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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

CHRIS WARD, JOSE PEREDA, and
TAWNY MILLIGAN, individually, and on
behalf of other members of the general
public similarly situated, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiffs,

vs.

RELISH LABS LLC, D/B/A HOME CHEF,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: CIVSB2113821

Honorable David S. Cohn
Department S26

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, FEE AND
EXPENSE AWARD, AND SERVICE
PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement, Fee and
Expense Award, and Service Payments;
Declarations of Class Representatives (Chris
Ward, Jose Pereda, and Tawny Milligan);
Declaration of Settlement Administrator
(Jarrod Salinas); and [Proposed] Final
Approval Order and Judgment filed
concurrently herewith]

Date: July 13, 2023
Time: 10:00 a.m.
Department: S26

Complaint Filed: May 13, 2021
FAC Filed: August 26, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, hereby declare as follows:

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

PRELIMINARY APPROVAL OF SETTLEMENT

2. On January 13, 2023, in Department S26 of the above-entitled Court, the Honorable David S. Cohn preliminarily approved the Class Action and PAGA Settlement Agreement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant Relish Labs LLC (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Chris Ward, Jose Pereda, and Tawny Milligan as the representatives of the Class (collectively, “Class Representatives”). 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 Settlement of Class Action (“Class Notice”), Notice of Eligible Work Weeks (Form A), and Request for Exclusion From Class Settlement (Form B), and Memorandum Regarding PAGA Settlement Award (collectively, “Notice Packet”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and to handle the notice and settlement administration process.

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

WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers for Justice, PC actively engaged in litigating the above-captioned putative class action (“*Ward* Action”) which was commenced on May 13, 2021, and the Private Attorneys General Act (“PAGA”) representative action entitled *Jose Pereda v. Relish Labs LLC, d/b/a Home Chef*, San Bernardino County Superior Court Case No. CIVSB2026010 (“*Pereda* Action”), commenced on November 23, 2020, and the putative class action and PAGA representative action *Tawny Milligan v. Relish Labs LLC, d/b/a Home Chef*, San Bernardino County Superior Court Case No. CIVSB2116459 (“*Milligan* Action”), commenced on June 24, 2021, since their inception. On August 26, 2022, a First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code §2698, Et Seq. was filed in the *Ward* Action, adding Plaintiffs Jose Pereda and Tawny Milligan, and adding the additional Plaintiffs’ claims to the *Ward* 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 Plaintiffs Jose Pereda, Chris Ward, and Tawny Milligan and research into the various legal issues involved in the case(s), namely, the current state of the law as it applied to class certification, representative adjudication, off-the-clock theory, misclassification, meal and rest periods, Industrial Welfare Commission (“IWC”) Wage Orders, on-premises breaks, wage-and-hour law and enforcement, PAGA representative claims, arbitration agreements, waivers, Plaintiffs’ claims and allegations, and Defendant’s potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiffs were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting similarly situated groups of current and former hourly-paid or non-exempt employees and misclassified salaried exempt production supervisors who were employed by Defendant in California, and who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

