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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

FRANK DEGOURVILLE, individually, and
on behalf of other members of the general
public similarly situated and other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiff,

vs.

TPS PARKING MANAGEMENT, INC., an
unknown business entity; TPS PARKING
MANAGEMENT, LLC, an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 21STCV07881

Honorable Elaine Lu
Department SSC9

CLASS ACTION

**DECLARATION OF YASMIN HOSSEINI
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 (Frank Degourville);
Declaration of Settlement Administrator
(Mayra Gonzalez); and [Proposed] Final
Approval Order and Judgment filed
concurrently herein]

Date: January 28, 2025
Time: 8:30 a.m.
Department: SSC9

Complaint Filed: March 1, 2021
FAC Filed: February 28, 2024
Trial Date: None Set

DECLARATION OF YASMIN HOSSEINI

I, Yasmin Hosseini, 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 Frank Degourville (“Plaintiff”) and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On August 1, 2024, in Department SSC9 of the above-entitled Court, the Honorable Elaine Lu preliminarily approved the Second Amended Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant TPS Parking Management, LLC (“Defendant”) (together with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Frank Degourville as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Payment (“Motion for Final Approval”), no Class Members have objected to the Class Settlement, the contemplated request for Attorneys’ Fees and Costs, Enhancement Payment, Settlement Administration Costs, or the allocation for the PAGA Penalty Amount.

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WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers for Justice, PC have been actively performing work in the matters since the inception of the above-captioned action (“Class Action”), which was commenced by Frank Degourville on March 1, 2021, and the representative PAGA Action entitled *Frank Degourville v. TPS Parking Management, LLC*, Superior Court of California for the County of Los Angeles, Case No. 21TRCV00367 (“PAGA Action”). On February 7, 2024, the Court issued the Final Order Regarding Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (Checklist), and the Parties were asked to file a consolidated complaint. On February 28, 2024, Plaintiff filed the First Amended Consolidated Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code §2698, *et. seq.*, in the Class Action, thereby consolidating the Class Action and PAGA Action (together, the “Actions”). The Actions are being resolved by way of the settlement for which approval is being sought in the Class Action.

5. Before initiating the cases, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers for Justice, PC and Plaintiff and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour law and enforcement, Plaintiff’s claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiff were well-suited for class-wide 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 business expenses.

6. Class Counsel conducted significant litigation and formal and informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial prior to reaching the

1 Settlement. The Parties exchanged thousands of pages of information, documents, and data
2 throughout the course of the litigation and in connection with the mediation and settlement
3 negotiations. Class Counsel had the opportunity to interview and obtain information from
4 Plaintiff and percipient witnesses, and reviewed and analyzed thousands of pages of information,
5 data, and documents obtained from Plaintiff, Defendant, and other sources. The volume of data
6 and documents that Class Counsel reviewed and analyzed included and was not limited to:
7 Plaintiff's employment records and payroll records, multiple iterations of Defendant's
8 Employment Handbook, forms (including but not limited to TPS Driver Training Outline and
9 Road Test Certification, Direct Deposit Authorization, California Healthy Workplaces, Healthy
10 Families Act Leave Policy Acknowledgment Form, Driver/Valet Additional Employment
11 Acknowledgement, Employee Authorization Agreement for Electronic Pay Stub, and Handbook
12 Acknowledgement Form), procedures, and policies, internal memoranda, job descriptions,
13 Defendant's operations and employment practices and procedures, among other information and
14 documents. Class Counsel propounded multiple sets of written discovery requests on Defendant
15 (including, but not limited to Form Interrogatories—General (Set One), Special Interrogatories
16 (Sets One and Two), and Requests for Production of Documents (Sets One)), and the Parties
17 eventually agreed to engage in, and did engage in, extensive formal and informal discovery. Class
18 Counsel also developed liability, damages, violation, and penalties valuation models in the course
19 of litigation and in connection with mediation and settlement negotiations and met and conferred
20 with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings,
21 discovery and the production of information, documents, and data in the course of litigation and
22 in connection with mediation and settlement negotiations, and settlement. Other work performed
23 by Class Counsel included, and was not limited to, case strategy and analysis; researching,
24 drafting, reviewing, and/or revising the pleadings, the mediation brief, and settlement documents;
25 and preparing for and attending court proceedings, mediation, and settlement negotiations, among
26 other tasks.

