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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**

JOSE CERON, individually, and on behalf of
other members of the general public similarly
situated,

Plaintiff,

vs.

SEVEN NINETY-TWO COMPANY, INC.,
an unknown business entity; IHOP #792, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

JOSE CERON, individually, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

SEVEN NINETY-TWO COMPANY, INC.,
an unknown business entity; IHOP #792, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case Nos.: 21STCV05360 (lead)
(Consolidated with Case No. 21TRCV00365)

Honorable William F. Highberger
Department SSC10

CLASS ACTION

**DECLARATION OF BRIAN J. ST. JOHN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES, COSTS, AND SERVICE AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs and Service Award;
Declaration of Class Representative (Jose
Ceron) Declaration of Settlement Administrator
(Jennifer Beliveau); and [Proposed] Final
Approval Order and Judgment filed
concurrently herewith]

Date: October 29, 2024
Time: 10:00 a.m.
Department: SSC10

Class Action Filed: February 10, 2021
PAGA Action Filed: May 17, 2021
Trial Date: None Set

DECLARATION OF BRIAN J. ST. JOHN

I, Brian J. St. John, 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 Jose Ceron (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On June 5, 2024, in Department SSC17 of the above-entitled Court, the Honorable William F. Highberger preliminarily approved the Joint Stipulation and Agreement for Class and Representative Action Settlement and Release and Amendment No. 1 to Joint Stipulation and Agreement for Class and Representative Action Settlement and Release (together, the “Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Seven Ninety Two Company, Inc. (“Defendant”) (together, the “Parties”) and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Jose Ceron 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 and Hearing Date for Final Court Approval (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” 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, Costs, and Service Award (“Motion for Final Approval”), not a single Class Member has objected to or requested exclusion from any aspect of the Settlement, including the requested Attorneys’ Fees and Expenses, Service Award, 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

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned action, which was commenced by Plaintiff on February 10, 2021, and the representative PAGA action entitled *Jose Ceron v. Seven Ninety Two, Inc., et al.*, Los Angeles County Superior Court, Case No. 21TRCV00365 (“*Ceron* PAGA Action”), which was commenced by Plaintiff on May 17, 2021, since prior to their commencement. On October 13, 2022, the Court entered an Order consolidating the above-captioned action and the *Ceron* PAGA 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, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement, 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 case, to assess the veracity, strength, and scope of the claims, and Class Counsel worked on preparing the case for class certification and trial, prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff, Defendant, other Class Members, Aggrieved Employees, and percipient witnesses. The information, documents, and

1 data reviewed and analyzed by Class Counsel included, and were not limited to: Plaintiff's
2 employment records, a detailed sampling of Plaintiff's and other Class Members' time data and
3 pay records, Defendant's Employee Handbook, Defendant's operations and employment
4 practices, forms, procedures, and policies (including, and not limited to, Compensation Policy,
5 Confidentiality Agreement, Timekeeping Policy, Rest and Meal Periods policy, and Meal Period
6 Waiver), among other information and documents. Class Counsel also developed damages,
7 violation, and penalties valuation models in connection with mediation and settlement
8 negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to
9 discuss issues relating to the pleadings, case management, informal discovery, mediation, and
10 production of documents and data in the course of litigation and mediation and settlement
11 negotiations. Other work performed by Class Counsel included, and was not limited to, case
12 strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-
13 related papers, claims assessment and evaluation, the mediation briefs, and settlement
14 documents; and preparing for and attending court proceedings, mediation, and settlement
15 negotiations, among other tasks.

16 7. As outlined herein, the Parties have conducted significant and meaningful
17 investigation and informal discovery during the course of litigating the cases and mediation and
18 settlement negotiations. Class Counsel analyzed a large volume of information, documents, and
19 data obtained from Plaintiff, Defendant, and other sources. The information, documents, and
20 data provided a critical understanding of the nature of the work performed by the Class Members
21 and Aggrieved Employees, as well as Defendant's operations and employment policies,
22 practices, and procedures, and were used in analyzing liability, damages, penalties, and valuation
23 issues in connection with all phases of the litigation, and ultimately, in connection with
24 mediation and settlement negotiations. Class Counsel also performed significant research into
25 the applicable law, which is evolving as it relates to class certification, representative
26 adjudication, and trial; the law relating to manageability, off-the-clock theory, meal and rest
27 periods, expense reimbursements, recordkeeping and wage statement requirements,
28 representative PAGA claims and penalties, and wage-and-hour law and enforcement,

1 Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts
2 discovered.