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1 6. Class Counsel investigated the veracity, strength, and scope of each of the
2 Plaintiffs' claims, and was preparing the *Ward* Action and *Milligan* Action for class certification
3 and trial prior to reaching the Settlement. The parties conducted significant informal discovery
4 and investigation into the facts of the cases, exchanging a large volume of documents,
5 information, and data throughout the course of litigation and in connection with mediation and
6 settlement negotiations. Class Counsel had the opportunity to interview and obtain information
7 from Plaintiffs and other Class Members and reviewed and analyzed a large volume of
8 information, documents, and data obtained from Plaintiffs, Defendant, and other sources. The
9 information, documents, and data reviewed and analyzed by Class Counsel included, and was not
10 limited to, Plaintiffs' and other Class Members employment records, a detailed sampling of Class
11 Members' time and pay data; company policy acknowledgments and agreements (*e.g.*, IT Mobile
12 Stipend Policy Employee Acknowledgment, Receipt of Employee Handbook, Meal Break
13 Waiver Agreement, Receipt of Time Hire Pamphlet, Acknowledgement Receipt of Revised Time
14 and Attendance Policy, Labor Code Section 2810.5 Notice to Employee, Notice of Employment
15 Responsibilities, Employment Restrictive Covenant Agreement, Mutual Agreement to Arbitrate,
16 and Paid Sick Leave and Worker's Compensation Policy Acknowledgment of Receipt), internal
17 memoranda, forms (including, but not limited to, Time Off Request Form, Time Clock Missed
18 Punch Form, Biometric Time Clock Employee Consent Form, Corrective Action Form,
19 Employee Payroll Change Form, and Early Out Form), and Defendant's employee handbooks
20 and operations and employment policies, practices, and procedures(*e.g.*, Home Chef Salaried
21 Employee Handbook, Home Chef Hourly Employee Handbook, California Rest Break & Meal
22 Period Rules, Cell Phone Allowance Policy, job descriptions), among other information,
23 documents and data. Class Counsel researched applicable law, developed liability, damages, and
24 penalties valuation models in connection with mediation and settlement negotiations, and met
25 and conferred with Defendant's counsel on numerous occasions, *e.g.*, to discuss issues relating to
26 the pleadings, case management, discovery, and the production of information, documents, and
27 data in the course of litigation as well as mediation and settlement negotiations. Other work
28 performed by Class Counsel included, and was not limited to, case strategy and analysis;

1 reviewing and drafting responses to discovery, drafting, reviewing, and revising; pleadings, the
2 mediation brief, and settlement documents; preparing for and attending court proceedings; and
3 preparing for and participating in two mediation sessions and further settlement negotiations,
4 among other tasks.

5 7. The parties have conducted significant formal and informal discovery and
6 investigation during the course of litigating the case and in connection with mediation and
7 settlement negotiations. Class Counsel analyzed a large volume of information, documents, and
8 data obtained from Plaintiffs, other Class Members, Defendant, and other sources. The
9 information, documents, and data that were considered provided a critical understanding of the
10 nature of the work performed by the Class Members, as well as Defendant's operations and
11 employment policies, practices, and procedures, and were used in analyzing liability, damages,
12 and penalties valuation issues in connection with all phases of the litigation, and ultimately in
13 connection with the mediation and settlement negotiation process. Class Counsel also performed
14 research regarding applicable law, which is evolving as it relates to class certification, off-the-
15 clock theory, meal and rest periods, PAGA representative claims, arbitration agreements,
16 misclassification and exemption, sick leave and vacation pay, reporting time pay, suitable seating
17 requirements, wage-and-hour law and enforcement, and Plaintiffs' claims and allegations and
18 Defendant's defenses thereto, as well as facts discovered.

19 8. After conducting significant investigation of the facts and law during the
20 prosecution of the cases, counsel for the parties engaged in extensive settlement negotiations to
21 try to resolve the entire matter. These efforts included participating in a formal, full-day
22 mediation; an additional, supplemental mediation session; and extensive follow-up discussions
23 and negotiations thereafter, which were conducted by the Honorable Edward A. Infante (Ret.), a
24 well-regarded mediator experienced in mediating complex labor and employment matters.
25 During all settlement discussions, the parties conducted their negotiations at arm's length in an
26 adversarial position. In the course of mediation and settlement negotiations, the parties exchanged
27 information and data, and discussed all aspects of the cases, including and not limited to, the risks
28 and delays of further litigation, the risks to the parties of proceeding with class certification and

trial, the law relating to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims and manageability, exemptions, sick leave and vacation pay, reporting time pay, suitable seating requirements, and wage-and-hour law and enforcement, the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the parties was not easy. Defendant and its counsel felt strongly about Defendant's ability to prevail on the merits and to avoid class certification and representative adjudication, while Plaintiffs and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the parties ultimately agreed that the cases were well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the cases, and the real possibility of no monetary recovery after years of litigation.

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$483,333.33, which is one-third (1/3) of the Gross Settlement Amount of \$1,450,000.00, in line with the Settlement Agreement and the Class Notice. Pursuant to the contingency-fee agreement entered into by and between each of the Plaintiffs and Class Counsel, Plaintiffs have each agreed to contingency fees of at least thirty-five percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the cases; and (6) the other cases that Class Counsel has turned down in order to devote its time and efforts to this matter.

