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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

KATHLEEN O'BRIEN, AURORA
GALVAN, and CARA LISH individuals, on
behalf of themselves and on behalf of all
persons similarly situated,

Plaintiffs,

v.

CERIDA INVESTMENT CORP., a
Corporation; DELOITTE CONSULTING
L.P., a Limited Partnership, and DOES 1 to
50, inclusive,

Defendants.

CASE NO. 21CV384527

**DECLARATION OF HAIG B. KAZANDJIAN
IN SUPPORT OF MOTION FOR ORDER
GRANTING FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: December 11, 2024
Time: 1:30 p.m.
Dept.: 19

Complaint filed: July 20, 2021
Trial Date: Not set

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DECLARATION OF HAIG B. KAZANDJIAN IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS SETTLEMENT

I, Haig B. Kazandjian, declare:

1. I am an attorney licensed to practice before all courts of the State of California. I am counsel for the class action Plaintiffs herein and have personal knowledge of the facts thereto. If called as a witness, I could and would competently testify herein.

Qualifications of Class Counsel

2. I received my J.D. from Southwestern Law School in 2011.

3. In December 2011, I was admitted to the California Bar. In January 2012, I founded the Law Offices of Haig B. Kazandjian. In 2017, I founded Haig B. Kazandjian Lawyers APC, where I have been the principal and managing attorney. My law practice focuses on complex cases involving labor and employment, as well as mass tort claims. Currently I am the attorney of record in numerous employment-related wage and hour putative class actions and PAGA representative actions.

4. I am well-experienced in wage-and-hour class action litigation as well as PAGA litigation. As class counsel, I have been granted final approval of many wage-and-hour class actions and PAGA representative action. I have acted as lead counsel on the following class and PAGA cases which gained final approval by the Courts: (1) Kalbaklian et al. v. PSI Services LLC (BC637011 – Judge Freeman); (2) Hackett et al. v. Hotei Marketing (BC639589 – Judge Palazuelos); (3) Shamiryan et al. v. Codemetro (BC683326 – Judge Buckley) (4) Gutierrez et al. v. Foremost Foods Corp. (BC706453 – Judge Mooney); (5) Salinas et al. v. True World Foods Los Angeles (18STCV01288– Judge Nelson); (6) Estrada v. TT Fremont Holding, Inc. (19CHCV00193 – Judge Sandvig); (7) Visket v. LA Solar Group Inc (LS030122 – Judge Cotton); (8) Nicholas v. Rockstar Beverage Corp. (19STCV18234 – Judge Court); (9) Glassel v. Toscanova (20VECV00755 – Judge Keeny); (10) Beltran v. Vista Del Mar Child and Family Services (20SMCV01926 – Judge Karlan); (11) Arceo v. Volcano Grill, Inc. (19BBCV00473 – Judge Kralik); (12) Gonzalez-Arellano v. Starchild Interventions (21STCV10947); (13) Ba v. Advantage Gold LLC (20SMCV01687 – Judge Epstein); (14) Godinez v. The Natures Bounty Co.