3 8. After conducting significant investigation of the facts and law during the
4 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
5 try to resolve the cases. These efforts included participating in mediation conducted by Eve
6 Wagner, Esq., a well-regarded mediator experienced in handling complex labor and employment
7 matters. Prior to and during mediation and settlement negotiations, the Parties exchanged
8 information, data, and documents, and discussed various aspects of the case, including and not
9 limited to, the risks and delays of further litigation, the risks and expenses to the Parties of
10 proceeding with class certification, representative adjudication, and trial; the law relating to class
11 certification, manageability, off-the-clock theory, meal and rest periods, expense
12 reimbursements, recordkeeping and wage statement requirements, representative PAGA claims
13 and penalties, and wage-and-hour law and enforcement; the evidence produced and analyzed;
14 and the possibility of appeals, among other things. During all settlement discussions, the Parties
15 conducted their negotiations at arm's length in an adversarial position. Arriving at a settlement
16 that was acceptable to the Parties was not easy. Defendant contended that individualized
17 questions of fact predominate over any common issues, and these issues would pose challenges
18 to class certification and representative adjudication. Defendant and its counsel felt strongly
19 about Defendant's ability to prevail on the merits and to avoid class certification and
20 representative adjudication, while Plaintiff and Class Counsel believed that they would be able to
21 obtain class certification and prevail at trial. After conducting extensive informal discovery and
22 investigations and settlement negotiations, with the aid of the mediator's evaluation, the Parties
23 ultimately agreed that the case was well-suited for settlement given the legal issues relating to
24 Plaintiff's principal claims, as well as the costs and risks to the Parties that would attend further
25 litigation. These risks of further litigation include, and are not limited to, that the claim are
26 unsuitable for class treatment and/or representative adjudication, class de-certification after
27 certification of a class, allowing a jury to decide the claims asserted in the cases, and the real
28 possibility of no monetary recovery after years of litigation. The Settlement takes into account

1 the strengths and weaknesses of each side's position and the uncertainty of how the case might
2 have concluded at certification, trial, and/or appeals.

3 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
4 attorneys' fees in the amount of \$231,666.67, which is one-third (1/3) of the Gross Settlement
5 Amount of \$695,000.00. Pursuant to the contingency fee agreement entered into by and between
6 Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least one-third (1/3) of
7 the recovery.

8 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
9 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
10 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
11 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
12 have achieved in the case; and (6) the other cases that Class Counsel has turned down in order to
13 devote their time and efforts to this matter. The nature of the work performed, skill exercised,
14 and the outcome in this matter support the percentage fee sought and the application of a lodestar
15 multiplier.

16 11. While not necessarily required to be demonstrated because the percentage fee is
17 proper for this settlement, Class Counsel has incurred many hours of work in connection with
18 prosecuting the case such that the award of attorneys' fees is also justified under a lodestar
19 analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **428.30 hours** performing
20 tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney
21 Task and Time Chart that sets forth in detail the nature of the legal services provided by
22 attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services.
23 The hours attributable to Lawyers *for* Justice, PC include work done by several other attorneys at
24 the firm and myself. Additionally, separate from the hours referenced herein and in the attached
25 chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with
26 the prosecution of this matter.

27 12. The work performed in this particular matter, the background of our firm, as well
28 as the individual backgrounds, training, and experience of the attorneys who worked on this

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

15 **EXPERIENCE AND ADEQUACY OF**

16 **LAWYERS *for* JUSTICE, PC**

17 13. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
18 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
19 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC
20 is the attorney of record in well over a dozen employment-related putative class actions in both
21 state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of
22 attorneys who focus on litigating complex wage-and-hour class and PAGA representative
23 actions. The firm has successfully litigated cases involving nearly every aspect of California
24 wage and hour law, including payment of overtime and minimum wages, provision of meal and
25 rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant
26 wage statements, reimbursement of business expenses, executive, administrative, and other
27 overtime exemptions to the State of California and federal overtime compensation requirements,
28 PAGA claims, and sister statutes under federal law. During a relatively short time, in association

1 with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of
2 thousands of individuals in California.

