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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MANUEL BRUNO, 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;

Plaintiff,

vs.

U.S RENAL CARE, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendant.

Case No.: 2:21-CV-04617-FLA-MBKx

Honorable Fernando L. Aenlle-Rocha
Courtroom 6B

CLASS ACTION

**DECLARATION OF SELENA
MATAVOSIAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS
ACTION AND PAGA
SETTLEMENT AND MOTION
FOR CLASS COUNSEL AWARD
AND CLASS REPRESENTATIVE
SERVICE AWARD**

[Notice of Motion and Motion for
Final Approval of Class Action and
PAGA Settlement; Notice of Motion
and Motion for Class Counsel Award
and Class Representative Service
Award; Declaration of Class
Representative (Manuel Bruno);
Declaration of Settlement
Administrator (Lisa Pavlik); Table 1;
Table 2; [Proposed] Order Granting
Final Approval of Class Action and
PAGA Settlement and Judgment; and
[Proposed] Order Awarding Class
Counsel Award and Class
Representative Service Award filed
concurrently herewith]

**DECLARATION OF SELENA MATAVOSIAN IN SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AND MOTION FOR
CLASS COUNSEL AWARD AND CLASS REPRESENTATIVE SERVICE AWARD**

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Date: December 5, 2025
Time: 2:00 p.m.
Courtroom: 6B

Complaint Filed: March 3, 2021
FAC Filed: June 24, 2021
SAC Filed: September 5, 2024
Trial Date: None set

DECLARATION OF SELENA MATAVOSIAN

I, Selena Matavosian, 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 Manuel Bruno (“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 March 11, 2025, in Courtroom 6B of the above-captioned Court, the Honorable Fernando L. Aenlle-Rocha preliminarily approved the Second Amended Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (“Settlement Agreement,” “Settlement,” or “Agreement”), entered into between Plaintiff and Defendant U.S. Renal Care, Inc. (“Defendant”) (together with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Manuel Bruno 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 three (3) versions of the Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” 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 and PAGA Settlement (“Motion for Final Approval”) and accompanying Motion for Class Counsel Award and Class Representative Service Award (“Motion for Fees”), no Class Members have objected to the California Class Settlement and/or FCRA Class Settlement, the request for Class Counsel

Award, Class Representative Service Award, Settlement Administrator Costs, FCRA Settlement Amount, or the allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

PROCEDURAL HISTORY OF THE ACTION

4. A summary of the procedural history in the Actions, demonstrating that extensive pleading, motion, and discovery practice has taken place, is provided herein:

- a. Defendant provides in-center and home dialysis for people living with kidney disease. Plaintiff was employed by Defendant as an hourly-paid, non-exempt employee from approximately March 2020 to November 2020.
- b. On February 19, 2021, Plaintiff provided written notice to the Labor and Workforce Development Agency (“LWDA”) and Defendant, of Plaintiff’s intent to seek civil penalties for alleged violations of the California Labor Code.
- c. On March 3, 2021, Plaintiff filed the Class Action Complaint for Damages, thereby commencing a putative class action in the Superior Court of California for the County of Los Angeles, Case No. 21STCV08325, against Defendant for violations of the California Labor Code and the California Business and Professions Code (“Action”).
- d. On April 26, 2021, Plaintiff filed a Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et. Seq., thereby commencing a representative PAGA action in the Superior Court of California for the County of Los Angeles, Case No. 21SMCV00764 (“PAGA Action”).

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- e. On June 4, 2021, Defendant removed the Action to the United States District Court for the Central District of California (the “Court”), Case No. 21-CV-04617-FLA-MBKx (i.e., Action) (together with the PAGA Action, the “Actions”).
- f. On June 24, 2021, Plaintiff filed the First Amended Class Action Complaint for Damages in the Action (Doc. No. 11).
- g. On July 2, 2021, Plaintiff filed a Motion to Remand, along with supporting documents (Doc. Nos. 13, 13-1, & 13-2).
- h. On July 16, 2021, Defendant filed an Opposition to Plaintiff’s Motion to Remand (Doc. No. 19).
- i. On July 22, 2021, Defendant filed a Motion to Dismiss Plaintiff’s First and Fourth Through Eighth Causes of Action in the First Amended Complaint, along with supporting documentation (Doc. Nos. 20 & 20-1).
- j. On July 23, 2021, Plaintiff filed a Reply in Support of Motion to Remand Pursuant to 28 U.S.C. § 1447 (Doc. No. 21).
- k. On July 30, 2021, Plaintiff filed an Opposition to Defendants’ Motion to Dismiss Plaintiff’s First and Fourth Through Eighth Causes of Action in the First Amended Complaint, along with supporting documentation (Doc. No. 23 & 23-1).
- l. On August 6, 2021, Defendant filed a Reply in Support of its Motion to Dismiss Plaintiff’s First and Fourth Through Eighth Causes of Action in the First Amended Complaint (Doc. No. 25).
- m. On October 4, 2021, Plaintiff served on Defendant multiple sets of written discovery requests (specifically, Form Interrogatories – General (Set One), Special Interrogatories (Sets One and Two), and Request for Production of Documents (Set One)), and served notices of deposition of person most knowledgeable with accompanying

- requests for productions of documents on Defendant.
- n. On July 5, 2022, the Court entered an Order Denying Plaintiff's Motion to Remand [Dkt. 13] and Granting in Part Defendant's Motion to Dismiss [Dkt. 20] (Doc. No. 27).
- o. On July 26, 2022, Defendant filed its Answer to Plaintiff's First Amended Complaint (Doc. No. 32).
- p. On August 24, 2022, the Parties participated in a private mediation before Jeffrey Krivis, Esq., a well-respected mediator experienced in handling complex wage-and-hour matters. With the aid of the mediator's evaluations, the Parties reached the Settlement to resolve the Actions.
- q. On October 14, 2022, the Parties filed a Joint Notice of Settlement and Stipulation Vacating Scheduling Conference (Doc. No. 41).
- r. On October 2, 2023, Plaintiff filed his Motion for Preliminary Approval of Class Action Settlement ("Motion for Preliminary Approval") and supporting documents (Doc. Nos. 58, 58-1, 58-2, & 58-3) in the Action, thereby seeking preliminary approval of the Joint Stipulation of Class Action and PAGA Settlement and Release of Claims and Addendum No. 1 to Joint Stipulation of Class Action and PAGA Settlement and Release of Claims entered into by the Parties.
- s. On November 14, 2023, the Court entered an (In Chambers) Order Taking Motion of Plaintiff Manuel Bruno for Preliminary Approval of Class Action and PAGA Claim (Dkt. [58]) Under Submission (Doc. No. 63), thereby taking the Motion for Preliminary Approval under submission without oral argument and vacating the hearing on the Motion for Preliminary Approval.
- t. On August 30, 2024, the Court entered an Order Granting in Part and Denying in Part Motion for Preliminary Approval of Class Action and PAGA Settlement ("August 30, 2024 Order") (Doc. No. 65), thereby

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1 granting Plaintiff leave to file the Second Amended Complaint by
2 September 6, 2024, provisionally certifying the proposed classes for
3 purposes of settlement on the condition that Plaintiff files a
4 supplemental declaration by September 6, 2024 (attesting that he
5 understands he owes fiduciary duties to the classes and has an
6 obligation to seek to maximize the classes' recovery), and denying
7 Plaintiff's Motion for Preliminary Approval with sixty (60) calendar
8 days leave to amend (namely, providing the Parties an opportunity to
9 submit an amended settlement agreement and supplemental papers
10 addressing particular issues raised by the Court regarding the
11 monetary allocations for the Net California Settlement Fund, FCRA
12 Settlement Amount, and PAGA Settlement Amount, and to provide
13 additional information to support the allocation for the Class Counsel
14 Award, in order to support a finding that the proposed settlement is
15 fundamentally fair and reasonable).

16 u. On September 5, 2024, Plaintiff filed the Second Amended Class
17 Action Complaint for Damages and Enforcement Under the Private
18 Attorneys General Act, Cal. Labor Code § 2698 Et Seq. (Doc. No. 66)
19 in the Action.

