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Attorneys for Plaintiffs and the Class

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

CELIA ACUNA, 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;
IAN PFEIFLE, individually, and on behalf
of other members of the general public
similarly situated;

Plaintiffs,

vs.

BASS PRO OUTDOOR WORLD, LLC, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: CIVDS1811384

Honorable David S. Cohn
Department S26

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND INCENTIVE
PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and Incentive
Payments; Declarations of Class
Representatives (Celina Acuna and Ian Pfeifle);
Declaration of Settlement Administrator (Kevin
Lee); and [Proposed] Final Approval Order
and Judgment filed concurrently herein]

Date: April 26, 2022
Time: 10:00 a.m.
Department: S26

Complaint Filed: May 9, 2018
FAC Filed: June 3, 2021
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, 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 Celina Acuna and Ian Pfeifle (together, “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 November 5, 2021, in Department S26 of the above-entitled Court, the Honorable David S. Cohn preliminarily approved the Joint Stipulation of Class Action Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant Bass Pro Outdoor World, LLC (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Celina Acuna and Ian Pfeifle as Class Representatives. The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as Class Counsel. The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix”) to serve as Settlement Administrator for handling the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval, no Class Members have objected to the Settlement or the request for Attorneys’ Fees and Costs, Incentive 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 have been actively engaged in litigating this matter since prior to the commencement of the action on May 9, 2018, as have several other attorneys and members in our firm.

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1 5. Lawyers *for* Justice, PC has actively participated in all phases of the litigation
2 process. Before initiating the action, Class Counsel investigated and researched the facts and
3 circumstances underlying the pertinent factual and legal issues and applicable law. This required
4 thorough discussions and interviews between attorneys at our firm and Plaintiff Acuna, and
5 research into the various legal issues involved in the case, namely, the current state of the law as
6 it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour
7 enforcement, the claims of Plaintiff Acuna, and potential defenses. After conducting initial
8 investigation, our firm determined that the claims of Plaintiff Acuna were well-suited for class-
9 wide adjudication owing to what appeared to be a common course of conduct affecting a
10 similarly situated group of current and former hourly-paid or non-exempt employees who
11 worked for Defendant, who were not properly compensated for, *inter alia*, all hours worked, and
12 non-compliant meal and rest periods.

13 6. Prior to reaching the Settlement, the parties used the pre-mediation time period to
14 investigate the veracity, strength, and scope of the claims, and also to prepare the matter for class
15 certification, representative adjudication, and trial. The parties conducted significant formal and
16 informal discovery and investigation into the facts of the case, and also informally exchanged
17 information and data in preparation for mediation. Class Counsel propounded multiple sets of
18 formal written discovery requests on Defendant, reviewed Defendant's responses and
19 supplemental responses thereto, noticed the depositions of Defendant's Person Most
20 Knowledgeable designees regarding organizational structure and job duties, and worked with
21 Plaintiffs to provide responses to discovery requests that were propounded by Defendant. Class
22 Counsel prepared for and took two depositions of Defendant's Person Most Knowledgeable
23 witnesses.-Class Counsel also interviewed and obtained information from Plaintiffs and other
24 Class Members, including and not limited to the names of potential witnesses, and reviewed and
25 analyzed thousands of pages of documents and data produced by Defendant and obtained
26 through other sources. The documents and data reviewed and analyzed by Class Counsel
27 included, and were not limited to, Plaintiffs and other Class Members' employment records, a
28 detailed sampling of Class Members' time and pay data, multiple iterations of Defendant's

1 Associate Handbook and California Handbook Supplement, company policy acknowledgements
2 (including but not limited to Receipt of Substance Abuse Policy for Employees and Voluntary
3 Waiver of Meal Period), emails, new hire orientation checklists (including but not limited to
4 New Hire Checklist – Retail Locations, New Hire Data Sheet, and Employment Interview Form),
5 Defendant’s operations and employment practices, forms (including but not limited to Associate
6 Coaching/Counseling Report, Bass Pro Shops – Retail Performance Appraisal, Bass Pro Group
7 Separation Notice, and Exit Interview Form), procedures (including but not limited to Security
8 and Inspections, Breaks and Meal Periods, and Searches of Company and Associate Property),
9 and policies (including but not limited to Overtime, Time Keeping, Appearance Standards, Code
10 of Ethics, and Conflicts of Interest), among other information and documents. The parties
11 engaged in significant motion practice, and Class Counsel researched applicable law, developed
12 damages/valuation models in preparation for mediation, and met and conferred with Defendant’s
13 counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, discovery, and
14 production of various documents and data prior to mediation. Other work performed by Class
15 Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and
16 revising pleadings and mediation brief; preparing and appearing for court proceedings; and
17 preparing for and attending mediation and settlement negotiations.