3 14. Edwin Aiwazian is the Managing Member and Shareholder of Lawyers for
4 Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of
5 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of
6 2004. He has extensive formal training in dispute resolution and negotiation from the Straus
7 Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In
8 addition, he has previously served as a pro bono mediator for the Los Angeles County Superior
9 Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA
10 Extension Program. During the summer of 2000, he studied Legal Writing at Harvard
11 University. From approximately September 2002 to approximately December 2002, he served as
12 a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals
13 for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served
14 as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the
15 Second Appellate District. In December of 2004, he obtained a license to practice law from the
16 California State Bar. Since in or around October of 2008, through his work at Lawyers *for*
17 Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment
18 class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or
19 consumer fraud. While employed by Lawyers for Justice PC, he has argued over one hundred
20 (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of
21 expert witnesses for deposition or trial, and attended over one hundred seventy-five (175)
22 mediations. Together with other attorneys at the firm, and in many cases in conjunction with co-
23 counsel, he has successfully litigated cases involving the executive, administrative, and other
24 overtime exemptions to the State of California and federal overtime compensation requirements.
25 Under his supervision, Lawyers for Justice, PC has successfully obtained class certification by
26 contested motion practice in approximately fifteen (15) cases in the last decade, and litigated
27 over 1,000 class action or representative action cases.

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

21 16. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a
22 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
23 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
24 Georgetown University Law Center in 2010. She is admitted to practice in California (since
25 2010) and in New York (since 2013) and she is also admitted to practice in all U.S. District
26 Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the
27 U.S. Supreme Court. She has taken and defended dozens of depositions and successfully
28 handled motion practice in class action cases regarding discovery (including and not limited to,

1 regarding class contact information), class certification (both contested class certification and
2 stipulated class certification), arbitration agreements, coordination, and intervention. She has
3 successfully handled briefing and oral argument on appeal and obtained notable decisions
4 regarding the Private Attorneys General Act and employer efforts to compel arbitration of PAGA
5 claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9
6 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB,*
7 *N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions,
8 including and not limited to working on cases to obtain class certification through contested
9 motion practice and working on cases in the post-certification stage (e.g., post-certification
10 discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with
11 co-counsel in a case involving a certified class consisting of approximately 2,600 individuals).
12 She has extensive experience with class action and/or representative action settlements, and has
13 handled this process in over five hundred (500) cases. Under her, Edwin Aiwarzian, and Arby
14 Aiwarzian's supervision, Lawyers for Justice, PC has handled the class certification and court
15 approval process for hundreds of class action and/or representative action matters that have
16 successfully resolved. She is a member of the California Employment Lawyers Association and,
17 on several occasions, has been a speaker regarding topics in wage and hour law at the
18 organization's continuing legal education events.

19 17. I am a Member of Lawyers for Justice, PC. I received my Bachelor's degree from
20 the University of California, San Diego in 2010 and earned my Juris Doctor degree from the
21 University of California, Berkeley, School of Law in 2013. I was admitted to practice law in
22 California in 2015. I am admitted to practice before all courts of the State of California and all
23 federal district courts in the State of California. I have worked on many wage and hour class
24 action and PAGA representative matters, and my work has included, *inter alia*, researching and
25 drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing
26 stipulations and settlement agreements, engaging in motion practice, claims evaluation and
27 analysis, and making court appearances. Prior to working at Lawyers for Justice, PC, I spent
28 several years working for a boutique employment and labor law firm representing employers,

1 and, in 2019 and 2020, I was employed as general counsel for a DMHC licensed discount dental
2 plan.

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

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

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

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

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

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

27 e) LFJ, in association with co-counsel therein, represented the plaintiff in a
28 wage-and-hour class and PAGA representative action against a bank, involving allegations of

1 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
2 granted final approval of the class and PAGA representative action settlement. The Kern County
3 Superior Court Case Number is S-1500-CV-273194-LHB.