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

11. While not necessarily required to be demonstrated because the percentage fee is

proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the cases such that the award of attorneys' fees is also justified under a simple lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **641.30 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred in performing those services. These hours include work done by myself and several other attorneys at Lawyers for Justice, PC. Additionally, separate from the hours referenced herein, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this particular matter, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class and representative actions, support a reasonable blended hourly rate of compensation of at least \$725 for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$725 per hour for legal services performed, by courts granting approval of settlement in other wage-and-hour cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; final approval of the class

and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

ADEQUACY OF LAWYERS for JUSTICE, PC

EDUCATION

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

JUDICIAL EXTERNSHIPS

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

LITIGATION AND CLASS ACTION EXPERIENCE

15. In December of 2004, I obtained a license to practice law from the California State Bar. From approximately December 2004 to approximately August 2008, I was employed by a prominent plaintiff-side law firm.

16. At the prominent plaintiff-side law firm, my practice focused on class actions and other complex cases involving toxic torts and products liability. In addition, I gained substantial experience on cases involving insurance bad faith, premises liability, and medical negligence.

17. Since its inception, in or around October of 2008, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. In association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

b) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national retailer of household items involving allegations of misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court

1 granted final approval of the class action settlement. The Los Angeles County Superior Court
2 Case Number is BC413498.

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

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

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

18 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
19 wage-and-hour class and PAGA representative action against a national wholesale distributor of
20 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
21 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
22 representative action settlement. The Sacramento County Superior Court Case Number is 34-
23 2012-00136285.

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

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

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

1 m) LFJ represented the plaintiff in a PAGA representative action against a real
2 estate and property management company, on behalf of non-exempt employees. On November
3 4, 2016, the court granted approval of the PAGA representative action settlement. The Orange
4 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

14 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
15 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
16 the employer's motion to compel arbitration, which resulted in a published opinion by the
17 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
18 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
19 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
20 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
21 5046.

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

27 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class and PAGA representative action against a manufacturer of food service

1 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final
2 approval of the class and PAGA representative action settlement. The Orange County Superior
3 Court Case Number is 30-2015-00810013-CU-OE-CXC.

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

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

14 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
15 representative action against a food company on behalf of non-exempt employees. On June 30,
16 2017, the court granted final approval of the class and PAGA representative action settlement.
17 The Sacramento County Superior Court Case Number is 34-2015-00175871.

18 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
19 representative action against a chocolate company on behalf of non-exempt employees. On July
20 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
21 The Alameda County Superior Court Case Number is RG15764300.

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

26 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
27 representative action against a manufacturer of plastic containers on behalf of non-exempt
28 employees. On October 31, 2017, the court granted final approval of the class and PAGA

1 representative action settlement. The Los Angeles County Superior Court Case Number is
2 BC577233.

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

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

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

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

23 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
24 representative action against a behavioral health service provider on behalf of non-exempt
25 employees. On November 13, 2018, the court granted final approval of the class and PAGA
26 representative action settlement. The Alameda County Superior Court Case Number is
27 RG16811450.
28

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

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

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

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

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

27 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
28 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed

1 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
2 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
3 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
4 approval of the PAGA representative action settlement. The San Diego County Superior Court
5 Case Number is 34-2015-00175330.

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

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

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

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

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

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 \$18,753.16 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.

SERVICE PAYMENTS TO PLAINTIFFS

20. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for Service Payments in the amount of \$7,500.00 each to Plaintiffs Chris Ward, Jose Pereda, and Tawny Milligan. The requested Service Payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort in producing relevant documents and past employment records and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would facilitate the pursuit of the class and PAGA claims. Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their work experiences with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs Chris Ward, Jose Pereda, and Tawny Milligan to receive \$7,500.00 each as reasonable Service Payments for their services on behalf of the Class Members, the PAGA Group Members, and the State of California, in addition to their individual Class Settlement Awards and PAGA Settlement Awards.

21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiffs, other Class Members, the PAGA Group 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 20th day of June 2023, at Glendale, California.