18 7. As outlined herein, the parties have conducted significant formal and informal
19 discovery and investigation during the course of litigating the case. Class Counsel analyzed
20 thousands of pages of documents and data either produced by Plaintiffs and Defendant or
21 obtained by Class Counsel through other sources. These documents and data provided a critical
22 understanding of the nature of the work performed by the Class Members, as well as Defendant’s
23 operations and employment policies, practices, and procedures, and were used in analyzing
24 liability, damages, and valuation issues in connection with all phases of the litigation, and
25 ultimately with the mediation and settlement negotiation process. Class Counsel also performed
26 significant research into the law concerning Defendant’s defenses.

27 8. After conducting significant investigation of the facts and law during the
28 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to

try to resolve the entire matter. These efforts included participating in a formal, full-day mediation conducted by David A. Rotman, a well-regarded mediator experienced in mediating complex labor and employment matters. During all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position. Prior to and during mediation, the parties exchanged information and data, and discussed all aspects of the case, including the risks and delays of further litigation, the risks to the parties of proceeding with class certification and trial, the law relating to off-the-clock theory, meal and rest periods, representative PAGA claims, and wage-and-hour 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 also contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to certification and representative adjudication. Defendant and its counsel felt very strongly about Defendant's ability to prevail on the merits and to obtain a denial of class certification, while Plaintiffs and Class Counsel believed that class certification would be obtained and that they would prevail at trial. With the aid of the mediator's evaluation, the parties agreed that the case was 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, failure to obtain certification, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the case, and the real possibility of no recovery after years of litigation.

9. As set forth more fully in the accompanying Motion for Final Approval, Class Counsel seeks Attorneys' Fees in the amount of \$1,666,666.67, which is one-third (1/3) of the Gross Settlement Amount of \$5,000,000.00, even though a higher figure was set forth in the Settlement Agreement and the Class Notice. Pursuant to the contingency-fee agreement entered into by and between 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 case; (2) the time,

1 effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that
2 Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the
3 litigation; (5) the value of the settlement that Class Counsel has achieved for the Class Members;
4 and (6) the other cases that Class Counsel has turned down in order to devote its time and efforts
5 to this matter.

6 10. I am aware that the common and acceptable rate for contingency representation in
7 wage and hour class action litigation is normally 40% before trial, with the range being from
8 33.3% up to 50%.

9 11. While not necessarily required to be demonstrated because the contingent fee is
10 proper for this settlement, Class Counsel has incurred many hours of work in connection with
11 prosecuting the case such that the award of Attorneys' Fees is also justified under a simple
12 lodestar analysis with a multiplier of 2.28. Class Counsel has spent a total of **946.10 hours**
13 performing tasks and obtaining recovery on behalf of Plaintiffs and the Class Members.
14 Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time and Chart that sets forth in
15 detail the nature of the legal services provided by Class Counsel and the time incurred in
16 performing those services. These hours include work done by myself and several of the firm's
17 other members. We also had litigation support personnel actively engaged in assisting with the
18 prosecution of this matter.

19 12. The work performed in this particular matter, the background of our firm, as well
20 as the individual backgrounds, training, and experience of the attorneys who worked on this
21 matter, in litigating complex wage-and-hour matters, and in particular, employment class actions,
22 support a reasonable hourly rate of compensation at the rate of \$775 for work performed by
23 Class Counsel. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm
24 at the rate of at least \$775 per hour for legal services performed, by courts granting final
25 approval in other cases: final approval of the class action settlement in *Thereasa Carrozzella v.*
26 *Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-
27 00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees
28 involved an hourly rate of \$766.05; final approval of the class and representative action

1 settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior
2 Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees
3 involved an hourly rate of \$764.82; final approval of the class and representative action
4 settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
5 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved a
6 higher hourly rate of \$855.96; final approval of the class and representative action settlement in
7 *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No.
8 RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved a
9 higher hourly rate of \$831.38; final approval of the class and representative action settlement in
10 *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No.
11 2020582) was granted on May 15, 2018, and the award of attorney's fees involved a higher
12 hourly rate of \$780.77; and final approval of the class and representative action settlement in
13 *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No.
14 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved a
15 higher hourly rate of \$845.64.