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

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

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

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

26 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a national retailer of upscale
28 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the

1 court granted final approval of the class and PAGA representative action settlement. The Los
2 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
3 Council Coordination Proceeding Number is 4794.

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

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

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

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

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

27 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
28 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to

1 the employer's motion to compel arbitration, which resulted in a published opinion by the
2 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
3 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
4 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
5 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
6 5046.

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

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

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

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

27 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
28 representative action against a food company on behalf of non-exempt employees. On June 30,

2017, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175871.

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

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

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

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

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

aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a global provider of flexible office

space solutions. On February 15, 2018, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC498401.

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

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

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

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

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

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1 gg) 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 apparel and
3 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted
4 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the
5 court granted final approval of the class and PAGA representative action settlement. The
6 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

12 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
13 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
14 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
15 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
16 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
17 approval of the PAGA representative action settlement. The San Diego County Superior Court
18 Case Number is 37-2016-00005578-CU-OE-CTL.

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

25 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
27 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the
28 court granted in part the plaintiff's motion for class certification and certified a class. The

Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the Judicial Council Coordination Proceeding Number is 4930.

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

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

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 represents 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 have borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. However, Lawyers *for* Justice, PC only seeks reimbursement of **\$15,719.10** in litigation costs and expenses incurred in the Actions, as reflected in “**EXHIBIT B**” attached hereto. The cost savings of \$9,280.90 will be part of the Net Settlement Amount, which will be distributed to Settlement Class Members in accordance with the Settlement. These expenses were reasonable and necessary in the prosecution of the case and to obtain the Settlement.

SERVICE AWARD TO PLAINTIFF

20. In recognition of her efforts and work expended in the case and serving as the Class Representative, the Settlement provides for a Service Award, in the amount of \$7,500.00 to Plaintiff. The requested Service Award 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 case. Accordingly, it is appropriate and just for Plaintiff to receive \$7,500.00 as a reasonable Service Award for his services performed in the matter.

21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, the Class, the 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 7th day of October 2024, at Glendale, California.



Brian J. St. John

EXHIBIT A

JOSE CERON V. SEVEN NINETY TWO COMPANY, INC.
Los Angeles County Superior Court Case No. 21STCV05360 (“Class Action”)
Los Angeles County Superior Court Case No. 21TRCV00365 (“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, and Commonality	9.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Jose Ceron’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	8.10
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Seven Ninety Two Company, Inc. (“Defendant”) With Respect to the Damages Sustained by Plaintiff and the Putative Class Members	7.60
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	7.50
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiff and the Aggrieved Employees	7.0
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	7.30
Investigation of Defendant, Its Business Relationships, and the Industry in Which It Operates	3.50

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	4.30
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	3.80
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced and/or Operated by Defendant in California During the Class Period, Including Differences Between Them (If Any) to Determine Whether Those 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 and Whether Differences Will Cause Individual Issues to Predominate Over Common Issues	5.20
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	4.30
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	4.90
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Scheduling, Timekeeping, Overtime Pay, Non-Discretionary Bonus/Shift Differential/Performance/Incentive Pay, Regular Rate of Pay, Meal and Rest Breaks, On-Premises/On-Duty Meal and Rest Breaks, Use of Personal Cell Phones, Dress Code, Footwear, and Reimbursement of Business Expenses	25.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Calendar, Inventory, Sales, Customer Relations Management, Logistics, Information and Document Sharing, and Communications, with a Focus on What	3.20

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	
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	7.20
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.10
Review and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Class Members' and Aggrieved Employees' Work	4.90
Meet and Communicate With Plaintiff Jose Ceron Throughout the Pendency of the Case	37.80
Investigate, Communicate With, and/or Interview Class Members, Aggrieved Employees, and/or Percipient Witnesses	14.50
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 February 10, 2021) (Class Action)	7.80
Review Court's Notice of Case Assignment (filed on February 10, 2021) (Class Action)	0.10
Draft Plaintiff's Peremptory Challenge to Judicial Officer (filed on February 16, 2021) (Class Action)	0.20
Review Court's Minute Order Re: Peremptory Challenge to Judicial Officer (Code Civ. Proc., Section 170.6) (filed on February 17, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Complex Designation (filed on April 1, 2021) (Class Action)	0.10
Review Defendant's Notice of Appearance (served on April 19, 2021) (Class Action)	0.10