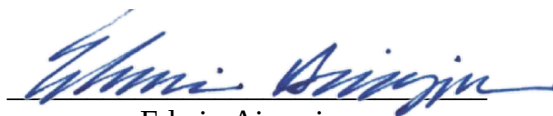

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EXHIBIT A

JOSE PEREDA V. RELISH LABS, LLC
(SAN BERNARDINO COUNTY SUPERIOR COURT CASE NO. CIVSB2026010) (“PEREDA ACTION”)

CHRIS WARD V. RELISH LABS, LLC
(SAN BERNARDINO COUNTY SUPERIOR COURT CASE NO. CIVSB2113821) (“WARD ACTION”)

TAWNY MILLIGAN V. RELISH LABS, LLC
(SAN BERNARDINO COUNTY SUPERIOR COURT CASE NO. CIVSB2116459) (“MILLIGAN ACTION”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality, and Numerosity	11.20
Investigation of the Merits of Plaintiff Jose Pereda’s (“Plaintiff Pereda”) Private Attorneys General act (“PAGA”) Claim on Behalf of the State of California with Respect to Aggrieved Employees	10.30
Investigation of the Merits of Plaintiff Chris Ward’s (“Plaintiff Ward”) Claims and the Merits of the Claims of the Putative Class Members and the State of California with Respect to Aggrieved Employees	12.10
Investigation of the Merits of Plaintiff Tawny Milligan’s (“Plaintiff Milligan”) Claims and the Merits of the Claims of the Putative Class Members and the State of California with Respect to Aggrieved Employees	11.60

Investigation of Potential Damages and Penalties Exposure of Defendant Relish Labs, LLC (“Defendant”) with Respect to the Damages Sustained by Plaintiffs, the Putative Class Members, and Aggrieved Employees	13.10
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Wage Order, Exemption, Misclassification, Representative Private Attorneys General Act (“PAGA”), Arbitration Agreement, and Class Certification Decisions in California, Including All New and Relevant DLSE Materials	9.20
Investigation of Defendant, Defendant’s Business Relationships (Including, and Not Limited to, Vendors and Customers), and the Industry in which Defendant Operates	7.30
Investigation of Defendant’s Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	3.70
Investigation of Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	4.20
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant’s Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant’s Competitors	3.80
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	5.70
Comparative Analysis and Cross-Checking of All Available Job Postings and/or Job 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	6.10

Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members and Aggrieved Employees Worked in California	4.90
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Bonus/Incentive/Shift Differential Pay, Reporting Time, Timekeeping, On-Premises Meal/Rest Breaks, Meal Period Waivers, Overtime Compensation, Classification of Putative Class Members and Aggrieved Employees as Exempt or Non-Exempt from Provisions of the Applicable Wage Order, Food Safety/Sanitation, PPE, Donning and Doffing, Locker Rooms, Equipment/Supplies, Uniforms and Cold Weather Gear for Work in Refrigerated Sections, Personal Cell Phone Use, Personal Vehicle Use, Reimbursement of Business-Related Expenses, Paid Sick Leave, Suitable Seating, and Individual Releases and/or Arbitration Agreements	22.50
Research and Investigation Re: Software and Other Technology That Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Logistics, Inventory, Customer Management, Human Resource Management, and Physical Resource Management, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	5.90
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, Arbitration Agreements, and Compliant Policies	13.10
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	6.50
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Employment Related Issues	2.10
Prepare a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	4.70

Research and Investigation Regarding Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' and Aggrieved Employees' Work	8.90
Meet and Communicate with Plaintiff Jose Pereda Throughout the Pendency of the Case	40.40
Meet and Communicate with Plaintiff Chris Ward Throughout the Pendency of the Case	42.50
Meet and Communicate with Plaintiff Tawny Milligan Throughout the Pendency of the Case	43.50
Investigate, Meet with, Communicate with, and/or Conduct Interviews with Putative Class Members and Percipient Witnesses	15.50
Pleadings and Court Filings	
Research and Draft Plaintiff Jose Pereda's Complaint for Enforcement under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on November 23, 2020) (Pereda Action)	8.80
Review Court's Notice of Trial Setting Conference and Notice of Case Assignment (filed on December 9, 2020) (Pereda Action)	0.10
Review and Analyze Defendant Relish Labs LLC's Answer to Plaintiff's Unverified Complaint and Research Affirmative Defenses in Defendant's Answer (served on April 5, 2021) (Pereda Action)	0.90
Draft Plaintiff Pereda's Notice of Posting Jury Fees (filed April 15, 2021) (Pereda Action)	0.20
Review Court's Notice of Re-Assignment of Case for All Purposes (filed on April 20, 2021) (Pereda Action)	0.10
Review Defendant's Notice of Guidelines for the Complex Litigation Program (served on May 5, 2021) (Pereda Action)	0.20

