unverified Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on August 8, 2019)	2.10
Review Defendant's Offer to Compromise Plaintiff's Individual Claims Under California Code of Civil Procedure Section 998 (served on August 13, 2019)	1.50
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Extend Deadline for Plaintiff's Motion for Class Certification; [Proposed] Order (submitted on May 13, 2020)	1.80
Review Court's Minute Order (filed on May 18, 2020)	0.10
Draft Plaintiff Perez's Notice of Ruling re Ex Parte Application to Extend the Deadline for Plaintiff's Motion for Class Certification (filed on May 21, 2020)	0.20
Review Court's Order Granting Draft Joint Stipulation to Extend Deadline for Plaintiff's Motion for Class Certification (filed on June 16, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to (1) Extend Deadline for Plaintiff's Motion for Class Certification and (2) Set Hearing Date and Briefing Schedule for Defendant's May 18, 2020 Motion for an Order Denying Class Certification; [Proposed] Order (submitted on June 29, 2020)	1.80
Review Court's Order Granting Joint Stipulation to (1) Extend Deadline for Plaintiff's Motion for Class Certification and (2) Set Hearing Date and Briefing Schedule for Defendant's May 18, 2020 Motion for an Order Denying Class Certification (filed on July 2, 2020)	0.10
Draft Plaintiff Perez's Notice of Entry of Judgment or Order (filed on August 14, 2020)	0.20
Review and Analyze Defendant's Amended Answer to Unverified Class Action Complaint for Damages (served on August 20, 2019)	0.80

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to (1) Continue Deadline for Plaintiff's Motion for Class Certification and (2) Continue Hearing Date and Briefing Schedule for Defendant's Motion for an Order Denying Class Certification; [Proposed] Order (submitted on August 21, 2020)	1.40
Review Court's Order Granting Joint Stipulation to (1) Continue Deadline for Plaintiff's Motion for Class Certification and (2) Continue Hearing Date and Briefing Schedule for Defendant's Motion for an Order Denying Class Certification (filed on September 4, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Stipulation to Vacate Motion for Class Certification-Related Date and Deadlines; [Proposed] Order Thereon (submitted on October 13, 2020)	1.10
Review Court's Order Granting Stipulation to Vacate Motion for Class Certification-Related Date and Deadlines (filed on October 16, 2020)	0.10
Draft Plaintiff Perez's Notice of Entry of Judgment or Order (filed on October 16, 2020)	0.20
Research and Draft Plaintiffs' First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved, and Meet and Confer with Defendant's Counsel and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order Thereon (submitted on April 1, 2021)	5.40
Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed on April 9, 2021)	0.10
Review Court's Minute Order (filed on August 25, 2021)	0.10
Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on December 3, 2021)	0.20

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Amend Settlement Agreement and [Proposed] Order Granting Preliminary Approval of Class Action Settlement, and Extend Notice Administration Process Consistent Therewith (submitted on December 7, 2021)	1.90
Review Court's Order Granting Joint Stipulation to Amend Settlement Agreement and [Proposed] Order Granting Preliminary Approval of Class Action Settlement, and Extend Notice Administration Process Consistent Therewith (filed on December 16, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Final Approval Hearing; [Proposed] Order Thereon (submitted on January 6, 2022)	1.20
Review Court's Order Denying Joint Stipulation to Continue Final Approval Hearing (filed on February 8, 2022)	0.30
Review Court's Minute Order (filed on February 17, 2022)	0.10
Appearances	
Prepare for, Travel to/from, and Attend Initial Status Conference (Los Angeles, March 15, 2019)	2.80
Prepare for, Travel to/from, and Attend Further Status Conference (Los Angeles, July 10, 2019)	1.50
Prepare for, Travel to/from, and Attend <i>Ex Parte</i> Hearing to Extend Plaintiff's Deadline to File Motion for Class Certification (Los Angeles, May 18, 2020)	2.10
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (August 25, 2021)	1.10
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (November 1, 2021)	0.80

Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Incentive Awards (May 26, 2022) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ramiro Perez (served on September 28, 2018)	1.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ramiro Perez (served on November 1, 2018)	2.30
Review and Analyze Defendant's Request for Production of Documents to Plaintiff Perez, Set One (served on August 13, 2019)	0.50
Review Defendant's Notice of Taking Videotaped Deposition of Plaintiff Ramiro Perez (served on August 13, 2019)	0.20
Draft Plaintiff Perez's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant (served on August 27, 2019)	8.70
Draft Plaintiff Perez's Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Corporation and Requests for Production of Documents (October 16, 2019; Organizational Structure) (served on August 27, 2019)	4.30
Draft Plaintiff Perez's Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Corporation and Requests for Production of Documents (October 17, 2019; Wage and Hour Practices) (served on August 27, 2019)	3.80