Draft Plaintiff's Notice of Posting Jury Fees (filed on May 4, 2021) (Class Action)	0.20
Meet and Confer With Defendant's Counsel, and Draft [Proposed] Order Authorizing Electronic Service (Case Anywhere) (filed on May 6, 2021) (Class Action)	0.50
Meet and Confer With Defendant's Counsel, and Draft Joint Stipulation to Continue Initial Status Conference; [Proposed] Order Thereon (filed on May 11, 2021) (Class Action)	1.60
Review Court's Order Re: Joint Stipulation to Continue Initial Status Conference (filed on May 12, 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 17, 2021) (PAGA Action)	7.50
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 18, 2021) (PAGA Action)	0.10
Review Court's Notice of Order to Show Cause Hearing For Failure to File Proof of Service (filed on May 18, 2021) (PAGA Action)	0.10
Review Court's Order Authorizing Electronic Service (Case Anywhere) (filed May 19, 2021) (Class Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Stipulation to Continue Initial Status Conference; [Proposed] Order Thereon (filed on June 8, 2021) (Class Action)	1.40
Meet and Confer With Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on June 23, 2021) (PAGA Action)	1.50
Review Court's Order Re: Joint Stipulation to Continue Case Management Conference (filed on July 14, 2021) (PAGA Action)	0.10

Review Defendant's Notice of Entry of Order Continuing Case Management Conference (served on July 30, 2021) (PAGA Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Stipulation to Continue Initial Status Conference; [Proposed] Order Thereon (filed on September 2, 2021) (Class Action)	1.50
Review Court's Order Re: Joint Stipulation to Continue Initial Status Conference (filed on September 8, 2021) (Class Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Case Management Conference Statement and Notice of Settlement (filed on January 26, 2022) (PAGA Action)	1.20
Review Defendant's Notice of Change of Address (served on February 16, 2022) (Class Action)	0.10
Review Defendant's Notice of Change of Address (served on February 16, 2022) (PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on February 17, 2022) (PAGA Action)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on February 23, 2022) (Class Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (filed on June 15, 2022) (PAGA Action)	1.40
Review Defendant's Notice of Continuance of Order to Show Cause Re Dismissal (filed on June 22, 2022) (PAGA Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Status Report in Advance of Non-Appearance Case Review (filed on June 24, 2022) (Class Action)	1.40
Review Court's Minute Order Re: Non-Appearance Review Re Motion for Preliminary Approval (filed on July 1, 2022) (Class Action)	0.10

Draft Plaintiff's Notice of Related Case (filed on September 7, 2022) (Class Action)	0.20
Review Court's Minute Order Re: Non-Appearance Case Review Re Motion for Preliminary Approval (filed on September 12, 2022) (Class Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (filed on September 13, 2022) (PAGA Action)	1.10
Review Court's Minute Order Re: Order to Show Cause Re Dismissal Settlement (filed on September 19, 2022) (PAGA Action)	0.10
Review Court's Minute Order Re: Notice of Related Case (filed on September 29, 2022) (Class Action) (PAGA Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Stipulation to Consolidate Case Numbers 21STCV05360 and 21TRCV00365; [Proposed] Order Thereon (filed on October 5, 2022) (Class Action)	1.30
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on October 5, 2022) (Class Action)	0.10
Review Court's Order Re: Joint Stipulation to Consolidate Case Numbers 21STCV05360 and 21TRCV00365 (filed on October 13, 2022) (Class Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Non-Appearance Case Review Report (filed on November 21, 2022) (Class Action)	1.20
Review Court's Minute Order Re: Non-Appearance Case Review Re: Motion for Preliminary Approval (filed on November 22, 2022) (Class Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Non-Appearance Case Review Report (filed on February 8, 2023) (Class Action)	1.20
Review Court's Minute Order Re Continuance (filed on February 14, 2023) (Class Action)	0.10