Research and Draft Plaintiff Ward's Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on May 13, 2021) (Ward Action)	8.30
Draft Plaintiff Pereda's Notice of Posting Complex fees (filed on May 13, 2021) (Pereda Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Case Management Conference Statement (submitted on May 18, 2021) (Pereda Action)	1.60
Draft Plaintiff Pereda's General Civil Case At-Issue Memorandum (filed on May 20, 2021) (Pereda Action)	0.50
Review Court's Initial Case Management Conference Order (filed on May 25, 2021) (Ward Action)	0.30
Draft Plaintiff Pereda's Notice of Related Case: <i>Ward v. Relish Labs LLC</i> (filed on June 3, 2021) (Pereda Action)	0.50
Review Defendant Relish Lab LLC's Notice of Appearance (filed on June 15, 2021) (Ward Action)	0.10
Draft Plaintiff Milligan's Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on June 24, 2021) (Milligan Action)	7.90
Review Court's Initial Case Management Conference Order (served on July 13, 2021) (Milligan Action)	0.30
Draft Plaintiff Milligan's Notice of Related Case (filed on August 4, 2021) (Milligan Action)	0.50
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Case Management Conference Report (filed on August 5, 2021) (Ward Action)	1.40
Draft Plaintiff Ward's Notice of Posting Jury Fees (filed on August 12, 2021) (Ward Action)	0.20

Review Defendant's Notice of Appearance (filed on August 19, 2021) (Milligan Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order to Continue Initial Case Management Conference (submitted on September 13, 2021) (Milligan Action)	0.90
Review Joint Stipulation and Order to Continue Initial Case Management Conference (filed on September 20, 2021) (Milligan Action)	0.20
Draft Plaintiff Milligan's Notice of Posting Jury Fees (filed on September 20, 2021) (Milligan Action)	0.30
Draft [Proposed] Order Authorizing Electronic Service (Case Anywhere) (filed on October 27, 2021) (Pereda Action)	0.50
Review Defendant's Notice of Related Case: <i>Macey v. Relish Labs LLC</i> (served on November 16, 2021) (Pereda Action)	0.30
Review Defendant's Notice of Related Case: <i>Macey v. Relish Labs LLC</i> (served on November 16, 2021) (Milligan Action)	0.30
Review Defendant's Notice of Related Case: <i>Macey v. Relish Labs LLC</i> (served on November 16, 2021) (Ward Action)	0.30
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on November 19, 2021) (Pereda Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on November 19, 2021) (Milligan Action)	0.70
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on November 19, 2021) (Ward Action)	0.70

Review Joint Stipulation to Continue Case Management Conference; and Order (filed on November 29, 2021) (Pereda Action)	0.10
Review Joint Stipulation to Continue Case Management Conference; and Order (filed on November 29, 2021) (Milligan Action)	0.10
Review Joint Stipulation to Continue Case Management Conference; and Order (filed on November 29, 2021) (Ward Action)	0.10
Draft Plaintiff Pereda's Notice of Entry of Judgment or Order (filed on December 13, 2021) (Pereda Action)	0.30
Draft Plaintiff Milligan's Notice of Entry of Judgment or Order (filed on December 13, 2021) (Milligan Action)	0.20
Draft Plaintiff Ward's Notice of Entry of Judgment or Order (filed on December 13, 2021) (Ward Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on January 28, 2022) (Pereda Action)	1.50
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on January 28, 2022) (Milligan Action)	0.60
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on January 31, 2022) (Ward Action)	0.60
Review Clerk's Notice of Continuance (filed on March 15, 2022) (Pereda Action)	0.10
Review Clerk's Notice of Continuance (filed on March 15, 2022) (Milligan Action)	0.10
Review Clerk's Notice of Continuance (filed on March 15, 2022) (Ward Action)	0.10