20 v. Plaintiff's core allegations are that Defendant violated the California
21 Labor Code and California Business and Professions Code by, *inter alia*,
22 failing to properly pay minimum and overtime wages, failing to provide
23 compliant meal and rest periods or pay associated premiums, failing to
24 timely pay wages upon termination and associated waiting time
25 penalties, failing to provide complaint wage statements, and failing to
26 reimburse necessary business-related expenses. Plaintiff contends that
27 Defendant's conduct constitutes unfair business practices and gives rise
28 to penalties under PAGA. Plaintiff also alleges that Defendant violated

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1 the Fair Credit Reporting Act (codified at 15 U.S.C. § 1681 *et seq.*)
2 (“FCRA”). Plaintiff further alleges that Defendant’s failure to properly
3 pay all compensation due, arises from, *inter alia*, Defendant’s
4 practices and policies which required Class Members to work before
5 clocking in for their shifts and after clocking out of their shifts. As a
6 result, Plaintiff contends that he and the Class Members are entitled
7 to, *inter alia*, unpaid wages, penalties (including and not limited to,
8 penalties pursuant to PAGA), and attorneys’ fees.

9 w. Defendant denies any liability of any kind associated with the claims and
10 allegations, and further denies that Plaintiff or the Class Members are
11 entitled to any relief. Defendant also denies that this case is appropriate
12 for class or representative treatment for any purpose other than the
13 Settlement. Defendant maintains, among other things, that they have
14 complied with federal and California laws in all respects.

15 x. On September 6, 2024, Plaintiff filed the Supplemental Declaration of
16 Manuel Bruno in Support of Plaintiff’s Motion for Preliminary
17 Approval of Class Action Settlement (Doc. No. 67) in the Action.

18 y. On October 29, 2024, Plaintiff filed the Declaration of Joanna Ghosh
19 in Support of Plaintiff’s Motion for Preliminary Approval of Class
20 Action Settlement (Doc. No. 68) in the Action, thereby addressing the
21 issues raised in the August 30, 2024 Order and informing the Court
22 that the Parties were meeting and conferring and in the process of
23 negotiating an amended settlement agreement that would provide for
24 different monetary allocations for the Net Class Settlement Fund,
25 FCRA Settlement Amount, and PAGA Settlement Amount.

26 z. On November 26, 2024, the Court entered an Order Certifying
27 Provisionally the Proposed Classes for Purposes of Settlement
28 Proceedings and Extending the Parties’ Deadline to File an Amended

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1 Motion for Preliminary Approval of Class Action and PAGA
2 Settlement [Dkts. 65, 68] (Doc. No. 69) (“November 26, 2024
3 Order”). The November 26, 2024 Order noted, *inter alia*, that the
4 Parties were negotiating an amended settlement agreement, and
5 extended the deadline to file an amended Motion for Preliminary
6 Approval to December 31, 2024.

7 aa. On December 31, 2024, Plaintiff filed the Supplemental Declaration
8 of Joanna Ghosh in Support of Plaintiff’s Motion for Preliminary
9 Approval of Class Action Settlement (Doc. No. 70) in the Action,
10 thereby addressing the issues raised in the August 30, 2024 Order and
11 presenting to the Court, for its consideration and approval, the
12 partially-executed First Amended Joint Stipulation of Class Action
13 and PAGA Settlement and Release of Claims (“First Amended
14 Settlement Agreement”), as well as revised versions of the three
15 iterations of the Class Notice.

16 bb. On January 6, 2025, the Court entered an Order (Doc. No. 71), thereby
17 further extending the Parties’ deadline to file an amended Motion for
18 Preliminary Approval to January 17, 2025 (“January 6, 2025 Order”).
19 The January 6, 2025 Order included the following recommendation:
20 “[a]s the proportion of civil penalties to be distributed to the California
21 Labor and Workforce Development Agency has changed effective
22 July 1, 2024, the amended motion should reflect the correct allocation
23 under Cal. Labor Code § 2699(m).”

24 cc. On January 17, 2025, Plaintiff filed the Supplemental Declaration of
25 Selena Matavosian in Support of Plaintiff’s Motion for Preliminary
26 Approval of Class Action Settlement and supporting documents (Doc.
27 Nos. 72 & 72-1) in the Action, thereby addressing the issues raised in
28 the January 6, 2025 Order and presenting to the Court, for its

1 consideration and approval, the fully-executed First Amended
2 Settlement Agreement.

3 dd. On February 12, 2025, the Court entered an (In Chambers) Order
4 (Doc. No. 73), thereby ordering “the Parties to Show Cause (“OSC”)
5 in writing, on or before February 21, 2025, why the action should not
6 be dismissed for lack of prosecution,” and that “the filing of an
7 amended motion shall constitute a sufficient response to the OSC.”

8 ee. On February 21, 2025, Plaintiff filed the Renewed Motion for
9 Preliminary Approval of Class Action and PAGA Settlement
10 (“Renewed Motion for Preliminary Approval”), along with supporting
11 documentation, in the Action (Doc. No. 74, 74-1, 74-2, 74-3 and 74-
12 4), thereby seeking preliminary approval of the First Amended
13 Settlement Agreement entered into by the Parties.

14 ff. On March 11, 2025, the Court entered a Corrected Order Granting
15 Motion for Preliminary Approval of Class Action and PAGA
16 Settlement [Dkt. 74] (Doc. No. 77) (“March 11, 2025 Order”), thereby
17 granting the Renewed Motion for Preliminary Approval and
18 authorizing notice to be sent to the Class Members on the condition
19 that the Class Notice, First Amended Agreement and all other
20 documents are corrected to identify all claims in the Second Amended
21 Complaint and to reflect a twenty-five percent (25%) attorneys’ fee
22 award. The March 11, 2025 Order also ordered Plaintiff to file proof
23 of service of the settlement agreement to the LWDA and notice to the
24 appropriate federal and state officials pursuant to 28 U.S.C. § 1715(b).

25 gg. On March 18, 2025, Plaintiff filed the Supplemental Declaration of
26 Selena Matavosian in Support of Plaintiff’s Renewed Motion for
27 Preliminary Approval of Class Action and PAGA Settlement (Doc.
28 No. 78), thereby partially addressing the issues raised in the March 11,

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2025 Order.

hh. On April 9, 2025, Defendant filed the Declaration of Omar M. Aniff Regarding Further Notice of Proposed Class Action Settlement Provided Pursuant to 28 U.S.C. § 1715 (Doc. No. 79).

ii. On April 14, 2025, Plaintiff filed the Further Supplemental Declaration of Selena Matavosian in Support of Plaintiff's Renewed Motion for Preliminary Approval of Class Action and PAGA Settlement (Doc. No. 80) ("April 14, 2025 Declaration of Selena Matavosian"), thereby addressing the remaining issues raised in the March 11, 2025 Order, and presenting to the Court, for its consideration and approval, the Settlement Agreement, as well as the revised versions of the three (3) iterations of the Class Notice.

jj. On April 23, 2025, the Court entered an (In Chambers) Order, thereby approving the three (3) versions of the Class Notice as provided in the April 14, 2025 Declaration of Selena Matavosian.

kk. On July 25, 2025, the Parties filed a Stipulation to Continue Deadline and Hearing on Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement (Doc. No. 85).

ll. On July 31, 2025, the Court entered the Order Approving Stipulation to Continue Deadline and Hearing on Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement (Doc. No. 86), thereby ordering the Class Notice to be mailed by August 11, 2025, setting the Response Deadline to be within forty-five (45) calendar days of the date the Class Notice is mailed, continuing the hearing on the Motion for Final Approval to December 5, 2025 at 2:00 p.m. in Department 6B of the above-captioned Court, and setting a deadline to file the Motion for Final Approval at least twenty-eight (28) calendar days prior to the hearing.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the matter since prior to its commencement in the Superior Court of California for the County of Los Angeles on March 3, 2021. This matter was removed by Defendant to the United States Federal District Court for the Central District of California on June 4, 2021.

6. Before initiating the cases, 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 Plaintiff, and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims, FCRA claims, rounding, regular rate of pay, reporting time pay, providing a day of rest, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and Defendant's defenses. After conducting initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiff 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 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.

7. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the cases, 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 and analyzed a large volume of pages of information, documents, and data obtained from Plaintiff, Defendant, and other sources, in the course of the litigation and in connection with the mediation and settlement negotiations. Class Counsel served multiple sets of

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1 formal written discovery requests onto Defendant (specifically, Form
2 Interrogatories – General (Set One), Special Interrogatories (Sets One and Two),
3 and Request for Production of Documents (Set One)), and noticed the depositions
4 of Defendant’s person most knowledgeable designee(s), along with accompanying
5 requests for production of documents. The volume of data and documents that
6 Class Counsel reviewed and analyzed included and was not limited to:
7 employment records of Plaintiff, a detailed sampling of Class Members’ time and
8 pay data, job description, earning statements, Defendant’s Employee Handbook,
9 company policy acknowledgments and forms (including, but not limited to,
10 Defendant’s Employee Handbook Acknowledgment Form, California Meal
11 Period Policy Acknowledgement, New Hire Acknowledgement of the Compliance
12 Program and Code of Ethical Conduct, Receipt and Acknowledgement of
13 Acceptable Use Policy, Workers’ Comp – Notice to New Employees),
14 employment policies, practices, and procedures (including, but not limited to,
15 Defendant’s California Meal Period Policy, Employee Handbook Addendum/Paid
16 Sick Leave Policy, Voluntary Self-Identification), among other information and
17 documents. Class Counsel had the opportunity to interview and obtain information
18 from Plaintiff and percipient witnesses, and reviewed and analyzed a volume of
19 information, data, and documents obtained from Plaintiff, Defendant, and other
20 sources. Class Counsel developed liability, damages, violation, and penalties
21 valuation models in the course of litigation and in connection with the mediation
22 and settlement negotiations, and met and conferred with Defendant’s counsel on
23 numerous occasions, e.g., to discuss issues relating to the pleadings, case
24 management, motion practice, formal and informal discovery, jurisdiction, and the
25 production of information, documents, and data in the course of litigation and in
26 connection with mediation and settlement negotiations, and settlement. Other
27 work performed by Class Counsel included, and was not limited to, case strategy
28 and analysis; researching, drafting, reviewing, and/or revising the pleadings,

1 motion-related papers, the mediation briefing and supporting materials, and
2 settlement documents; and preparing for and attending court proceedings,
3 mediation, and settlement negotiations, among other tasks.

4 8. As outlined herein, the Parties have conducted significant
5 investigation and formal and informal discovery during the course of litigating this
6 matter, the mediation, and extensive settlement negotiations. Class Counsel
7 analyzed a volume of pages of information, documents, and data obtained from
8 Plaintiff, Defendant, and other sources that provided a critical understanding of
9 the nature of the work performed by Settlement Class Members and PAGA Group
10 Members, as well as Defendant's organizational structure and their operations and
11 employment policies, practices, and procedures. The information, documents, and
12 data were used in analyzing liability, damages, penalties, and other valuation
13 issues in connection with all phases of the litigation, and ultimately, in connection
14 with the mediation and settlement negotiation process. Class Counsel also
15 performed significant research into the applicable law, which is evolving as it
16 relates to class certification, manageability, off-the-clock theory, meal and rest
17 periods, FCRA claims and penalties, representative PAGA claims and penalties,
18 rounding, regular rate of pay, reporting time pay, providing a day of rest, wage-
19 and-hour law and enforcement, Plaintiff's claims and allegations, and Defendant's
20 defenses thereto, as well as facts discovered.

21 9. After conducting significant investigation of the facts and law during
22 the prosecution of this matter, and formal and informal discovery, counsel for the
23 Parties engaged in extensive settlement negotiations to try to resolve the cases.
24 These efforts included participating in a mediation session conducted on August
25 24, 2022 by Jeffrey Krivis, Esq., a well-regarded mediator experienced in handling
26 complex labor and employment matters. During all settlement discussions, the
27 Parties conducted their negotiations at arm's length in an adversarial position. In
28 the course of the mediation and settlement negotiations, the Parties exchanged

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1 information, documents, and data, and discussed various aspects of the cases,
2 including and not limited to, the risks and delays of further litigation, the risks and
3 expenses to the Parties of proceeding with class certification, representative
4 adjudication, and trial; the law relating to class certification, manageability, off-
5 the-clock theory, rounding, regular rates of pay, reporting time pay, providing a
6 day of rest, meal and rest periods (including *inter alia*, on premises breaks),
7 expense reimbursements, recordkeeping and wage statement requirements,
8 representative PAGA claims and penalties, FCRA claims and penalties, and wage-
9 and-hour law and enforcement; Plaintiff's claims and allegations, and Defendant's
10 defenses thereto, as well as the evidence produced and analyzed; and the
11 possibility of appeals, among other things. Arriving at a settlement that was
12 acceptable to the Parties was not easy. Defendant contended that individualized
13 questions of fact predominate over any common issues, and these issues would
14 pose challenges to class certification and representative adjudication. Defendant
15 and its counsel felt strongly about Defendant's ability to avoid class certification
16 prevail on the merits and, while Plaintiff and Class Counsel believed that they
17 would be able to obtain class certification and prevail at trial. With the aid of the
18 mediator's evaluation, the Parties ultimately agreed that this matter was well-
19 suited for settlement given the legal issues relating to Plaintiff's principal claims,
20 as well as the costs and risks to the Parties that would attend further litigation.
21 These risks of further litigation include, and are not limited to, a determination that
22 the claims are unsuitable for class treatment and/or representative adjudication,
23 class de-certification after certification of a class, allowing a jury to decide the
24 claims asserted in the cases, and the real possibility of no monetary recovery after
25 years of litigation.

26 10. By way of the accompanying Motion for Fees, Class Counsel seeks
27 attorneys' fees in the amount of \$625,000.00, which is twenty-five percent (25%)
28 of the Gross Settlement Fund of \$2,500,000.00. Pursuant to the contingency-fee

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1 agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has
2 agreed to a contingency fee of at least twenty-five percent (25%) of the recovery.

3 11. The attorneys' fees sought are commensurate with: (1) the risk that
4 Class Counsel took in commencing the cases; (2) the time, effort, and expense that
5 Class Counsel dedicated to the cases; (3) the skill and determination that Class
6 Counsel have shown; (4) the results that Class Counsel have achieved throughout
7 the litigation; (5) the value of the settlement that Class Counsel have achieved in
8 this matter; and (6) the other cases that Class Counsel have turned down in order
9 to devote their time and efforts to these cases. The nature of the work performed,
10 skill exercised, and the outcome in this matter which involves an outstanding
11 monetary recovery involving a Gross Settlement Fund of \$2,500,000.00—with a
12 Net California Settlement Fund of approximately at least \$1,173,257.02 to be paid
13 to Settlement California Class Members (with gross Individual California
14 Settlement Payments averaging approximately more than \$559.99), payment of
15 \$64,575.00 to PAGA Group Members (with Individual PAGA Settlement
16 Payments averaging approximately \$34.53), payment of \$193,725.00 to the State
17 of California, and payment of \$377,932.50 to FCRA Settlement Class Members
18 (with Individual FCRA Settlement Payments estimated to be approximately
19 \$37.28)—support the percentage fee sought.

20 12. While not necessarily required to be demonstrated because the
21 percentage fee is proper for this settlement, it should be noted that Class Counsel
22 has incurred many hours of work in connection with prosecuting this matter such
23 that the award of attorneys' fees is also justified under a lodestar analysis.
24 Attorneys at Lawyers *for* Justice, PC have spent a total of **522.00 hours**
25 performing tasks and obtaining recovery in this matter. Attached hereto as
26 **"EXHIBIT A"** is an Attorney Task and Time Chart that sets forth in detail the
27 nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and
28 the time incurred by them in performing those services. These hours include work

1 done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the
2 hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation
3 support personnel actively engaged in assisting with the prosecution of this matter.

4 13. The attorneys identified in Table 1 and Table 2, filed concurrently
5 herewith, have worked on the cases, and they have performed their work in this
6 matter exclusively on a contingency basis.

7 14. Each of the attorneys identified in Table 1 and Table 2, filed
8 concurrently herewith, performed their work in this matter exclusively on a
9 contingency basis. Plaintiff has not been billed for, and has not paid for, any of
10 the work performed in the instant actions to date by attorneys at Lawyers *for*
11 Justice, PC (i.e., Plaintiff has not been billed for or paid the hourly rates of the
12 various attorneys who performed work in the instant actions). Lawyers *for* Justice,
13 PC will receive compensation for the work performed by attorneys at the firm thus
14 far, if attorneys' fees are awarded by the Court as a part of the Settlement.