27 7. As outlined herein, the Parties have conducted significant investigation and formal
28 and informal discovery during the course of litigating the cases, mediation, and extensive

1 settlement negotiations. Class Counsel analyzed thousands of pages of information, documents,
2 and data obtained from Plaintiff, Defendant, and other sources that provided a critical
3 understanding of the nature of the work performed by the Class Members and PAGA Members,
4 as well as Defendant's operations and employment policies, practices, and procedures. Class
5 Counsel also conducted formal written discovery and noticed the depositions of Defendant's
6 Persons Most Knowledgeable designees. The information, documents, and data were used in
7 analyzing liability, damages, penalties, and other valuation issues in connection with all phases
8 of the litigation, and ultimately, in connection with the mediation and settlement negotiation
9 process. Class Counsel also performed significant research into the applicable law, which is
10 evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest
11 periods, representative PAGA claims and penalties, wage-and-hour law and enforcement,
12 Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

13 8. After conducting significant investigation of the facts and law during the
14 prosecution of the cases, and formal and informal discovery, counsel for the Parties engaged in
15 extensive settlement negotiations to try to resolve the cases. These efforts included participating
16 in a formal, full-day mediation conducted by the Hon. Michael Latin, (Ret.), a well-regarded
17 mediator experienced in handling complex labor and employment matters. During all settlement
18 discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In
19 the course of mediation and settlement discussions, the Parties exchanged information,
20 documents, and data, and discussed various aspects of the case, including and not limited to, the
21 risks and delays of further litigation, the risks and expenses to the Parties of proceeding with class
22 certification and trial, the law relating to class certification, manageability, off-the-clock theory,
23 meal and rest periods, representative PAGA claims, and wage-and-hour law and enforcement, as
24 well as the evidence produced and analyzed, and the possibility of appeals, among other things.
25 Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended that
26 individualized questions of fact predominate over any common issues, and these issues would
27 pose challenges to class certification and representative adjudication. Defendant and its counsel
28 felt strongly about Defendant's ability to avoid class certification and prevail on the merits, while

1 Plaintiff and Class Counsel believed that they would be able to obtain class certification and
2 prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that the
3 case was well-suited for settlement given the legal issues relating to Plaintiff's principal claims,
4 as well as the costs and risks to the Parties that would attend further litigation. These risks of
5 further litigation include, and are not limited to, a determination that the claims are unsuitable for
6 class treatment and/or representative adjudication, class de-certification after certification of a
7 class, allowing a jury to decide the claims asserted in the cases, and the real possibility of no
8 monetary recovery after years of litigation.

9 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
10 attorneys' fees in the amount of \$550,000.00, which is one-third (1/3) of the Total Settlement
11 Amount of \$1,650,000.00. Pursuant to the contingency-fee agreement entered into by and
12 between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least one-third
13 (1/3) of the recovery.

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

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 with a multiplier of 1.80. Attorneys at Lawyers for Justice, PC have spent a total of
24 **362.40 hours** performing tasks and obtaining recovery in the matters. Attached hereto as
25 **"EXHIBIT A"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal
26 services provided by attorneys at Lawyers for Justice, PC and the time incurred by them in
27 performing those services. These hours include work done by several attorneys at Lawyers for
28 Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice,

1 PC had litigation support personnel actively engaged in assisting with the prosecution of this
2 matter.

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

20 EXPERIENCE AND ADEQUACY OF

21 LAWYERS *for* JUSTICE, PC

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

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

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

1 exemptions to the State of California and federal overtime compensation requirements. Under
2 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested
3 motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000
4 class action or representative action cases.