Draft Plaintiff Perez's Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Corporation and Requests for Production of Documents (October 18, 2019; Affirmative Defenses) (served on August 27, 2019)	5.40
Draft Plaintiff Perez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (December 6, 2019; Organizational Structure) (served on October 24, 2019)	1.20
Draft Plaintiff Perez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (December 9, 2019; Job Duties) (served on October 24, 2019)	0.20
Review Defendant's First Amended Notice of Taking Videotaped Deposition of Plaintiff Ramiro Perez and Request for Production of Documents at Deposition (served on October 28, 2019)	0.20
Draft Plaintiff Perez's Responses to Defendant's Requests for Production of Documents (Set One) (served on November 14, 2019)	13.50
Review and Analyze Defendant's Responses to Plaintiff Perez's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) (served on November 15, 2019)	5.60
Review and Analyze Defendant's Objections to Plaintiff Perez's Re-Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (December 9, 2019; Wage and Hour Practices) (served on December 3, 2019)	1.40
Draft Plaintiff Perez's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (February 11, 2020; Organizational Structure) (served on January 30, 2020)	0.90

Draft Plaintiff Perez's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (February 12, 2020; Wage and Hour Practices) (served on January 30, 2020)	0.60
Review and Analyze Defendant's Objections to Plaintiff Perez's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (February 11, 2020, and February 12, 2020) (served on February 4, 2020)	1.40
Draft Plaintiff Perez's Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (May 19, 2020; Organizational Structure) (served on May 7, 2020)	0.50
Draft Plaintiff Perez's Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (May 20, 2020; Wage and Hour Practices) (served on May 7, 2020)	0.20
Review and Analyze Defendant's Objections to Plaintiff Perez's Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (May 19, 2020; Organizational Structure) (served on May 15, 2020)	1.30
Review and Analyze Defendant's Objections to Plaintiff Perez's [Second] Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (May 20, 2020; Job Duties) (served on May 15, 2020)	1.80
Review and Analyze Documents Produced by Defendant (served on May 18, 2020)	32.70
Prepare for and Take the Deposition of Person Most Knowledgeable Jayne Sabo (May 19, 2020; Remote Deposition Via Zoom) and Review Deposition Transcript	9.50
Prepare for and Take the Deposition of Person Most Knowledgeable Fred Espinoza (May 19, 2020; Remote Deposition Via Zoom) and Review Deposition Transcript	8.70

Prepare for and Take the Deposition of Person Most Knowledgeable Samantha Seger (May 20, 2020; Remote Deposition Via Zoom) and Review Deposition Transcript	9.30
Prepare for and Take the Deposition of Person Most Knowledgeable Leslie Nielsen (May 20, 2020; Remote Deposition Via Zoom) and Review Deposition Transcript	8.10
Prepare for and Defend the Deposition of Person Most Knowledgeable Fred Espinoza (May 21, 2020; Remote Deposition Via Zoom) and Review Deposition Transcript	8.30
Draft Plaintiff Perez's Third Amended Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (June 16-17, 2020; Organizational Structure) (served on June 4, 2020)	0.90
Draft Plaintiff Perez's Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (June 16-17, 2020; Settlement Agreements) (served on June 4, 2020)	0.80
Review and Analyze Defendant's Objections to Plaintiff Perez's Third Amended Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Fabricated Products, LLC and Requests for Production of Documents (June 16-17, 2020; Organizational Structure) (served on June 11, 2020)	2.20
Review and Analyze Defendant's Objections to Plaintiff Perez's Notice of Deposition of Person Most Knowledgeable at Defendant Kaiser Aluminum Corporation and Requests for Production of Documents (June 16-17, 2020; Settlement Agreements) (served on June 11, 2020)	1.50
Prepare for and Take the Deposition of Person Most Knowledgeable Jayne Sabo (June 16, 2020; Remote Deposition Via Zoom) and Review Deposition Transcript	6.90
Prepare for and Take the Deposition of Person Most Knowledgeable Samantha Seger (June 17, 2020; Remote Deposition Via Zoom) and Review Deposition Transcript	7.50