16 **ADEQUACY OF LAWYERS for JUSTICE, PC**

17 ***EDUCATION***

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

26 ***JUDICIAL EXTERNSHIPS***

27 14. From approximately September 2002 to approximately December 2002, I served
28 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of*

1 *Appeals for the Ninth Circuit.* From approximately June 2002 to approximately August 2002, I
2 served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal*
3 *for the Second Appellate District.*

4 ***LITIGATION AND CLASS ACTION EXPERIENCE***

5 15. In December of 2004, I obtained a license to practice law from the California
6 State Bar. From approximately December 2004 to approximately August 2008, I was employed
7 by *Girardi & Keese*.

8 16. At *Girardi & Keese*, my practice focused on class actions and other complex
9 cases involving toxic torts and products liability. In addition, I gained substantial experience on
10 cases involving insurance bad faith, premises liability, and medical negligence. While employed
11 by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150
12 depositions, and prepared dozens of expert witnesses for deposition or trial.

13 17. Since its inception, in or around October of 2008, our firm has almost exclusively
14 focused on the prosecution of consumer and employment class actions, involving wage-and-hour
15 claims, race discrimination, unfair business practices or consumer fraud. Currently, we are the
16 attorneys of record in over a dozen employment-related putative class actions in both state and
17 federal courts in the State of California. Our firm has successfully litigated cases involving the
18 executive, administrative, and other overtime exemptions to the State of California and federal
19 overtime compensation requirements. During this relatively short time, in association with other
20 law firms, we have obtained millions of dollars on behalf of thousands of individuals in
21 California.

22 ***EXAMPLES OF CLASS ACTION RESULTS***

23 18. What follows are just a few examples of the type of results we have achieved on
24 behalf of our clients:

25
26 a) Our firm, in association with co-counsel, represented the plaintiffs in a
27 wage-and-hour class and representative action against a major property management company
28 involving allegations of misclassification of various “manager” positions. On September 20,

1 2010, the court granted final approval of the class and representative action settlement. The Los
2 Angeles County Superior Court Case Number is BC400414.

3 b) Our firm, in association with co-counsel, represented the plaintiffs in a
4 wage-and-hour class action against a national retailer involving allegations of misclassification
5 of the “Assistant Store Manager” position. On October 28, 2010, the court granted final
6 approval of the class action settlement. The Los Angeles County Superior Court Case Number is
7 BC413498.

8 c) Our firm, in association with co-counsel, represented the plaintiffs in a
9 wage-and-hour class and representative action against a national property management company
10 involving allegations of misclassification of the “Property Manager” position. On May 23, 2012,
11 the court granted final approval of the class and representative action settlement. The Los
12 Angeles County Superior Court Case Number is BC430918.

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

18 e) Our firm, in association with co-counsel, represented the plaintiffs in a
19 wage-and-hour class and representative action against a bank, involving allegations of
20 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
21 granted final approval of the class and representative action settlement. The Kern County
22 Superior Court Case Number is S-1500-CV-273194-LHB.

23 f) Our firm, in association with co-counsel, represented the plaintiffs in a
24 wage-and-hour class and representative action against a national wholesale distributor of
25 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
26 “manager” positions. On May 22, 2014, the court granted final approval of the class and
27 representative action settlement. The Sacramento County Superior Court Case Number is 34-
28 2012-00136285.

1 g) Our firm, in association with co-counsel, represented the plaintiffs in a
2 wage-and-hour class action involving allegations of misclassification of the “Operations
3 Manager” position. On September 16, 2014, the court granted plaintiffs’ motion for class
4 certification. The Los Angeles County Superior Court Case Number is BC478769.

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

10 i) Our firm, in association with co-counsel, represented the plaintiffs in a
11 wage-and-hour class action involving allegations of misclassification of the salaried residential
12 “Property Manager” position. On September 17, 2015, the court granted plaintiffs’ motion for
13 class certification. The Los Angeles County Superior Court Case Number is BC474784.

14 j) Our firm, in association with co-counsel, represented the plaintiffs in a
15 wage-and-hour class and representative action against a national retailer of upscale hardware and
16 home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted
17 final approval of the class and representative action settlement. The Los Angeles County
18 Superior Court Case Number is JCCP4794.