1 (20CHCV00263- Judge Sandvig; (15) Martinez v. Alfred Club, LLC (19STCV44314- Judge
2 Jones); (16) Cam Luu, et al. v. PMI Management, LLC (21STCV11962) – Judge Leis); (17)
3 Alexandre Passos, et al. v. Beaumont Management Co. Inc., et al. (20VECV00962 – Judge Fahey);
4 (18) Gerardo Linares, et al. v. Adept Fasteners, Inc. (21CHCV00181- Judge Pfahler); (19) Lisa
5 Clark, et al. v. Allstate Investment Group, Inc. (21SMCV00632 - Judge Zukin); (20) Mariam
6 Davtyan, et al. v. IN2VISION Programs, LLC (21NWCV00175- Judge Bernal); (21) Erik Lopez,
7 et al. v. The Switch Enterprises, LLC (21BBCV00710 - Judge Hofer); (22) Arin Shipley, et al.
8 Robsag Inc., et al. (20GDCV00578 - Judge Leis) (23) Aivazian v Lakeside Medical Group
9 (BC701224-Judge Nelson); (24) Gragoosian v. Volt Management Corporation (20STCV28854-
10 Judge Fruin); (25) Ramirez v. Melrose Gardens LA, LLC (21STCV05842- Judge Tamzarian);
11 (26) Gutierrez v Buca, Inc. (19BBCV01008- Judge Kralik); (27) Gonzalez v 4 Over, LLC, et al.
12 (18STCV01287 – Judge Riff).; (28) Smith v Velocity Aerospace Group, Inc. (20STCV03159
13 Judge Palazuelos); and (29) Landeros v Gardner Management, Ltd. (20STCV03151 Judge
14 Palazuelos); (30) Bustamante v Calwest Refrigeration, Inc. (CIVSB2119755 Judge Cohn); (31)
15 Baez v Centinela Skilled Nursing & Wellness Centre, East, LLC (21TRCV00270 Judge Tanaka);
16 (32) Hill v. Prime Healthcare Centinela, LLC (20TRCV00071- Judge Tanaka); (33) Kim v. Hi-
17 Temp Metals, Inc. (21CHCV00176 Judge Pfahler).; (34) Passos v Beaumont Management Co.,
18 Inc. (20VECV00962- Judge Fahey); (35) Traub v Roll Up Doors, Inc. (21PSCV00705 – Judge
19 Falls); (36) Rhyoo v. Loan depot (VECV01419 – Judge Cotton); (37) Keraachi v Net2Source Inc
20 (21GDCV01171 – Judge Hofer); (38) Scarpati v Consejosano, Inc. (22BBCV00003 – Judge
21 Kralik); (39) Chenault v. Los Angeles Collective, LLC (21STCV43550 Judge Meiers); (40)
22 Mosley v Tender Home Health (21CHCV00773 Judge Sandvig); (41) Cummings v. A
23 Community of Friends (21STCV09262 -Judge Landin); (42) Davtyan v. In2Vision Programs, Inc.
24 (21NWCV00175 - Judge Bernal); (43) Garcia v Alyn Industries, Inc. (21VECV00671 – Judge
25 Watkins); (44) Borillo v S&F Management Company, Inc. (21SMCV01370 Judge Mandel); (45)
26 Panosian v. 5905 AHK, LLC (21VECV00401 Judge Salkin); (46) Medina v. Caden
27 (19VECV00781 Judge Virginia Keeny); (47) Lopez-Casillas v. PHC Service Co. (21STCV08874
28 Judge Stephen I. Goorvitch); (48) Banks v. Carter Saco Logistics (21CHCV00399 Judge Stephen

1 P. Phahler); (49) Gamil v. 444-448 W. Windsor, LLC, (22GDCV00100 - Judge David A. Rosen);
2 (50) Mota v. Mt. Olive, (22PSCV00154- Judge Sirna Savatore); (51) Reed v Williams-Sonoma
3 Stores, Inc. (CGC- 22-598118- Judge Ulmer); (52) Ruvalcaba v. Amphenol Corp.,
4 (22NWCV00167, Judge Tsao); (53) Sanchez v. Volt Management, (22TRCV00125, Judge
5 Tanaka); (54) Mkhitarian v. Bank of the West, (BC691989 – Judge Freeman); (55) Davis v.
6 Greenbox Loans, Inc. (23STCV03314, Judge Fruin); (56) Vigne v. Paybox LLC,
7 (23VECV02108, Judge Cotton); (57) Luu v. JV Property Management & Brokerage, Inc.,
8 (22CHCV00766, Judge Sandvig); (58) Zuniga v. Norman Krieger Inc., (23LBCV00094, Judge
9 Kim); (59) Ortiz v Ashley Furniture, (CIVDS2012912/CIVDS2012912, Judge Morgan); (60)
10 Gonzalez v Costco Wholesale., (22AHCV00255, Judge Moses); (61) Navarrete v Sunline Transit,
11 (CVRI2103875, Judge Hopp); (62) Murphy v Fusion Learning (2:21-cv-06732-JAK-AS, Judge
12 Kronstadt); (63) Ratliff v Wayfinder Family Services (23STCV15669, Judge Takasugi); (64) King
13 v RADC Enterprises, Inc. (CIVSB2221711, Judge Ortiz); (65) Villegas v Medical Solutions, LLC
14 (CIVSB2307691, Judge Ortiz); (66) Chandra v Le Zinc Bar;(22STCV09367, Judge Kuhl); (67)
15 McGuire v Fight Club New York LLC; (23STCV27019, Judge Lu) (68) Sosa v Elwood Staffing
16 Services; (23TRCV01299, Judge Frank) (69) Luu v PMI Management LLC; (21STCV11962,
17 Judge Meiers) (70) Rico v IWH: Worley Group Inc.; (22AHCV00040 , Judge Crowfoot); (71)
18 Vasquez v New School; (21STCV13381, Judge Dillon); and (72) Davis. V Greenbox Loans;
19 (23STCV03314, Judge Fruin)