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

24 16. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
25 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
26 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
27 Georgetown University Law Center in 2010. She is admitted to practice in California (since
28 2010) and in New York (since 2013) and is 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. She has 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. She has 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., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. She is a member of the California Employment Lawyers Association, and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

17. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from Pepperdine University School of Law in 2017. I was admitted to practice law in California in 2019. I was admitted to practice before all courts of the State of California and all federal district courts in the State of California. I have worked on many wage and hour class action and PAGA representative matters, and my work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement

1 agreements, engaging in motion practice, claims evaluation and analysis, and making court
2 appearances. Prior to working at Lawyers *for* Justice, PC, I represented filmmakers and talent,
3 negotiating and structuring various types of agreements on their behalf. I am a member of the
4 California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian
5 American Bar Association.

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

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

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

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

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

25 d) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against a national retailer involving allegations of misclassification
27 of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class
28

1 certification. On August 26, 2013, the court granted final approval of the class action settlement.
2 The Los Angeles County Superior Court Case Number is BC424012.

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

8 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
9 wage-and-hour class and PAGA representative action against a national wholesale distributor of
10 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
11 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
12 representative action settlement. The Sacramento County Superior Court Case Number is 34-
13 2012-00136285.

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

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

24 i) LFJ, in association with co-counsel therein, represented the plaintiff in a
25 wage-and-hour class and PAGA representative action involving allegations of misclassification
26 of the salaried residential “Property Manager” position. On September 17, 2015, the court granted
27 plaintiff’s motion for class certification. On October 20, 2017, the court granted final approval of
28

the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC474784.

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.

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

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

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

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

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

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

6 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
7 representative action against a food company on behalf of non-exempt employees. On June 30,
8 2017, the court granted final approval of the class and PAGA representative action settlement.
9 The Sacramento County Superior Court Case Number is 34-2015-00175871.

10 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
11 representative action against a chocolate company on behalf of non-exempt employees. On July
12 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
13 The Alameda County Superior Court Case Number is RG15764300.

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

18 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
19 representative action against a manufacturer of plastic containers on behalf of non-exempt
20 employees. On October 31, 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 BC577233.

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

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

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

12 bb) LFJ, in association with co-counsel therein, represented the plaintiff in a
13 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
14 employees. On March 10, 2023, the court granted final approval of the class action settlement.
15 On October 15, 2018, the court granted the plaintiff's motion for class certification. The Tulare
16 County Superior Court Case Number is VCU264528.

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

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

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

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

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

17 hh) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
18 and-hour class and PAGA representative action against a plastic packaging company on behalf
19 of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs' motion for
20 class certification and certified a class. On November 8, 2021, the court granted approval of the
21 partial settlement of the action. On April 22, 2024, the court granted approval of the PAGA
22 settlement and entered an order dismissing the action. The San Bernardino County Superior
23 Court Case Number is CIVDS1507361.

24 ii) LFJ, in association with co-counsel therein, represented the plaintiff in a
25 wage-and-hour class and PAGA representative action against a medical equipment supplier on
26 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
27 for class certification and certified a class. On November 2, 2023, the court granted final approval
28

1 of the class and PAGA representative action settlement. The San Bernardino County Superior
2 Court Case Number is CIVDS1505744.

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

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

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

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

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

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

pp) LFJ represents the plaintiffs in a wage-and-hour class action against a chain of restaurants on behalf of non-exempt employees. On July 22, 2024, the court granted in part the plaintiffs' motion for class certification and certified a class. The San Francisco Superior Court Case Number is CGC-20-582809.

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

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$16,088.75** in litigation costs and expenses incurred in the cases, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

20. In recognition of his efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Payment in the amount of \$17,500.00 to Plaintiff. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort to produce relevant documents and information and 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 cases. 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 to receive \$17,500.00 as a reasonable Enhancement Payment for his services in the cases, in addition to his individual settlement payment.

21. I submit that the Settlement is fair, reasonable, and adequate, and 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 3rd day of January 2024, at Glendale, California.