15 15. The billing rates for each of the attorneys listed in Table 1 and Table
16 2, filed concurrently herewith, who worked on this matter, are reasonable, usual,
17 and commensurate with the individual backgrounds, training, and experience of
18 the attorneys, in litigating complex wage-and-hour actions, and in particular,
19 employment class actions and representative actions. These rates are the
20 reasonable and usual hourly rates for the referenced attorneys' services in wage
21 and hour class action cases handled by Lawyers *for* Justice, PC, and are
22 commensurate with rates charged in the community by other plaintiffs-side and
23 defense-side attorneys in this practice area. Lawyers *for* Justice, PC almost
24 exclusively handles the prosecution of plaintiffs' side cases. To the best of
25 undersign counsel's knowledge, Lawyers *for* Justice, PC has not billed nor
26 required any of its clients, who are usually workers who do not have the financial
27 means to pay a retainer or otherwise fund the prosecution or litigation of their
28 wage-and-hour cases against their current or former employers, to pay the firm for

1 the legal work performed by attorneys at the firm (and thus, has not billed any
2 clients using any hourly rates).

3 **EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC**

4 16. For over a decade, Lawyers *for* Justice, PC has almost exclusively
5 focused on the prosecution of consumer and employment class actions, involving
6 wage-and-hour claims, race discrimination, unfair business practices, or consumer
7 fraud. Currently, Lawyers *for* Justice, PC is attorney of record in dozens of
8 employment-related putative class actions in both state and federal courts in the
9 State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus
10 on litigating complex wage-and-hour class and Private Attorneys General Act
11 (“PAGA”) representative actions. The firm has successfully litigated cases
12 involving nearly every aspect of California wage and hour law, including payment
13 of overtime and minimum wages, provision of meal and rest breaks and/or
14 premiums wages for same, timely payment of wages, provision of compliant wage
15 statements, reimbursement of business expenses, the executive, administrative,
16 and other overtime exemptions to the State of California and federal overtime
17 compensation requirements, PAGA claims, and sister statutes under federal law.
18 During a relatively short time, in association with other law firms, Lawyers *for*
19 Justice, PC has recovered millions of dollars on behalf of thousands of individuals
20 in California.

21 17. Edwin Aiwarzian is the Managing Member and Shareholder of
22 Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine
23 University in April of 1999 and earned a Juris Doctor degree from Pepperdine
24 University School of Law in May of 2004. He has extensive formal training in
25 dispute resolution and negotiation from the Straus Institute for Dispute Resolution
26 as part of its Masters in Dispute Resolution degree program. In addition, he has
27 previously served as a pro bono mediator for the Los Angeles County Superior
28 Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the

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1 UCLA Extension Program. During the summer of 2000, he studied Legal Writing
2 at Harvard University. From approximately September 2002 to approximately
3 December 2002, he served as a Judicial Extern to the Honorable Kim McLane
4 Wardlaw of the United States Court of Appeals for the Ninth Circuit. From
5 approximately June 2002 to approximately August 2002, he served as a Judicial
6 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the
7 Second Appellate District. In December of 2004, he obtained a license to practice
8 law from the California State Bar. Since in or around October of 2008, through
9 his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the
10 prosecution of consumer and employment class actions. While employed by
11 Lawyers *for* Justice PC, he has argued over 100 motions, taken or defended over
12 150 depositions, prepared dozens of expert witnesses for deposition or trial, and
13 attended over 175 mediations. Together with other attorneys at the firm, and in
14 some cases in conjunction with co-counsel, he has successfully litigated cases
15 involving the executive, administrative, and other overtime exemptions to the
16 State of California and federal overtime compensation requirements. Under his
17 supervision, Lawyers *for* Justice, PC has successfully obtained class certification
18 by contested motion practice in approximately sixteen (16) cases in the last decade,
19 and litigated over 1,000 class action or representative action cases.

20 18. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice,
21 PC. He received his Bachelor of Arts degree from University of California, Los
22 Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum
23 laude, from Southwestern Law School. From approximately May 2007 to
24 approximately July 2007, he served as a Judicial Extern to the Honorable Earl
25 Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
26 From approximately August 2008 to approximately December 2008, he served as
27 a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States
28 Court of Appeals for the Ninth Circuit. He was admitted to practice law in

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

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

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2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. She is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

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

21. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Science degree from California State University, Northridge in 2019, and was the recipient of the Wildman Schumacher Scholarship. I earned a Juris Doctor degree from Southwestern Law School in 2022, and I was the recipient of the Witkin Award for Academic Excellence. I was admitted to practice law in California in 2022. I am admitted to practice before all courts of the State of California and all U.S. Federal District Courts in the State of California. I have worked on many wage-and-hour class action and PAGA representative cases, and my work on these cases has included, *inter alia*, researching and drafting pleadings and motion-related papers, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, performing claims evaluation and analysis, and making court appearances.

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

22. 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 matter. The Settlement provides for reimbursement of Class Counsel's litigation costs and expenses in the amount of up to \$17,000.00. Class Counsel seeks reimbursement of **\$13,010.48** in litigation costs and expenses incurred in the matter, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. The cost savings of \$3,989.52 will be part of the Net California Settlement Fund, which will be distributed to the Settlement California Class Members in accordance with the Settlement.

CLASS REPRESENTATIVE SERVICE AWARD TO PLAINTIFF

23. In recognition of his efforts and work spearheading the prosecution of the cases and serving as the Class Representative, as well as his broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set

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1 forth in Section III.4 of the Settlement Agreement), the Settlement provides for a
2 Class Representative Service Award in the amount of \$7,500.00 to Plaintiff.
3 Plaintiff spent a substantial amount of time and effort discussing his employment
4 with Class Counsel, gathering and providing relevant documents and information,
5 and providing facts and evidence to support the prosecution of the claims. Plaintiff
6 was available whenever Class Counsel needed him and actively tried to obtain and
7 provide information that would help obtain a recovery in this matter. Accordingly,
8 it is fair and appropriate for Plaintiff to receive \$7,500.00 as a reasonable Class
9 Representative Service Award for his broader waiver and release of claims and
10 services performed in this matter, in addition to his Individual California
11 Settlement Payment, Individual FCRA Settlement Payment, and Individual PAGA
12 Settlement Payment (if applicable).

13 24. I submit that the Settlement is fair, reasonable, and adequate, and is in
14 the best interests of Plaintiff, California Class Members, FCRA Class Members,
15 PAGA Group Members, and the State of California.

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

18 Executed this 7th day of November 2025, at Glendale, California.

19 

20 _____
21 Selena Matavosian
22
23
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28

EXHIBIT A

MANUEL BRUNO VS. U.S. RENAL CARE, INC.

**Los Angeles County Superior Court, Case No. 21STCV08325 (“Class Action”),
United States District Court, Central District of California Case No. 21-CV-04617-FLA-MBKx (“Federal Action”)**

MANUEL BRUNO VS. U.S. RENAL CARE, INC.

Los Angeles County Superior Court, Case No. 21SMCV00764 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Manuel Bruno (“Plaintiff”) During the Case • Edwin Aiwazian – 0.30 hour • Tara Zabehe – 2.20 hours • Travis J. Maher – 2.50 hours • Selena Matavosian – 6.60 hours • Ovsanna Takvoryan – 2.80 hours • Melissa A. LeBlanc-Mansell – 6.90 hours • Alexandra Rose – 4.50 hours • Jennifer Wai-Shing Maquire – 5.60 hours • Andrew H. Kim – 5.70 hours	37.10

Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses • Edwin Aiwazian – 8.20 hours • Tara Zabehe – 2.50 hours • Jennifer Wai-Shing Maquire – 1.80 hours	12.50
Review and Analyze Court Filings in <i>David Whitaker vs. U.S. Renal Care, Inc.</i> , Los Angeles County Superior Court, Case No. BC649682 • Jennifer Wai-Shing Maquire – 1.20 hours • Andrew H. Kim – 1.10 hours	2.30
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Claims, Conduct Legal Research and Analysis Regarding Claims Involved, and Draft Plaintiff’s Class Action Complaint for Damages (filed on March 3, 2021) (Class Action) • Edwin Aiwazian – 7.50 hours	7.50
Review Court’s Notice of Case Assignment (filed on March 3, 2021) (Class Action) • Edwin Aiwazian – 0.10 hour	0.10
Review Court’s Initial Status Conference Order (Complex Cases and Class Actions) and Minute Order Re: Court Order Re: Complex Designation (filed on March 9, 2021) (Class Action) • Edwin Aiwazian – 0.20 hour	0.20