20 **Procedural History**

21 5. On July 20, 2021, Plaintiff O’Brien commenced this Action by filing a Class Action
22 Complaint against Defendants, Case No. 21CV384529. On July 20, 2021, Plaintiff O’Brien also
23 filed a separated Representative Action Complaint against Defendants, Case No. 21CV384527. On
24 August 13, 2022, Plaintiff Galvin filed a Representative Action Complaint against Cerda, Case
25 No. 21STCV30165. On February 23, 2022, Plaintiff Lish filed a Class Action Complaint against
26 Cerda, Case No. 34-2022-00320177-CU-OE-GDS.

27 6. On October 21, 2022, the Parties filed, and the Court approved, the Joint Stipulation
28 And Order To Consolidate Cases For Settlement Approval And For Leave To File Amended

1 Complaint For Settlement Purposes, consolidating the O'Brien Class Action and PAGA Action
2 and amending the consolidated O'Brien Action to include Plaintiffs Galvan and Lish as additional
3 Class Representatives. This consolidated complaint is now the operative complaint in the O'Brien
4 Action and is referred to herein as the "Operative Complaint". Following consolidation of matter
5 and amendments of the Operative Complaint, the Galvan PAGA Action, the Lish Class Action and
6 the Lish PAGA action were dismissed without prejudice and Plaintiff's Galvan, Lish and O'Brien
7 therefore seek approval of the settlement in the consolidated O'Brien Action. Plaintiffs have entered
8 into a joint prosecution agreement in this case and have consented to the agreement in writing.

9 7. Plaintiff O'Brien's and Plaintiff Lish's Counsel and I entered into discussions which
10 resulted in an agreement to coordinate the cases for the collective benefit of potential class
11 members. Plaintiffs have entered into a joint prosecution agreement in this case and have consented
12 to the agreement in writing.

13 8. Over the course of this Action, Plaintiffs' Counsel conducted a thorough
14 investigation into, and evaluation of, the merits of the potential claims and defenses. Plaintiffs'
15 Counsel focused their investigation and legal research on the underlying merits of Class Members'
16 claims, the damages to which they were entitled, and the propriety of class certification. As part
17 of their investigation, Plaintiffs' Counsel conducted a thorough investigation which included
18 substantial discovery. Additionally, Plaintiffs' Counsel conducted in-depth background research
19 on Defendant, including obtaining each named Plaintiffs' personnel file and reviewing Defendant's
20 website job postings to obtain further information on the claims and defenses.

