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*Attorneys for Plaintiff Amit Singh and the Class*

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

AMIT SINGH, 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;

Plaintiff,

vs.

RYDER TRUCK RENTAL, INC., a Florida  
corporation; and DOES 1 through 100,  
inclusive,

Defendants

Case No.: 21STCV22972

Honorable Theresa M. Traber  
Department SSC-1

**CLASS ACTION**

**DECLARATION OF VARTAN MADOYAN  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT,  
ATTORNEYS' FEES AND COSTS, AND  
CLASS REPRESENTATIVE  
ENHANCEMENT AWARD**

Date: November 21, 2025  
Time: 10:30 a.m.  
Department: SSC-1

Complaint Filed: June 17, 2021  
FAC Filed: May 12, 2022  
Trial Date: None Set

**DECLARATION OF VARTAN MADOYAN**

I, Vartan Madoyan, hereby declare as follows:

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

**PRELIMINARY APPROVAL OF SETTLEMENT**

2. On May 22, 2025, in Department SSC-1 of the above-entitled Court, the Honorable Stuart M. Rice preliminarily approved the Class Action and PAGA Settlement Agreement (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Ryder Truck Rental, Inc., (“Defendant,”) (together with Plaintiff referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Amit Singh as the representative of the Class (“Class Representative”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class/PAGA Counsel”).

3. The Court approved and ordered the mailing of the Notice of Class and PAGA Settlement, adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys Fees and Costs, and Class Representative Enhancement Award (“Motion for Final Approval”), no Participating Class Member has objected to the class settlement, the contemplated request for Attorneys Fees and Costs, Class Representative Enhancement Award, and Settlement administration fees, or the allocation for the PAGA Fund.

**WORK PERFORMED BY CLASS/PAGA COUNSEL**

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above captioned action entitled *Singh v. Ryder Truck Rental, Inc.*, Los Angeles County

1 Superior Court, Case No. 21STCV22972, which was filed on June 17, 2021, and the  
2 representative Private Attorneys General Act (“PAGA”) action entitled *Singh v. Ryder Truck*  
3 *Rental, Inc.*, Los Angeles County Superior Court, Case No. 21TRCV00445 (“PAGA Action”),  
4 which was filed on June 17, 2021, since prior to their commencement. Plaintiff ultimately  
5 combined those claims via a First Amended Complaint in the above-captioned action (the PAGA  
6 Action was then voluntarily dismissed after the cases were combined).

7 6. Before initiating the case, Lawyers for Justice, PC investigated and researched the  
8 facts and circumstances underlying the pertinent factual and legal issues and applicable law.  
9 This required thorough discussions and interviews between attorneys at Lawyers for Justice, PC  
10 and Plaintiff and research into the various legal issues involved in the cases, namely, the current  
11 state of the law as it applied to class certification, representative adjudication, and trial; the law  
12 relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense  
13 reimbursements, recordkeeping and wage statement requirements, representative Private  
14 Attorneys General Act (“PAGA”) claims and penalties, and wage-and-hour law and  
15 enforcement, Plaintiff’s claims and allegations, and potential defenses. After conducting an initial  
16 investigation, Lawyers for Justice, PC determined that the claims of Plaintiff were well-suited for  
17 class-wide and representative adjudication, owing to what appeared to be a common course of  
18 conduct affecting a similarly situated group of current and former hourly-paid or non-exempt  
19 employees of Defendant who were employed in California at any time during the Class Period,  
20 who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and  
21 rest periods, and business expenses.

22 7. Collectively, Class/PAGA Counsel conducted significant formal and informal  
23 discovery and investigation into the facts of the case, to assess the veracity, strength, and scope  
24 of the claims, and were preparing the case for class certification and trial, prior to reaching the  
25 Settlement. The Parties exchanged a large volume of information, documents, and data  
26 throughout the course of the litigation and in connection with the mediations and settlement  
27 negotiations. The volume of records and documents that Class/PAGA Counsel reviewed and  
28 analyzed included, and were not limited to: employment records of Plaintiff, a detailed sampling

of Plaintiff, Class Members, and aggrieved employees timekeeping, payroll, and reimbursement data, Defendant's Employee Handbook, company policy acknowledgements (including, but not limited to, Meal and Rest Break Policy Acknowledgement, Union Regulated Employee Acknowledgement, and Non-Exempt Employee Overtime Pay Acknowledgement), internal memoranda, job descriptions, operations and employment policies, performance evaluations, practices, and procedures documents (including, but not limited to, Time Records Policy, Overtime Policy, Working Hours and Pay Policy, Meal and Rest Breaks Policy, Uniform Policy, Mobile Phone Use Policy, Expense Reporting, Open Door Policy, Workplace Conduct, Discipline Policy), union agreements, among other information and documents. Class/PAGA Counsel had the opportunity to interview and obtain information from Plaintiff and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. Class/PAGA Counsel developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediations and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, motion practice, formal and informal discovery, and the production of information, documents, and data in the course of litigation and in connection with mediations and settlement negotiations, and settlement. Other work performed by Class/PAGA Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediations briefing and supporting materials, and settlement documents; drafting and propounding multiple sets of formal written discovery requests on Defendant and notices of depositions of Defendant's persons most knowledgeable designees (along with accompanying requests for production of documents); defending the deposition of Plaintiff, and reviewing Defendant's responses and objections to written discovery requests and deposition notices and accompanying requests for production of documents; and preparing for and attending court proceedings, mediations, and settlement negotiations, among other tasks.

8. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating this matter, mediations, and

1 extensive settlement negotiations. Class/PAGA Counsel analyzed a large volume of information,  
2 documents, and data obtained from Plaintiff, Defendant, and other sources that provided a  
3 critical understanding of the nature of the work performed by the Class Members and PAGA  
4 Employees, as well as Defendant's organizational structure and their operations and employment  
5 policies, practices, and procedures. The information, documents, and data were used in analyzing  
6 liability, damages, penalties, and other valuation issues in connection with all phases of the  
7 litigation, and ultimately, in connection with the mediations and settlement negotiations process.  
8 Class/PAGA Counsel also performed significant research into the applicable law, which is  
9 evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest  
10 periods, representative PAGA claims and penalties, wage-and-hour enforcement, regular rate,  
11 Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

12 9. After conducting significant investigation of the facts and law during the  
13 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to  
14 try to resolve the case. These efforts included participating in a mediation session conducted by  
15 Antonio Piazza, Esq., a well-regarded mediator experienced in handling complex labor and  
16 employment matters. This mediation was unsuccessful. The Parties attended a second mediation  
17 on July 14, 2023 conducted by Paul Grossman, Esq., also a well-regarded mediator experienced  
18 in handling complex labor and employment matters. This second mediation was successful.  
19 During all settlement discussions, the Parties conducted their negotiations at arm's length in an  
20 adversarial position. In the course of the mediations and settlement negotiations, the Parties  
21 exchanged documents and data, and discussed various aspects of the case, including and not  
22 limited to, the risks and delays of further litigation, the risks and expenses to the Parties of  
23 proceeding with class certification, representative adjudication, and trial; the law relating to class  
24 certification, manageability, off-the-clock theory, rounding, regular rates of pay, meal and rest  
25 periods (including *inter alia*, on premises breaks), expense reimbursements, recordkeeping and  
26 wage statement requirements, representative PAGA claims and penalties, and wage-and-hour  
27 law and enforcement; Plaintiff's claims and allegations, and Defendant's defenses thereto, as well  
28 as 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 contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class certification prevail on the merits and, while Plaintiff and Class/PAGA 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 this matter was well-suited for settlement given the legal issues relating to Plaintiff's 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 this matter, and the real possibility of no monetary recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class/PAGA Counsel seeks attorneys' fees in the amount of \$1,116,666.67, which is thirty-three and one-third percent (33.33%) of the Gross Settlement Amount of \$3,350,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class/PAGA Counsel, Plaintiff has agreed to a contingency fee of at least thirty-three and one-third percent (33.33%) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class/PAGA Counsel took in commencing the case; (2) the time, effort, and expense that Class/PAGA Counsel dedicated to the case; (3) the skill and determination that Class/PAGA Counsel has shown; (4) the results that Class/PAGA Counsel has achieved throughout the litigation; (5) the value of the settlement that Class/PAGA Counsel has achieved in this matter; and (6) the other cases that Class/PAGA Counsel has turned down in order to devote their time and efforts to this case. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Gross Settlement Amount of \$3,350,000.00 (with a Net Class Settlement Amount of approximately at least \$1,772,333.00 to be paid to Participating Class Members (with gross Individual Settlement Payments averaging approximately more than \$1,320.67), payment of \$100,000.00 to PAGA Employees (with

individual PAGA Payment Shares averaging approximately \$91.91) and payment of \$400,000.00 to the State of California)—support the percentage fee sought.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class/PAGA Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **712.70 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** 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 by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. 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 action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$850 per hour 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 \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action 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 compensation at the rate of \$936.47 per hour; 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 compensation at the rate of \$919.57 per hour; 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 compensation at the rate of \$855.96 per hour.

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

14. For over a decade, 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 is comprised of attorneys who focus on litigating complex wage-and-hour class and PAGA representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

15. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has 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, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he 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, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers for Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers for Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers for Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000 class action or representative action cases.

16. Arby Aiwarzian is a Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County

1 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County  
2 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or  
3 representative action cases have resulted in settlements that have been granted court approval.  
4 He has handled over one hundred and fifty (150) mediations and worked on over two hundred  
5 and fifty (250) class action or representative action cases which have resulted in settlement.

6 17. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a  
7 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of  
8 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from  
9 Georgetown University Law Center in 2010. She is admitted to practice in California (since  
10 2010) and in New York (since 2013) and she is also admitted to practice in all U.S. District  
11 Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the  
12 U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled  
13 motion practice in class action cases regarding discovery (including and not limited to, regarding  
14 class contact information), class certification (both contested class certification and stipulated  
15 class certification), arbitration agreements, coordination, and intervention. She has successfully  
16 handled briefing and oral arguments on appeal and obtained notable decisions regarding Private  
17 Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g.,  
18 *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th  
19 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v.*  
20 *Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including  
21 and not limited to working on cases to obtain class certification through contested motion  
22 practice and working on cases in the post-certification stage (e.g., post-certification discovery,  
23 appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel  
24 in a case involving a certified class consisting of approximately 2,600 individuals). She has  
25 extensive experience with class action and/or representative action settlements, and has handled  
26 this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby Aiwazian's  
27 supervision, Lawyers *for* Justice, PC has handled the class certification and court approval  
28 process for hundreds of class action and/or representative action matters that have successfully

1 resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and, on  
2 several occasions, has been a speaker regarding topics in wage and hour law at the organization's  
3 continuing legal education events.

4 18. I, Vartan Madoyan, am a Member of Lawyers for Justice, PC. I received my  
5 Bachelor of Arts degree in Economics from the University of California, San Diego in 2007, and  
6 a Juris Doctor degree from Loyola Law School in 2011, graduating with Cum Laude and Order  
7 of the Coif honors. I am admitted to practice before all courts in the State of California and all  
8 U.S. District Courts in California. I externed for the Honorable Victoria S. Kaufman of the  
9 United States Bankruptcy Court, Central District of California, from June 2009 to August 2009.  
10 I externed for the Honorable Gary A. Feess of the United States District Court, Central District  
11 of California, from January 2010 to May 2010. From 2011 through and including the present, I  
12 have practiced almost exclusively on complex wage and hour class action and PAGA action  
13 matters in California. From October 2011 to June 2013, I was an Associate at Littler  
14 Mendelson's Century City, California office, working for one of the largest employer-side labor  
15 and employment law firms in the United States. From July 2013 to March 2014, I was an  
16 Associate at Sheppard, Mullin, Richter & Hampton's Century City, California office. From  
17 March 2014 to July 2023, I worked as an Associate and then as Counsel at Baker Hostetler  
18 LLP's Los Angeles office. From August 2023 to the present, I have been a Member of Lawyers  
19 for Justice, PC. I have taken and defended dozens of depositions and successfully handled  
20 motion practice in class action and PAGA cases regarding discovery (including and not limited  
21 to motions regarding class contact information), class certification (both contested class  
22 certification and stipulated class certification), dispositive motions, arbitration agreements,  
23 coordination, and intervention. I have successfully handled a complex wage and hour class  
24 action and PAGA case through a trial verdict in the matter of Estrada v. Royalty Carpet Mills,  
25 Orange County Superior Court, Case No. 30-2013-00692890. I have also successfully handled  
26 briefing on appeal regarding employer efforts to compel arbitration. TitleMax of Cal. v. Pena,  
27 California Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28,  
28 2023) (unpublished decision). Further, I have extensive experience with settlements of class

1 actions and PAGA actions and have handled and supervised this process in over one hundred  
2 (100) cases.

