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

Coordination Proceeding Special Title
(California Rules of Court, Rule 3.550)

**CASCADE DRILLING WAGE AND
HOUR CASES**

Included Actions:

*Eugene Martinez, et al. v. Cascade
Drilling, L.P.*, Alameda County Superior
Court Case No. RG21090743

John Lilla v. Cascade Drilling, LP, Contra
Costa County Superior Court Case No.
MSC21-01568

Case No.: RG21090743

Honorable Stephen Kaus
Department 19

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PRIVATE ATTORNEY GENERAL ACT
SETTLEMENT AND MOTION FOR
ATTORNEYS' FEES AND COSTS**

Reservation Nos.	<u>A-21090743-001</u> <u>A-21090743-002</u>
Date:	June 26, 2023
Time:	3:00 p.m.
Department:	19

**DECLARATION OF EDWIN AIWAZIAN IN SUPPORT OF MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT AND MOTION FOR
ATTORNEYS' FEES AND COSTS**

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, 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 John Lilla (“Plaintiff Lilla”), the named plaintiff in the wage and hour putative class action entitled *John Lilla v. Cascade Drilling, LP*, Contra Costa County Superior Court Case No. MSC21-01568 (“*Lilla* Action”), which is coordinated with, and being resolved together with, the wage and hour putative class action and Private Attorney General Act (“PAGA”) action entitled *Eugene Martinez, et al. v. Cascade Drilling, L.P.*, Alameda County Superior Court Case No. RG21090743 (“*Martinez* Action”). The *Lilla* Action and the *Martinez* Action are included actions in *Cascade Drilling Wage and Hour Cases*, Judicial Council Coordination Proceeding No. 5215 (together with the *Lilla* Action and *Martinez* Action, referred to as “Actions”). 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.

SUMMARY OF WORK PERFORMED

2. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in this litigation from the inception of the *Lilla* Action. Lawyers *for* Justice, PC has fully and actively participated in the litigation process in the *Lilla* Action, as well as the settlement process that resulted in the settlement of the Actions. Also, since joining forces with Keller Grover LLP and Capstone Law APC, counsel for Plaintiffs Eugene Martinez and Robert Williams, who have been pursuing the *Martinez* Action, we have worked cooperatively with them. Together, Plaintiffs Eugene Martinez, Robert Williams, and John Lilla are referred to herein as “Plaintiffs.” Together, Lawyers *for* Justice, PC, Keller Grover LLP, and Capstone Law APC are referred to herein as “Class Counsel.”

3. Before initiating the *Lilla* Action, Lawyers *for* Justice, PC conducted extensive investigation and research into 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 Lilla, and research into the various legal issues involved in the

1 *Lilla* Action, namely, the current state of the law as it applied to class certification, off-the-clock
2 theory, meal and rest periods, wage-and-hour enforcement, Plaintiff Lilla's claims, and potential
3 defenses. After conducting initial investigation, our firm determined that Plaintiff Lilla's claims
4 were well-suited for class action treatment owing to what appeared to be a common course of
5 conduct affecting a similarly situated group of non-exempt, hourly employees who worked for
6 Defendant within the State of California, who were not properly compensated for, *inter alia*, all
7 hours worked, non-compliant meal and rest periods, and business expenses.

8 4. Lawyers for Justice, PC investigated the veracity, strength, and scope of the
9 claims in the *Lilla* Action, and was also preparing for class certification and trial, prior to
10 reaching the settlement. The *Lilla* Action has involved ongoing investigations, extensive
11 research into legal and factual issues, formal and informal discovery, and mediation. In the *Lilla*
12 Action, Lawyers for Justice, PC served multiple sets of formal written discovery on Defendant
13 (specifically, Requests for Production of Documents (Set One), Special Interrogatories (Set
14 One), and Form Interrogatories – General (Set One)) and served multiple notices of deposition of
15 Person(s) Most Knowledgeable at Defendant along with accompanying requests for production
16 of documents. Counsel for the parties also met and conferred on numerous occasions, e.g., to
17 discuss issues relating to the pleadings, case coordination, and the production of information,
18 documents, and data in the course of litigation and in connection with mediation and settlement
19 negotiations. Other work that Lawyer for Justice, PC performed included, and was not limited
20 to, case strategy and analysis; drafting, reviewing, and revising the pleadings; and preparing for
21 and attended court proceedings, mediation, and settlement negotiations, among other tasks.
22 Lawyers for Justice, PC also invested time researching and investigating the applicable law,
23 which is evolving as it relates to off-the-clock theory, meal and rest periods and premiums,
24 PAGA representative actions, wage-and-hour enforcement, Plaintiff Lilla's claims, and
25 Defendant's defenses thereto, as well as facts discovered.