19 k) Our firm, in association with co-counsel, represented the plaintiffs in a
20 wage-and-hour class and representative action against a national retailer of apparel and fashion
21 accessories, on behalf of non-exempt employees. On August 5, 2016, the court granted final
22 approval of the class and representative action settlement. The Los Angeles County Superior
23 Court Case Number is BC488069.

24 l) Our firm, in association with co-counsel, represented the plaintiffs in a
25 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
26 involving allegations of misclassification of the “Department Manager” position. On August 12,
27 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
28 The Alameda County Superior Court Case Number is RG13680477.

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

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

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

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

20 q) Our firm represented the plaintiffs in a wage-and-hour class and
21 representative action against a food company on behalf of non-exempt employees. On June 30,
22 2017, the court granted final approval of the class action settlement. The Sacramento County
23 Superior Court Case Number is 34-2015-00175871.

24 r) Our firm represented the plaintiffs in a wage-and-hour class and
25 representative action against a chocolate company on behalf of non-exempt employees. On July
26 19, 2017, the court granted final approval of the class and representative action settlement. The
27 Alameda County Superior Court Case Number is RG15764300.

28

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

5 t) Our firm, in association with co-counsel, represented the plaintiffs in a
6 wage-and-hour class and representative action against a bank on behalf of non-exempt
7 employees. On December 11, 2017, the court entered an order granting final approval of class
8 and representative action settlement. The Los Angeles County Superior Court Case Number is
9 BC569646.

10 u) Our firm, in association with co-counsel, represented the plaintiffs in a
11 wage-and-hour class and representative action against a property management company on
12 behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court entered an order
13 granting final approval of the class and representative action settlement. The Los Angeles
14 County Superior Court Case Number is JCCP4819.

15 v) Our firm, in association with co-counsel, represented the plaintiffs in a
16 wage-and-hour class and representative action against a global provider of flexible office space
17 solutions. On February 15, 2018, the court entered an order granting final approval of the class
18 and representative action settlement. The Los Angeles County Superior Court Case Number is
19 BC498401.

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

25 x) Our firm, in association with co-counsel, represented the plaintiff in a
26 representative action under the Private Attorneys General Act, against a global provider of
27 products and services to the energy industry, on behalf of hourly-paid and non-exempt
28

1 employees. On November 19, 2018, the Court granted approval of the settlement. The Kern
2 County Superior Court Case Number is S-1500-CV-280215-SDC.

3 y) Our firm represented the plaintiff in a wage-and-hour class action against
4 a parking company on behalf of non-exempt employees. On September 3, 2019, the court
5 granted the plaintiff's motion for class certification and certified a class. The Santa Clara County
6 Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding
7 Number is JCCP 4886.

8 z) Our firm, in association with other counsel, on behalf of the plaintiff and
9 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
10 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
11 notable decision from the California Supreme Court clarifying the law and finding, in part, that
12 employer arbitration agreements are unenforceable where they block a PAGA claim from
13 proceeding, *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019).

14 aa) Our firm represents the plaintiffs in a wage-and-hour class and
15 representative action against a bank on behalf of non-exempt employees. On September 27,
16 2019, the court granted the plaintiffs' motion for class certification in part and certified a class.
17 The Alameda County Superior Court Case Number is RG15757606 and the Judicial Council
18 Coordination Proceeding Number is JCCP 4921.

19 bb) Our firm represented the plaintiffs in a wage-and-hour class and
20 representative action against a national retailer of apparel and fashion accessories, on behalf of
21 non-exempt employees. On October 9, 2019, the court granted the plaintiffs' motion for class
22 certification in part and certified a class. The Sacramento County Superior Court Case Number
23 is 34-2015-00175330-CU-OE-GDS.

24 cc) Our firm represented the plaintiff in a wage-and-hour class and PAGA
25 representative action against a medical equipment supplier on behalf of non-exempt employees.
26 On February 13, 2020, the court granted the plaintiff's motion for class certification and certified
27 a class. The San Bernardino County Superior Court Case Number is CIVDS1505744.
28

dd) Our firm, in association with other counsel, represented the plaintiff in a wage-and-hour class and PAGA representative action against a large national drug testing laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the plaintiff's motion for class certification and certified a class. The San Diego County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

ee) Our firm represented the plaintiffs in a wage-and-hour class and representative action against a national retailer of sportswear, footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the court granted in part the plaintiff's motion for class certification and certified a class. The Riverside County Superior Court Case Number is RICJCCP4930.

ff) Our firm 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. The San Bernardino County Superior Court Case Number is CIVDS1507361.

gg) Our firm, in association with co-counsel, 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. The San Diego County Superior Court Case Number is 37-2015-00025968-CU-OE-CTL.

hh) Our firm 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.