Review Court's Order Authorizing Electronic Service (Case Anywhere) (filed on April 8, 2022) (Pereda Action)	0.10
Review Defendant's Notice of Related Case: <i>Macey v. Relish Labs LLC</i> (filed on April 8, 2022) (Pereda Action)	0.10
Review Defendant's Notice of Related Case: <i>Macey v. Relish Labs LLC</i> (filed on April 8, 2022) (Milligan Action)	0.10
Review Defendant's Notice of Related Case: <i>Macey v. Relish Labs LLC</i> (filed on April 8, 2022) (Ward Action)	0.10
Review Clerk's Notice of Continuance (filed on April 26, 2022) (Milligan Action)	0.10
Review Clerk's Notice of Continuance (filed on April 26, 2022) (Milligan Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (filed on May 31, 2022) (Pereda Action)	0.70
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (filed on May 31, 2022) (Milligan Action)	0.90
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (filed on May 31, 2022) (Ward Action)	0.70
Draft Plaintiffs' First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq., (filed on August 26, 2022); Meet and Confer with Defendant's Counsel, and Draft Stipulation and [Proposed] Order Granting Plaintiff Leave to File a First Amended Consolidated Complaint for Settlement Purposes Only (submitted on August 1, 2022) (Ward Action)	5.30

Review Court's Order Granting Plaintiff Leave to File a First Amended Consolidated Complaint for Settlement Purposes Only (filed on August 9, 2022) (Ward Action)	0.10
Review Clerk's Notice of Continuance (filed on August 12, 2022) (Pereda Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on August 26, 2022) (Ward Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Hearing Date and Deadline for Plaintiff's Motion for Preliminary Approval; and [Proposed] Order Thereon (submitted on August 26, 2022) (Ward Action)	1.10
Review Stipulation to Continue Hearing Date and Deadline for Plaintiff's Motion for Preliminary Approval; and Order Thereon (filed on August 31, 2022) (Ward Action)	0.10
Review Defendant's Answer to Plaintiffs' First Amended Complaint (filed on November 28, 2022) (Ward Action)	0.30
Review Clerk's Notice of Continuance (filed on December 12, 2022) (Pereda Action)	0.10
Review Clerk's Notice of Continuance (filed on December 12, 2022) (Milligan Action)	0.10
Review Clerk's Notice of Continuance (filed on December 12, 2022) (Ward Action)	0.10
Review Clerk's Notice of Continuance (filed on December 14, 2022) (Ward Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on January 25, 2023) (Ward Action)	0.20
Appearances	
Prepare for and Telephonically Attend Case Management Conference (May 24, 2021) (Pereda Action)	1.00

Prepare for and Telephonically Attend Case Management Conference (February 8, 2022) (Pereda, Ward, and Milligan Actions)	0.70
Prepare for and Telephonically Attend Case Management Conference (June 10, 2022) (Pereda, Ward, and Milligan Actions)	0.50
Prepare for and Telephonically Attend Hearing on Motion for Preliminary Approval of Class Action Settlement (January 13, 2023) (Ward Action)	1.70
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Fee and Expense Award, and Service Payments (July 13, 2023) (Ward Action)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jose Pereda (served on June 19, 2020) (Pereda Action)	1.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jose Pereda (served on July 10, 2020) (Pereda Action)	2.20
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Chris Ward (served on November 18, 2020) (Ward Action)	1.70
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Tawny Milligan (served on November 18, 2020) (Milligan Action)	1.80
Draft Follow- Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Chris Ward (served on February 2, 2021) (Ward Action)	0.70
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Tawny Milligan (served on February 2, 2021) (Milligan Action)	0.70

Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on February 4, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Chris Ward (served on February 9, 2021) (Ward Action)	2.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Tawny Milligan (served February 9, 2021) (Milligan Action)	2.40
Review Defendant's Request for Production of Documents to Plaintiff Jose Pereda (Set One) (served on April 5, 2021) (Pereda Action)	0.80
Review Defendant's Notice of Deposition of Plaintiff Pereda (served on April 5, 2021) (Pereda Action)	0.30
Draft Plaintiff Pereda's Responses to Defendant's Requests for Production of Documents and Exhibits Thereto (Set One) (served on May 10, 2021) (Pereda Action)	18.30
Draft Plaintiff Pereda's Objections to Notice of Deposition of Plaintiff Pereda by Defendants (served on May 11, 2021) (Pereda Action)	0.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on October 28, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 22, 2021)	2.80
Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Jose Pereda for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 17, 2020)	5.60

Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Chris Ward for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on March 8, 2021) (Ward Action)	4.60
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Tawny Milligan for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on April 19, 2021) (Milligan Action)	4.40
Research and Draft Follow-Up Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Jose Pereda for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on May 25, 2022) (Pereda Action)	5.10
Research and Draft Follow-Up Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Tawny Milligan for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on May 25, 2022) (Milligan Action)	3.80
Research and Draft Follow-Up Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Chris Ward for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on May 25, 2022) (Ward Action)	3.30
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	24.80
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources to Evaluate and Assess Claims in Advance of November 9, 2021 Mediation • Employee Handbooks and Employment and Operations Policies, Practices, and Procedures Documents • Sampling of Employee Time Data • Sampling of Employee Pay Data • Time and Payroll Records of Plaintiffs	68.50

Prepare for November 9, 2021 Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on November 2, 2021)	27.50
Attend Mediation (November 9, 2021; Zoom Video Conference)	10.50
Attend Supplemental Mediation (January 9, 2022)	4.50
Review and Analyze Additional Information, Data, and Documents Obtained from Defendant in the Course of Mediation and Ongoing Settlement Negotiations	6.50
Draft, Review, Revise, Negotiate, and/or Finalize Class Action and PAGA Settlement Agreement and Release (executed on December 6, 2022), Notice of Settlement of Class Action (“Class Notice”), Memorandum Regarding PAGA Settlement Award (“PAGA Cover Letter”), Notice of Eligible Work Weeks (Form A), Request for Exclusion from Class Settlement (Form B), and Exhibits E and F	27.80
Law and Motion	
Research and Draft Plaintiffs’ Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Annabel Blanchard in Support Thereof, Declaration of Jose Pereda in Support Thereof, Declaration of Tawny Milligan in Support Thereof, and [Proposed] Order Thereon (filed on December 12, 2022) (Ward Action)	17.40
Draft Declaration of Chris Ward in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement (filed on December 19, 2022) (Ward Action)	1.20
Review Court’s Tentative Ruling re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on January 12, 2023) (Ward Action)	0.30
Review Court’s Order Granting Preliminary Approval of Class Action Settlement (filed on January 13, 2023) (Ward Action)	0.10

Review and Analyze Settlement Administrator's Declaration Regarding Notice and Settlement Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Fee and Expense Award, and Service Payments, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on June 20, 2023)	18.10
Total Hours:	641.30

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Pereda v. Relish Labs, LLC DBA Home Chef

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/17/2020	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
11/23/2020	Legal Document Server, Inc.	Attorney Service	165.23
11/23/2020	San Bernardino Superior Court	Complaint Filing Fee	435.00
3/5/2021	ProLegal	Attorney Service	185.00
4/9/2021	General Logistics Systems US, Inc.	Courier Service	20.45
4/15/2021	FedEx Express	Courier Service	25.93
4/15/2021	Legal Document Server, Inc.	Attorney Service	135.25
4/15/2021	San Bernardino Superior Court	Jury Fee	150.00
5/10/2021	Legal Document Server, Inc.	Attorney Service	130.00
5/13/2021	Legal Document Server, Inc.	Attorney Service	155.00
5/13/2021	San Bernardino Superior Court	Complex Filing Fee	1,000.00
6/3/2021	Legal Document Server, Inc.	Attorney Service	95.00
6/3/2021	Legal Document Server, Inc.	Attorney Service	95.00
9/3/2021	ProLegal	Attorney Service	179.75
9/9/2021	Jams, Inc.	Mediation Fee	7,950.00
11/3/2021	FedEx Express	Courier Service	36.06
11/19/2021	Legal Document Server, Inc.	Attorney Service	195.85
11/19/2021	San Bernardino Superior Court	Filing Fee	20.00
12/13/2021	Legal Document Server, Inc.	Attorney Service	130.00
12/13/2021	Legal Document Server, Inc.	Attorney Service	65.00
1/11/2022	San Bernardino Superior Court	Document Download Fee	10.00
1/15/2022	One Legal	Attorney Service	70.08
1/15/2022	San Bernardino Superior Court	Filing Fee	20.00
2/9/2022	CourtCall, LLC	Attorney Service	94.00
5/31/2022	Legal Document Server, Inc.	Attorney Service	125.00
6/13/2022	CourtCall, LLC	Attorney Service	94.00
Total:			11,656.60