26 5. Collectively, Class Counsel obtained information from Plaintiffs, putative class
27 members, aggrieved employees, and percipient witnesses, reviewed and analyzed a large volume
28 of information, documents, and data obtained from Plaintiffs, Defendant, and other sources,

1 researched applicable law, and undertook analyses and calculations of the value of claims and
2 damages and penalties exposure. The information, documents, and data provided a critical
3 understanding of the nature of the work performed by Class Members and PAGA Members, as
4 well as Defendant's operations and employment policies, practices, and procedures, and were
5 used in analyzing liability, penalties, damages, and valuation issues. Accordingly, sufficient
6 investigation and review of information has taken place in order for the parties to be sufficiently
7 informed of the nature and extent of the class and PAGA claims, and to enable all parties to fully
8 evaluate the settlement for its fairness, adequacy, and reasonableness.

9 6. After conducting significant investigation of the facts and law during the
10 prosecution of the cases, counsel for the parties engaged in extensive settlement negotiations to
11 try to resolve the cases. These efforts included, preparing for and participating in a private
12 mediation session on May 20, 2022, conducted by Jill R. Sperber, Esq., a well-respected
13 mediator experienced in mediating complex labor and employment matters. During all
14 settlement discussions, the parties conducted their negotiations at arm's length in an adversarial
15 position. In the course of mediation and settlement discussions, the parties exchanged extensive
16 information, data, and documents and engaged in an extensive discussion regarding their
17 evaluations of the cases and various aspects of the cases, including but not limited to, the risks
18 and delays of further litigation, the risks to the parties of proceeding with class certification and
19 representative adjudication, the law relating to the off-the-clock theory, meal and rest periods
20 and premiums, PAGA representative actions, meal period waivers, collective bargaining
21 agreements, pre-emption, *Pick Up Stix* releases/waivers, and wage-and-hour enforcement, as
22 well as the evidence produced and analyzed, and the possibility of appeals, among other things.
23 Arriving at a settlement that was acceptable to the parties was not easy. Defendant and its
24 counsel felt very strongly about Defendant's ability to prevail on the merits and to obtain a denial
25 of class certification, while Plaintiffs and Class Counsel disagreed with these contentions and
26 believed that class certification would be obtained and that they would prevail at trial. After,
27 collectively, conducting investigations, formal and informal discovery and exchange of
28 information, and extensive settlement negotiations, with the aid of mediator Jill R. Sperber's

1 evaluations, the parties agreed that the cases were well-suited for settlement given the legal and
2 factual issues relating to the Plaintiffs' principal claims and the class and PAGA claims, as well
3 as the costs and risks to the parties that would attend further litigation. These risks of further
4 litigation include, and are not limited to, a determination that the claims are unsuitable for class
5 treatment and/or representative adjudication, allowing a jury to decide the claims asserted in the
6 cases, and the real possibility of no recovery after years of litigation.

7 7. As set forth more fully in the accompanying motion for attorneys' fees and costs,
8 Class Counsel seek attorneys' fees in the total amount of \$533,333.00, which is approximately
9 one-third (1/3) of the Gross Settlement Amount of \$1,600,000.00.

10 8. Pursuant to the contingency-fee agreement entered into by and between Plaintiff
11 Lilla and Lawyers for Justice, PC, Plaintiff Lilla has agreed to a contingency fee of at least one-
12 third (1/3) of the recovery.