Prepare for and Defend the Deposition of Person Most Knowledgeable Mark Krouse (June 17, 2020; Remote Deposition Via Zoom) and Review Deposition Transcript	4.30
Draft Plaintiff Perez's Special Interrogatories (Set Four) to Defendant Kaiser Aluminum (served June 26, 2020)	4.20
Draft <i>Belaire-West</i> Notice Paperwork, Monitor Notice Administration Process, and Review Class Contact List (notice mailed July 13, 2020; list released August 14, 2020)	4.60
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kim Balling ("Plaintiff Balling") (served on January 21, 2021)	1.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kim Balling (served on February 15, 2021)	2.50
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kim Balling (served on April 13, 2021)	1
Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Regarding Claims of Plaintiff Kim Balling for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on January 19, 2021)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	21.50
Mediation/Settlement	
Review and Analyze Data and Documents Produced by Defendant Prior to Mediations • Collective Bargaining Agreements and Employee Handbooks and Policies • Kaiser CA Meal and Rest Periods Policies • Employee Time and Pay Data	24.50

Settlement Agreement(s) and Related Notices and Acknowledgements Regarding Pending Class Action Lawsuit	
Prepare for First Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages/Penalties Analysis and Calculations (submitted on May 22, 2019)	17.60
Travel to/from and Attend Mediation Session (May 24, 2019; Los Angeles, California)	9.50
Prepare for Second Mediation, Including Compiling Supplemental Exhibits in Support of Mediation Brief, and Performing Damages/Penalties Analysis and Calculations (submitted on September 25, 2020)	15.50
Attend Mediation Session (September 28, 2020; Zoom Videoconference)	10.50
Draft, Review, Revise, Negotiate, and Finalize Stipulation and Agreement for Class Action and PAGA Settlement (executed on June 11, 2021) and Draft Exhibits	16.50
Draft, Review, Revise, Negotiate, and Finalize First Amended Stipulation and Agreement for Class Action and PAGA Settlement (executed on October 22, 2021) and Draft Exhibits	4.30
Review and Monitor Settlement Administration Process and Weekly Reports	4.80
Law and Motion	
Draft Plaintiff Perez's Ex Parte Application to Extend the Deadline for Plaintiff's Motion for Class Certification, Declaration of Daniel Kramer in Support Thereof, and [Proposed] Order (filed on May 15, 2020)	5.90
Review and Analyze Defendant's Response to Plaintiff Perez's Ex Parte Application to Extend the Deadline for Plaintiff's Motion for Class Certification, and Declaration of Robert Vogel and Exhibits in Support Thereof (served on May 17, 2020)	1.20

Review and Analyze Defendant's Notice of Motion and Motion for an Order Denying Class Certification, Memorandum of Points and Authorities in Support Thereof, Index of Evidence in Support Thereof, Declaration of Jayne Sabo in Support Thereof, and Declaration of Samantha Segar in Support Thereof (served on May 18, 2020)	9.50
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwazian in Support Thereof, Declaration of Ramiro Perez in Support Thereof, Declaration of Kim Balling in Support Thereof, and [Proposed] Order Thereon (filed on August 3, 2021)	14.80
Draft Plaintiff's Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Edwin Aiwazian in Support Thereof, Declaration of Robert Vogel and Exhibits in Support Thereof, and [Revised Proposed] Order Thereon (filed on October 25, 2021)	10.90
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on November 1, 2021)	0.20
Review and Analyze Settlement Administrator's Declaration Regarding Notice and Settlement Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Incentive Awards, and Declaration of Edwin Aiwazian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on May 4, 2022)	21.50
Total Hours:	595.60

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Perez v. Kaiser Aluminum Corporation

