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

REY PARRA, 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.

SHERWOOD COUNTRY CLUB, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 56-2021-00551869-CU-OE-VTA

Honorable Mark S. Borrell
Department 40

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND ENHANCEMENT
PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and Enhancement
Payment; Declaration of Class Representative
(Rey Parra); Declaration of Settlement
Administrator (Taylor Mitzner); and [Proposed]
Final Approval Order and Judgment filed
concurrently herewith]

Date: October 24, 2023
Time: 8:20 a.m.
Department: 40

Complaint Filed: March 11, 2021
FAC Filed: May 25, 2021
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Rey Parra (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On May 31, 2023, in Department 40 of the above-entitled Court, the Honorable Mark S. Borrell entered an order preliminarily approving the Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Sherwood Country Club (“Defendant”) (together, Plaintiff and Defendant are referred to as the “Parties”). On May 31, 2023, the Court conditionally certified the Class for settlement purposes, preliminarily appointed Plaintiff Rey Parra to represent the Class (“Class Representative”), and preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and to handle the notice and settlement administration process.

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

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WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned action (“Action”) since prior to its commencement on March 11, 2021.

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

6. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff and other Class Members and percipient witnesses, and reviewed and analyzed a large volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included and were not limited to: employment records of Plaintiff, a detailed sampling of Class Members’ time data and pay data, payroll records, Defendant’s Employee Handbook, company policy acknowledgements and forms (including, but not limited to, Handbook Receipt and Acknowledgement, Meal & Rest

1 Period Acknowledgement, Agreement to Waive Meal Break, Revocation to Waive Meal Break,
2 Warning Notice Regarding Meal Breaks, and Time Clock Punching Errors) and Defendant's
3 operations and employment policies, practices, and procedures documents (including policies
4 and procedures in regards to: attendance standards, cell phone use, time schedules and hours of
5 work, lingering after hours, time-keeping systems, overtime pay, dress code, pay days, payroll
6 deductions, meal and rest breaks, vacations, sick leave, paid time off, and employee discipline),
7 among other information and documents. Class Counsel developed liability, damages, and
8 penalties valuation models in the course of litigation and in connection with mediation and
9 settlement negotiations, and met and conferred with Defendant's counsel on numerous
10 occasions, e.g., to discuss issues relating to the pleadings, case management, discovery, and the
11 production of information, documents, and data in the course of litigation and in connection
12 with mediation and settlement negotiations. Other work performed by Class Counsel included,
13 and was not limited to, case strategy and analysis; drafting, reviewing, and revising the
14 pleadings, the mediation brief, and settlement documents; drafting and propounding multiple
15 sets of formal written discovery requests on Defendant; noticing the depositions of Defendant's
16 Persons Most Knowledgeable designees; reviewing and responding to Defendant's notice of
17 Deposition of Plaintiff; preparing for Defendant's deposition of Plaintiff (although the
18 deposition did not go forward); reviewing Defendant's responses and objections to deposition
19 notices; preparing for and attending court proceedings; and preparing for and participating in
20 mediation and settlement negotiations, among other tasks.

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

1 settlement negotiation process. Class Counsel also performed research regarding the applicable
2 law, which is evolving as it relates to class certification, off-the-clock theory, regular rate,
3 rounding, meal and rest periods, meal waivers, representative PAGA claims and penalties, joint
4 employer/joint liability, wage-and-hour law and enforcement, Plaintiff's claims and allegations,
5 and Defendant's defenses thereto, as well as facts discovered.