13 9. I am aware that common and acceptable rates for contingency representation in
14 wage and hour class action litigation are normally in the range from 33.3% to 50%.

15 10. The attorneys' fees that are sought are commensurate with: (1) the risk that Class
16 Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel
17 dedicated to the cases; (3) the skill and determination that Class Counsel have shown; (4) the
18 results that Class Counsel have achieved throughout the litigation of the cases; (5) the value of
19 the settlement that Class Counsel have achieved; and (6) the other cases that Class Counsel have
20 turned down in order to devote their time and efforts to the cases.

21 11. Attorneys at Lawyers for Justice, PC have spent a total of **308.60 hours**
22 performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an
23 Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by
24 attorneys at Lawyers for Justice, PC and the time incurred in performing those services. The
25 hours attributable to Lawyers for Justice, PC include work done by myself and several other
26 attorneys at the firm. Additionally, Lawyers for Justice, PC had litigation support personnel
27 actively engaged in assisting with the prosecution of this matter, separate from the hours
28 referenced herein.

12. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate of \$650 per hour 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 \$650 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour 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 an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v.*

1 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
2 granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

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

4 ***EDUCATION***

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

13 ***JUDICIAL EXTERNSHIPS***

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

19 ***LITIGATION AND CLASS ACTION EXPERIENCE***

20 15. In December of 2004, I obtained a license to practice law from the California
21 State Bar. From approximately December 2004 to approximately August 2008, I was employed
22 by a prominent plaintiff-side law firm.

23 16. At the prominent plaintiff-side law firm, my practice focused on class actions and
24 other complex cases involving toxic torts and products liability. In addition, I gained substantial
25 experience on cases involving insurance bad faith, premises liability, and medical negligence.
26 While employed by the prominent plaintiff-side law firm, I argued approximately 100 motions,
27 took or defended approximately 150 depositions, and prepared dozens of expert witnesses for
28 deposition or trial.

1 17. Since its inception, in or around October of 2008, Lawyers *for* Justice, PC has
2 almost exclusively focused on the prosecution of consumer and employment class actions,
3 involving wage-and-hour claims, race discrimination, unfair business practices or consumer
4 fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen
5 employment-related putative class actions in both state and federal courts in the State of
6 California. Lawyers *for* Justice, PC has successfully litigated cases involving the executive,
7 administrative, and other overtime exemptions to the State of California and federal overtime
8 compensation requirements. During this relatively short time, in association with other law
9 firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of
10 individuals in California.

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

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

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

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

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

Case Number is BC430918.

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

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

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

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

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

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

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

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

17 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
18 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
19 involving allegations of misclassification of the “Department Manager” position. On August 12,
20 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
21 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
22 County Superior Court Case Number is RG13680477.

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

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

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

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

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

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

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

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

11 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
12 representative action against a food company on behalf of non-exempt employees. On June 30,
13 2017, the court granted final approval of the class and PAGA representative action settlement.
14 The Sacramento County Superior Court Case Number is 34-2015-00175871.

15 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a chocolate company on behalf of non-exempt employees. On July
17 19, 2017, the court granted final approval of the class and PAGA representative action
18 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

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

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

26 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 PAGA representative action against a global provider of products and services to the energy
28 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court

1 granted approval of the PAGA representative action settlement. The Kern County Superior
2 Court Case Number is S-1500-CV-280215-SDC.

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

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

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

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

24 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
25 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
26 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
27 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
28 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted

1 approval of the PAGA representative action settlement. The San Diego County Superior Court
2 Case Number is 34-2015-00175330.

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

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

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

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

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LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS *for* JUSTICE, PC

19. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation and prosecution of the matter on behalf of Plaintiff Lilla, and will not receive any compensation until recovery is obtained in the Actions. Lawyers *for* Justice, PC seeks reimbursement of **\$3,095.64** 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 *Lilla* Action and to reach the settlement of the Actions.