3 **LITIGATION COSTS AND EXPENSES INCURRED BY**

4 **LAWYERS FOR JUSTICE, PC**

5 19. To date, Class/PAGA Counsel has borne all of the risks and costs of litigation and  
6 will not receive any compensation until recovery is obtained in this matter. The Settlement  
7 provides for reimbursement of litigation costs and expenses of up to \$30,000.00. Lawyers *for*  
8 Justice, PC seeks reimbursement of **\$30,000.00** in litigation costs and expenses incurred in the  
9 matter, as reflected in “**EXHIBIT 2**” attached hereto. In fact, as reflected in Exhibit 2, my firm  
10 incurred more than \$45,000 in actual litigation costs but has voluntarily reduced the  
11 reimbursement amount to \$30,000.00. These expenses were reasonable and necessary in the  
12 prosecution of the matter and to obtain the Settlement.

13 **CLASS REPRESENTATIVE ENHANCEMENT AWARD TO PLAINTIFF**

14 20. In recognition of his efforts and work spearheading the prosecution of this matter  
15 and serving as the Class Representative, the Settlement provides for a Class Representative  
16 Enhancement Award, in the amount of up to \$15,000.00 to Plaintiff. Plaintiff spent a substantial  
17 amount of time and effort discussing his employment with Class/PAGA Counsel, gathering and  
18 providing relevant documents and information, and providing facts and evidence to support the  
19 prosecution of the claims. Plaintiff was available whenever Class/PAGA Counsel needed him  
20 and actively tried to obtain and provide information that would help obtain a recovery in this  
21 matter. Plaintiff provides his own declaration as well in support of the Enhancement Award.  
22 For all of these reasons, it is appropriate for Plaintiff to receive \$15,000.00 as a reasonable Class  
23 Representative Enhancement Award.

24 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best  
25 interests of Plaintiff, the Class, and the State of California.

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

3 Executed this 29th day of October 2025, at Glendale, California.

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6 Vartan Madoyan  
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# **EXHIBIT 1**

***AMIT SINGH v. RYDER TRUCK RENTAL, INC.***  
**Los Angeles County Superior Court Case No. 21STCV22972 (“Singh Class Action”)**  
**Los Angeles County Superior Court Case No. 21TRCV00445 (“Singh PAGA Action”)**

**ATTORNEY TASK AND TIME CHART**

| <b>TASK</b>                                                                                                                                                                                                                                                                                                                                       | <b>LAWYERS <i>for</i> JUSTICE, PC</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                                                                                                                                                                                 |                                       |
| Meet and Communicate with Plaintiff Amit Singh (“Plaintiff”)                                                                                                                                                                                                                                                                                      | 50.50                                 |
| Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses                                                                                                                                                                                                                          | 165.50                                |
| <b>Pleadings and Court Filings</b>                                                                                                                                                                                                                                                                                                                |                                       |
| Investigate the Merits of Plaintiff’s Class Action Claims, Conduct Legal Research and Analysis Regarding Class Action Claims, and Draft Plaintiff’s Class Action Complaint for Damages (filed on June 17, 2021) (Singh Class Action)                                                                                                              | 8.50                                  |
| Investigate the Merits of Plaintiff’s Private Attorneys General Act, California Labor Code § 2698, Et Seq. (“PAGA”) Claim, Legal Research and Analysis of PAGA Claim, and Draft Plaintiff’s Complaint for Enforcement Under the private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on June 17, 2021) (Singh PAGA Action) | 7.50                                  |
| Review Court’s Notice of Case Assignment – Unlimited Civil Case (filed on June 17, 2021) (Singh Class Action & Singh PAGA Action)                                                                                                                                                                                                                 | 0.10                                  |
| Review Court’s Initial Status Conference Order (Complex Litigation Program) and Minute Order Re: Initial Status Conference (filed on July 15, 2021) (Singh Class Action)                                                                                                                                                                          | 0.20                                  |

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Review Court's Notice of Case Management Conference and Order to Show Cause Hearing (filed on July 22, 2021) (Singh PAGA Action)                                                                                                                                                                                                                      | 0.10 |
| Review Defendant Ryder Truck Rental, Inc.'s ("Defendant") Notice of Related Case (filed on August 13, 2021) and Review and Analyze Documents Filed and Register of Actions in <i>Richard Tobin, et al. v. Ryder Truck Rental, Inc.</i> , United States District Court, Central District of California, Case No. 5:20-cv01569-JGB (Singh Class Action) | 1.60 |
| Review Defendant's Peremptory Challenge to Judicial Officer (filed on August 13, 2021) (Singh Class Action)                                                                                                                                                                                                                                           | 0.10 |
| Review Defendant's Peremptory Challenge to Judicial Officer (filed on August 13, 2021) (Singh PAGA Action)                                                                                                                                                                                                                                            | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Initial Case Management Conference Status Report (filed on August 16, 2021) (Singh Class Action)                                                                                                                                                                     | 1.30 |
| Review Court's Minute Order Re: CCP 170.6 Challenge (filed on August 16, 2021) (Singh PAGA Action)                                                                                                                                                                                                                                                    | 0.10 |
| Review Court's Minute Order Re: CCP 170.6 Challenge (filed on August 19, 2021) (Singh Class Action)                                                                                                                                                                                                                                                   | 0.10 |
| Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (Vacate Dates) (filed on August 19, 2021) (Singh Class Action)                                                                                                                                                                                                      | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Deadline to File Responsive Pleading; [Proposed] Order Thereon (filed on August 19, 2021) (Singh PAGA Action)                                                                                                                                | 1.10 |
| Review Defendant's Notice of Related Case (filed on August 23, 2021) (Singh PAGA Action)                                                                                                                                                                                                                                                              | 0.10 |
| Review Court's Minute Order Re: Case Reassignment (filed on August 30, 2021) (Singh Class Action)                                                                                                                                                                                                                                                     | 0.10 |
| Review Court's Initial Status Conference Order (Complex Litigation Program) (filed on September 3, 2021) (Singh Class Action)                                                                                                                                                                                                                         | 0.20 |
| Review Defendant's Notice of Entry of Order (served on September 7, 2021) (Singh Class Action)                                                                                                                                                                                                                                                        | 0.10 |
| Meet and Confer with Defendant's Counsel and Draft, Review, and/or Revise Joint Initial Case Management Conference Status Report (filed on December 15, 2021) (Singh Class Action)                                                                                                                                                                    | 1.50 |
| Review Court's Minute Order Re: Initial Status Conference and Case Management Order (filed December 22, 2021) (Singh Class Action)                                                                                                                                                                                                                    | 0.20 |