Yasmin Hosseini

EXHIBIT A

FRANK DEGOURVILLE V. TPS PARKING MANAGEMENT, LLC, ET. AL.
Los Angeles Superior Court Case No. 21STCV07881 (“Class Action”)

FRANK DEGOURVILLE V. TPS PARKING MANAGEMENT, LLC, ET. AL.
Los Angeles Superior Court Case No. 21TRCV00367 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Frank Degourville (“Plaintiff”) during the Case	58.70
Investigate, Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	8.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft Plaintiff’s Class Action Complaint for Damages (filed on March 1, 2021) (Class Action)	7.50
Review Court’s Notice of Case Assignment (filed on March 1, 2021) (Class Action)	0.10
Draft Plaintiff’s Amendment to Complaint (Fictitious/Incorrect Name) (filed on March 16, 2021) (Class Action)	0.10
Review Court’s Initial Status Conference Order (filed on March 25, 2021) (Class Action)	0.10

Review Court's Minute Order Re: Setting Initial Status Conference (filed on March 25, 2021) (Class Action)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on April 21, 2021) (Class Action)	0.10
Review Defendant's Notice of Appearance (filed on April 21, 2021) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Statement (filed on April 23, 2021) (Class Action)	1.50
Review Court's Case Management Order (filed on May 3, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on May 3, 2021) (Class Action)	0.10
Review Court's Order Authorizing Electronic Service (filed on May 3, 2021) (Class Action)	0.10
Review Defendant's Notice of Application for Admission of Heather A. Bailey <i>Pro Hac Vice</i> , Verified Application for Admission of Heather A. Bailey <i>Pro Hac Vice</i> , Declaration of Sabrina L. Shadi in Support Thereof, and [Proposed] Order Granting Application Thereon (filed on May 11, 2021) (Class Action)	0.30
Investigate the Merits of Plaintiff's Private Attorneys General Act ("PAGA") Claims, Conduct Legal Research and Analysis of All Allegations Involved, and Draft Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code §2698, Et Seq. (filed on May 17, 2021) (PAGA Action)	6.50
Review Court's Notice of Case Assignment (filed on May 17, 2021) (PAGA Action)	0.10
Review Court's Notice of Case Management Conference (filed on May 20, 2021) (PAGA Action)	0.10
Review Court's Order to Show Cause Hearing (filed on May 20, 2021) (PAGA Action)	0.10

Review Defendant TPS Parking Management LLC's ("Defendant") Answer and Affirmative Defenses to Plaintiff's Class Action Complaint for Damages (served on June 3, 2021) (Class Action)	1.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing Responsive Pleading or Motion (filed on June 10, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Hearing on Motion to be Admitted <i>Pro Hac Vice</i> (filed on June 17, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review (filed on July 8, 2021) (Class Action)	0.10
Review Court's Order Granting Application for Admission of Heather Bailey <i>Pro Hac Vice</i> (filed on July 8, 2021) (Class Action)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on August 11, 2021) (PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference; Order to Show Cause Re: Failure to File Proof of Service; Failure to Prosecute Case; Failure to File Request for Entry of Default (filed on September 14, 2021) (PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on January 6, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Deadline to Move for Class Certification; [Proposed] Order (submitted on February 23, 2022) (Class Action)	1.20
Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Deadline to Move for Class Certification (filed on February 23, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Entry of Order Granting Joint Stipulation to Continue Plaintiff's Deadline to Move for Class Certification (filed on February 24, 2022) (Class Action)	0.10