21 9. Once the matter was at issue, the Parties engaged in meet and confer discussions
22 regarding potential discovery issues, potential law and motion matters, and the merits of the case,
23 and ultimately agreed to attempt early mediation. They then engaged in significant informal
24 discovery to facilitate an exchange of information necessary to engage in a meaningful mediation.
25 Consequently, Plaintiffs' counsel reviewed time records, payroll records, personnel
26 policies/handbooks, meal break policies, personnel files, and a random sampling of paystubs
27 produced by Cerida. Defendant also provided documents and information reflecting the estimated
28 total amount of workweeks and pay periods they worked, and average hourly pay rates, among

1 other relevant data. Plaintiffs' had this information reviewed and analyzed by consulting expert
2 Berger Consulting Group to assist with, inter alia, determining potential meal/rest period violation
3 rates, the amount of potential "off the clock" work, etc., and formulating a damages model.

4 10. The Parties then engaged Jeffrey Krivis, Esq., a respected mediator with extensive
5 wage and hour class action experience and on June 15, 2022 participated in a full day mediation
6 with Mr. Krivis. Throughout the day, the arms-length negotiations were hard-fought and
7 adversarial as the Parties exchanged extensive information on their legal and factual positions, and
8 made numerous offers and counter-offers. Following the mediation, each side, represented by its
9 respective counsel, were able to agree to settle the Action, memorialized in the form of a
10 Memorandum of Understanding, executed by all parties on or about August 23, 2023. The Parties
11 later negotiated the Class Action and PAGA Settlement Agreement setting forth the full and final
12 settlement terms.

13 11. I recognize the expense and length of continued proceedings necessary to litigate
14 this Action through trial and potential appeals. I have also taken into account the uncertainty and
15 risk of the outcome of further litigation and arbitration, and the difficulties and delays inherent in
16 such proceedings. I am also aware of the burdens of proof necessary to establish liability for the
17 claims asserted in the Action, both generally and in response to Defendants' defenses, and the
18 difficulties in establishing damages for the Settlement Class Members. If the Parties continued to
19 litigate the case, they would need to conduct extensive further document discovery, including
20 substantial discovery of electronically-stored information, and take numerous depositions of
21 Defendant's corporate representatives, Class Members, and other fact witnesses. The Parties'
22 Settlement is not the result of fraud or collusion. Rather, the proposed Settlement was reached after
23 commencing litigation and following several years of highly contested litigation and arms-length
24 negotiations with opposing counsel in this matter. Pursuant to *Kullar v. Foot Locker Retail, Inc.*
25 (2008) 168 Cal.App.4th 116, the Parties conducted extensive discovery and exchanged documents,
26 data, and information prior to mediating.

27 12. Accordingly, I have determined that the terms set forth in this Settlement
28 Agreement are fair, adequate and reasonable, and in the best interests of the Class Members.

1 Having carefully weighed all these considerations, at the time the Settlement was reached, I was
2 satisfied that the proposed Settlement was in the best interests of the Class. Further, the proposed
3 settlement did not involve the presence of a governmental participant.

4 13. The ongoing work in litigating the claims in this case has been extensive, and
5 ultimately successful, in achieving a substantial settlement resolution.

6 14. I will continue to work on this case for several more months at a minimum. As
7 Class Counsel, along with co-counsel, I anticipate spending significant time on this case attending
8 the Final Approval hearing, and answering Settlement Class Member questions, communicating
9 with the Settlement Administrator, and communicating with Defendant as necessary regarding any
10 settlement administration issues that may arise.

11 **Risk of Representation and Resources Expended**

12 15. This matter has required my firm to expend substantial time that could have been
13 spent on other fee-generating matters. We took this matter on a pure contingency basis, expending
14 this effort without any guarantee of recovery. At various times, the litigation has consumed a
15 significant percentage of my time, my attorney colleagues' time, and my staff's time.

16 16. My firm undertook representation of Plaintiffs in this action without any assurance
17 of payment for its services, litigating the case on a wholly contingent basis in the face of significant
18 risk. Class cases of this type are, by their very nature, complicated and time-consuming. Any
19 lawyer undertaking representation of large numbers of affected employees in class actions
20 inevitably must be prepared to make a tremendous investment of time, energy, and resources.
21 Sometimes these cases result in a recovery for the class, and sometimes they do not, in which case
22 we are paid nothing for our time and costs incurred.