|                                                                                                                                                                                                                                                                                                                                                                                    |      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Review Defendant's Case Management Statement (filed on January 6, 2022) (Singh PAGA Action)                                                                                                                                                                                                                                                                                        | 0.30 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation to Request Continuance of January 24, 2022 Case Management Conference; [Proposed] Order Thereon (filed on January 14, 2022) (Singh PAGA Action)                                                                                                                                             | 0.50 |
| Meet and Confer with Defendant's Counsel and Draft, Review, and/or Revise Joint Stipulation to Extend Responsive Pleading Deadline; [Proposed] Order (filed on January 21, 2022) (Singh Class Action)                                                                                                                                                                              | 0.80 |
| Review Court's Order to Extend Responsive Pleading Deadline (filed on January 27, 2022) (Singh Class Action)                                                                                                                                                                                                                                                                       | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Extend Responsive Pleading Deadline; [Proposed] Order (filed on February 14, 2022) (Singh Class Action)                                                                                                                                                                            | 0.80 |
| Review Court's Order to Extend Responsive Pleading Deadline (filed on February 18, 2022) (Singh Class Action)                                                                                                                                                                                                                                                                      | 0.10 |
| Draft Plaintiff's First Amended Class Action Complaint for Damages and for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on May 12, 2022); Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Amend Complaint; [Proposed] Order (filed on February 25, 2022) (Singh Class Action) | 4.80 |
| Review Court's Order to Amend Complaint (filed on March 4, 2022) (Singh Class Action)                                                                                                                                                                                                                                                                                              | 0.10 |
| Draft Plaintiff's Notice of Entry of Judgment or Order (filed on May 12, 2022) (Singh Class Action)                                                                                                                                                                                                                                                                                | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft Plaintiff's Request for Dismissal; Declaration of Edwin Aiwazian in Support Thereof; and [Proposed] Order Thereon (filed on May 27, 2022) (Singh PAGA Action)                                                                                                                                                                  | 1.60 |
| Review and Analyze Defendant's Answer to Plaintiff's Unverified First Amended Complaint (served on June 13, 2022) (Singh Class Action), and Research Affirmative Defenses in Defendant's Answer                                                                                                                                                                                    | 1.50 |
| Draft Plaintiff's CIV-110 Request for Dismissal (filed on June 23, 2022) (Singh PAGA Action)                                                                                                                                                                                                                                                                                       | 0.10 |
| Draft Plaintiff's Notice of Entry of Dismissal and Proof of Service (filed on June 30, 2022) (Singh PAGA Action)                                                                                                                                                                                                                                                                   | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order to Continue Plaintiff's Motion for Class Certification Filing Deadline and Related Dates (filed on August 26, 2022) (Singh Class Action)                                                                                                                         | 1.50 |

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| Review Court's Order to Continue Plaintiff's Motion for Class Certification Filing Deadline and Related Dates (filed on August 29, 2022) (Singh Class Action)                                                                                                                                                 | 0.10 |
| Draft Plaintiff's Notice of Entry of Judgment or Order (filed on August 31, 2022) (Singh Class Action)                                                                                                                                                                                                        | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Second Joint Stipulation and [Proposed] Order to Continue Plaintiff's Motion for Class Certification Filing Deadline and Related Dates (filed on January 10, 2023) (Singh Class Action)                                            | 1.10 |
| Review Court's Order to Continue Plaintiff's Motion for Class Certification Filing Deadline and Related Dates (filed on January 10, 2023) (Singh Class Action)                                                                                                                                                | 0.10 |
| Draft Plaintiff's Notice of Entry of Judgment or Order (filed on January 11, 2023) (Singh Class Action)                                                                                                                                                                                                       | 0.10 |
| Review Defendant's Notice of Appearance (filed on March 21, 2023) (Singh Class Action)                                                                                                                                                                                                                        | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Los Angeles Superior Court Model Stipulated Protective Order – Confidential Designation Only and [Proposed] Order Granting Stipulated Protective Order – Confidential Designation Only (filed on May 4, 2023) (Singh Class Action) | 1.30 |
| Review Court's Order Granting Stipulated Protective Order – Confidential Designation Only (filed on May 30, 2023) (Singh Class Action)                                                                                                                                                                        | 0.10 |
| Draft Plaintiff's Notice of Entry of Judgment or Order (filed on May 30, 2023) (Singh Class Action)                                                                                                                                                                                                           | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Informal Discovery Conference Statement (filed on June 9, 2023) (Singh Class Action)                                                                                                                                         | 2.40 |
| Review Court's Minute Order Re: Informal Discovery Conference (filed on June 15, 2023) (Singh Class Action)                                                                                                                                                                                                   | 0.10 |
| Draft Notice of Ruling from June 15, 2023 Informal Discovery Conference (IDC) (filed on June 16, 2023) (Singh Class Action)                                                                                                                                                                                   | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Third Joint Stipulation and [Proposed] Order to Continue Plaintiff's Motion for Class Certification Filing Deadline and Related Dates (filed on July 3, 2023) (Singh Class Action)                                                 | 1.10 |