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

19. To date, Class Counsel has borne all the risks and costs of litigation and will not receive any compensation until recovery is obtained by Plaintiffs and the Class Members. Lawyers for Justice, PC has incurred **\$36,401.64** in litigation costs and expenses as reflected in **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the

1 prosecution of this matter and to obtain the Settlement. It should be noted that Class Counsel has
2 borne all of the risks and costs of litigation and will not receive any compensation until recovery
3 is obtained under the Settlement.

4 **INCENTIVE PAYMENTS TO PLAINTIFFS**

5 20. In recognition of their efforts and work serving as the Class Representatives, the
6 Settlement provides for an Incentive Payments in the amount of \$10,000.00 each to Plaintiffs
7 Celina Acuna and Ian Pfeifle to compensate Plaintiffs for the time and effort that they expended
8 on behalf of the Class. The requested Incentive Payments are fair and appropriate. Plaintiffs
9 spent a substantial amount of time and effort in producing relevant documents and past
10 employment records and provided the facts and evidence necessary to attempt to prove the
11 allegations, including and not limited to, by way of working with Class Counsel to provide
12 responses to discovery requests that were propounded on each of them by Defendant. Plaintiffs
13 were available whenever Class Counsel needed them and actively tried to obtain information that
14 would benefit the Class. Plaintiffs spent numerous hours speaking with Class Counsel about
15 their claims, describing their work experience with Defendant, and gathering and reviewing
16 documents. Accordingly, it is appropriate for Plaintiffs Celina Acuna and Ian Pfeifle to each
17 receive \$10,000.00 as a reasonable Incentive Payments, in addition to their Individual Settlement
18 Payments, for their services on behalf of the Class.

19 21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
20 Settlement is in the best interests of Plaintiffs and other Class Members.

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

23
24 Executed this 4th day of April 2022, at Glendale, California.

25
26 

27 Edwin Aiwasian
28

EXHIBIT A

ACUNA V. BASS PRO OUTDOOR WORLD, LLC
(SAN BERNARDINO COUNTY SUPERIOR COURT CASE NO. CIVDS1811384)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>FOR</i> 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	18.40
Pre-Lawsuit Investigation of the Merits of Plaintiff Celina Acuna’s Claims and the Merits of the Claims of the Putative Class Members	15.90
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Bass Pro Outdoor World, LLC (“Defendant”) with Respect to the Employment of Plaintiff Celina Acuna and the Putative Class	14.50
Pre-Lawsuit Legal Research & Analysis of Latest Off-the-Clock, Meal and Rest Break Law, PAGA, Wage Order, Exemption, and Certification Decisions and Law in California, including all Relevant and New Guidance and DLSE Materials	10.20
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	8.10
Investigation of Defendant’s Organizational and Corporate Structure, and Executive Reporting Structure as It Relates to the Employment and Management of the Putative Class Members	7.50
Investigation of Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	7.80

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	8.50
Research and Investigation Re: Locations, Divisions, and/or Departments Owned, Managed, and/or Operated by Defendant in California During the Class Period, Including Differences Between the Various Locations, Divisions, and/or Departments to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	9.50
Research and Investigation Re: Workforce and Staffing Models and Levels for Defendant's Operations Throughout California at which Putative Class Members and Aggrieved Employees Worked	8.10
Comparative Analysis and Cross-Checking of All Available Job Postings by Defendant and Employee and Customer Reviews 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	12.50
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Defendant's Operations, and Putative Class Members and Aggrieved Employees' Work	16.90
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Non-Discretionary Bonuses/Incentives, Schedules, Store Hours, Shifts, Reporting Time, Opening and Closing Procedures, Alarm System and Security Procedures, Bag Check, Customer Service, Timekeeping, Rounding, Wage Statements, Meal/Rest Breaks, On Premises Rest Breaks, Breakrooms, Meal Waivers, Overtime Compensation, Security Bag Checks and Inspections, Uniforms, Donning and Doffing, Cell Phone Use, and Reimbursement of Business-Related Expenses	32.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technologies that Defendant Uses to Conduct Its Everyday Business, Including Resource Management, Sales, Inventory, Timekeeping, Theft Prevention, Surveillance, and Security Systems, 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 During Meal Breaks	10.80

Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	10.50
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	11.50
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	6.20
Prepare a Discovery Strategy Plan of Action, including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	15.10
Research, Analyze, and Preliminarily Outline Class Certification Issues and Trial Plan	89.50
Meet and Communicate with Plaintiff Celina Acuna throughout the Pendency of the Case	55.50
Investigate Percipient Witnesses and Meet and Communicate with Putative Class Members	42.50
Pleadings and Court Filings	
Draft Plaintiff Celina Acuna's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on May 9, 2018)	10.50
Review Court's Notice of Case Assignment and Notice of Case Management Conference (filed on May 9, 2018)	0.20
Draft Plaintiff Celina Acuna's Notice of Posting Jury Fees (filed on May 17, 2018)	0.20
Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on June 11, 2018)	3.50

Review and Analyze Defendant's Amended Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on July 3, 2018)	3.90
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Case Management Conference Statement (filed on July 11, 2018)	2.30
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on November 19, 2018)	2.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on March 15, 2019)	1.90
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on July 11, 2019)	2.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on October 29, 2019)	2.10
Review Court's Minute Order (filed on May 4, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on May 29, 2020)	2.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on July 6, 2020)	2.10
Review Court Order Granting Joint Stipulation to Continue Case Management Conference (filed on July 13, 2020)	0.10
Draft Plaintiff Celina Acuna's Notice of Entry of Judgment or Order (filed on July 28, 2020)	0.20

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Motion for Class Certification Deadline; [Proposed] Order (submitted on October 21, 2020)	3.50
Review Court's Order Granting Joint Stipulation to Continue Motion for Class Certification Deadline (filed on October 29, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on November 20, 2020)	2.10
Draft Plaintiff Celina Acuna's Notice of Entry of Judgment or Order (filed on December 10, 2020)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Stipulation to Continue Case Management Conference and Vacate Class Certification Related Deadlines (submitted on February 24, 2021)	2.50
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference and Vacate Class Certification Related Deadlines (filed on February 24, 2021)	0.10
Draft Plaintiffs' First Amended 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, Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File Amended Complaint; and [Proposed] Order (submitted on May 17, 2021)	6.20
Review Court's Minute Order (filed on May 24, 2021)	0.10
Review Court's Order Granting Plaintiff Leave to File Amended Complaint (filed on May 28, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on August 27, 2021)	2.20
Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on November 8, 2021)	0.20

Appearances	
Prepare for, Travel to/from, and Attend Initial Case Management Conference (San Bernardino; July 16, 2018)	4.50
Prepare for and Telephonically Attend Case Management Conference (November 21, 2018)	1.50
Prepare for and Telephonically Attend Case Management Conference (March 21, 2019)	1.10
Prepare for and Telephonically Attend Case Management Conference (July 19, 2019)	0.70
Prepare for, Travel to/from, and Attend Case Management Conference (San Bernardino; November 4, 2019)	4.50
Prepare for and Telephonically Attend Case Management Conference (December 1, 2020)	1.10
Prepare for and Telephonically Attend Case Management Conference (May 24, 2021)	0.70
Prepare for and Telephonically Attend Case Management Conference (August 31, 2021)	0.70
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (November 5, 2021)	1.80
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Incentive Payments (April 26, 2022) (Anticipated)	2.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Celina Acuna (served on March 20, 2018)	2.10
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Celina Acuna (served on April 17, 2018)	2.50

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Celina Acuna (served on April 21, 2018)	4.30
Draft Plaintiff Celina Acuna's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on July 18, 2018)	10.50
Draft Plaintiff Celina Acuna's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for August 22, 2018; Organizational Structure) (served on July 18, 2018)	5.30
Draft Plaintiff Celina Acuna's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for August 23, 2018; Job Duties) (served on July 18, 2018)	4.80
Draft Plaintiff Celina Acuna's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant (served on August 2, 2018)	6.40
Draft Plaintiff Celina Acuna's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for September 6, 2018; Affirmative Defenses) (served on August 2, 2018)	5.60
Review and Analyze Defendant's Responses to Plaintiff Celina Acuna's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on August 21, 2018)	9.50
Review and Analyze Documents Produced by Defendant (served on August 21, 2018)	3.10
Review and Analyze Defendant's Responses to Plaintiff Celina Acuna's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) (served on September 5, 2018)	7.60