23 **The Value of the Time and Costs Invested by Haig B. Kazandjian Lawyers**

24 17. As of today, my firm has expended approximately 187.85 hours on this matter, with
25 work still continuing. Attached hereto as **Exhibit 1** is a true and correct Attorney Task and Time
26 Chart that sets forth in detail the breakdown of time for the requisite tasks performed by Class
27 Counsel. The firm's total lodestar for these hours amounts to \$136,191.25.

28 18. The work performed in this matter, the backgrounds of my firm, as well as the

1 individual backgrounds, training, and experience of the attorneys who worked on this matter, in
2 litigating class actions, and in particular, wage-and-hour matters, support a reasonable blended
3 hourly rate of compensation at the rate of \$725 per hour for work performed by Class Counsel. The
4 rate is my firm's current billing rate and is supported by the extensive and specialized experience
5 in these types of cases and has been approved by other courts. My office's rates are also in line
6 with those typically approved in California wage-and hour class action litigation. The Laffey
7 Matrix would actually provide for a rate increase. (Haig B. Kazandjian Lawyers, APC: Founder,
8 Haig B. Kazandjian, 11+ years' experience - \$878)

9 **Out-of-Pocket Costs Incurred by Haig B. Kazandjian Lawyers**

10 19. Haig B. Kazandjian Lawyers, APC maintains all records regarding litigation
11 expenses incurred on each case. I have reviewed the records of litigation expenses incurred in this
12 matter. According to our records, our firm has incurred at least \$7,157.76 in costs as of today.
13 Attached hereto as **Exhibit 2** is a true and correct summary of the litigation expenses incurred by
14 Haig B. Kazandjian Lawyers, APC in this matter. Haig B. Kazandjian Lawyers, APC has not
15 received any reimbursement for any of the monies expended to cover costs incurred in this matter.

16 **Service Awards**

17 20. In exchange for a general release, the release of all their individual claims in the
18 lawsuit, and for their time, effort and risk in bringing and prosecuting this matter, the Parties have
19 agreed to pay Class Representative Service Payments of \$10,000 each to Plaintiff's O'Brien and
20 Galvin and of \$5,000.00 to Plaintiff Lish for a total of \$25,000. The Court reduced these amounts
21 to \$5,000 per Plaintiff (for a total of \$15,000) in its Order granting Preliminary Approval.

22 21. The requested Class Representative Service Awards are fair and appropriate
23 considering the substantial amount of time each of the named Plaintiffs spent in prosecution of this
24 case and the substantial reputational risk they each took on in bringing the claims.

25 22. The Service Awards of \$5,000 per Class Representative are also proportional
26 compared to the total recovery in this case. The amount of the total for the three Service Awards
27 is approximately 1.5% of the gross settlement amount.

1 23. The requested awards are well within the range of reasonableness, particularly in
2 light of the fact that each of the Class Representatives have agreed to sign general releases, whereas
3 each Settlement Class Member will only be releasing specific wage and hour claims

4 24. The Class Representatives, simply by having their names listed as the named
5 Plaintiffs on court documents that are widely available on the internet, have undertaken significant
6 risks and notoriety in bringing these cases. To date, the Class Representatives have not received
7 any personal benefit as a result of their efforts in this Litigation.

8 25. The requested Class Representative Service Awards are fair and appropriate. Each
9 Plaintiff spent a substantial amount of time and effort to produce relevant information, documents,
10 and past employment records, gathering and providing the facts and evidence necessary to prove
11 the allegations. Plaintiffs were available whenever Plaintiffs' counsel needed them and actively
12 tried to obtain information that would benefit the Class.

13 26. Accordingly, it is appropriate and just for Plaintiffs to receive service awards in the
14 amount set forth above, in addition to their Individual Settlement Payment, for their services
15 provided, and risks undertaken on behalf of all Class Members. The ongoing work in litigating the
16 claims in this case will be extensive and uncertain, however the Plaintiffs have achieved a
17 substantial settlement resolution at this time.

