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Attorneys for Plaintiff and the Class

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

EDUARDO CHINA, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

v.

SOUTHWESTERN INDUSTRIES, INC., an
unknown business entity; and DOES 1
through 100 inclusive,

Defendants.

Case No. 21STCV11874 (lead)
(Consolidated with Case No. 21CMCV00123)

Honorable William F. Highberger
Department SSC-10

CLASS ACTION

**DECLARATION OF JOANNA GHOSH IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES, COSTS, AND CLASS
REPRESENTATIVE ENHANCEMENT**

[Plaintiff's Motion for Final Approval of Class
Action Settlement, Attorneys' Fees, Costs, and
Class Representative Enhancement;
Declaration of Class Representative (Eduardo
China); Declaration of Settlement
Administrator (Taylor Mitzner); and
[Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: June 17, 2024
Time: 10:00 a.m.
Department: SSC-10

Complaint Filed: March 26, 2021
Trial Date: None Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, 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 Eduardo China (“Plaintiff”) and the Class in the above-captioned action. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On January 18, 2024, in Department SSC-10 of the above-entitled Court, the Honorable William F. Highberger preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between the Plaintiff and Defendant Southwestern Industries, Inc. (“Defendant”) (together with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Eduardo China to represent the Class (“Class Representative”). The Court also preliminarily appointed 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”), and 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 administrator and handle the notice and settlement administration process.

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

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WORK PERFORMED BY LAWYERS FOR JUSTICE, PC

4. Several attorneys at Lawyers for Justice, PC have been actively engaged in litigating the above-captioned class action, entitled *China v. Southwestern Industries, Inc.*, Los Angeles County Superior Court, Case No. 21STCV11874 (“Class Action”), which was filed on March 26, 2021, and the representative Private Attorneys General Act (“PAGA”) action entitled *China v. Southwestern Industries, Inc.*, Los Angeles County Superior Court, Case No. 21CMCV00123 (“PAGA Action”), which was filed on May 21, 2021, since prior to their commencement. On December 16, 2022, the Class Action and PAGA Action (together, the “Actions”) were consolidated and the Class Action was designated the lead action.

5. Before initiating the cases, 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, and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to, *inter alia*, class certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour enforcement and penalties, Plaintiff’s claims and allegations, and potential defenses. After conducting initial investigation, Lawyers for Justice, PC determined that Plaintiff’s claims were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed expenses.

6. Class Counsel conducted significant informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and Class Counsel worked on preparing the cases for class certification and trial, prior to reaching the Settlement. The Parties exchanged information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations. Class Counsel reviewed and analyzed information, documents, and data obtained from Plaintiff, Defendant, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included, and were not

1 limited to, employment records of Plaintiff, a detailed sampling of Class Members' time and pay
2 data, multiple iterations of Defendant's Employee Handbook, company policy
3 acknowledgements, internal memoranda, job descriptions, new hire orientation checklists,
4 operations and employment practices, forms, procedures, and policies documents (including but
5 not limited to Work Hours and Break Time policy, Attendance policy, Personal Conduct policy,
6 Cell Phone Policy, and Use of Computer Software Policy), among other information and
7 documents. Class Counsel also met and conferred with Defendant's counsel on numerous
8 occasions, e.g., to discuss issues relating to the pleadings, case management, court proceedings,
9 informal discovery and production of various information, documents, and data in the course of
10 litigation and mediation and settlement negotiations, and mediation and settlement negotiations.
11 Other work that Class Counsel performed included, and was not limited to, case strategy and
12 analysis; drafting, reviewing, and revising the pleadings, the mediation brief, and settlement-
13 related papers; case management; claims assessment and evaluation; and preparing for and
14 attending court proceedings and mediation and settlement negotiations, among other tasks.