6 8. After conducting significant investigation of the facts and law during the
7 prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to
8 try to resolve the case. These efforts included preparing for mediation, and participating in a
9 formal, full-day mediation conducted by Paul Grossman, Esq., a well-regarded mediator
10 experienced in mediating complex labor and employment matters. During all settlement
11 discussions, the Parties conducted their negotiations at arm's length in an adversarial position.
12 In the course of mediation and settlement negotiations, the Parties exchanged information,
13 documents, and data, and discussed all aspects of the case, including the risks and delays of
14 further litigation, the risks to the parties of proceeding with class certification and trial, the law
15 relating to class certification, off-the-clock theory, regular rate, rounding, meal and rest periods,
16 meal waivers, representative PAGA claims, joint employer/joint liability and wage-and-hour
17 law and enforcement, as well as the evidence produced and analyzed, and the possibility of
18 appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not
19 easy. Defendant contended that individualized questions of fact predominated over any
20 common issues, and these issues would pose challenges to class certification and representative
21 adjudication. Defendant and its counsel felt strongly about Defendant's ability to prevail on the
22 merits and to avoid class certification, while Plaintiff and Class Counsel believed that they
23 would be able to obtain class certification and prevail at trial. With the aid of the mediator's
24 evaluation, the Parties ultimately agreed that the case was well-suited for settlement given the
25 legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the Parties
26 that would attend further litigation. These risks of further litigation include, and are not limited
27 to, a determination that the claims are unsuitable for class treatment and/or representative
28 adjudication, class de-certification after certification of a class, allowing a jury to decide the

claims asserted in the case, and the real possibility of no monetary recovery after years of litigation.

ATTORNEYS' FEES TO CLASS COUNSEL

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$420,000.00, which is thirty-five percent (35%) of the Maximum Settlement Amount of \$1,200,000.00, as set forth in the Settlement Agreement and the Class Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to devote its time and efforts to this matter.

10. I am aware that common and acceptable rates for contingency representation in wage and hour class action and representative action litigation are normally in the range of 33.3% to 50%.

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a simple lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **528.40 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred in performing those services. These hours include work done by myself and several other attorneys at Lawyers for Justice, PC. Additionally, separate from the hours referenced herein, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this particular case, the background of Lawyers for Justice,

1 PC, as well as the individual backgrounds, training, and experience of the attorneys who worked
2 on this matter, in litigating complex wage-and-hour actions, and in particular, employment class
3 and representative actions, support a reasonable blended hourly rate of compensation of at least
4 \$750 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has
5 been awarded attorneys' fees, compensating the firm at the blended rate of at least \$750 per hour
6 for legal services performed, by courts granting approval of settlements in other wage-and-hour
7 cases: final approval of the class and representative action settlement in *David Dugan v. TEC*
8 *Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on
9 July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per
10 hour; final approval of the class and representative action settlement in *Larry Greenwood, et al.*
11 *v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April
12 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per
13 hour; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete*
14 *Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS)
15 was granted on February 21, 2020, and the award of attorneys' fees involved compensation at
16 the rate of \$766.05 per hour; final approval of the class and representative action settlement in
17 *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case
18 No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved
19 compensation at the rate of \$764.82 per hour; final approval of the class and representative
20 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
21 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved
22 compensation at the rate of \$855.96 per hour; final approval of the class and representative
23 action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior
24 Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys'
25 fees involved compensation at the rate of \$831.38 per hour; final approval of the class and
26 representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum*
27 (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the
28 award of attorney's fees involved compensation at the rate of \$780.77 per hour; and final

1 approval of the class and representative action settlement in *Demetrius Camarillo v. Blue*
2 *Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
3 granted on June 30, 2017, and the award of attorneys' fees involved compensation at the rate of
4 \$845.64 per hour.

5 ADEQUACY OF LAWYERS *for* JUSTICE, PC

6 EDUCATION

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

15 JUDICIAL EXTERNSHIPS

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

21 LITIGATION AND CLASS ACTION EXPERIENCE

22 15. In December of 2004, I obtained a license to practice law from the California State
23 Bar.

24 16. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
25 prosecution of consumer and employment class and representative actions, involving wage-and-
26 hour claims, race discrimination, unfair business practices or consumer fraud. Currently,
27 Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related
28 putative class actions in both state and federal courts in the State of California. Lawyers *for*

Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. In association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

c) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national property management company involving allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court 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.