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| Review Court's Order to Continue Plaintiff's Motion for Class Certification and Filing Deadline and Related Dates (filed on July 17, 2023) (Singh Class Action)                                                                                                                      | 0.10 |
| Draft Notice of Entry of Judgment or Order (filed on July 17, 2023) (Singh Class Action)                                                                                                                                                                                             | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on August 7, 2023) (Singh Class Action)                                                                                                                                 | 0.40 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Report Regarding Case Status (filed on September 6, 2023) (Singh Class Action)                                                                                                                      | 0.30 |
| Review Court's Minute Order Re: Status Conference (filed on September 19, 2023) (Singh Class Action)                                                                                                                                                                                 | 0.10 |
| Review Defendant's Notice of Related Case (filed on September 25, 2023) and Review and Analyze Documents Filed and Register of Actions in <i>Radni Abdisho v. Ryder Truck Rental, Inc.</i> , San Joaquin County Superior Court, Case No. STK-CV-UOE-2021-008295 (Singh Class Action) | 1.60 |
| Review Court's Minute Order Re: Notice of Related Case (filed on October 13, 2023) (Singh Class Action)                                                                                                                                                                              | 0.10 |
| Draft Plaintiff's Statement Regarding Non-Appearance Case Review (filed on October 17, 2024) (Singh Class Action)                                                                                                                                                                    | 0.80 |
| Review Court's Court Order Vacating Non-Appearance Case Review (filed on October 18, 2024) (Singh Class Action)                                                                                                                                                                      | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on November 21, 2024) (Singh Class Action)                                                                                                                       | 0.70 |
| Review Court's Minute Order Re: Continuance (filed on November 21, 2024) (Singh Class Action)                                                                                                                                                                                        | 0.10 |
| Review Court's Minute Order Deeming Cases Not Related (filed on January 9, 2025) (Singh Class Action)                                                                                                                                                                                | 0.10 |
| Review Defendant's Notice of Order Re: Related Case (filed on January 15, 2025) (Singh Class Action)                                                                                                                                                                                 | 0.10 |
| Review Defendant's Notice of Change of Address (served on February 7, 2025) (Singh Class Action)                                                                                                                                                                                     | 0.10 |
| Draft Notice of Change of Address or Other Contact Information (filed on April 11, 2025) (Singh Class Action)                                                                                                                                                                        | 0.10 |
| Draft Notice of Entry of Judgment or Order (filed on April 18, 2025) (Singh Class Action)                                                                                                                                                                                            | 0.10 |

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| Draft Notice of Entry of Judgment or Order (filed on May 23, 2025) (Singh Class Action)                                                                                                                                                                                             | 0.10 |
| <b>Appearances</b>                                                                                                                                                                                                                                                                  |      |
| Prepare for and Remotely Attend Initial Status Conference (December 22, 2021) (Singh Class Action)                                                                                                                                                                                  | 0.80 |
| Prepare for and Remotely Attend Informal Discovery Conference Re: <i>Belair-West</i> (June 15, 2023) (Singh Class Action)                                                                                                                                                           | 0.90 |
| Prepare for and Remotely Attend Status Conference (September 19, 2023) (Singh Class Action)                                                                                                                                                                                         | 1.50 |
| Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (March 24, 2025)                                                                                                                                         | 0.70 |
| <b>Discovery and Deposition</b>                                                                                                                                                                                                                                                     |      |
| Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Amit Singh (served on April 14, 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 Amit Singh (served on May 10, 2021)                                                                                                     | 6.90 |
| Review Defendant's Notice of Deposition of Plaintiff Amit Singh (served on March 9, 2023) (Singh Class Action)                                                                                                                                                                      | 0.20 |
| Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Production of Documents (Set One), and Requests for Admissions (Set One) to Defendant (served on March 9, 2023) (Singh Class Action) | 5.10 |
| Review Defendant's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), and Requests for Production of Documents (Set One) to Plaintiff (served on March 9, 2023) (Singh Class Action)                                                        | 1.10 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for April 21, 2023) (served on March 10, 2023) (Singh Class Action)                                                    | 1.40 |
| Draft Plaintiff's Demand for Site Inspection of Los Angeles Facility Per Cal. Civ. P. § 2031.010(D) (noticed for April 26, 2023; served on March 20, 2023) (Singh Class Action)                                                                                                     | 1.10 |

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| Draft Plaintiff's Demand for Site Inspection of Rancho Dominguez Facility Per Cal. Civ. P. § 2031.010(D) (noticed for April 27, 2023; served on March 20, 2023) (Singh Class Action)                                                                                                              | 0.90  |
| Draft Plaintiff's Demand for Site Inspection of Montebello Facility Per Cal. Civ. P. § 2031.010(D) (noticed for April 28, 2023; served on March 20, 2023) (Singh Class Action)                                                                                                                    | 0.90  |
| Review Defendant's First Amended Notice of Deposition of Plaintiff Amit Singh (served on March 30, 2023) (Singh Class Action)                                                                                                                                                                     | 0.10  |
| Draft Plaintiff's Objections to Defendant's First Amended Notice of Deposition of Plaintiff Amit Singh (served on April 7, 2023) (Singh Class Action)                                                                                                                                             | 0.50  |
| Draft Plaintiff's Responses to Defendant's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), and Requests for Production of Documents (Set One), and Prepare and Analyze Plaintiff's Document Production (served on April 11, 2023) (Singh Class Action) | 17.50 |
| Review Defendant's Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Production of Documents (Set One), and Requests for Admissions (Set One) (served on April 11, 2023) (Singh Class Action) | 4.90  |
| Review and Analyze Documents Produced By Defendant (served on April 11, 2023)                                                                                                                                                                                                                     | 8.50  |
| Review and Analyze Defendant's Objections to Plaintiff's Demand to Inspect its Los Angeles Facility Per Cal. Civ. P. § 2031.010(D) (served on April 14, 2023) (Singh Class Action)                                                                                                                | 0.80  |
| Review and Analyze Defendant's Objections to Plaintiff's Demand to Inspect its Rancho Dominguez Facility Per Cal. Civ. P. § 2031.010(D) (served on April 14, 2023) (Singh Class Action)                                                                                                           | 0.60  |
| Review and Analyze Defendant's Objections to Plaintiff's Demand to Inspect its Montebello Facility Per Cal. Civ. P. § 2031.010(D) (served on April 14, 2023) (Singh Class Action)                                                                                                                 | 0.60  |
| Review and Analyze Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable and Request for Production of Documents (served on April 14, 2023) (Singh Class Action)                                                                                                | 2.10  |
| Draft Plaintiff's Objections to Defendant's Notice of Deposition of Plaintiff Amit Singh (served on April 24, 2023) (Singh Class Action)                                                                                                                                                          | 0.50  |