15 7. As outlined herein, the parties have conducted meaningful informal discovery and
16 investigation during the course of litigating the cases and mediation and settlement negotiations.
17 Class Counsel analyzed a volume of information, documents, and data obtained from Plaintiff,
18 Defendant, and other sources, that provided a critical understanding of the nature of the work
19 performed by Class Members and Aggrieved Employees, as well as Defendant's operations and
20 employment policies, practices, and procedures, and were used in analyzing liability, damages,
21 and penalties valuation issues in connection with multiple phases of the litigation, and ultimately
22 in connection with the mediation and settlement negotiation process. Class Counsel also
23 performed research regarding applicable law, which is evolving as it relates to class certification,
24 manageability, off-the-clock theory, rounding, regular rate, meal and rest periods, representative
25 PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiff's claims and
26 allegations, and Defendant's defenses thereto, as well as facts discovered. Accordingly, sufficient
27 investigation and review of information have taken place in order for the parties to be adequately
28 informed of the nature and extent of the claims, and to enable all parties to fully evaluate the

1 Settlement for its fairness, adequacy, and reasonableness.

2 8. After conducting significant investigation of the facts and law during the prosecution
3 of the cases, counsel for the Parties engaged in extensive settlement negotiations to try to resolve
4 the cases. These efforts included participating in a formal, full-day mediation conducted by Jeffrey
5 A. Ross, Esq., a well-regarded mediator experienced in mediating complex labor and employment
6 matters. Prior to and during mediation and settlement discussions, the Parties exchanged
7 information, data, and documents, and discussed various aspects of the cases, including and not
8 limited to, the risks and delays of further litigation, the risks to the Parties of proceeding with class
9 certification and trial, the law relating to class certification, manageability, off-the-clock theory,
10 rounding, regular rate, meal and rest periods, and representative PAGA claims, wage-and-hour
11 law and enforcement, as well as the evidence produced and analyzed, and the possibility of
12 appeals, among other things. During all settlement discussions, the Parties conducted their
13 negotiations at arm's length in an adversarial position. Arriving at a settlement that was
14 acceptable to the Parties was not easy. Defendant and its counsel felt very strongly about
15 Defendant's ability to prevail on the merits, and to obtain a denial of class certification, while
16 Plaintiff and Class Counsel believed that class certification would be obtained, and that Plaintiff
17 would prevail at trial. After conducting extensive informal discovery and investigations and
18 settlement negotiations, with the aid of the mediator's evaluation, the Parties agreed that the cases
19 were well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as
20 well as the costs and risks to the Parties that would attend further litigation. These risks of further
21 litigation include, and are not limited to, a determination that the claims are unsuitable for class
22 treatment and/or representative adjudication, class de-certification after certification of a class,
23 allowing a jury to decide the claims, and the real possibility of no monetary recovery after years
24 of litigation. The Settlement takes into account the strengths and weaknesses of each side's
25 position and the uncertainty of how the cases might have concluded at certification, trial, and/or
26 appeals.

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1 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
2 attorneys' fees in the amount of \$633,333.33, which is one-third (1/3) of the Total Settlement
3 Amount of \$1,900,000.00, although the Settlement provides for attorneys' fees of up to thirty-five
4 percent (35%). Pursuant to the contingency-fee agreement entered into by and between Plaintiff
5 and Lawyers for Justice, PC, Plaintiff has agreed to a contingency fee of at least one-third (1/3) of
6 the recovery.

7 10. The attorneys' fees that are sought are commensurate with: (1) the risk that Class
8 Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel
9 dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the results
10 that Class Counsel has achieved throughout the litigation of the cases; (5) the value of the
11 settlement that Class Counsel has achieved; and (6) the other cases that Class Counsel has turned
12 down in order to devote their time and efforts to the cases. The nature of the work performed,
13 skill exercised, and the outcome in this matter support the percentage fee sought and the
14 application of a lodestar multiplier. This matter involves an outstanding monetary recovery
15 involving a **Total Settlement Amount of \$1,900,000.00** (with a **Net Settlement Amount of at**
16 **least \$932,735.14 to be paid to Participating Class Members** with an average payment of
17 approximately \$4,579.64 per Participating Class Member, a **payment of \$75,000.00 to Aggrieved**
18 **Employees** with an average payment of \$487.01 per Aggrieved Employee, and **payment of**
19 **\$225,000.00 to the State of California**).