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

6 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
7 wage-and-hour class and PAGA representative action against a national wholesale distributor
8 of plumbing and builder supplies, involving allegations of misclassification of multiple salaried
9 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
10 representative action settlement. The Sacramento County Superior Court Case Number is 34-
11 2012-00136285.

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

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

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

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

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

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

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

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

o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative action against a foodservice distributor, on behalf of non-exempt employees. On January 26, 2017, the court granted final approval of the class and PAGA representative action

1 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

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

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

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

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

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

1 BC586234.

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

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

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

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

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

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

Number is 4819.

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

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

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

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

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

ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt employees. On September 27, 2019, the court granted the plaintiffs' motion for class

1 certification in part and certified a class. The Alameda County Superior Court Case Number is
2 RG15757606 and the Judicial Council Coordination Proceeding Number is 4921.

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

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

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

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

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

7 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
8 wage-and-hour class action against manufacturer and supplier of power products and services
9 on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
10 motion for class certification and certified a class. On August 27, 2021, the court granted final
11 approval of the class action settlement. The San Diego County Superior Court Case Number is
12 37-2015-00025968-CU-OE-CTL.

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

17 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
18 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for
19 the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On
20 July 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class.
21 The Los Angeles County Superior Court Case Number is BC707670.

22 **LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL**

23 18. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation
24 and will not receive any compensation until recovery is obtained in this matter. Lawyers *for*
25 Justice, PC seeks reimbursement of **\$18,724.57** in litigation costs and expenses incurred in this
26 matter, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and
27 necessary in the prosecution of the case and to obtain the Settlement.

28 ///

ENHANCEMENT PAYMENT TO PLAINTIFF

19. In recognition of his efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Payment in the amount of \$10,000.00 to Plaintiff Rey Parra. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort to produce relevant documents and information, and he provided facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information that would facilitate the pursuit of the case. Plaintiff spent numerous hours speaking with Class Counsel about his claims, describing his work experiences with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Rey Parra to receive \$10,000.00 as a reasonable Enhancement Payment, for his services on behalf of the Class Members, PAGA Members, and the State of California, in addition to his Individual Settlement Payment and Individual PAGA Payment.

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

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

Executed this 28th day of September 2023, at Glendale, California.



Edwin Aiwasian

EXHIBIT A

REY PARRA V. SHERWOOD COUNTRY CLUB
(Ventura County Superior Court Case No. 56-2021-00551869-CU-OE-VTA)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality, and Manageability	12.50
Investigation of the Merits of Plaintiff Rey Parra’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members, with Respect to Defendant Sherwood Country Club (“Defendant”) and Staffing Agencies	16.50
Investigation of Potential Damages Exposure of Defendant and Staffing Agencies with Respect to Plaintiff and the Putative Class Members	14.50
Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiff and Aggrieved Employees, with Respect to Defendant and Staffing Agencies	14.80
Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiff and Aggrieved Employees, with Respect to Defendant and Staffing Agencies	11.50
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, IWC Wage Orders, Regular Rate, Rounding, PAGA, Class Certification, and Joint Employer/Joint Liability Decisions and Law in California, Including all New and Relevant DLSE Materials	8.50
Investigation of Defendant, Its Business Relationships and Contracts, Its Affiliates, Vendors (including, <i>inter alia</i> , Staffing Agencies), Customers, the Industry in which It Operates, and Its Special Events	10.80