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

20 Executed this 14th day of November 2024 at Glendale, California

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Haig B. Kazandjian

EXHIBIT 1

HAIG B. KAZANDJIAN LAWYERS, APC**AURORA GALVAN VS CERIDA INVESTMENT CORP.****CASE NO: PAGA: 21STCV30165; 21CV384527**

Hours	Description	Rate	Billable
10.25	Pre-Lawsuit Investigation of the Key Facts with a Focus on Representative Action elements, including but not limited to adequacy of Potential Plaintiff(s), Pre-Lawsuit Investigation of the Merits of Claims and the Merits of the Claims of Other Representative Class Members Civil Penalties Under the California Private Attorneys General Act of 2004, Labor Code §§ 2698, <i>et seq</i>	\$725	\$7,431
3.75	Pre-Lawsuit Inquiry and Analysis of Potential Civil Penalties Exposure of Defendants with Respect to the Damages Sustained By/Civil Penalties Owed to Plaintiff and the Aggrieved Employees	\$725	\$2,719
4.5	Pre-Lawsuit Legal Research & Analysis of Latest Off-the-Clock, Meal and Rest Break Law, Failure to Reimburse Business Expenses, and Representative PAGA Decisions, including all New Relevant DLSE Materials	\$725	\$3,263
4.2	Investigation of Defendants' Organization and Corporate Structure, Vendors, and Executive Reporting Structure as they Related to the Employment and Management of the Representative Class Members	\$725	\$3,045
2.5	Investigation of Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage and Hour Issues and Establishing Willfulness and Uniformity	\$725	\$1,813
3.25	Research and Analysis of Potential Defenses Defendants May Raise, Including, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	\$725	\$2,356
3.75	Prepare a Discovery Strategy Plan of Action, including Topics of Inquiry Important to Discovery, Liability, and Civil Penalties	\$725	\$2,719
7.25	Analysis and Review of Personnel Documents/Client Docs of Plaintiff	\$725	\$5,256
3.4	Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues.	\$725	\$2,465

2.4	Comparative Analysis and Cross-Checking of All Available Job Postings by 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	\$725	\$1,740
2.2	Research and Investigation Re Manageability Issues, including Research Regarding Which Experts to retain and For What Purpose	\$725	\$1,595
2	Research and Investigation Re: Staffing Models and Staffing Levels at Defendant's Company	\$725	\$1,450
2.5	Research and Investigation Re Defendant's Policies, Practices, and Procedures Relating to Reporting Time, Timekeeping, Meal/Rest Breaks, Overtime Compensation, and Reimbursement of Business-Related Expenses	\$725	\$1,813
2.25	Research into Case Law and Active Cases Involving Facts Where Defendant Failed to Provide the Required Premium Pay Payments	\$725	\$1,631
3.75	Review and Analysis of Defendant's Written Policies, Practices, and Procedures and Related Documents Regarding Timekeeping, Compensation, and Wage-and-Hour Compliance	\$725	\$2,719
3	Review and Analysis of Defendant's Written Policies, Practices, and Procedures and Related Documents Regarding Scheduling, Payment and Calculation of Shift Differentials, Commissions, and Regular Rate Calculation	\$725	\$2,175
3	Review and Analysis of Defendant's Business-Related Expense Reimbursements Policy, Procedures and Practices, and Related Documents/Information	\$725	\$2,175
4.75	Review and Analysis of Defendant's Documents/Information Evidencing Defendant's Scheduling Practices and Procedures	\$725	\$3,444
2.5	Internal Meeting re Status of Case and Assigning Tasks internally	\$725	\$1,813
2.5	Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	\$725	\$1,813
1.5	Draft, edit, review and send Records Request document.	\$725	\$1,088
2.5	Draft, edit, review and route PAGA Notice to LWDA and Defendant	\$725	\$1,813
4.25	Draft, edit, review and file PAGA Complaint (21STCV30165)	\$725	\$3,081
0.25	Reviewing Notice of Case Management Conference	\$725	\$181
1	Draft and prepare Notice and Acknowledgment of Receipt and supporting documents.	\$725	\$725
0.2	Received, reviewed and filed executed Notice and Acknowledgment of Receipt.	\$725	\$145