CLASS REPRESENTATIVE ENHANCEMENT PAYMENTS TO PLAINTIFFS

20. In recognition of their efforts and work in the cases and serving as the Class Representatives, the Settlement provides for Class Representative Enhancement Payments in the amount of \$10,000.00 each to Plaintiffs Eugene Martinez, Robert Williams, and John Lilla. The Class Representative Enhancement Payments are to be paid out of the Gross Settlement Amount subject to approval by the Court. The requested Class Representative Enhancement Payments are fair and appropriate. Plaintiff Lilla spent considerable time and effort to gather, review, and provide relevant documents and information, and to provide the facts and evidence necessary to facilitate the prosecution of the claims. Plaintiff Lilla was available whenever Lawyer *for* Justice, PC needed him and spent numerous hours discussing his claims and describing his work experience with Defendant. Accordingly, it is fair and appropriate for Plaintiff Lilla to receive a Class Representative Enhancement Payment for his services on behalf of the Class, in addition to an individual settlement payment.

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

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

Executed this 30th day of May 2023, at Glendale, California.



Edwin Aiwanian

EXHIBIT A

JOHN LILLA V. CASCADE DRILLING, LP
Contra Costa County Superior Court Case No. MSC21-01568 (“LILLA ACTION”)
CASCADE DRILLING WAGE AND HOUR CASES
Alameda County Superior Court Case No. JCCP5215 / Judicial Council Coordination Proceeding No. 5215
(“COORDINATED ACTION”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality	8.50
Pre-Lawsuit Investigation of the Merits of Plaintiff John Lilla’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	7.80
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Cascade Drilling, L.P. (“Defendant”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members	7.10
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, Class Certification, Arbitration Agreement Decisions in California, Including all New and Relevant DLSE Materials	7.50
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	2.90
Investigation of Defendant’s Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members	2.50

Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity, and Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	2.80
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	3.50
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	4.30
Comparative Analysis and Cross-Checking of All Available Job Postings and Job Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	4.10
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members Worked Throughout California	3.50
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Scheduling, Project Assignments, Driving Between Projects/Client Sites, Daily Reports and Paperwork, Repair and Maintenance, Vehicle/Safety Checks, Mandatory Training and Safety Meetings, Bonus/Incentive/Performance/Shift Differential Pay, Timekeeping, Meal/Rest Breaks, Overtime Compensation, Uniform/Dress Code, Footwear, PPE, Tools/Equipment/Supplies, Use of Personal Cell Phones or Computing Devices, Company Credit Cards, Reimbursement of Business-Related Expenses, and <i>Pick Up Stix</i> Release Agreements	14.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including <i>Inter Alia</i> , Client Relations Management, Project Management, GPS, Communication, Information and Document Management, and Timekeeping Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal	3.50

Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Meal Period Waivers, Collective Bargaining Agreements, Pre-Emption, <i>Pick Up Stix</i> Releases/Waivers, and Compliant Policies	7.50
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	4.80
Prepare a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, Damages, and Penalties Issues	3.90
Review Register of Actions and Filings in <i>Eugene Martinez, et al. v. Cascade Drilling, L.P.</i> , Alameda County Superior Court Case No. RG21090743	2.10
Meet and Communicate with Plaintiff John Lilla Throughout the Pendency of the Case	46.50
Investigate, Meet with, Communicate with, and/or Conduct Interviews of Putative Class Members and Percipient Witnesses	11.50
Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on July 29, 2021) (<i>Lilla</i> Action)	7.60
Review Court's Notice of Case Assignment (filed on July 29, 2021) (<i>Lilla</i> Action)	0.10
Review Defendant's Notice of General Appearance (served on October 6, 2021) (<i>Lilla</i> Action)	0.10
Review Court's Notice of Continuance Re: Case Management Conference (filed on October 18, 2021) (<i>Lilla</i> Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on October 22, 2021) (<i>Lilla</i> Action)	1.20
Review Court's Correspondence Memo Re: Joint Stipulation to Continue Case Management Conference (filed on October 25, 2021) (<i>Lilla</i> Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Re-Submitted Joint Stipulation to Continue Case Management Conference (submitted on October 28, 2021) (<i>Lilla</i> Action)	0.50
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (filed on October 29, 2021) (<i>Lilla</i> Action)	0.10
Review Defendant's Case Management Statement, Notice of Related Case, and Notice of Posting Jury Fees (served on November 24, 2021) (<i>Lilla</i> Action)	0.50
Draft Plaintiff's Case Management Statement (field on November 29, 2021) (<i>Lilla</i> Action)	1.10
Review Court's Minute Order, Electronic Case Filing-Standing Order, and Order Mandating Electronic Filing and Service/Order to Show Cause Re: Exemptions (filed on December 1, 2021) (<i>Lilla</i> Action)	0.50
Review and Analyze Defendant's Answer to Plaintiff Lilla's Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on January 14, 2022) (<i>Lilla</i> Action)	1.50
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on March 7, 2022) (<i>Lilla</i> Action)	1.10
Review Defendant's Notice of Remote Appearance (served on March 10, 2022) (<i>Lilla</i> Action)	0.10
Review Court's Minute Order (filed on March 11, 2022) (<i>Lilla</i> Action)	0.10
Review Court's Notice of Case Reassignment (filed on March 23, 2022) (Coordinated Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Further Case Management Conference Statement and Notice of Settlement (filed on May 27, 2022) (<i>Lilla</i> Action)	1.20
Review Court's Minute Order (filed on June 6, 2022) (<i>Lilla</i> Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on June 27, 2022) (Coordinated Action)	1.10
Review Court's Minute Order Re: Case Management Conference (filed on July 12, 2022) (Coordinated Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on September 13, 2022) (Coordinated Action)	0.10
Appearances	
Prepare for and Telephonically Attend Case Management Conference (December 1, 2021) (<i>Lilla</i> Action)	0.50
Prepare for and Telephonically Attend Further Case Management Conference (March 11, 2022) (<i>Lilla</i> Action)	0.80
Prepare for and Telephonically Attend Further Case Management Conference (June 6, 2022) (<i>Lilla</i> Action)	0.80
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action and Private Attorneys General Act Settlement and Motion for Attorneys' Fees and Costs (June 26, 2023) (Anticipated) (Coordinated Action)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff John Lilla (served on April 20, 2021)	1.90

Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff John Lilla (served on June 9, 2021)	2.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff John Lilla (served on June 21, 2021)	5.50
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) to Defendant (served on January 25, 2022) (<i>Lilla</i> Action)	6.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for March 17, 2022; Organizational Structure) (served on January 25, 2022) (<i>Lilla</i> Action)	3.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Noticed March 18, 2022; Wage and Hour Practices) (served on January 25, 2022) (<i>Lilla</i> Action)	3.40
Meet with, Draft Correspondence to, and Respond to Correspondence from, Other Plaintiffs' Counsel	10.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	16.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation (served on April 20, 2022)	42.50
Prepare for 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 and Penalties Analysis and Calculations (submitted on May 13, 2022)	19.80
Review and Analyze Defendant's Mediation Brief and Exhibits A-K in Support of Mediation Brief (served on May 13, 2022)	6.10

Attend Mediation Session (May 20, 2022; Zoom Video Conference)	8.10
Draft, Review, Revise, Negotiate, and/or Finalize Stipulation of Class Action and Private Attorneys General Act Settlement and Release and Notice of Class Action Settlement (fully executed on November 14, 2022)	0.90
Law and Motion	
Review and Analyze Defendant's Petition for Coordination and Motion for Stay, Memorandum of Points and Authorities in Support Thereof, Declaration of Shaun Paisley in Support Thereof, and Declaration of Ken Moses in Support Thereof (served on December 3, 2021) (Coordinated Action)	1.50
Review Defendant's Notice of Submission of Petition for Coordination (served on December 3, 2021) (<i>Lilla</i> Action)	0.10
Review Defendant's Notice of Order Assigning Coordination Motion Judge (served on February 18, 2022) (<i>Lilla</i> Action)	0.10
Review Court's Order Setting Hearing on Petition for Coordination (filed on March 22, 2022) (Coordinated Action)	0.10
Review Defendant's Notice of Order Setting Hearing on Petition for Coordination (served on March 29, 2022) (<i>Lilla</i> Action)	0.10
Review Court's Minute Order Re: Hearing on Petition for Coordination (filed on April 18, 2022) (Coordinated Action)	0.10
Review Defendant's Notice of Order on Petition for Coordination (served on April 29, 2022) (<i>Lilla</i> Action)	0.10
Review Defendant's Notice of Order Assigning Coordination Trial Judge (served on May 25, 2022) (<i>Lilla</i> Action)	0.10