20 11. While not necessarily required to be demonstrated because the percentage fee is
21 proper for this settlement, Class Counsel has incurred many hours of work in connection with
22 prosecuting the cases, such that the award of attorneys' fees is also justified under a lodestar
23 analysis. Attorneys at Lawyers for Justice, PC have spent a total of **465.70 hours** performing tasks
24 and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and
25 Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers
26 for Justice, PC, and the time incurred in performing those services. The hours include work done
27 by myself and several other attorneys at Lawyers for Justice, PC. Additionally, separate from the
28 hours of work referenced herein and in the attached chart, Lawyers for Justice, PC had litigation

1 support personnel actively engaged in assisting with the prosecution of this matter.

2 12. The work performed in this matter, the background of Lawyers *for* Justice, PC, as
3 well as the individual backgrounds, training, and experience of the attorneys who worked on this
4 matter, in litigating complex wage-and-hour cases, and in particular, employment class actions
5 and representative actions, support a reasonable blended hourly rate of compensation at the rate of
6 at least \$850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC
7 has been awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for
8 legal services performed, by courts granting approval of settlements in other wage-and-hour class
9 action and/or representative action cases: final approval of the class and representative action
10 settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No.
11 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved
12 compensation at the rate of \$936.47 per hour; final approval of the class and representative action
13 settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No.
14 BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved
15 compensation at the rate of \$919.57 per hour; and final approval of the class and representative
16 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
17 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved
18 compensation at the rate of \$855.96 per hour.

19 **EXPERIENCE AND ADEQUACY OF**
20 **LAWYERS *for* JUSTICE, PC**

21 13. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
22 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
23 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC
24 is attorney of record in dozens of employment-related putative class actions in both state and
25 federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who
26 focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA")
27 representative actions. The firm has successfully litigated cases involving nearly every aspect of
28 California wage and hour law, including payment of overtime and minimum wages, provision of

1 meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of
2 compliant wage statements, reimbursement of business expenses, executive, administrative, and
3 other overtime exemptions to the State of California and federal overtime compensation
4 requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has
5 recovered (sometimes in association with other law firms) millions of dollars on behalf of
6 thousands of individuals in California.

7 14. Edwin Aiwazian is a Managing Member and Shareholder of Lawyers *for* Justice,
8 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
9 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
10 extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute
11 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
12 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October
13 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During
14 the summer of 2000, he studied Legal Writing at Harvard University. From approximately
15 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable
16 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From
17 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the
18 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
19 In December of 2004, he obtained a license to practice law from the California State Bar. Since
20 in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost
21 exclusively focused on the prosecution of consumer and employment class actions. While
22 employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or
23 defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for
24 deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with
25 other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully
26 litigated cases involving the executive, administrative, and other overtime exemptions to the State
27 of California and federal overtime compensation requirements. Under his supervision, Lawyers
28 *for* Justice, PC has successfully obtained class certification by contested motion practice in

1 approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or
2 representative action cases.

3 15. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He
4 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
5 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
6 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
7 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
8 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
9 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
10 He was admitted to practice law in California in 2010. He is admitted to practice before all courts
11 of the State of California and all United States District Courts in the State of California. He has
12 worked on many wage-and-hour class action and representative action cases, taking the lead in
13 taking and defending depositions, arguing motions, and attending mediations. He has played an
14 integral role in preparing matters for class certification, including and not limited to, successful
15 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
16 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
17 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
18 RG13680477). Under his supervision, dozens of class action or representative cases have resulted
19 in settlements that have been granted court approval, including and not limited to, those listed in
20 paragraph 18 herein. He has handled over one hundred and fifty (150) mediations and worked on
21 over two hundred and fifty (250) class action or representative action cases which have resulted
22 in settlement.