Review Court's Minute Order Re Request for Continuance (filed on May 25, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re Motion for Preliminary Approval (filed on September 15, 2023) (Class Action)	0.10
Review Defendant's Substitution of Attorney (filed on November 3, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Motion for Preliminary Approval (filed on February 1, 2024) (Class Action)	0.10
Draft Plaintiff's Response to Order to Show Cause Re: Why the Class Claims Should Not Be Stricken for Failure to Prosecute (filed on February 6, 2024) (Class Action)	0.80
Review Court's Minute Order to Show Cause Re: Why Class Claims Should Not Be Stricken for Failure to Prosecute (filed on February 13, 2024) (Class Action)	0.10
Review Defendant's Notice of Ruling (filed on February 16, 2024) (Class Action)	0.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on March 14, 2024) (Class Action)	0.10
Review Court's Message Board Posting Re: Further Continuance of Preliminary Approval Motion (filed on May 7, 2024) (Class Action)	0.10
Appearances	
Prepare for and Remotely Attend Case Management Conference (February 17, 2022) (PAGA Action)	0.70
Prepare for and Remotely Attend Hearing on Order to Show Cause Re: Dismissal (September 19, 2022) (PAGA Action)	0.80

Prepare for and Remotely Attend Order to Show Cause Re: Why Class Claims Should Not Be Stricken for Failure to Prosecute (February 13, 2024) (Class Action)	1.10
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (June 5, 2024) (Class Action)	4.0
Prepare for and Remotely Attend Further Status Conference Re: Escalator Provision (June 28, 2024) (Class Action)	4.0
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jose Ceron (served on August 3, 2020)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jose Ceron (served on October 13, 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 Jose Ceron (served on November 20, 2020)	3.10
Letters and Correspondence	
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Jose Ceron for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on March 11, 2021) (PAGA Action)	4.50
Meet With Defendants' Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	15.50
Mediation/Settlement	

Review and Analyze Information, Data and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation (Class Action)	58.50
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 on January 7, 2022), and Performing Damages and Penalties Analysis and Calculations (Class Action)	32.50
Attend Mediation Session (January 14, 2022; Zoom Video Conference) (Class Action)	15.0
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation and Agreement for Class and Representative Action Settlement and Release (fully executed on February 16, 2024) and Notice of Class Action Settlement and Hearing Date for Final Court Approval	22.50
Draft, Review, Revise, Negotiate, and Finalize Amendment No. 1 to Joint Stipulation and Agreement for Class and Representative Action Settlement and Release (fully executed on June 27, 2024) and Notice of Class Action Settlement and Hearing Date for Final Court Approval	2.10
Confer with Settlement Administrator, Monitor Notice Administration for Settlement, and Review Weekly Reports	4.50
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Brian J. St. John in Support Thereof, Declaration of Jose Ceron in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on February 16, 2024) (Class Action)	20.50
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed June 5, 2024) (Class Action)	0.20
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on June 5, 2024) (Class Action)	0.10

Draft Plaintiff's Notice Regarding Hearing Held on June 5, 2024 for Motion for Preliminary Approval of Class Action Settlement (filed on June 12, 2024) (Class Action)	0.20
Draft Supplemental Declaration of Brian J. St. John in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on June 25, 2024) (Class Action)	4.50
Meet and Confer With Defendant's Counsel, and Draft Joint Report Regarding Escalator Provision; Review and Analyze Settlement Administrator's Declaration Regarding Statistics of the Received Class List and Defendant's Declaration of Matthew R. Richardson Regarding Escalator (filed on June 25, 2024) (Class Action)	1.10
Draft Further Supplemental Declaration of Brian J. St. John in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on June 27, 2024) (Class Action)	0.40
Review Court's Minute Order Re: Further Status Conference Re: Escalator Provision (filed on June 28, 2024) (Class Action)	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 Settlement, Attorneys' Fees, Costs, and Service Award, and Declaration of Brian J. St. John in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on October 7, 2024) (Anticipated)	22.50
Total Hours:	428.30