LAWYERS for JUSTICE PC CASE COST DETAIL

Ward v. Relish Labs LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/18/2020	U.S. Postmaster	Postage	6.95
2/2/2021	U.S. Postmaster	Postage	7.00
5/13/2021	Legal Document Server, Inc.	Attorney Service	200.23
5/13/2021	San Bernardino Superior Court	Complaint Filing Fee	435.00
5/13/2021	San Bernardino Superior Court	Complex Filing Fee	1,000.00
6/4/2021	ProLegal	Attorney Service	224.75
6/23/2021	Legal Document Server, Inc.	Attorney Service	130.00
8/12/2021	Legal Document Server, Inc.	Attorney Service	135.25
8/12/2021	CourtCall, LLC	Attorney Service	94.00
8/12/2021	San Bernardino Superior Court	Jury Fee	150.00
11/19/2021	Legal Document Server, Inc.	Attorney Service	195.85
11/19/2021	San Bernardino Superior Court	Stipulation Fee	20.00
12/13/2021	Legal Document Server, Inc.	Attorney Service	130.00
12/13/2021	Legal Document Server, Inc.	Attorney Service	65.00
5/1/2022	Legal Document Server, Inc.	Attorney Service	125.00
8/2/2022	Legal Document Server, Inc.	Attorney Service	191.60
8/2/2022	San Bernardino Superior Court	Stipulation Fee	20.00
8/26/2022	Legal Document Server, Inc.	Attorney Service	202.00
8/29/2022	Legal Document Server, Inc.	Attorney Service	131.35
8/29/2022	San Bernardino Superior Court	Stipulation Fee	20.00
9/12/2022	San Bernardino Superior Court	Document Download Fee	2.50
12/7/2022	San Bernardino Superior Court	Document Download Fee	6.50
12/12/2022	Legal Document Server, Inc.	Attorney Service	286.08
12/12/2022	San Bernardino Superior Court	Motion Fee	90.00
12/13/2022	Legal Document Server, Inc.	Attorney Service	150.00
12/19/2022	Legal Document Server, Inc.	Attorney Service	110.00
1/16/2023	CourtCall, LLC	Attorney Service	72.00
1/24/2023	San Bernardino Superior Court	Document Download Fee	6.50
1/25/2023	Legal Document Server, Inc.	Attorney Service	150.00
Total:			4,357.56

LAWYERS for JUSTICE PC CASE COST DETAIL
Milligan v. Relish Labs LLC, DBA Home Chef

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/18/2020	US Postmaster	Postage	13.95
6/24/2021	Legal Document Server, Inc.	Attorney Service	200.23
6/24/2021	San Bernardino Superior Court	Complaint Filing Fee	435.00
6/24/2021	San Bernardino Superior Court	Complex Filing Fee	1,000.00
8/4/2021	Legal Document Server, Inc.	Attorney Service	120.00
9/27/2021	One Legal	Attorney Service	73.92
9/27/2021	San Bernardino Superior Court	Jury Fee	150.00
10/12/2021	Legal Document Server, Inc.	Attorney Service	130.00
11/19/2021	Legal Document Server, Inc.	Attorney Service	195.85
11/19/2021	San Bernardino Superior Court	Stipulation Fee	20.00
12/13/2021	Legal Document Server, Inc.	Attorney Service	130.00
12/13/2021	Legal Document Server, Inc.	Attorney Service	65.00
5/31/2022	Legal Document Server, Inc.	Attorney Service	125.00
6/13/2022	CourtCall, LLC	Attorney Service	94.00
Total:			2,739.00