0.4	Email correspondence with Opposing Counsel re informal discovery and mediation.	\$725	\$290
0.25	Phone correspondence with Opposing Counsel.	\$725	\$181
1	Email discussion with Opposing Counsel, re PAGA COA	\$725	\$725
0.3	Phone correspondence with Opposing Counsel re Joint Stipulation.	\$725	\$218
2	Reviewing Defendant Cerida Investment Corp's Notice Of Motion And Motion In Abatement Of Portions Of Plaintiff's Complaint; Memorandum Of Points And Authorities; Declaration Of Daniel Parker Jett In Support Thereof	\$725	\$1,450
4.75	Legal research and drafting opposition to motion to strike/abate.	\$725	\$3,444
0.5	Phone correspondence with Opposing Counsel re CMC and consolidation	\$725	\$363
1	Phone correspondence with Opposing Counsel re amendments	\$725	\$725
2.3	Reviewing Defendant Cerida Investment Corp's Notice Of Motion And Motion To Strike Portions Of Plaintiff's Complaint; Memorandum Of Points And Authorities In Support Thereof	\$725	\$1,668
0.2	Reviewing Court's Minute Order (Dated 12/13/2021, re Case Management Conference)	\$725	\$145
1	Draft Plaintiff's Case Management Statement (12/13/2021)	\$725	\$725
1.3	Email correspondence with Opposing Counsel re Motion.	\$725	\$943
1	Draft and prepare Joint Stipulation To Continue Hearings On Defendant's Motion In Abatement, Motion To Strike Portions Of Plaintiff's Complaint, And Initial Case Management Conference, And [Proposed] Order Thereon	\$725	\$725
0.5	Phone correspondence with Opposing Counsel and Co Counsel.	\$725	\$363
0.3	Reviewing Stipulation To Continue Hearing Dates On Defendant's Motion In Abatement, Motion To Strike Portions Of Plaintiff's Complaint, And Case Management Conference, And [Proposed] Order Thereon	\$725	\$218
1	Phone correspondence with Opposing Counsel.	\$725	\$725
1	Reviewing First Amended Stipulation To Continue Hearing Dates On Defendant's Motion In Abatement, Motion To Strike Portions Of Plaintiff's Complaint, And Case Management Conference, And [Proposed] Order Thereon	\$725	\$725
0.2	Draft and prepare Notice of Settlement	\$725	\$145
0.2	Reviewing Order To Show Cause Hearing Re: Dismissal (Settlement), dated 09/06/2022	\$725	\$145
1.2	Reviewing First Amended Class Complaint.	\$725	\$870
0.2	Reviewing Notice Of Court Order, dated 10/27/2022	\$725	\$145

0.2	Reviewing Notice Of Rescheduled Case Management Conference	\$725	\$145
0.2	Reviewing Joint Case Management Conference Statement	\$725	\$145
0.2	Reviewing Court's Minute Order, dated 5/10/2023	\$725	\$145
1	Internal Meeting re Mediation, Assigning Tasks internally	\$725	\$725
5.5	Correspondence with Expert Reagrding Damages Analysis re Mediation	\$725	\$3,988
4.5	Review, analyze, discuss and drafting of Mediation Brief	\$725	\$3,263
2.3	Finalized Mediation Brief and emailed to Mediator	\$725	\$1,668
7	Review and Analyze Documents and information relating to Defendant's wage-and- hour policies, employee handbooks, earnings statements, and payroll histories; Review and analysis of sampling of time and corresponding pay data to prepare mediation brief, theories of case, and prepare for mediation	\$725	\$5,075
10.5	Prepare for and Attend Full-Day Mediation	\$725	\$7,613
1	Correspondence with Expert re Analysis.	\$725	\$725
7	Review, negotiate, finalize, explain to client and have signed long form settlement agreement and class notice from Opposing Counsel.	\$725	\$5,075
0.25	Draft and prepare Request for Dismissal	\$725	\$181
0.25	Reviewing Court's Minute Order dated 11/10/2022 (re Order to Show Cause Re: Dismissal (Settlement))	\$725	\$181
1	Reviewing Declaration of Cara Lish In Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement	\$725	\$725
1.5	Draft and prepare Declaration of Aurora Galvan In Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement	\$725	\$1,088
0.25	Reviewing Declaration of Kathleen O'Brien In Support of Motion for Preliminary Approval of Class Settlement	\$725	\$181
0.25	Reviewing Declaration of James R. Hawkins in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement	\$725	\$181
2.75	Draft and prepare Declaration of Haig B. Kazandjian in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement	\$725	\$1,994
0.25	Reviewing Declaration of Kyle Nordrehaug in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement	\$725	\$181