Review Court's Minute Order Re: Order to Show Cause Re: Failure to Appear (filed on April 11, 2022) (PAGA Action)	0.10
Draft Plaintiff's Notice Regarding April 11, 2022, Case Management Conference and Order to Show Cause (filed on April 18, 2022) (PAGA Action)	0.20
Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Mediation (filed on May 10, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report and Response to Order to Show Cause (filed on May 13, 2022) (Class Action)	1.10
Review Court's Minute Order Re: Court Order Re: Notice of Vacating Sanctions, Discharging Order to Show Cause, and Vacating Status Conference (filed on June 2, 2022) (Class Action)	0.10
Review Defendant's Notice of Payment of Annual Renewal Fees to Maintain <i>Pro Hac Vice</i> Status of Heather A. Bailey (filed on July 6, 2022) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Payment of <i>Pro Hac Vice</i> Fees (Hether Bailey) (filed on July 8, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report Re: Mediation (filed on August 3, 2022) (Class Action)	1.10
Review Defendant's Notice of Appearance of TPS Parking Management, LLC (filed on August 3, 2022) (PAGA Action)	0.10
Review Defendant's Notice of Appearance of Margaret Rosenthal and Vartan S. Madoyan on Behalf of Defendant TPS Parking Management, LLC (filed on August 3, 2022) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Mediation (filed on August 10, 2022) (Class Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Status Report Re: Mediation (filed on October 18, 2022) (Class Action)	1.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Mediation (filed on October 25, 2022) (Class Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff's Unverified Complaint (served on December 1, 2022), and Research Affirmative Defenses in Defendant's Answer (PAGA Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement and Notice of Settlement (filed on December 30, 2022) (PAGA Action)	1.00
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement (filed on December 30, 2022) (Class Action)	1.00
Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Mediation (filed on January 18, 2023) (Class Action)	0.10
Review Court's Notice of Order to Show Cause Hearing Re: Dismissal (Settlement) (filed on February 3, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Deadline of File Motion for Preliminary Approval and Non-Appearance Case Review Regarding Filing of Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on May 17, 2023) (Class Action)	1.20
Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Deadline of File Motion for Preliminary Approval and Non-Appearance Case Review Regarding Filing of Motion for Preliminary Approval (filed on May 17, 2023) (Class Action)	0.10

Draft Plaintiff's Notice Regarding May 17, 2023 Order to Continue Deadline of File Motion for Preliminary Approval and Non-Appearance Case Review Regarding Filing of Motion for Preliminary Approval (filed on May 19, 2023) (Class Action)	0.20
Review Court's Minute Order Re: Order to Show Cause Re: Settlement (filed on June 12, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Deadline of File Motion for Preliminary Approval and Non-Appearance Case Review Regarding Filing of Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on June 29, 2023) (Class Action)	1.20
Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Deadline of File Motion for Preliminary Approval and Non-Appearance Case Review Regarding Filing of Motion for Preliminary Approval (filed on June 30, 2023) (Class Action)	0.10
Review Defendant's Notice of Payment of Annual Renewal Fees to Maintain <i>Pro Hac Vice</i> Status of Heather A. Bailey (filed on July 3, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: <i>Pro Hac Vice</i> Renewal Fee for Heather A. Bailey (filed on July 13, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Deadline to File Motion for Preliminary Approval and Non-Appearance Case Review Regarding Filing of Motion for Preliminary Approval (submitted on July 28, 2023) (Class Action)	1.20
Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Deadline to File Motion for Preliminary Approval and Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval (filed on August 1, 2023) (Class Action)	0.20
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing and Serving of Motion for Preliminary Approval (filed on August 30, 2023) (Class Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Deem the Filing of Plaintiff's Motion for Preliminary Approval of Class Action Settlement Timely (submitted on August 30, 2023) (Class Action)	1.30
Review Court's Order Granting Joint Stipulation to Deem the Filing of Plaintiff's Motion for Preliminary Approval of Class Action Settlement Timely (filed on August 31, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (Settlement) and Order to Show Cause Re: Plaintiff's Failure to Appear (filed on September 7, 2023) (PAGA Action)	1.00
Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (Settlement); Order to Show Cause Regarding Plaintiff's Failure to Appear on June 12, 2023) (filed on September 14, 2023) (PAGA Action)	0.10
Draft Plaintiff's Notice Regarding September 14, 2023, Order to Show Cause Re: Dismissal and Order to Show Cause Regarding Plaintiff's Failure to Appear (filed on September 28, 2023) (PAGA Action)	0.20
Draft Plaintiff's Notice Regarding August 31, 2023, Order Approving the Joint Stipulation to Deem the Filing of Plaintiff's Motion for Preliminary Approval of Class Action Settlement Timely (filed on September 28, 2023) (Class Action)	0.20
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on January 10, 2024) (PAGA Action)	0.10
Draft Plaintiff's First Amended Consolidated Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act. California Labor Code §2698, <i>et seq.</i> (filed on February 28, 2024) (Class Action)	3.50
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Order to Show Cause Re: Dismissal (Settlement) (filed on February 29, 2024) (PAGA Action)	1.20

Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (Settlement) (filed on March 7, 2024) (PAGA Action)	0.10
Draft Plaintiff's Notice Regarding March 7, 2024, Order to Show Cause Re: Dismissal (Settlement) (filed on March 19, 2024) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Order to Show Cause Re: Dismissal (Settlement) and Order to Show Cause Re: Plaintiff's Failure to Appear (filed on May 30, 2024) (PAGA Action)	1.00
Draft Plaintiffs Notice Regarding May 23, 2024 Minute Order (filed on June 3, 2024) (Class Action)	0.20
Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (Settlement) (filed on June 5, 2024) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (Settlement) (filed on June 5, 2024) (PAGA Action) (Class Action)	1.00
Draft Plaintiff's Notice Regarding June 12, 2024 Minute Order (filed on July 1, 2024) (Class Action)	0.20
Review Defendant's Notice of Payment of Annual Renewal Fees to Maintain <i>Pro Hac Vice</i> Status of Heather A. Bailey (filed on July 3, 2024) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: <i>Pro Hac Vice</i> Renewal Fee for Heather A. Bailey (filed on July 10, 2024) (Class Action)	0.10
Draft Plaintiff's Notice Regarding July 18, 2024, Minute Order (Electronically Served on Parties on August 1, 2024) Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement and Reserved Hearing for Motion for Final Approval of Class Action Settlement (filed on August 14, 2024) (Class Action)	0.20

Appearances	
Prepare for and Telephonically Attend Order to Show Cause Hearing (September 14, 2021) (PAGA Action)	0.60
Prepare for and Telephonically Attend Order to Show Cause Hearing (April 11, 2022) (PAGA Action)	0.60
Prepare for and Telephonically Attend Order to Show Cause Re: Dismissal Hearing (September 14, 2023) (PAGA Action)	0.80
Prepare for and Telephonically Attend Order to Show Cause Re: Dismissal (Settlement) Hearing (March 7, 2024) (PAGA Action)	1.00
Prepare for and Telephonically Attend Order to Show Cause Re: Dismissal (Settlement) Hearing (June 5, 2024) (PAGA Action)	0.60
Prepare for and Telephonically Attend Order to Show Cause Re: Dismissal (Settlement) Hearing (December 19, 2024) (PAGA Action)	0.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Frank Degourville (served on August 11, 2020)	1.90
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Frank Degourville (served on September 16, 2020)	1.50
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Frank Degourville (served on October 26, 2020)	1.50

Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Frank Degourville (served on December 30, 2020)	1.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Frank Degourville (served on January 20, 2021)	1.80
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 January 18, 2022) (Class Action)	5.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; Noticed for March 8, 2022) (served on January 18, 2022) (Class Action)	1.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; Noticed for March 9, 2022) (served on January 18, 2022) (Class Action)	1.50
Draft Plaintiff's First Notice of Deposition of Defendant's Person Most Knowledgeable and Requests for Production of Documents (Noticed for November 16, 2022) (served on October 7, 2022) (Class Action)	1.50
Review Defendant's Objections to Plaintiff's First Notice of Deposition of Defendant's Person Most Knowledgeable and Requests for Production of Documents (served on November 9, 2022) (Class Action)	0.90
Draft Plaintiff's First Amended Notice of Deposition of Defendant's Person Most Knowledgeable and Requests for Production of Documents (Remote Videoconferencing; Noticed for January 11, 2023) (served on December 5, 2022) (Class Action)	1.40
Draft Plaintiff's First Amended Notice of Deposition of Defendant's Person Most Knowledgeable and Requests for Production of Documents (Glendale, California; Noticed for January 18, 2023) (served on December 5, 2022) (Class Action)	1.40

Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on June 5, 2023)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Punitive Class Member (served on June 26, 2023)	9.70
Letters and Correspondence	
Draft Notice of California Labor and Workforce Development Agency Re: Claims of Plaintiff Under the Private Attorneys General Act (served on March 12, 2021)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defense Counsel	17.60
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	62.40
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages Analysis/Calculations (June 7, 2022)	29.30
Attend Mediation Session (June 14, 2022; via Zoom Video Conference)	10.50
Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed on December 15, 2022)	4.20
Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement (executed on August 1, 2023), and Notice of Class Action Settlement	16.50
Review, Revise, Negotiate, and Finalize First Amended Stipulation of Class Action and PAGA Settlement (executed on April 18, 2024)	3.50

Review, Revise, Negotiate, and Finalize Amendment No. 1 to First Amended Stipulation of Class Action and PAGA Settlement, and Further Revised Notice of Class Action Settlement (executed on June 6, 2024)	2.10
Review, Revise, Negotiate, and Finalize Second Amended Stipulation of Class Action and PAGA Settlement, and Further Revised Notice of Class Action Settlement (executed on June 27, 2024)	3.40
Coordinate Settlement Administration with Settlement Administrator, Review Weekly Reports, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	4.50
Law and Motion	
Research and Draft Plaintiff's Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Frank Degourville in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on August 25, 2023) (Class Action)	17.80
Review Court's Tentative Ruling on Motion for Preliminary Approval of Class Action Settlement; Addendum (checklist) (filed on February 6, 2024) (Class Action)	0.20
Review Court's Final Ruling on Motion for Preliminary Approval of Class Action Settlement; Addendum (checklist) (filed on February 7, 2024) (Class Action)	0.20
Research and Draft Plaintiff's Supplemental Declaration of Yasmin Hosseini in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Declaration of Mary L. Ruberry in Support Thereof, and [Revised Proposed] Order Thereon (filed on April 18, 2024) (Class Action)	7.80
Draft Plaintiff's Further Supplemental Declaration of Yasmin Hosseini in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on April 24, 2024) (Class Action)	3.90
Review Court's Tentative Ruling on Motion for Preliminary Approval of Class Action Settlement (filed on May 22, 2024) (Class Action)	0.20

Review Court's Final Ruling on Motion for Preliminary Approval of Class Action Settlement (filed on May 23, 2024) (Class Action)	0.20
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on May 23, 2024) (Class Action)	0.10
Draft Plaintiff's Second Further Supplemental Declaration of Yasmin Hosseini Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Amendment No. 1 to First Amended Stipulation of Class Action and PAGA Settlement, and [Further Revised Proposed] Order Thereon (filed on June 6, 2024) (Class Action)	3.50
Review Court's Minute Order Re: Supplemental Papers to Unconditionally Grant the Motion for Preliminary Approval (filed on June 12, 2024) (Class Action)	0.10
Draft Plaintiff's Third Further Supplemental Declaration of Yasmin Hosseini Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement and [Second Further Revised Proposed] Order Theron (filed on July 10, 2024) (Class Action)	3.70
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on July 18, 2024) (Class Action)	0.10
Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Final Approval Order and Judgment; and Review Declaration of Settlement Administrator in Support Thereof (filed on January 3, 2025) (Anticipated)	18.50
Total Hours:	362.40