Review Defendant's Form Interrogatories - General (Set One) and Requests for Production of Documents (Set One) to Plaintiff Celina Acuna (served on September 12, 2018)	1.10
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (served on October 11, 2018)	2.10
Draft Plaintiff Celina Acuna's Responses to Defendant's Form Interrogatories - General (Set One) and Requests for Production of Documents (Set One) (served on October 31, 2018)	14.30
Review and Analyze Defendant's Supplemental Responses to Plaintiff Celina Acuna's Form Interrogatories Nos. 21.1, 12.2 and 12.3 (served on November 2, 2018)	2.50
Draft Plaintiff Celina Acuna's Form Interrogatories - General (Set Two), Requests for Production of Documents (Set Three), and Request for Admission (Set One) to Defendant (served on March 15, 2019)	8.20
Review and Analyze Defendant's Responses to Plaintiff Celina Acuna's Form Interrogatories - General (Set Two), Requests for Production of Documents (Set Three), and Request for Admission (Set One) (served on May 8, 2019)	4.70
Review and Analyze Documents Produced by Defendant (served on May 8, 2019)	3.60
Draft Plaintiff Celina Acuna's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for May 23, 2019; Organization Structure) (served on May 15, 2019)	2.60
Draft Plaintiff Celina Acuna's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for May 30, 2019; Organization Structure) (served on May 15, 2019)	2.50
Prepare for and Take the Deposition of Person Most Knowledgeable Greg Brown (May 23, 2019; Glendale, California) and Review Deposition Transcript	15.80

Prepare for and Take the Deposition of Person Most Knowledgeable Gerilyn York (May 30, 2019; Glendale, California) and Review Deposition Transcript	13.80
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on June 5, 2019)	2.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Putative Class Member (served on July 22, 2019)	2.60
Draft Plaintiff Celina Acuna's Special Interrogatories (Set Four) and Requests for Production of Documents (Set Four) to Defendant (served on November 10, 2020)	7.10
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on April 1, 2021)	2.10
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on June 23, 2021)	3.90
Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Celina Acuna for Penalties Under California Labor Code Section 2698, <i>et seq.</i> (served on March 1, 2021)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Plaintiff Ian Pfeifle's Other Counsel (Melmed Law Group P.C.)	10.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	56.50
Mediation/Settlement	
Review and Analyze Mediation Data and Documents Produced by Defendant (served on October 12, 2020) Employee Handbooks, Policies, and Waivers	89.40

• Sampling of Employee Time Data • Sampling of Employee Pay Data	
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, and Performing Violation, Damages, and Penalties Analyses and Calculations (submitted on October 8, 2020)	40.50
Attend Mediation Session (October 13, 2020; Zoom Video Conference)	10.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action Settlement (executed on September 1, 2021) and Draft Exhibits	29.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Inquiries	8.70
Law and Motion	
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Celina Acuna in Support Thereof, Declaration of Ian Pfeifle in Support Thereof, and [Proposed] Order Thereon (filed on October 28, 2021)	30.50
Review Court's Minute Order and Order Granting Motion for Preliminary Approval of Class Action Settlement (filed on November 5, 2021)	0.30
Review and Analyze Settlement Administrator's Declaration Regarding Settlement and Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Incentive Payments, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Celina Acuna in Support Thereof, Declaration of Ian Pfeifle in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on April 4, 2022)	32.10
Total Hours:	946.10