Investigate the Merits of Plaintiff’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding the Claim, and Draft Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq (filed on April 26, 2021) (PAGA Action) • Edwin Aiwazian – 7.10 hours	7.10
Review Court’s Notice of Case Assignment (filed on April 26, 2021) (PAGA Action) • Edwin Aiwazian – 0.10 hour	0.10
Review Court’s Notice Re: Continuance of Hearing and Order (filed on May 14, 2021) (Class Action) • Edwin Aiwazian – 0.10 hour	0.10
Review Defendant’s Notice of Appearance (filed on May 19, 2021) (Class Action) • Edwin Aiwazian – 0.10 hour	0.10
Draft Plaintiff’s Notice of Posting Jury Fees (filed on May 21, 2021) (Class Action) • Edwin Aiwazian – 0.10 hour	0.10
Meet and Confer with Defendant U.S. Renal Care, Inc.’s (“Defendant”) Counsel, and Draft Joint Initial Status Conference Statement (filed on June 3, 2021) (Class Action) • Tara Zabehe – 0.20 hour • Jennifer Wai-Shing Maguire – 1.10 hours	1.30
Review Defendant’s Certification of Interested Parties and Disclosure Statements in Compliance with FRCP 7.1 and Local Rule 7.1-1 (filed on June 4, 2021) (Federal Action) • Jennifer Wai-Shing Maguire – 0.10 hour	0.10

Review Defendant's Notice of Pendency of Other Actions or Proceedings Pursuant to Local Rule 83-1.4.1 (filed on June 4, 2021) (Federal Action) • Tara Zabehe – 0.10 hour • Jennifer Wai-Shing Maquire – 0.10 hour	0.20
Review Court's Notice of Assignment to United States Judges and Notice to Parties of Court-Directed ADR Program (filed on June 4, 2021) (Federal Action) • Jennifer Wai-Shing Maquire – 0.20 hour	0.20
Review Defendant's Notice to Adverse Party and Clerk of the California Superior Court of Removal of Civil Action to United States District Court (filed on June 7, 2021) (Class Action) • Jennifer Wai-Shing Maquire – 0.10 hour	0.10
Review and Analyze Defendant's Answer to Plaintiff's Complaint, and Research Affirmative Defenses in Defendant's Answer (filed on June 10, 2021) (PAGA Action) • Jennifer Wai-Shing Maquire 1.50 hours	1.50
Review Court's Minute Order Re: Initial Status Conference (filed on June 10, 2021) (Class Action) • Jennifer Wai-Shing Maquire – 0.10 hour	0.10
Review Court's Initial Standing Order (filed on June 11, 2021) (Federal Action) • Tara Zabehe – 0.10 hour • Jennifer Wai-Shing Maquire – 0.20 hour	0.30
Review Defendant's Notice of Entry of Minute Order (filed on June 23, 2021) (Class Action) • Jennifer Wai-Shing Maquire – 0.10 hour	0.10

Draft Plaintiff's First Amended Class Action Complaint for Damages and Conduct Legal Research and Analysis of All Claims Involved (filed on June 24, 2021) (Federal Action) Edwin Aiwarzian – 3.50 hours	3.50
Review Defendant's Notice of Withdrawal of Motion to Partially Dismiss Plaintiff's Complaint (filed on June 25, 2021) (Federal Action) Jennifer Wai-Shing Maguire – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Stipulation to Extend Defendant's Time to Respond to Plaintiff's First Amended Complaint (filed on July 2, 2021) (Federal Action) Jennifer Wai-Shing Maguire – 1.10 hours	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review and/or Revise Joint Stipulation to Continue Plaintiff's Motion to Remand; and [Proposed] Order Thereon (filed on July 8, 2021) (Federal Action) Jennifer Wai-Shing Maguire – 1.10 hours	1.10
Review Court's (In Chambers) Order Striking Stipulation (filed on July 8, 2021) (Federal Action) Jennifer Wai-Shing Macquire – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Plaintiff's Motion to Remand; and [Proposed] Order Thereon (filed on July 9, 2021) (Federal Action) Jennifer Wai-Shing Maguire – 0.20 hour	0.20
Review Court's Order Granting Joint Stipulation to Continue Briefing and Hearing on Plaintiff's Motion to Remand [Dkt. 17] (filed on July 9, 2021) (Federal Action) Jennifer Wai-Shing Maguire – 0.10 hour	0.10

Review Court's Notice to Filer of Deficiencies in Electronically Filed Documents (filed on July 26, 2021) (Federal Action) Jennifer Wai-Shing Maquire – 0.10 hour	0.10
Review Court's Notice Re: Continuance of Hearing and Order (filed on September 1, 2021) (PAGA Action) Tara Zabehi – 0.10 hour	0.10
Draft Plaintiff's Case Management Statement (filed on October 13, 2021) (PAGA Action) Tara Zabehi – 0.50 hour	0.50
Review Defendant's Case Management Statement (filed on October 14, 2021) (PAGA Action) Tara Zabehi – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order Thereon (filed on October 27, 2021) (PAGA Action) Tara Zabehi – 1.10 hours	1.10
Review Court's Order Continuing Case Management Conference (filed on October 28, 2021) (PAGA Action) Tara Zabehi – 0.10 hour	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Removal (filed on December 13, 2021) (Class Action) Tara Zabehi – 0.10 hour	0.10

Meet and Confer with Defendant’s Counsel, and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order Thereon (filed on March 1, 2022) (PAGA Action) • Andrew H. Kim – 1.10 hours	1.10
Review Court’s Order Re: Joint Stipulation to Continue Case Management Conference (filed on March 3, 2022) (PAGA Action) • Andrew H. Kim – 0.10 hour	0.10
Meet and Confer with Defendant’s Counsel and Draft, Review, and/or Revise Stipulation to Extend Time to Respond to First Amended Complaint by Not More Than 30 Days (L.R. 8-3); and [Proposed] Order Thereon (filed on July 20, 2022) (Federal Action) • Andrew H. Kim – 1.10 hours	1.10
Draft Plaintiff’s Notice of Appearance or Withdrawal of Counsel (filed on July 20, 2022) (Federal Action) • Edwin Aiwarzian – 0.10 hour	0.10
Review Court’s Order Granting Stipulation to Extend Defendant’s Deadline to File Response to First Amended Complaint [Dkt. 28] and Order Setting Scheduling Conference (filed on July 22, 2022) (Federal Action) • Andrew H. Kim – 0.10 hour	0.30
Review and Analyze Defendant’s Answer to Plaintiff’s First Amended Complaint and Research Affirmative Defenses in Defendant’s Answer (filed on July 26, 2022) (Federal Action) • Andrew H. Kim – 1.50 hours	1.50
Meet and Confer with Defendant’s Counsel, and Draft, Review, and/or Revise Stipulated Protective Order (filed on August 2, 2022) (Federal Action) • Andrew H. Kim – 1.90 hours	1.90

Review Court's Order Re: Stipulated Protective Order (filed on August 3, 2022) (Federal Action) Andrew H. Kim – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel and Draft, Review, and/or Revise Joint Stipulation to Continue Scheduling Conference for Good Cause; and [Proposed] Order Thereon (filed on August 3, 2022) (Federal Action) Travis J. Maher – 1.10 hours	1.10
Review Court's Notice to Filer of Deficiencies in Electronically Filed Documents (filed on August 5, 2022) (Federal Action) Travis J. Maher – 0.10 hour	0.10
Review Court's Order Granting in Part Stipulation to Continue Scheduling Conference [Dkt. 36] (filed on August 10, 2022) (Federal Action) Travis J. Maher – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Scheduling Conference for Good Cause; and [Proposed] Order Thereon (filed on September 1, 2022) (Federal Action) Tara Zabehe – 1.10 hours	1.10
Review Court's Order Granting in Part Stipulation to Continue Scheduling Conference [Dkt. 39] (filed on September 8, 2022) (Federal Action) Tara Zabehe – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Stipulation Vacating Scheduling Conference, and [Proposed] Order Thereon (filed on October 14, 2022) (Federal Action) Tara Zabehe – 1.10 hours	1.10