Investigation of Defendant's and Staffing Agencies' Organizational, Corporate, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	7.30
Investigation, Research, and Analysis Regarding Defendant's and Staffing Agencies' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, To Evaluate Willfulness and Uniformity	7.60
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	3.80
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	4.10
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Consumer 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	5.30
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Within California	5.60
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Pre-Shift and Post-Shift Tasks, Attendance, Rounding, Scheduling, On-Premises Breaks, Meal/Rest Premiums, Meal Period Waivers, Break Area, Lockers, Members-Only Facilities, Non-Discretionary Bonuses/Incentive/Shift Differential Pay, Tips, Timekeeping, Time Corrections, Overtime Compensation, Tools, Equipment, Walkie-Talkies, Use of Personal Cell Phones, Use of Personal Vehicles, Mileage, Donning and Doffing, Dress Code/Uniform, Footwear, and Reimbursement of Business-Related Expenses	18.50
Research and Investigation Re: Software Programs, Applications, Systems, and Other Technology Defendant and Staffing Agencies Use to Conduct Their Everyday Business, Including Timekeeping, Communication, Resource Management, Scheduling, Surveillance, and Secured Access, with a Focus on What Documents (Both Paper and	5.80

Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal and/or Rest Breaks	
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	8.20
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	5.60
Prepare a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	4.30
Research and Investigation of Impact of COVID-19 Pandemic on Defendant and Staffing Agencies, Their Operations, and Class Members' and Aggrieved Employees' Work	8.50
Meet and Communicate with Plaintiff Rey Parra Throughout the Pendency of the Case	49.50
Meet, Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	14.50
Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on March 11, 2021)	7.50
Review Court's Minute Order Re: Complex Case/ Class Action Designation (filed on March 15, 2021)	0.10
Review Court's Notice of Change of Track Assignment – Complex Case (filed on March 19, 2021)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on May 18, 2021)	0.10

Draft Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on May 25, 2021)	5.10
Review Court's Notice of Reassignment of Judicial Officer and Change of Hearing Location (filed on June 4, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Complex Case Status Report (filed on July 8, 2021)	1.60
Review Court's Minute Order Re: Case Management Conference (filed on July 13, 2021)	0.10
Review and Analyze Defendant's Answer to First Amended Class Action Complaint for Damages and Research Allegations and Affirmative Defenses in Defendant's Answer (served on July 15, 2021)	2.60
Review Defendant's Substitution of Attorney (served on September 15, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on December 8, 2021)	1.30
Review Court's Order to Continue Case Management Conference (filed on December 17, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement and Notice of Settlement (filed on April 1, 2022)	1.10
Review Court's Notice of Continuance Re: Case Management Conference (filed on June 22, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on August 15, 2022)	0.90
Review Court's Minute Order Re: Case Management Conference (file don August 19, 2022)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on November 1, 2022)	0.80
Review Court's Minute Order Re: Status Conference (Re: Settlement) (filed on November 15, 2022)	0.10
Review Court's Minute Order Re: Status Conference (Re: Settlement) (filed on January 17, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on February 27, 2023)	0.80
Review Court's Minute Order Re: Status Conference (Re: Settlement) (filed on March 13, 2023)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Preliminary Approval of Class Action Settlement (filed on June 2, 2023)	0.10
Appearances	
Prepare for and Telephonically Attend Initial Status Conference (July 13, 2021)	1.30
Prepare for and Telephonically Attend Case Management Conference (August 19, 2022)	0.80
Prepare for and Telephonically Attend Case Management Conference (November 15, 2022)	0.80
Prepare for and Telephonically Attend Status Conference (January 17, 2023)	1.10
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (April 19, 2023)	1.10
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payment (October 24, 2023) (Anticipated)	1.50