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Acuna v. Bass Pro Outdoor World, LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/9/18	ProLegal	Attorney Service	330.24
5/9/18	San Bernardino Superior Court	Filing Fee	435.00
5/9/18	San Bernardino Superior Court	Complex Fee	1,000.00
5/11/18	ProLegal	Attorney Service	122.07
5/17/18	ProLegal	Attorney Service	175.54
5/17/18	San Bernardino Superior Court	Jury Fee	150.00
7/11/18	ProLegal	Attorney Service	126.99
7/13/18	CourtCall, LLC	Attorney Service	116.00
7/16/18	Alice Kwak	Travel Reimbursment	73.70
7/18/18	General Logistics Systems US, Inc.	Courier Service	15.66
9/12/18	U.S. Postmaster	Postage	1.10
9/20/18	General Logistics Systems US, Inc.	Courier Service	11.63
10/22/18	General Logistics Systems US, Inc.	Courier Service	17.13
10/25/18	General Logistics Systems US, Inc.	Courier Service	11.68
10/31/18	General Logistics Systems US, Inc.	Courier Service	13.43
11/16/18	CourtCall, LLC	Attorney Service	86.00
11/16/18	General Logistics Systems US, Inc.	Courier Service	13.48
11/19/18	ProLegal	Attorney Service	193.49
3/4/19	ProLegal	Attorney Service	116.95
3/4/19	San Bernardino Superior Court	Filing Fee	20.00
3/15/19	General Logistics Systems US, Inc.	Courier Service	17.14
3/15/19	ProLegal	Attorney Service	126.99
3/27/19	Pure Legal, Inc.	Notice Mailing	311.25
3/27/19	U.S. Postmaster	Postage	45.65
5/15/19	General Logistics Systems US, Inc.	Courier Service	13.63
5/23/19	Coalition Court Reporters	Court Reporter	1,972.85
5/30/19	Coalition Court Reporters	Court Reporter	1,635.80
6/7/19	U.S. Postmaster	Postage	6.85
7/11/19	General Logistics Systems US, Inc.	Courier Service	17.41
7/11/19	Legal Document Server, Inc.	Attorney Service	130.00
7/15/19	CourtCall, LLC	Attorney Service	94.00
8/2/19	General Logistics Systems US, Inc.	Courier Service	13.38
8/15/19	General Logistics Systems US, Inc.	Courier Service	12.68
10/29/19	Legal Document Server, Inc.	Attorney Service	195.00
11/4/19	Alik Ourfalian	Travel Reimbursment	69.72
4/23/20	U.S. Postmaster	Postage	2.64
6/5/20	Legal Document Server, Inc.	Attorney Service	130.00
7/6/20	Legal Document Server, Inc.	Attorney Service	130.70
7/6/20	San Bernardino Superior Court	Filing Fee	20.00
7/28/20	Legal Document Server, Inc.	Attorney Service	130.00
10/2/20	David A. Rotman	Mediation Fee	13,250.00
10/2/20	CounselOne, P.C.	Damages Consulting Expert	4,750.00

LAWYERS for JUSTICE PC CASE COST DETAIL

Acuna v. Bass Pro Outdoor World, LLC

10/9/20	General Logistics Systems US, Inc.	Courier Service	35.80
10/13/20	Robert A. Parris	Damages Consulting Expert	5,400.00
10/21/20	Legal Document Server, Inc.	Attorney Service	130.70
10/21/20	San Bernardino Superior Court	Filing Fee	20.00
10/30/20	General Logistics Systems US, Inc.	Courier Service	301.58
11/9/20	General Logistics Systems US, Inc.	Courier Service	17.58
11/10/20	General Logistics Systems US, Inc.	Courier Service	16.07
11/11/20	General Logistics Systems US, Inc.	Courier Service	24.57
11/19/20	General Logistics Systems US, Inc.	Courier Service	18.98
11/23/20	Legal Document Server, Inc.	Attorney Service	130.00
11/24/20	Legal Document Server, Inc.	Attorney Service	185.00
12/2/20	CourtCall, LLC	Attorney Service	94.00
12/10/20	Legal Document Server, Inc.	Attorney Service	130.00
2/23/21	Legal Document Server, Inc.	Attorney Service	120.70
2/23/21	San Bernardino Superior Court	Filing Fee	20.00
3/18/21	Robert A. Parris	Damages Consulting Expert	2,100.00
5/17/21	Legal Document Server, Inc.	Attorney Service	130.00
5/17/21	Legal Document Server, Inc.	Attorney Service	150.70
5/17/21	San Bernardino Superior Court	Filing Fee	20.00
5/25/21	CourtCall, LLC	Attorney Service	94.00
6/2/21	San Bernardino Superior Court	Filing Fee	20.00
6/3/21	Legal Document Server, Inc.	Attorney Service	150.00
8/30/21	Legal Document Server, Inc.	Attorney Service	195.00
10/28/21	Legal Document Server, Inc.	Attorney Service	265.33
10/29/21	Legal Document Server, Inc.	Attorney Service	195.85
10/29/21	San Bernardino Superior Court	Filing Fee	20.00
10/29/21	San Bernardino Superior Court	Filing Fee	90.00
11/5/21	San Bernardino Superior Court	Document Download Fee	6.00
11/8/21	CourtCall, LLC	Attorney Service	94.00
11/9/21	Legal Document Server, Inc.	Attorney Service	120.00
Total:			36,401.64