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| Review Defendant's Second Amended Notice of Deposition of Plaintiff Amit Singh (served on May 3, 2023) (Singh Class Action)                                                                                                                                       | 0.10  |
| Review and Analyze Documents Produced by Defendant (served on May 9, 2023)                                                                                                                                                                                        | 5.30  |
| Draft Plaintiff's Objections to Defendant's Second Amended Notice of Deposition of Plaintiff Amit Singh (served on May 16, 2023) (Singh Class Action)                                                                                                             | 0.30  |
| Review Defendant's Third Amended Notice of Deposition of Plaintiff Amit Singh (served on May 19, 2023) (Singh Class Action)                                                                                                                                       | 0.10  |
| Draft Plaintiff's Supplemental Responses to Defendant's Form Interrogatories – General (Set One) and Requests for Production of Documents (Set One) (served on June 2, 2023) (Singh Class Action)                                                                 | 3.50  |
| Draft Plaintiff's Second Supplemental Responses to Defendant's Form Interrogatories – General (Set One) (served on June 9, 2023) (Singh Class Action)                                                                                                             | 1.90  |
| Review and Analyze Additional Documents Produced by Defendant (served on June 9, 2023)                                                                                                                                                                            | 2.60  |
| Review and Analyze Additional Documents Produced by Defendant (served on June 11, 2023)                                                                                                                                                                           | 1.50  |
| Prepare for and Defend the Deposition of Plaintiff Amit Singh (Video Conference; June 12, 2023) and Review Deposition Transcript                                                                                                                                  | 15.50 |
| Review and Analyze Additional Documents Produced by Defendant (served on July 3, 2023) (Singh Class Action)                                                                                                                                                       | 1.10  |
| Draft Plaintiff's Second Amended Notice of Deposition of Defendant's Person Most Knowledgeable and Requests for Production of Documents (Organizational Structure; noticed for August 24, 2023 and August 25, 2023) (served on July 7, 2023) (Singh Class Action) | 1.10  |
| Review and Analyze Additional Documents Produced by Defendant (served on July 7, 2023)                                                                                                                                                                            | 0.80  |
| Draft Contemplated <i>Belaire-West</i> Notice, Meet and Confer with Defendant's Counsel and/or Third-Party Administrator(s) Regarding Potential <i>Belaire-West</i> Notice                                                                                        | 3.50  |
| Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on October 9, 2024)                                                                                                                       | 1.90  |

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| 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 8, 2024)                                                                                                                                                          | 2.10  |
| <b>Letters and Correspondence</b>                                                                                                                                                                                                                                                                                                             |       |
| Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Under the Private Attorneys General Act (served on April 13, 2021)                                                                                                                                                                                   | 4.50  |
| Draft Correspondence to, Meet and Confer With, and/or Respond to Correspondence from Defendant's Counsel                                                                                                                                                                                                                                      | 33.50 |
| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                                                                                   |       |
| Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to First Mediation Session on March 7, 2023 (Singh Class Action)                                                                                                                                                              | 67.50 |
| Prepare for First Mediation Session, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analyses and Calculations (submitted on February 17, 2023) (Singh Class Action)                              | 48.50 |
| Attend Mediation Session (March 7, 2023; Zoom Video Conference) (Singh Class Action)                                                                                                                                                                                                                                                          | 17.10 |
| Review and Analyze Additional Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Second Mediation Session on July 14, 2023 (Singh Class Action)                                                                                                                                                  | 37.50 |
| Prepare for Second Mediation Session, Including Researching Additional Settlement-Related and Merits-Related Issues, Drafting Second Mediation Brief and Compiling Exhibits in Support of Second Mediation Brief, and Performing Additional Damages and Penalties Analyses and Calculations (submitted on July 10, 2023) (Singh Class Action) | 22.50 |
| Attend In-Person Mediation Session (July 14, 2023; Los Angeles, California) (Singh Class Action)                                                                                                                                                                                                                                              | 24.50 |
| Review and Analyze Mediator's Proposal (July 15, 2023)                                                                                                                                                                                                                                                                                        | 1.80  |
| Review and Analyze Documents Filed and Register of Actions in <i>Quincy Griffin Perkins v. Ryder Integrated Logistics, Inc., at al.</i> , United States District Court, Northern District of California, Case No. 3:23-cv-00502-WHO                                                                                                           | 1.80  |
| Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on November 13, 2024) and Draft Notice of Class and PAGA Settlement                                                                                                                                                                       | 18.50 |

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| Draft, Review, Revise, Negotiate, and Finalize Amended Class Action and PAGA Settlement Agreement (executed on May 15, 2025), and Draft Revised Notice of Class and PAGA Settlement                                                                                                                                                              | 3.50 |
| Review and Monitor Communications to/from Settlement Administrator Re: Notice Administration Process, Weekly Reports, and Class Member Submissions/Inquiries                                                                                                                                                                                     | 7.50 |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                            |      |
| Review and Analyze Defendant's Notice of Demurrer and Demurrer to Plaintiff's Complaint; Memorandum of Points and Authorities in Support Thereof, Declaration of Rafael N. Tumanyan in Support Thereof, Request for Judicial Notice in Support Thereof, and [Proposed] Order Thereon (filed on August 27, 2021) (Singh PAGA Action)              | 2.10 |
| Review Defendant's Amended Notice of Demurrer, and Notice of Continuance of Case Management Conference on Defendant's Demurrer (filed on September 21, 2021) (Singh PAGA Action)                                                                                                                                                                 | 0.20 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (filed on February 23, 2024) (Singh Class Action)                                                                           | 1.10 |
| Review Court's Order to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on February 27, 2024) (Singh Class Action)                                                                                                                                                                             | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft Plaintiff's Unopposed Request to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement and [Proposed] Order to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on July 26, 2024) (Singh Class Action) | 0.80 |
| Review Defendant's Response Statement to Plaintiff's Unopposed Request to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on July 25, 2024) (Singh Class Action)                                                                                                                               | 0.10 |
| Review Court's Order to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on July 29, 2024) (Singh Class Action)                                                                                                                                                                                 | 0.10 |