23 16. Brian J. St. John is a Member of Lawyers *for* Justice, PC. He received his
24 Bachelor's degree from the University of California, San Diego in 2010 and earned his Juris
25 Doctor degree from the University of California, Berkeley, School of Law in 2013. He was
26 admitted to practice law in California in 2015. He is admitted to practice before all courts of the
27 State of California and the Northern and Southern federal district courts in the State of California.
28 He has worked on many wage and hour class action and PAGA representative matters, and his

work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation and analysis, and making court appearances. Prior to working at Lawyers for Justice, PC, he spent several years working for a boutique employment and labor law firm representing employers, and, in 2019 and 2020, he was employed as general counsel for a DMHC licensed discount dental plan. He has successfully overseen the settlement of dozens of class action and PAGA cases, and supervises a team of attorneys

17. I am a Managing Member of Lawyers for Justice, PC. I received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since 2013) and I am also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. I have taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. I have successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th 175 (2019). I have significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). I also have extensive experience with class action and/or representative action settlements, and have handled this process in over three hundred (300) cases. Under Edwin Aiwasian, Arby Aiwasian, and my supervision, Lawyers for Justice, PC has handled the class

1 certification and court approval process for hundreds of class action and/or representative action
2 matters that have successfully resolved. I am a member of the California Employment Lawyers
3 Association.

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

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

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

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

18 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
19 wage-and-hour class action against a national property management company involving
20 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court
21 granted final approval of the class action settlement. The Los Angeles County Superior Court
22 Case Number is BC430918.

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

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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 of
8 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 County
21 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 of
24 the salaried residential “Property Manager” position. On September 17, 2015, the court granted
25 plaintiff’s motion for class certification. On October 20, 2017, the court granted final approval of
26 the class and PAGA representative action settlement. The Los Angeles County Superior Court
27 Case Number is BC474784.

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

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

11 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
12 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
13 involving allegations of misclassification of the “Department Manager” position. On August 12,
14 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class. On
15 August 6, 2019, the court granted final approval of the class action settlement. The Alameda
16 County Superior Court Case Number is RG13680477.

17 m) LFJ represented the plaintiff in a PAGA representative action against a real
18 estate and property management company, on behalf of non-exempt employees. On November 4,
19 2016, the court granted approval of the PAGA representative action settlement. The Orange
20 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

26 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
27 representative action against a foodservice distributor, on behalf of non-exempt employees. On
28 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 the
4 employer's motion to compel arbitration, which resulted in a published opinion by the California
5 Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall Supply* (Cal.
6 App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S. Supreme Court
7 Docket No. 17-254). The Riverside County Superior Court Case Numbers are RIC1503952 and
8 RICJCCP5046, and the Judicial Council Coordination Proceeding Number is 5046.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1 and the Judicial Council Coordination Proceeding Number is 4921.

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

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

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

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

26 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
28 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the

1 court granted in part the plaintiff's motion for class certification and certified a class. The
2 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
3 Judicial Council Coordination Proceeding Number is 4930.

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

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

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

19 **LITIGATION COSTS AND EXPENSES INCURRED BY**

20 **LAWYERS FOR JUSTICE, PC**

21 19. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation and
22 will not receive any compensation until a recovery is obtained in this matter. Lawyers *for* Justice,
23 PC seeks reimbursement of **\$14,931.53** in litigation costs and expenses incurred in the cases, as
24 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the
25 prosecution of the cases and to obtain the Settlement.

26 ///

27 ///

28 ///

CLASS REPRESENTATIVE ENHANCEMENT TO PLAINTIFF

20. In recognition of his efforts and work expended in the cases and for serving as the Class Representative, the Settlement provides for a Class Representative Enhancement to Plaintiff in the amount of \$10,000.00. The contemplated and requested Class Representative Enhancement is fair and appropriate. Plaintiff spent a substantial amount of time and effort in providing relevant documents, past employment records, and the facts and evidence necessary to attempt to prove the allegations in the cases. Plaintiff was available whenever his attorneys needed him and actively tried to obtain and provide information that would facilitate the pursuit of the cases. Accordingly, it is appropriate and just for Plaintiff to receive \$10,000.00 as a reasonable Class Representative Enhancement for his services performed in the matter.