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rey Parra (served on February 5, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rey Parra (served on February 25, 2021)	3.50
Review Defendant's Notice of Deposition to Plaintiff Rey Parra (served on May 12, 2021)	0.50
Conduct Preparation for Deposition of Plaintiff Noticed for June 29, 2021 (May 21, 2021 and June 22, 2021)	10.50
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 July 20, 2021)	6.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for August 25, 2021; Organizational Structure) (served on July 20, 2021)	3.60
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for August 26, 2021; Wage and Hour Practices) (served on July 20, 2021)	4.10
Review and Analyze Defendant's Response to Plaintiff's Notice of Deposition of Defendant's Person Most Knowledgeable and Requests for Production of Documents (Organizational Structure) (served on August 19, 2021)	1.50
Review and Analyze Defendant's Response to Plaintiff's Notice of Deposition of Defendant's Person Most Knowledgeable and Requests for Production of Documents (Wage and Hour Practices) (served on August 19, 2021)	1.90
Draft Tentative <i>Belaire-West</i> Notice (drafted and provided to Defendant's Counsel on September 10, 2021)	1.50

Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Rey Parra for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on March 18, 2021)	4.60
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	24.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (approximately 5,529 pages), and Other Sources Prior to Mediation	83.50
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 March 9, 2022)	39.50
Attend Mediation Session (March 17, 2022; Zoom Video Conference)	12.50
Review and Analyze Mediator's Proposal (Issued March 17, 2022)	0.70
Review and Analyze Revised and Final Mediator's Proposal (Issued March 23, 2022)	0.80
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on March 4, 2023) and Notice of Class Action Settlement	19.50
Law and Motion	
Review Defendant's Notice of Motion and Motion for Peremptory Challenge Pursuant to Code of Civil Procedure Section 170.6; Memorandum of Points and Authorities in Support Thereof; and Declaration of Nora K. Stilestein in Support Thereof (served on June 1, 2021)	0.80

Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Annabel Blanchard in Support Thereof, Declaration of Rey Parra in Support Thereof, and [Proposed] Order Thereon (filed on March 10, 2023)	18.50
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on April 19, 2023)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on May 31, 2023)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payment, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (anticipated to be filed on September 28, 2023)	20.50
Total Hours:	528.40

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Parra v. Sherwood Country Club

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/5/2021	U.S. Postmaster	Postage	7.00
3/11/2021	Legal Document Server, Inc.	Attorney Service	165.23
3/11/2021	Ventura Superior Court	Complaint Filing Fee	435.00
3/19/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
4/26/2021	Legal Document Server, Inc.	Attorney Service	150.00
5/13/2021	Legal Document Server, Inc.	Attorney Service	95.00
5/18/2021	Legal Document Server, Inc.	Attorney Service	100.25
5/18/2021	Ventura Superior Court	Jury Fee	150.00
5/25/2021	Legal Document Server, Inc.	Attorney Service	150.00
7/7/2021	General Logistics Systems US, Inc.	Courier Service	13.14
7/8/2021	Legal Document Server, Inc.	Attorney Service	130.00
7/20/2021	General Logistics Systems US, Inc.	Courier Service	23.40
12/29/2021	CourtCall, LLC	Attorney Service	94.00
3/9/2022	Paul Hasting LLP	Mediation Fee	15,000.00
4/2/2022	Legal Document Server, Inc.	Attorney Service	145.00
5/9/2022	CourtCall, LLC	Attorney Service	94.00
8/15/2022	Legal Document Server, Inc.	Attorney Service	130.00
8/17/2022	CourtCall, LLC	Attorney Service	94.00
11/1/2022	Legal Document Server, Inc.	Attorney Service	130.00
11/8/2022	CourtCall, LLC	Attorney Service	94.00
1/4/2023	Legal Document Server, Inc.	Attorney Service	150.00
1/10/2023	CourtCall, LLC	Attorney Service	72.00
2/27/2023	Legal Document Server, Inc.	Attorney Service	150.00
3/10/2023	Legal Document Server, Inc.	Attorney Service	703.55
3/10/2023	Ventura Superior Court	Motion Fee	60.00
3/10/2023	CourtCall, LLC	Attorney Service	72.00
4/11/2023	CourtCall, LLC	Attorney Service	72.00
6/2/2023	Legal Document Server, Inc.	Attorney Service	170.00
Total:			18,724.57