6	Draft and prepare Memorandum Of Points And Authorities In Support Of Motion For Preliminary Approval Of Class Action Settlement	\$725	\$4,350
0.25	Draft and prepare Notice Of Motion And Motion For Preliminary Approval Of Class Action Settlement	\$725	\$181
2	Draft and prepare [Proposed] Preliminary Approval Order	\$725	\$1,450
2	Finalized the Motion For Preliminary Approval Of Class Action Settlement with supporting documents.	\$725	\$1,450
0.2	Reviewing Court's Minute Order, dates 4/24/2024	\$725	\$145
0.5	Reviewing Supplemental Declaration Of Kyle Nordrehaug In Support Of Plaintiffs' Motion For Preliminary Approval Of Class Action Settlement	\$725	\$363
27	Meet and communicate via email and phone with Named Plaintiff throughout the pendency of the case	\$725	\$19,575
0.2	Reviewing administrators approval (Case Manager Introduction)	\$725	\$145
0.2	Reviewing email correspondence between administrator and OPC regarding timeline of administration of this settlement and receipt of class list on 08/23/2024	\$725	\$145
0.2	Reviewing email correspondence with administrator regarding formatted mailing documents	\$725	\$145
0.2	Reviewing email correspondence between administrator and OPC regarding case status updates	\$725	\$145
0.2	Reviewing email correspondence of revised administration timeline	\$725	\$145
0.2	Reviewing email correspondence between administrator and OPC regarding preliminary calculations for review and approval	\$725	\$145
2	Review Motion for Final Approval	\$725	\$1,450
0.2	Reviewing email correspondence with administrator regarding conformation for class notice	\$725	\$145
0.2	Reviewing status report as of 09/24/2024	\$725	\$145
0.2	Reviewing status report as of 10/29/2024	\$725	\$145
0.5	Reviewing Declaration of Cassandra Poltes of ILYM GROUP.	\$725	\$363
1	Prepare and Appear at Case Management Conference	\$725	\$725
1	Prepare and Appear at Order to Show Cause Re: Dismissal (Settlement)	\$725	\$725

1	Prepare and Appear at Case Management Conference	\$725	\$725
1	Prepare and Appear at Motion: Preliminary Approval	\$725	\$725
187.85			\$136,191.25

EXHIBIT 2

Cost- Galvan v Cerida	
Description	Amount:
PAGA Filing Fee	\$ 75.00
E-Filing Fee. Case Initiation at LA County	\$ 454.22
Efiling - Joint Stip	\$ 27.81
E-filing fee NARC	\$ 7.26
E-filing fee, CMS	\$ 7.26
E-filing fee, Stipulation and Order	\$ 27.81
Mediation fee	\$ 4,500.00
Berger Consulting Services	\$ 2,025.00
CA: File To Existing - #22LA01104210 - AURORA GALVAN vs CERIDA INVESTME	\$ 16.70
CA: File To Existing - #22LA01423195 - AURORA GALVAN vs CERIDA INVESTME	\$ 16.70
	\$ 7,157.76