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/10/18	Golden State Overnight	Courier Service	11.63
9/20/18	FedEx Express	Courier Service	20.73
11/8/18	Golden State Overnight	Courier Service	11.73
11/16/18	FedEx Express	Courier Service	20.68
11/28/18	Los Angeles Superior Court	Filing Fee	435.00
11/28/18	Los Angeles Superior Court	Complex Fee	1,000.00
11/28/18	Los Angeles Superior Court	Jury Fee	150.00
12/6/18	ProLegal	Attorney Service	138.35
12/6/18	Pure Legal, Inc.	Attorney Service	204.30
12/27/18	Pure Legal, Inc.	Attorney Service	196.50
2/14/19	Pure Legal, Inc.	Attorney Service	195.90
3/12/19	Los Angeles Superior Court	Document Download Fee	5.80
3/13/19	Jams, Inc.	Mediation Fee	5,450.00
5/24/19	Tiffany Hyun	Travel Reimbursement	385.50
6/12/19	Robert A. Parris	Damages Consulting Expert	7,197.33
6/14/19	Case Anywhere LLC	Attorney Service	86.40
7/2/19	Pure Legal, Inc.	Attorney Service	197.10
8/13/19	Golden State Overnight	Courier Service	18.41
8/15/19	FedEx Express	Courier Service	21.62
8/27/19	Golden State Overnight	Courier Service	37.76
9/5/19	Case Anywhere LLC	Attorney Service	120.00
10/24/19	Golden State Overnight	Courier Service	31.08
12/4/19	Case Anywhere LLC	Attorney Service	126.00
12/4/19	Jams, Inc.	Mediation Fee	1,560.00
3/13/20	Case Anywhere LLC	Attorney Service	138.00
5/13/20	Legal Document Server, Inc.	Attorney Service	130.70
5/13/20	Los Angeles Superior Court	Filing Fee	20.00
5/15/20	Legal Document Server, Inc.	Attorney Service	132.10
5/15/20	Legal Document Server, Inc.	Attorney Service	65.00
5/15/20	Los Angeles Superior Court	Filing Fee	60.00
5/18/20	Daniel Kramer	Travel Reimbursement	22.31
5/19/20	Esquire Deposition Solutions LLC	Court Reporter	2,303.20
5/20/20	Esquire Deposition Solutions LLC	Court Reporter	2,503.15
5/21/20	Esquire Deposition Solutions LLC	Court Reporter	1,448.85
5/21/20	Legal Document Server, Inc.	Attorney Service	130.00
6/3/20	Case Anywhere LLC	Attorney Service	174.00
6/12/20	Los Angeles Superior Court	Document Download Fee	6.20
6/16/20	Esquire Deposition Solutions LLC	Court Reporter	2,354.15
6/16/20	Esquire Deposition Solutions LLC	Videography Service	1,107.50
6/17/20	Esquire Deposition Solutions LLC	Videography Service	860.00
6/17/20	Esquire Deposition Solutions LLC	Court Reporter	1,862.50
6/30/20	Legal Document Server, Inc.	Attorney Service	215.00

LAWYERS for JUSTICE PC CASE COST DETAIL

Perez v. Kaiser Aluminum Corporation

7/13/20	Simpluris, Inc.	Privacy Mailing	224.50
8/11/20	Los Angeles Superior Court	Document Download Fee	6.60
8/14/20	Legal Document Server, Inc.	Attorney Service	125.00
8/21/20	Legal Document Server, Inc.	Attorney Service	65.00
8/21/20	Legal Document Server, Inc.	Attorney Service	130.70
8/21/20	Los Angeles Superior Court	Filing Fee	20.00
9/4/20	Case Anywhere LLC	Attorney Service	162.00
9/9/20	Jams, Inc.	Mediation Fee	3,950.00
9/28/20	Los Angeles Superior Court	Document Download Fee	5.80
10/13/20	Legal Document Server, Inc.	Attorney Service	195.00
10/13/20	Los Angeles Superior Court	Filing Fee	20.00
10/16/20	Legal Document Server, Inc.	Attorney Service	80.00
12/3/20	Case Anywhere LLC	Attorney Service	126.00
12/4/20	Jams, Inc.	Mediation Fee	530.00
12/15/20	Los Angeles Superior Court	Document Download Fee	5.00
3/4/21	Case Anywhere LLC	Attorney Service	120.00
4/1/21	Legal Document Server, Inc.	Attorney Service	245.70
4/1/21	Los Angeles Superior Court	Filing Fee	20.00
4/16/21	Legal Document Server, Inc.	Attorney Service	245.00
6/3/21	Case Anywhere LLC	Attorney Service	132.00
6/8/21	General Logistics Systems US, Inc.	Courier Service	14.64
6/15/21	FedEx Express	Courier Service	23.31
8/3/21	Legal Document Server, Inc.	Attorney Service	243.10
8/3/21	Los Angeles Superior Court	Filing Fee	60.00
8/30/21	Los Angeles Superior Court	Remote Hearing Fee	15.00
9/3/21	Case Anywhere LLC	Attorney Service	156.00
10/26/21	One Legal	Attorney Service	16.68
12/3/21	Legal Document Server, Inc.	Attorney Service	15.20
12/7/21	Case Anywhere LLC	Attorney Service	144.00
1/7/22	Legal Document Server, Inc.	Attorney Service	16.15
1/7/22	Los Angeles Superior Court	Filing Fee	20.00
3/3/22	Case Anywhere LLC	Attorney Service	132.00
Total:			38,418.86