Review Court's Order Vacating Scheduling Conference [Dkt. 41] (filed on October 19, 2022) (Federal Action) • Tara Zabehi – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement and Notice of Settlement (filed on October 21, 2022) (PAGA Action) • Melissa A. LeBlanc-Mansell – 0.90 hour	0.90
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order Thereon (filed on October 24, 2022) (PAGA Action) • Melissa A. LeBlanc-Mansell – 0.60 hour	0.60
Review Court's Order Continuing the Case Management Conference (filed on October 25, 2022) (PAGA Action) • Melissa A. LeBlanc-Mansell – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; and [Proposed] Order Thereon (filed on January 25, 2023) (PAGA Action) • Ovsanna Takvoryan – 1.10 hours	1.10
Review Court's Order Continuing the Case Management Conference (filed on January 26, 2023) (PAGA Action) • Ovsanna Takvoryan – 0.10 hour	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Deadline to File a Motion for Preliminary Approval of Class Action Settlement; and [Proposed] Order Thereon (filed on February 15, 2023) (Federal Action) • Osvanna Takvoryan – 1.10 hours	1.10
Review Court's (In Chambers) Order Striking Stipulation [Dkt. 43] (filed on February 16, 2023) (Federal Action) • Ovsanna Takvoryan – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Deadline to File a Motion for Preliminary Approval of Class Action Settlement; and [Proposed] Order Thereon (filed on February 16, 2023) (Federal Action) • Osvanna Takvoryan – 1.10 hours	1.10
Review Court's Order Granting Joint Stipulation to Continue Deadline to File a Motion for Preliminary Approval of Class Action Settlement [Dkt. 45] (filed on February 17, 2023) (Federal Action) • Ovsanna Takvoryan – 0.10 hour	0.10
Draft Plaintiff's Notice of Appearance or Withdrawal of Counsel (filed on February 17, 2023) (Federal Action) • Travis J. Maher – 0.10 hour	0.10
Draft Plaintiff's Notice of Appearance or Withdrawal of Counsel (filed on February 21, 2023) (Federal Action) • Tara Zabehe – 0.10 hour	0.10

Draft Plaintiff's Notice of Appearance or Withdrawal of Counsel (filed on March 3, 2023) (Federal Action) • Ovsanna Takvoryan – 0.10 hour	0.10
Draft Plaintiff's Notice of Appearance or Withdrawal of Counsel (filed on March 3, 2023) (Federal Action) • Alexandra Rose – 0.10 hour	0.10
Review Defendant's Notice of Appearance or Withdrawal of Counsel (filed on April 14, 2023) (Federal Action) • Alexandra Rose – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on May 22, 2023) (PAGA Action) • Alexandra Rose – 1.10 hours	1.10
Review Court's Order Re: Joint Stipulation to Continue Case Management Conference (filed on May 24, 2023) (PAGA Action) • Alexandra Rose – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Deadline to File Motion for Preliminary Approval of Class Action Settlement; and [Proposed] Order Thereon (filed on June 8, 2023) (Federal Action) • Alexandra Rose – 1.10 hours	1.10
Review Court's Order Granting Joint Stipulation to Continue Deadline to File Motion for Preliminary Approval of Class Action Settlement [Dkt. 52] (filed on June 13, 2023) (Federal Action) • Alexandra Rose – 0.10 hour	0.10

Meet and Confer with Defendant’s Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on August 30, 2023) (PAGA Action) Selena Matavosian – 1.10 hours	1.10
Review Court’s Order Re: Joint Stipulation to Continue Case Management Conference (filed on September 11, 2023) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Review Court’s Order to Show Cause Why the Court Should Not Dismiss the Action for Lack of Prosecution (filed on September 25, 2023) (Federal Action) Selena Matavosian – 0.10 hour	0.10
Draft Plaintiff’s Notices of Appearance or Withdrawal of Counsel (filed on September 26, 2023) (Federal Action) - Selena Matavosian – 0.20 hour - Joanna Ghosh – 0.20 hour	0.40
Draft Plaintiff’s Response to Order to Show Cause (filed on October 2, 2023) (Federal Action) - Joanna Ghosh – 0.30 hour - Selena Matavosian – 0.60 hour	0.90
Review Court’s Notice to Filer of Deficiencies in Electronically Filed Document (filed on October 3, 2023) (Federal Action) Selena Matavosian – 0.10 hour	0.10
Review Defendant’s Notice of Proposed Settlement and Notice of Errata Re: Notice of Proposed Class Action Settlement; and Exhibit A in Support Thereof (filed on October 18, 2023) (Federal Action) Selena Matavosian – 0.30 hour	0.30

Meet and Confer with Defendant’s Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on October 30, 2023) (PAGA Action) Selena Matavosian – 1.10 hours	1.10
Review Court’s Order Re: Joint Stipulation to Continue Case Management Conference (filed on October 31, 2023) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Draft Plaintiff’s Notice of Entry of Judgment or Order (filed on November 2, 2023) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Meet and Confer with Defendant’s Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on January 8, 2024) (PAGA Action) Selena Matavosian – 1.10 hours	1.10
Review Court’s Order Re: Joint Stipulation to Continue Case Management Conference (filed on January 10, 2024) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Review Court’s (In Chambers) Order (filed on March 12, 2024) (Federal Action) Selena Matavosian – 0.10 hour	0.10
Meet and Confer with Defendant’s Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on April 15, 2024) (PAGA Action) Selena Matavosian – 1.10 hours	1.10

Review Court's Order Re: Joint Stipulation to Continue Case Management Conference (filed on April 16, 2024) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on April 23, 2024) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on July 8, 2024) (PAGA Action) Brian J. St. John – 1.10 hours	1.10
Review Court's Order Re: Joint Stipulation to Continue Case Management Conference (filed on July 12, 2024) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Draft Plaintiff's Second Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, Cal. Labor Code § 2698 Et. Seq. and Conduct Legal Research and Analysis of All Claims Involved (filed on September 5, 2024) (Federal Action) - Joanna Ghosh – 1.80 hours - Selena Matavosian – 3.70 hours	5.50
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on October 17, 2024) (PAGA Action) Selena Matavosian – 1.10 hours	1.10
Review Court's Minute Order Re: Court Order (filed on October 23, 2024) (PAGA Action) Selena Matavosian – 0.10 hour	0.10

Meet and Confer with Defendant’s Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on November 1, 2024) (PAGA Action) Selena Matavosian – 1.10 hours	1.10
Review Court’s Order Re: Joint Stipulation to Continue Case Management Conference (filed on November 5, 2024) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Review Court’s (In Chambers) Order (filed on January 6, 2025) (Federal Action) Selena Matavosian – 0.10 hour	0.10
Meet and Confer with Defendant’s Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on February 11, 2025) (PAGA Action) Selena Matavosian – 1.10 hours	1.10
Review Court’s (In Chambers) Order (filed on February 12, 2025) (Federal Action) Selena Matavosian – 0.10 hour	0.10
Review Court’s Minute Order Re: Case Management Conference (filed on February 27, 2025) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Review Court’s Notice of Reassignment of Case Due to Unavailability of Judicial Officer (filed on February 28, 2025) (Federal Action) Selena Matavosian – 0.10 hour	0.10

Review Court's (In Chambers) Order (filed on April 23, 2025) (Federal Action) Selena Matavosian – 0.10 hour	0.10
Draft Plaintiff's Declaration of Selena Matavosian Regarding Submission of Settlement Agreement to California Labor and Workforce Development Agency (filed on April 30, 2025) (Federal Action) Selena Matavosian – 0.70 hour	0.70
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on May 14, 2025) (PAGA Action) Selena Matavosian – 1.10 hour	1.10
Review Court's Order Re: Joint Stipulation to Continue Case Management Conference (filed on May 19, 2025) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on May 28, 2025) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Stipulation to Continue Deadline and Hearing on Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement; and [Proposed] Order Thereon (filed on July 23, 2025) (Federal Action) - Joanna Ghosh – 0.40 hour - Selena Matavosian – 1.10 hours	1.50
Review Court's (In Chambers) Order Striking Stipulation (Dkt. [83]) (filed on July 24, 2025) (Federal Action) Selena Matavosian – 0.10 hour	0.10