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Degourville v. TPS Parking Management, Inc., et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/11/2020	U.S. Postmaster	Postage	\$6.95
9/16/2020	U.S. Postmaster	Postage	\$7.10
10/26/2020	U.S. Postmaster	Postage	\$6.95
12/30/2020	U.S. Postmaster	Postage	\$6.95
3/1/2021	Legal Document Server, Inc.	Attorney Service	\$180.23
3/1/2021	Los Angeles Superior Court	Court Filing Fee	\$435.00
3/1/2021	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
3/16/2021	Legal Document Server, Inc.	Attorney Service	\$95.00
3/16/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
4/21/2021	Legal Document Server, Inc.	Attorney Service	\$65.25
4/21/2021	Los Angeles Superior Court	Jury Fee	\$150.00
4/22/2021	Legal Document Server, Inc.	Attorney Service	\$60.00
5/28/2021	ProLegal	Attorney Service	\$355.00
7/7/2021	Legal Document Server, Inc.	Attorney Service	\$175.00
8/1/2021	Case Anywhere LLC	Attorney Service	\$106.80
11/8/2021	Case Anywhere LLC	Attorney Service	\$120.00
2/2/2022	Case Anywhere LLC	Attorney Service	\$168.00
2/23/2022	Legal Document Server, Inc.	Attorney Service	\$111.15
2/23/2022	Los Angeles Superior Court	Filing Fee	\$20.00
2/24/2022	Legal Document Server, Inc.	Attorney Service	\$110.20
5/5/2022	Case Anywhere LLC	Attorney Service	\$132.00
5/13/2022	Signature Resolution LLC	Mediation Fee	\$9,450.00
5/16/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
6/8/2022	FedEx Express	Courier Service	\$61.25
8/4/2022	Case Anywhere LLC	Attorney Service	\$126.00
11/8/2022	Case Anywhere LLC	Attorney Service	\$126.00
1/3/2023	Legal Document Server, Inc.	Attorney Service	\$15.95
2/7/2023	Case Anywhere LLC	Attorney Service	\$162.00
5/8/2023	Case Anywhere LLC	Attorney Service	\$120.00
5/16/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
5/16/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
5/22/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
6/30/2023	Legal Document Server, Inc.	Attorney Service	\$18.15
6/30/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
7/31/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
7/31/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
8/5/2023	Case Anywhere LLC	Attorney Service	\$144.00
8/23/2023	Los Angeles Superior Court	Document Download Fee	\$5.80

LAWYERS for JUSTICE PC CASE COST DETAIL
Degourville v. TPS Parking Management, Inc., et al.

8/25/2023	Los Angeles Superior Court	Document Download Fee	\$5.80
8/28/2023	Legal Document Server, Inc.	Attorney Service	\$232.82
8/28/2023	Los Angeles Superior Court	Motion Fee	\$60.00
8/29/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
8/29/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
9/29/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
11/1/2023	Case Anywhere LLC	Attorney Service	\$162.00
2/2/2024	Case Anywhere LLC	Attorney Service	\$120.00
2/29/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
3/1/2024	Legal Document Server, Inc.	Attorney Service	\$28.10
4/19/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
4/25/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
5/5/2024	Case Anywhere LLC	Attorney Service	\$168.00
5/31/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
6/3/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
6/6/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
7/1/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
7/10/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
8/1/2024	Case Anywhere LLC	Attorney Service	\$174.00
8/14/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
Total:			<u>\$14,926.92</u>

LAWYERS for JUSTICE PC CASE COST DETAIL
Degourville vs. TPS Parking Management, LLC (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/12/2021	U.S. Postmaster	Postage	\$7.50
3/12/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
5/18/2021	Legal Document Server, Inc.	Attorney Service	\$30.43
5/18/2021	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
6/7/2021	ProLegal	Attorney Service	\$288.25
7/19/2021	Legal Document Server, Inc.	Attorney Service	\$15.20
8/11/2021	Legal Document Server, Inc.	Attorney Service	\$20.45
8/11/2021	Los Angeles Superior Court	Jury Fee	\$150.00
4/18/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
1/3/2023	Legal Document Server, Inc.	Attorney Service	\$15.95
9/11/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
10/2/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
1/22/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
3/1/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
3/20/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
5/30/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
6/5/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
Total:			\$1,161.83