Review Court's Order Assigning Coordination Trial Judge (served on June 7, 2022) (Coordinated Action)	0.10
Review Defendant's Notice of Order Assigning Coordination Trial Judge (served on June 10, 2022) (<i>Lilla</i> Action)	0.10
Review Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and Private Attorneys General Act Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Eric A. Grover in Support Thereof Declaration of Raul Perez in Support Thereof, Declaration of Robert Spencer in Support Thereof, and [Proposed] Order (filed on November 30, 2022) (Coordinated Action)	1.10
Draft Declaration of Joanna Ghosh in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on November 30, 2022) (Coordinated Action)	2.30
Review Defendant's Statement of Non-Opposition to Motion for Preliminary Approval of Settlement (served on December 28, 2022) (Coordinated Action)	0.10
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (issued on January 5, 2023) (Coordinated Action)	0.20
Meet and Confer with Defendant's Counsel and Other Plaintiffs' Counsel, and Draft Stipulation and [Proposed] Order to Continue Hearing on Final Approval of Class Action and Private Attorney General Act Settlement (submitted on February 22, 2023) (Coordinated Action)	0.20
Review Court's Order Granting Motion for Preliminary Approval of Class Action and Private Attorney General Act Settlement (filed on March 3, 2023) (Coordinated Action)	0.10
Draft Declaration of Edwin Aiwazian in Support of Motion for Final Approval of Class Action and Private Attorneys General Act Settlement and Motion for Attorneys' Fees and Costs (Coordinated Action)	5.80

Total Hours:	308.60
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EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Lilia v. Cascade Drilling LP

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/20/2021	U.S. Postmaster	Postage	7.00
7/29/2021	Contra Costa Superior Court	Court Filing Fee	435.00
7/29/2021	Contra Costa Superior Court	Complex Filing Fee	1,000.00
7/29/2021	Legal Document Server, Inc.	Attorney Service	220.23
9/1/2021	ProLegal	Attorney Service	163.25
9/24/2021	Legal Document Server, Inc.	Attorney Service	205.00
10/14/2021	CourtCall, LLC	Attorney Service	94.00
10/25/2021	Contra Costa Superior Court	Stipulation Fee	20.00
10/25/2021	General Logistics Systems US, Inc.	Courier Service	17.78
10/25/2021	Legal Document Server, Inc.	Attorney Service	150.85
10/28/2021	Contra Costa Superior Court	Stipulation Fee	20.00
10/28/2021	General Logistics Systems US, Inc.	Courier Service	19.45
10/28/2021	Legal Document Server, Inc.	Attorney Service	150.85
11/29/2021	Legal Document Server, Inc.	Attorney Service	215.00
12/1/2021	CourtCall, LLC	Attorney Service	94.00
1/25/2022	General Logistics Systems US, Inc.	Courier Service	19.35
3/10/2022	CourtCall, LLC	Attorney Service	94.00
5/27/2022	File & ServeXpress	Attorney Service	24.00
6/2/2022	File & ServeXpress	Attorney Service	5.00
6/3/2022	CourtCall, LLC	Attorney Service	94.00
8/16/2022	FedEx Express	Courier Service	46.88
Total:			3,095.64

PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On **June 1, 2023**, in the case of *Cascade Drilling Wage and Hour Cases*, Alameda County Superior Court, case number RG21090743, I served the foregoing document(s):

DECLARATION OF EDWIN AIWAZIAN IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT AND MOTION FOR ATTORNEYS' FEES AND COSTS

on the interested party(ies) below, using the following means:

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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


JOEY GONZALEZ