Meet and Confer with Defendant's Counsel, and Draft Stipulation to Continue Deadline and Hearing on Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement; and [Proposed] Order Thereon (filed on July 25, 2025) (Federal Action) Selena Matavosian – 0.90 hour	0.90
Review Court's Order Approving Stipulation to Continue Deadline and Hearing on Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement [Dkt. 85] (filed on July 31, 2025) (Federal Action) Selena Matavosian – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on October 7, 2025) (PAGA Action) Selena Matavosian – 1.10 hours	1.10
Review Court's Minute Order Re: Status Conference Re: Settlement (filed on October 22, 2025) (PAGA Action) Selena Matavosian – 0.10 hour	0.10
Appearances	
Prepare for and Telephonically Attend Hearing on Motion for Stay of Proceedings (March 21, 2022) (PAGA Action) Travis J. Maher – 1.10 hours	1.10
Prepare for and Telephonically Attend Case Management Conference Hearing (February 27, 2025) (PAGA Action) Selena Matavosian – 0.80 hour	0.80

Prepare for and Telephonically Attend Status Conference Hearing (October 22, 2025) (PAGA Action) Selena Matavosian – 1.10 hour	1.10
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on December 1, 2020) Edwin Aiwazian – 1.90 hours	1.90
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on January 27, 2021) Edwin Aiwazian – 1.50 hours	1.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on February 5, 2021) - Edwin Aiwazian – 3.50 hours - Jennifer Wai-Shing Maquire – 3.40 hours - Andrew H. Kim – 1.80 hours	8.70
Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on October 4, 2021) (PAGA Action) Tara Zabehe – 4.50 hours	4.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant, and Requests for Production of Documents (Noticed for December 2, 2021; Organizational Structure) (served on October 4, 2021) (PAGA Action) Tara Zabehe – 1.40 hours	1.40

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant, and Requests for Production of Documents (Noticed for December 3, 2021; Wage and Hour Practices) (served on October 4, 2021) (PAGA Action) Tara Zabehe – 1.60 hours	1.60
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (served on February 19, 2021) Edwin Aiwazian – 4.50 hours	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel - Edwin Aiwazian – 2.20 hours - Joanna Ghosh – 1.30 hours - Tara Zabehe – 3.50 hours - Travis J. Maher – 3.10 hours - Brian J. St. John – 1.50 hours - Selena Matavosian – 7.30 hours - Ovsanna Takvoryan – 2.70 hours - Melissa A. LeBlanc-Mansell – 5.30 hours - Alexandra Rose – 5.70 hours - Jennifer Wai-Shing Maquire – 5.50 hours - Andrew H. Kim – 4.40 hours	42.50
Mediation/Settlement	

Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation • Edwin Aiwazian – 5.60 hours • Arby Aiwazian – 9.10 hours • Hagit Goltzer – 16.50 hours • Melissa A. LeBlanc-Mansell – 15.60 hours • Andrew H. Kim – 21.70 hours	68.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analyses and Calculations (submitted on August 17, 2022) • Edwin Aiwazian – 3.30 hours • Arby Aiwazian – 6.80 hours • Hagit Goltzer – 11.20 hours • Andrew H. Kim – 14.10 hours	35.40
Attend Mediation Session (August 24, 2022; via Zoom Video Conference) • Arby Aiwazian – 7.90 hours • Andrew H. Kim – 7.90 hours	15.80
Review and Analyze Mediator’s Proposal (issued on September 10, 2022) • Arby Aiwazian – 0.20 hour • Melissa A. LeBlanc-Mansell – 1.10 hours • Andrew H. Kim – 0.30 hour	1.60
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Agreement (fully executed on November 30, 2022) • Melissa A. LeBlanc-Mansell – 4.50 hours	4.50

Draft, Review, Revise, Negotiate, and/or Finalize Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (fully executed on August 16, 2023), and Draft Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval (for California Class Members), Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval (for FCRA Class Members), and Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval (for California Class Members and FCRA Class Members) • Edwin Aiwazian – 0.60 hour • Joanna Ghosh – 1.20 hours • Brian J. St. John – 2.20 hours • Selena Matavosian – 11.30 hours • Alexandra Rose – 7.40 hours	22.70
Draft, Review, Revise, Negotiate, and/or Finalize Addendum No. 1 to Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (fully executed on October 2, 2023) • Joanna Ghosh – 1.50 hours • Selena Matavosian – 1.60 hours	3.10
Draft, Review, Revise, Negotiate, and/or Finalize First Amended Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (fully executed on January 15, 2025) and Draft Revised Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval (for California Class Members), Revised Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval (for FCRA Class Members), and Revised Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval (for California Class Members and FCRA Class Members) • Joanna Ghosh – 1.90 hours • Selena Matavosian – 3.80 hours	5.70

Draft, Review, Revise, Negotiate, and/or Finalize Second Amended Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (fully executed on April 3, 2025) and Draft Further Revised Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval (for California Class Members), Further Revised Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval (for FCRA Class Members), and Further Revised Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval (for California Class Members and FCRA Class Members) • Joanna Ghosh – 1.10 hours • Selena Matavosian – 2.50 hours	3.60
Communicate with Settlement Administrator, Monitor Notice Administration Process, and Review Weekly Reports • Joanna Ghosh – 1.10 hours • Selena Matavosian – 6.40 hours	7.50
Law and Motion	
Review Defendant's Notice of Removal of Civil Action to United States District Court; Exhibit A; and Declaration of Sarah Temple in Support Thereof (filed on June 4, 2021) (Federal Action) • Tara Zabehe – 0.40 hour • Jennifer Wai-Shing Maguire – 1.80 hours	2.20
Review and Analyze Defendant's Notice of Motion and Motion to Partially Dismiss Plaintiff's Complaint; Memorandum of Points and Authorities in Support Thereof; and [Proposed] Order Thereon (filed on June 11, 2021) (Federal Action) • Jennifer Wai-Shing Maguire – 1.60 hours	1.60

Draft Plaintiff's Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. § 1447; Memorandum of Points and Authorities in Support Thereof, Declaration of Jennifer Maguire in Support Thereof, and [Proposed] Order Thereon (filed on July 2, 2021) (Federal Action) • Tara Zabehe – 1.90 hours • Jennifer Wai-Shing Maguire – 12.60 hours	14.50
Review and Analyze Defendant's Opposition to Plaintiff's Motion to Remand (filed on July 16, 2021) (Federal Action) • Jennifer Wai-Shing Macquire – 1.80 hours	1.80
Review and Analyze Defendant's Notice of Motion and Motion to Dismiss Plaintiff's First and Fourth Through Eighth Causes of Action in the First Amended Complaint; Memorandum of Points and Authorities in Support Thereof; and [Proposed] Order Thereon (filed on July 22, 2021) (Federal Action) • Jennifer Wai-Shing Macquire – 1.80 hours	1.80
Draft Plaintiff's Reply in Support of Motion to Remand Pursuant to 28 U.S.C. § 1447 (filed on July 23, 2021) (Federal Action) • Jennifer Wai-Shing Maguire – 9.50 hours	9.50
Draft Plaintiff's Opposition to Defendant's Motion to Dismiss Plaintiff's First and Fourth Through Eighth Causes of Action in the First Amended Complaint; and Declaration of Jennifer Maguire in Support Thereof (filed on July 30, 2021) (Federal Action) • Jennifer Wai-Shing Maguire – 14.50 hours	14.50
Review Court's Text Entry (In Chambers) Order Taking Plaintiff Manuel Bruno's Motion to Remand Under Submission (filed on August 3, 2021) (Federal Action) • Jennifer Wai-Shing Maquire – 0.10 hour	0.10