21. I submit that the Settlement is fair, reasonable, and adequate, and in the best interests of Plaintiff, the Class Members, Aggrieved Employees, 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 23rd day of May 2024, at Glendale, California.



Joanna Ghosh

EXHIBIT A

EDUARDO CHINA V. SOUTHWESTERN INDUSTRIES, INC.
Los Angeles County Superior Court, Case No. 21STCV11874 (“Class Action”)
Los Angeles County Superior Court, Case No. 21CMCV00123 (“PAGA Action”)

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	9.80
Pre-Lawsuit Investigation of the Merits of Plaintiff Eduardo China’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	8.30
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Southwestern Industries, Inc. (“Defendant”) with Respect to Plaintiff and the Putative Class Members	7.50
Pre-Notice Investigation of the Merits of Plaintiff’s Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiff and the Aggrieved Employees	7.60
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiff and the Aggrieved Employees	7.10
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, IWC Wage Orders, Representative PAGA, Class Certification, and Manageability in California, Including all New and Relevant Enforcement Guidance and Division of Labor Standard Enforcement (DLSE) Materials	7.50
Investigation of Defendant, Its Business Relationships, and the Industry in Which It Operates	3.60
Investigation of Defendant’s Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of Putative Class Members and Aggrieved Employees	4.20

Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues to Evaluate Willfulness and Uniformity, and Research and Analysis of Defendant's Past and Recent Litigation History Involving Labor, Wage-and-Hour, and Other Related Employment Issues	3.90
Analysis of Competitors Within Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	4.10
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 (If Any) to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	5.50
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other Online Postings and 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	4.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	5.10
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Scheduling, Timekeeping, Auto-Deduction, Rounding, Overtime Pay, Non-Discretionary Bonus/Shift Differential/Performance/Incentive Pay, Regular Rate of Pay, Break Room/Area, Bell System, Meal and Rest Breaks, On-Premises Breaks, On-Duty Meal Periods, COVID Protocol and Screenings, Equipment/Tools, Supplies, PPE, Use of Personal Cell Phones, Dress Code, and Expense Reimbursements	20.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Timekeeping, Inventory, Resource/Manufacturing Management, Sales, Customer Relations Management, Logistics, Information and Document Sharing, and Communications, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal and Rest Breaks	3.40

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	8.10
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	5.40
Review and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Class Members' and Aggrieved Employees' Work	6.10
Meet and Communicate with Plaintiff Eduardo China During the Case	38.50
Investigate, Meet, Communicate with, and/or Conduct Interviews of Putative Class Members and/or Percipient Witnesses	12.50
Pleadings and Court Filings	
Research and Draft Plaintiff's Class Action Complaint for Damages. and Legal Research and Analysis of All Claims Involved (filed on March 26, 2021) (Class Action)	7.80
Review Court's Notice of Case Assignment (filed on March 26, 2021) (Class Action)	0.10
Review Court's Initial Status Conference Order and Minute Order Re: Complex Determination (filed on April 20, 2021) (Class Action)	0.10
Research and Draft Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on May 21, 2021) (PAGA Action)	7.50
Draft Plaintiff's Notice of Posting Jury Fees (filed on May 11, 2021) (Class Action)	0.10
Review Notice of Appearance of Melanie L. Ronen and Natalie M. Lagunas as Attorneys for Defendant Southwestern Industries, Inc. (served on May 28, 2021) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Review, Draft, and/or Revise Joint Initial Status Conference Statement (filed on June 28, 2021) (Class Action)	1.70
Draft Plaintiff's Amendment to Complaint (Fictitious/ Incorrect Name) (filed on July 13, 2021) ("Class Action")	0.10