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Ceron v. Seven Ninety-Two Company (Class)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/3/2020	U.S. Postmaster	Postage	6.95
8/7/2020	U.S. Postmaster	Postage	6.95
10/13/2020	U.S. Postmaster	Postage	6.95
2/10/2021	Legal Document Server	Attorney Service	180.23
2/10/2021	Los Angeles Superior Court	Complex Filing Fee	1,000.00
2/10/2021	Los Angeles Superior Court	Complaint Filing Fee	435.00
2/16/2021	Legal Document Server	Attorney Service	110.00
3/10/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
3/18/2021	Legal Document Server	Attorney Service	260.00
4/16/2021	Legal Document Server	Attorney Service	205.00
5/4/2021	Legal Document Server	Attorney Service	215.50
5/4/2021	Los Angeles Superior Court	Jury Fee	150.00
5/6/2021	General Logistics System US, Inc.	Courier Service	20.13
5/6/2021	Legal Document Server	Attorney Service	350.00
6/3/2021	ProLegal	Attorney Service	352.76
6/10/2021	Los Angeles Superior Court	Document Download Fee	3.00
9/1/2021	Case Anywhere, LLC	Attorney Service	118.80
12/6/2021	Case Anywhere, LLC	Attorney Service	120.00
12/29/2021	Signature Resolution	Mediation Fee	9,450.00
3/2/2022	Case Anywhere, LLC	Attorney Service	120.00
6/1/2022	Case Anywhere, LLC	Attorney Service	126.00
6/6/2022	Case Anywhere, LLC	Attorney Service	120.00
6/24/2022	Legal Document Server	Attorney Service	15.20
9/7/2022	Case Anywhere, LLC	Attorney Service	126.00
9/8/2022	Legal Document Server	Attorney Service	15.95
10/4/2022	Legal Document Server	Attorney Service	11.75
10/5/2022	Legal Document Server	Attorney Service	33.25
10/5/2022	Los Angeles Superior Court	Stipulation & Order Fee	20.00
11/21/2022	Legal Document Server	Attorney Service	15.95
12/5/2022	Case Anywhere, LLC	Attorney Service	150.00
2/8/2023	Legal Document Server	Attorney Service	15.95
3/1/2023	Case Anywhere, LLC	Attorney Service	126.00
6/1/2023	Case Anywhere, LLC	Attorney Service	120.00
9/2/2023	Case Anywhere, LLC	Attorney Service	120.00
12/6/2023	Case Anywhere, LLC	Attorney Service	120.00
2/7/2024	Legal Document Server	Attorney Service	16.15
2/20/2024	Legal Document Server	Attorney Service	241.57
2/20/2024	Los Angeles Superior Court	Motion Fee	60.00
3/4/2024	Case Anywhere, LLC	Attorney Service	156.00
6/3/2024	Case Anywhere, LLC	Attorney Service	120.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Ceron v. Seven Ninety-Two Company (Class)

6/6/2024	Los Angeles Superior Court	Document Download Fee	2.00
6/11/2024	Legal Document Server	Attorney Service	16.15
6/12/2024	Legal Document Server	Attorney Service	32.30
6/14/2024	General Logistics System US, Inc.	Courier Service	26.04
6/18/2024	General Logistics System US, Inc.	Courier Service	20.34
6/25/2024	Legal Document Server	Attorney Service	16.15
6/26/2024	Legal Document Server	Attorney Service	16.15
6/27/2024	General Logistics System US, Inc.	Courier Service	26.04
6/28/2024	Legal Document Server	Attorney Service	16.15
7/10/2024	General Logistics System US, Inc.	Courier Service	26.04
9/3/2024	Case Anywhere, LLC	Attorney Service	168.00
Total:			<u>15,080.32</u>

LAWYERS for JUSTICE PC CASE COST DETAIL
Ceron v. Seven Ninety Two Company, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/11/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
3/11/2021	U.S. Postmaster	Postage	21.60
5/18/2021	Legal Document Server	Attorney Service	30.43
5/18/2021	Los Angeles Superior Court	Complaint Filing Fee	435.00
6/9/2021	Legal Document Server	Attorney Service	15.20
7/1/2021	Legal Document Server	Attorney Service	15.20
1/26/2022	Legal Document Server	Attorney Service	15.20
6/16/2022	Legal Document Server	Attorney Service	15.20
9/13/2022	Legal Document Server	Attorney Service	15.95
Total:			<u>638.78</u>