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| Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Vartan Madoyan in Support Thereof, Declaration of Plaintiff Amit Singh in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on January 3, 2025)                                                                                 | 21.50  |
| Review Court's Case Anywhere Message Board Vacating Status Conference Re: Filing Motion for Preliminary Approval, and Minute Order Vacating Status Conference (filed on January 6, 2025) (Singh Class Action)                                                                                                                                                                                                                                                                         | 0.10   |
| Review Court's Tentative Ruling Re: Checklist for Preliminary Approval of Class Action Settlement (filed on March 19, 2025)                                                                                                                                                                                                                                                                                                                                                           | 0.70   |
| Review Court's Minute Order Re: Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on March 24, 2025)                                                                                                                                                                                                                                                                                                                                           | 0.10   |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Non-Appearance Case Review Re: Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on April 11, 2025) (Singh Class Action)                                                                                                                                                                                                       | 0.70   |
| Review Court's Order to Continue Non-Appearance Case Review Re: Motion for Preliminary Approval of Class Action Settlement (filed on April 16, 2025)                                                                                                                                                                                                                                                                                                                                  | 0.10   |
| Draft Supplemental Declaration of Vartan Madoyan in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Amit Singh in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement , and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on May 19, 2025)                                                                                                    | 9.50   |
| Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement, and Order Granting Preliminary Approval of Class Action Settlement (filed on May 22, 2025) (Singh Class Action)                                                                                                                                                                                                                                                                  | 0.20   |
| Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Class Representative Enhancement Award; Memorandum of Points and Authorities in Support Thereof, Declaration of Vartan Madoyan in Support Thereof, Declaration of Plaintiff Amit Singh in Support Thereof, and [Proposed] Final Approval Order and Judgment | 22.50  |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 712.70 |

# **EXHIBIT 2**

LAWYERS *for* JUSTICE, PC CASE COST DETAIL  
Singh vs. Ryder Truck Rental, Inc. (Class)

| <u>Date</u> | <u>Payee</u>                         | <u>Expense Description</u> | <u>Amount</u> |
|-------------|--------------------------------------|----------------------------|---------------|
| 4/13/2021   | U.S. Postmaster                      | Postage                    | \$14.32       |
| 4/13/2021   | Labor & Workforce Development Agency | PAGA Filing Fee            | \$75.00       |
| 4/15/2021   | U.S. Postmaster                      | Postage                    | \$7.00        |
| 6/17/2021   | Legal Document Server, Inc.          | Attorney Service           | \$180.23      |
| 6/17/2021   | Los Angeles Superior Court           | Complex Filing Fee         | \$1,000.00    |
| 6/17/2021   | Los Angeles Superior Court           | Complaint Filing Fee       | \$435.00      |
| 7/28/2021   | Legal Document Server, Inc.          | Attorney Service           | \$175.00      |
| 8/5/2021    | ProLegal                             | Attorney Service           | \$91.30       |
| 8/16/2021   | Legal Document Server, Inc.          | Attorney Service           | \$175.00      |
| 8/23/2021   | Legal Document Server, Inc.          | Attorney Service           | \$175.00      |
| 8/30/2021   | Legal Document Server, Inc.          | Attorney Service           | \$175.00      |
| 9/8/2021    | Legal Document Server, Inc.          | Attorney Service           | \$175.00      |
| 2/28/2022   | Legal Document Server, Inc.          | Attorney Service           | \$131.15      |
| 2/28/2022   | Los Angeles Superior Court           | Stipulation & Order Fee    | \$20.00       |
| 3/4/2022    | Legal Document Server, Inc.          | Attorney Service           | \$0.40        |
| 3/4/2022    | Case Anywhere LLC                    | Attorney Service           | \$117.60      |
| 5/10/2022   | Los Angeles Superior Court           | Document Download Fee      | \$18.60       |
| 5/12/2022   | Legal Document Server, Inc.          | Attorney Service           | \$15.20       |
| 6/7/2022    | Case Anywhere LLC                    | Attorney Service           | \$132.00      |
| 8/29/2022   | Legal Document Server, Inc.          | Attorney Service           | \$142.30      |
| 8/29/2022   | Los Angeles Superior Court           | Stipulation & Order Fee    | \$20.00       |
| 8/31/2022   | Legal Document Server, Inc.          | Attorney Service           | \$15.95       |
| 9/9/2022    | Case Anywhere LLC                    | Attorney Service           | \$132.00      |
| 12/8/2022   | Case Anywhere LLC                    | Attorney Service           | \$120.00      |
| 1/10/2023   | Legal Document Server, Inc.          | Attorney Service           | \$17.30       |
| 1/10/2023   | Los Angeles Superior Court           | Stipulation & Order Fee    | \$20.00       |
| 1/11/2023   | Legal Document Server, Inc.          | Attorney Service           | \$15.95       |
| 2/17/2023   | FedEx Express                        | Courier Service            | \$130.38      |
| 2/22/2023   | Antonio Piazza                       | Mediation Fee              | \$20,000.00   |
| 3/3/2023    | Case Anywhere LLC                    | Attorney Service           | \$138.00      |
| 3/20/2023   | ProLegal                             | Attorney Service           | \$240.39      |
| 5/4/2023    | Legal Document Server, Inc.          | Attorney Service           | \$17.54       |
| 5/4/2023    | Los Angeles Superior Court           | Stipulation & Order Fee    | \$20.00       |
| 5/10/2023   | Jacob Karczewski                     | Travel Reimbursement       | \$4.50        |
| 5/31/2023   | Legal Document Server, Inc.          | Attorney Service           | \$16.15       |
| 6/2/2023    | Case Anywhere LLC                    | Attorney Service           | \$246.00      |
| 6/12/2023   | Legal Document Server, Inc.          | Attorney Service           | \$16.15       |
| 6/12/2023   | Veritext, LLC                        | Court Reporter             | \$2,256.00    |