Review Defendant's Notice of Related Cases (served on August 2, 2021) (Class Action)	0.10
Review and Analyze Defendant Southwestern Industries, Inc.'s Answer to Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on August 2, 2021) and Research Affirmative Defenses (PAGA Action)	1.40
Review Court's Minute Order Re: Notice of Related Cases (filed on August 12, 2021) (Class Action)	0.10
Review Defendant's Notice of Entry of Judgment Re: Notice of Related Cases (served on August 19, 2021) (Class Action)	0.10
Draft Plaintiff's Amendment to Complaint (Fictitious/ Incorrect Name) (filed on September 8, 2021) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Review, Draft, and/or Revise Joint Case Management Conference Statement (filed on September 13, 2021) (Class Action)	1.50
Review Court's Minute Order Re: Further Status Conference (filed on September 20, 2021) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Review, Draft, and/or Revise Stipulation and Protective Order – Confidential Designation Only (submitted on June 1, 2022) (Class Action)	1.50
Meet and Confer with Defendant's Counsel, and Review, Draft, and/or Revise Joint Notice of Settlement and Post-Mediation Status Conference Statement (filed on July 12, 2022) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Review, Draft, and/or Revise Joint Status Report in Advance of Non-Appearance Case Review (filed on September 26, 2022) (Class Action)	1.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Motion for Preliminary Approval (filed on October 3, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Review, Draft, and/or Revise Joint Status Report in Advance of Non-Appearance Case Review (filed on December 9, 2022) (Class Action)	0.90
Meet and Confer with Defendant's Counsel, and Review, Draft, and/or Revise Joint Stipulation to Consolidate Case Numbers 21STCV11874 and 21CMCV00123; [Proposed] Order Thereon (submitted on December 15, 2022 (Class Action)	1.40

Review Court's Order Granting Joint Stipulation to Consolidate Case Numbers 21STCV11874 and 21CMCV00123 (filed on December 16, 2022 (Class Action))	0.10
Meet and Confer with Defendant's Counsel, and Review, Draft, and/or Revise Joint Status Report in Advance of Non-Appearance Case Review (filed on January 12, 2023) ("Class Action")	0.90
Review Court's Minute Order Re: Non-Appearance Case Review Continuance (filed on January 18, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Motion for Preliminary Approval (filed on June 1, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Review Re: Motion for Preliminary Approval (filed on August 7, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Continuance of Non-Appearance Case Review Re: Motion for Preliminary Approval (filed on September 19, 2023) (Class Action)	0.10
Review Defendant's Notice of Change of Address or Other Contact Information (filed May 16, 2024)	0.10
Appearances	
Prepare for and Remotely Attend Initial Status Conference (July 6, 2021) (Class Action)	1.10
Prepare for and Remotely Attend Case Management Conference (September 20, 2021) (Class Action) (PAGA Action)	1.20
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Settlement (December 19, 2023) (Class Action)	0.70
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Settlement (January 18, 2024) (Class Action)	0.60
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Eduardo China (served on January 27, 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 Eduardo China (served on February 17, 2021)	4.10
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Eduardo China for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on March 16, 2021)	4.50
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	105.50
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 (submitted June 23, 2022), and Performing Damages and Penalties Analysis and Calculations	38.50
Remotely Attend Mediation Session (June 30, 2022; Zoom Video Conference)	8.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding Re: Class Action/PAGA Settlement (executed on July 27, 2022)	3.20
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Settlement and Release (executed on September 18, 2023) and Notice of Class Action Settlement	19.50
Confer with Settlement Administrator, Monitor Notice Administration for Settlement, and Review Weekly Reports	5.50
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Points and Authorities in Support Thereof; Declaration of Brian J. St. John in Support Thereof, Declaration of Eduardo China in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on October 30, 2023) (Class Action)	21.50

Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed December 19, 2023) (Class Action)	0.10
Draft Supplemental Declaration of Brian J. St. John in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on January 12, 2024) (Class Action)	6.50
Review Order Granting Preliminary Approval of Class Action Settlement and Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on January 18, 2024)	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, Costs, and Class Representative Enhancement, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on May 23, 2024)	24.50
Total Hours:	465.70