Review and Analyze Defendant's Reply in Support of its Motion to Dismiss Plaintiff's First and Fourth Through Eighth Causes of Action in the First Amended Complaint (filed on August 6, 2021) (Federal Action) Jennifer Wai-Shing Macquire – 1.40 hours	1.40
Review Court's Text Entry (In Chambers) Order Taking Defendant U.S. Renal Care, Inc.'s Motion to Dismiss Plaintiff's First and Fourth Through Eighth Causes of Action in the First Amended Complaint Under Submission (filed on August 16, 2021) (Federal Action) Jennifer Wai-Shing Macquire – 0.10 hour	0.10
Review and Analyze Defendant's Notice of Motion and Motion to Stay the State Court Proceedings; Memorandum of Points and Authorities in Support Thereof; Request for Judicial Notice in Support Thereof; Declaration of David Szwarcztein in Support Thereof; and [Proposed] Order Thereon (filed on September 24, 2021) (PAGA Action) - Tara Zabehe – 0.80 hour - Travis J. Maher – 1.30 hours	2.10
Draft Plaintiff's Opposition to Defendant's Motion to Stay and Declaration of Travis J. Maher in Support Thereof (filed on March 3, 2022) (PAGA Action) Travis J. Maher – 11.60 hours	11.60
Review and Analyze Defendant's Reply in Support of Its Motion to Stay Proceedings (filed on March 9, 2022) (PAGA Action) Travis J. Maher – 1.10 hours	1.10
Review Court's Tentative Ruling Re: Motion to Stay (issued on March 18, 2022) (PAGA Action) Travis J. Maher – 0.10 hour	0.10

Review Court's Minute Order Re: Hearing on Motion for Stay of Proceedings (filed on March 21, 2022) (PAGA Action) • Tara Zabehi – 0.10 hour • Travis J. Maher – 0.20 hour	0.30
Review Court's Order Denying Plaintiff's Motion to Remand [Dkt. 13] and Granting in Part Defendant's Motion to Dismiss [Dkt. 20] (filed on July 5, 2022) (Federal Action) • Tara Zabehi – 0.20 hour • Travis J. Maher – 0.30 hour • Andrew H. Kim – 0.20 hour	0.70
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Selena Matavosian in Support Thereof, Declaration of Plaintiff Manuel Bruno in Support Thereof, and [Proposed] Order Thereon (filed on October 2, 2023) (Federal Action) • Brian J. St. John – 4.60 hours • Selena Matavosian – 18.90 hours	23.50
Review Court's (In Chambers) Order Taking Motion of Plaintiff Manuel Bruno for Preliminary Approval of Class Action and PAGA Claim (Dkt. [58]) Under Submission (filed on November 14, 2023) (Federal Action) • Selena Matavosian – 0.10 hour	0.10
Review Court's Order Granting in Part and Denying in Part Motion for Preliminary Approval of Class Action and PAGA Settlement [Dkt. 58] (filed on August 30, 2024) (Federal Action) • Joanna Ghosh – 0.20 hour • Selena Matavosian – 0.20 hour	0.40

Draft Plaintiff's Supplemental Declaration of Manuel Bruno in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on September 6, 2024) (Federal Action) • Joanna Ghosh – 0.50 hour • Selena Matavosian – 0.80 hour	1.30
Draft Plaintiff's Declaration of Joanna Ghosh in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on October 29, 2024) (Federal Action) • Joanna Ghosh – 3.50 hours • Selena Matavosian – 3.70 hours	7.20
Review Court's Order Certifying Provisionally the Proposed Classes for Purposes of Settlement Proceedings and Extending the Parties' Deadline to File an Amended Motion for Preliminary Approval of Class Action and PAGA Settlement [Dkts. 65-68] (filed on November 26, 2024) (Federal Action) • Joanna Ghosh – 0.10 hour • Selena Matavosian – 0.10 hour	0.20
Draft Plaintiff's Supplemental Declaration of Joanna Ghosh in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on December 31, 2024) (Federal Action) • Joanna Ghosh – 4.30 hours • Selena Matavosian – 6.80 hours	11.10
Draft Plaintiff's Supplemental Declaration of Selena Matavosian in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement; and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on January 17, 2025) (Federal Action) • Joanna Ghosh – 2.90 hours • Selena Matavosian – 5.40 hours	8.30

Draft Plaintiff's Notice of Motion and Renewed Motion for Preliminary approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Selena Matavosian in Support Thereof, Declaration of Manuel Bruno in Support Thereof, Supplemental Declaration of Manuel Bruno in Support Thereof, and [Further Revised Proposed] Order Thereon (filed on February 21, 2025) (Federal Action) • Joanna Ghosh – 0.30 hours • Yasmin Hosseini – 2.30 hours • Selena Matavosian – 10.10 hours	12.70
Review Court's Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement [Dkt. 58] (filed on March 11, 2025) (Federal Action) • Selena Matavosian – 0.20 hour	0.20
Review Court's Corrected Order Granting Amended Motion for Preliminary Approval of Class Action and PAGA Settlement [Dkt. 74] (filed on March 11, 2025) (Federal Action) • Selena Matavosian – 0.20 hour	0.20
Draft Plaintiff's Supplemental Declaration of Selena Matavosian in Support of Plaintiff's Renewed Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on March 18, 2025) (Federal Action) • Joanna Ghosh – 0.10 hour • Selena Matavosian – 5.70 hours	5.80
Review Defendant's Declaration of Omar M. Aniff Regarding Further Notice of Proposed Class Action Settlement Provided Pursuant to 28 U.S.C. § 1715 (filed on April 9, 2025) (Federal Action) • Selena Matavosian – 0.10 hour	0.10

Draft Plaintiff's Further Supplemental Declaration of Selena Matavosian in Support of Plaintiff's Renewed Motion for Preliminary Approval of Class Action and PAGA Settlement; and Second Revised [Proposed] Order Thereon (filed on April 14, 2025) (Federal Action) • Joanna Ghosh – 0.10 hour • Selena Matavosian – 7.10 hours	7.20
Review and Analyze Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Motion for Class Counsel Award and Class Representative Service Award, Declaration of Selena Matavosian in Support Thereof, [Proposed] Order Awarding Class Counsel Award and Class Representative Service Award, and [Proposed] Order Granting Final Approval of Class Action and PAGA Settlement and Judgment (filed on November 7, 2025) (Federal Action) • Joanna Ghosh – 1.90 hours • Yasmin Hosseini – 6.10 hours • Selena Matavosian – 13.50 hours	21.50
Total Hours:	522.00

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Bruno vs. U.S. Renal Care, Inc. (Class + PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/1/2020	U.S. Postmaster	Postage	\$6.95
1/27/2021	U.S. Postmaster	Postage	\$7.20
3/3/2021	Legal Document Server, Inc.	Attorney Service	\$180.23
3/3/2021	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
3/3/2021	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
5/5/2021	Legal Document Server, Inc.	Attorney Service	\$114.50
5/21/2021	Legal Document Server, Inc.	Attorney Service	\$355.25
5/21/2021	Los Angeles Superior Court	Jury Fee	\$150.00
5/25/2021	Legal Document Server, Inc.	Attorney Service	\$145.00
6/3/2021	Legal Document Server, Inc.	Attorney Service	\$175.00
6/3/2021	General Logistics Systems US, Inc.	Courier Service	\$22.90
12/10/2021	First Mediation Corporation	Mediation Fee	\$9,000.00
8/23/2022	Los Angeles Superior Court	Document Download Fee	\$12.20
8/24/2022	Los Angeles Superior Court	Document Download Fee	\$51.00
7/17/2025	Los Angeles Superior Court	Document Download Fee	\$3.00
Total:			<u>\$11,658.23</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Bruno v. U.S. Renal Care, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/19/2021	U.S. Postmaster	Postage	\$7.16
2/19/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
4/27/2021	Legal Document Server, Inc.	Attorney Service	\$30.43
4/27/2021	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
5/10/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
6/8/2021	Legal Document Server, Inc.	Attorney Service	\$15.20
9/7/2021	Legal Document Server, Inc.	Attorney Service	\$15.20
10/13/2021	One Legal	Attorney Service	\$16.68
3/1/2022	Legal Document Server, Inc.	Attorney Service	\$165.00
3/2/2022	Legal Document Server, Inc.	Attorney Service	\$16.55
3/2/2022	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
3/4/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
10/21/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
11/7/2022	CourtCall, LLC	Attorney Service	\$94.00
2/2/2023	Los Angeles Superior Court	Document Download Fee	\$3.00
5/23/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
5/23/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
8/31/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
8/31/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
10/31/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
10/31/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
11/2/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
4/16/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
4/16/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
4/26/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
10/23/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
10/23/2024	Los Angeles Superior Court	Stipulation Fee	\$20.00
11/4/2024	Legal Document Server, Inc.	Attorney Service	\$19.09
11/4/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
5/15/2025	Legal Document Server, Inc.	Attorney Service	\$20.09
5/15/2025	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
6/5/2025	Los Angeles Superior Court	Attorney Service	\$18.70
Total:			<u>\$1,352.25</u>