LAWYERS *for* JUSTICE, PC CASE COST DETAIL  
Singh vs. Ryder Truck Rental, Inc. (Class)

|            |                                    |                         |             |
|------------|------------------------------------|-------------------------|-------------|
| 6/12/2023  | Melissa Rinehart                   | Travel Reimbursement    | \$246.19    |
| 6/13/2023  | General Logistics Systems US, Inc. | Courier Service         | \$18.92     |
| 6/16/2023  | Legal Document Server, Inc.        | Attorney Service        | \$16.15     |
| 6/27/2023  | FedEx Express                      | Courier Service         | \$28.28     |
| 7/3/2023   | Legal Document Server, Inc.        | Attorney Service        | \$18.15     |
| 7/3/2023   | Los Angeles Superior Court         | Stipulation & Order Fee | \$20.00     |
| 7/10/2023  | General Logistics Systems US, Inc. | Courier Service         | \$26.08     |
| 7/10/2023  | PAUL HASTINGS LLP                  | Second Mediation Fee    | \$16,500.00 |
| 7/12/2023  | General Logistics Systems US, Inc. | Courier Service         | \$18.85     |
| 7/14/2023  | Jacob Karczewski                   | Travel Reimbursement    | \$52.00     |
| 7/18/2023  | Legal Document Server, Inc.        | Attorney Service        | \$16.15     |
| 8/8/2023   | Legal Document Server, Inc.        | Attorney Service        | \$16.15     |
| 9/4/2023   | Case Anywhere LLC                  | Attorney Service        | \$204.00    |
| 9/15/2023  | General Logistics Systems US, Inc. | Courier Service         | \$26.61     |
| 12/8/2023  | Case Anywhere LLC                  | Attorney Service        | \$120.00    |
| 2/26/2024  | One Legal                          | Attorney Service        | \$20.30     |
| 2/26/2024  | Los Angeles Superior Court         | Stipulation & Order Fee | \$20.00     |
| 3/5/2024   | Case Anywhere LLC                  | Attorney Service        | \$132.00    |
| 6/5/2024   | Case Anywhere LLC                  | Attorney Service        | \$120.00    |
| 7/24/2024  | Legal Document Server, Inc.        | Attorney Service        | \$16.15     |
| 7/25/2024  | Legal Document Server, Inc.        | Attorney Service        | \$11.95     |
| 7/26/2024  | Legal Document Server, Inc.        | Attorney Service        | \$17.54     |
| 7/26/2024  | Los Angeles Superior Court         | Stipulation & Order Fee | \$20.00     |
| 9/5/2024   | Case Anywhere LLC                  | Attorney Service        | \$150.00    |
| 10/3/2024  | General Logistics Systems US, Inc. | Courier Service         | \$20.10     |
| 10/8/2024  | General Logistics Systems US, Inc. | Courier Service         | \$25.72     |
| 10/11/2024 | Legal Document Server, Inc.        | Attorney Service        | \$150.32    |
| 10/11/2024 | Los Angeles Superior Court         | Motion Fee              | \$60.00     |
| 10/13/2024 | General Logistics Systems US, Inc. | Courier Service         | \$20.10     |
| 10/14/2024 | General Logistics Systems US, Inc. | Courier Service         | \$22.70     |
| 10/17/2024 | General Logistics Systems US, Inc. | Courier Service         | \$19.93     |
| 10/18/2024 | Legal Document Server, Inc.        | Attorney Service        | \$146.15    |
| 11/14/2024 | Legal Document Server, Inc.        | Attorney Service        | \$17.70     |
| 11/21/2024 | Legal Document Server, Inc.        | Attorney Service        | \$110.00    |
| 11/21/2024 | Legal Document Server, Inc.        | Attorney Service        | \$17.70     |
| 12/6/2024  | Case Anywhere LLC                  | Attorney Service        | \$156.00    |
| 1/6/2025   | Legal Document Server, Inc.        | Attorney Service        | \$22.87     |
| 1/6/2025   | Los Angeles Superior Court         | Motion Fee              | \$60.00     |
| 3/5/2025   | Case Anywhere LLC                  | Attorney Service        | \$150.00    |

LAWYERS *for* JUSTICE, PC CASE COST DETAIL  
Singh vs. Ryder Truck Rental, Inc. (Class)

|           |                             |                         |                    |
|-----------|-----------------------------|-------------------------|--------------------|
| 3/17/2025 | Legal Document Server, Inc. | Attorney Service        | \$18.70            |
| 4/4/2025  | Case Anywhere LLC           | Attorney Service        | \$52.00            |
| 4/14/2025 | Legal Document Server, Inc. | Attorney Service        | \$20.09            |
| 4/14/2025 | Los Angeles Superior Court  | Stipulation & Order Fee | \$20.00            |
| 4/21/2025 | Legal Document Server, Inc. | Attorney Service        | \$18.70            |
| 5/2/2025  | Case Anywhere LLC           | Attorney Service        | \$64.00            |
| 5/20/2025 | Legal Document Server, Inc. | Attorney Service        | \$18.70            |
| 5/23/2025 | Legal Document Server, Inc. | Attorney Service        | \$18.70            |
| 6/2/2025  | Case Anywhere LLC           | Attorney Service        | \$70.00            |
| 7/1/2025  | Case Anywhere LLC           | Attorney Service        | \$40.00            |
| 8/4/2025  | Case Anywhere LLC           | Attorney Service        | \$40.00            |
| 9/2/2025  | Case Anywhere LLC           | Attorney Service        | \$40.00            |
| 9/22/2025 | Los Angeles Superior Court  | Document Download Fee   | \$8.00             |
| Total:    |                             |                         | <u>\$45,945.06</u> |

LAWYERS *for* JUSTICE, PC CASE COST DETAIL  
Singh vs. Ryder Truck Rental, Inc. (PAGA)

| <u>Date</u> | <u>Payee</u>                         | <u>Expense Description</u> | <u>Amount</u>   |
|-------------|--------------------------------------|----------------------------|-----------------|
| 4/13/2021   | U.S. Postmaster                      | Postage                    | \$14.32         |
| 4/13/2021   | Labor & Workforce Development Agency | PAGA Filing Fee            | \$75.00         |
| 6/18/2021   | Legal Document Server, Inc.          | Attorney Service           | \$30.43         |
| 6/18/2021   | Los Angeles Superior Court           | Complaint Filing Fee       | \$435.00        |
| 7/2/2021    | ProLegal                             | Attorney Service           | \$79.30         |
| 7/27/2021   | Legal Document Server, Inc.          | Attorney Service           | \$15.20         |
| 6/2/2022    | Legal Document Server, Inc.          | Attorney Service           | \$16.55         |
| 6/2/2022    | Los Angeles Superior Court           | Stipulation & Order Fee    | \$20.00         |
| 6/24/2022   | Legal Document Server, Inc.          | Attorney Service           | \$15.20         |
| 7/1/2022    | Legal Document Server, Inc.          | Attorney Service           | \$15.95         |
| Total:      |                                      |                            | <u>\$716.95</u> |