EXHIBIT B

LAWYERS *for* JUSTICE PC CASE COST DETAIL
China v. Southwest Industries, Inc. (Class)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/27/2021	U.S. Postmaster	Postage	6.96
3/26/2021	Los Angeles Superior Court	Complex Filing Fee	1,000.00
3/26/2021	Los Angeles Superior Court	Complaint Filing Fee	435.00
3/26/2021	Legal Document Server, Inc.	Attorney Service	180.23
5/5/2021	Legal Document Server, Inc.	Attorney Service	111.35
5/11/2021	Legal Document Server, Inc.	Attorney Service	245.25
5/11/2021	Los Angeles Superior Court	Jury Fee	150.00
5/19/2021	Legal Document Server, Inc.	Attorney Service	145.00
5/25/2021	Legal Document Server, Inc.	Attorney Service	13.25
6/28/2021	General Logistics Systems US, Inc.	Courier Service	13.14
6/28/2021	Legal Document Server, Inc.	Attorney Service	175.00
7/13/2021	General Logistics Systems US, Inc.	Courier Service	19.28
7/15/2021	Legal Document Server, Inc.	Attorney Service	285.00
7/15/2021	General Logistics Systems US, Inc.	Courier Service	19.28
9/1/2021	Case Anywhere, LLC	Attorney Service	138.00
9/7/2021	Jeffrey Ross	Mediation Fee	9,000.00
9/13/2021	Legal Document Server, Inc.	Attorney Service	175.00
12/6/2021	Case Anywhere, LLC	Attorney Service	126.00
3/3/2022	Case Anywhere, LLC	Attorney Service	120.00
6/6/2022	Case Anywhere, LLC	Attorney Service	120.00
7/12/2022	Legal Document Server, Inc.	Attorney Service	15.95
9/27/2022	Legal Document Server, Inc.	Attorney Service	15.95
12/5/2022	Case Anywhere, LLC	Attorney Service	126.00
12/9/2022	Legal Document Server, Inc.	Attorney Service	15.95
12/16/2022	Legal Document Server, Inc.	Attorney Service	17.30
12/16/2022	Los Angeles Superior Court	Stipulation & Order Fee	20.00
1/12/2023	Legal Document Server, Inc.	Attorney Service	15.95
3/1/2023	Case Anywhere, LLC	Attorney Service	144.00
6/1/2023	Case Anywhere, LLC	Attorney Service	120.00
9/2/2023	Case Anywhere, LLC	Attorney Service	120.00
10/31/2023	Legal Document Server, Inc.	Attorney Service	225.32
10/31/2023	Los Angeles Superior Court	Motion Fee	60.00
10/31/2023	Legal Document Server, Inc.	Attorney Service	205.00
12/6/2023	Case Anywhere, LLC	Attorney Service	150.00
1/16/2024	Legal Document Server, Inc.	Attorney Service	141.15
1/19/2024	Legal Document Server, Inc.	Attorney Service	16.15
3/4/2024	Case Anywhere, LLC	Attorney Service	144.00
Total:			14,030.46

LAWYERS *for* JUSTICE PC CASE COST DETAIL
China v. Southwest Industries, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/27/2021	U.S. Postmaster	Postage	7.00
3/16/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
3/16/2021	U.S. Postmaster	Postage	7.50
5/21/2021	Legal Document Server, Inc.	Attorney Service	11.00
5/24/2021	Legal Document Server, Inc.	Attorney Service	30.43
5/24/2021	Los Angeles Superior Court	Complaint Filing Fee	435.00
6/21/2021	ProLegal	Attorney Service	79.30
7/7/2021	Legal Document Server, Inc.	Attorney Service	15.20
9/2/2021	Legal Document Server, Inc.	Attorney Service	175.00
9/2/2021	General Logistics Systems US, Inc.	Courier Service	17.78
7/12/2022	Legal Document Server, Inc.	Attorney Service	15.95
9/26/2022	Legal Document Server, Inc.	Attorney Service	15.96
12/12/2022	Legal Document Server, Inc.	Attorney Service	15.95
Total:			901.07