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Attorneys for Plaintiff Sinora Freeland and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

SINORA FREELAND, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

MOMENTUM FOR MENTAL HEALTH, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 21CV376550

Honorable Theodore C. Zayner
Department 19

CLASS ACTION

**DECLARATION OF HELENE MAYER IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, CLASS COUNSEL
AWARD, AND ENHANCEMENT AWARD**

Date: May 6, 2026
Time: 1:30 p.m.
Department: 19

Complaint Filed: February 26, 2021
Trial Date: None Set

DECLARATION OF HELENE MAYER

I, Helene Mayer, 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 Sinora Freeland (“Plaintiff”) and the Class in the above-captioned matters. 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 October 21, 2025, in Department 19 of the above-entitled Court, the Honorable Theodore C. Zayner preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Momentum for Mental Health, (“Defendant”) (together with Plaintiff referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Sinora Freeland 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 Counsel”).

3. The Court approved and ordered the mailing of the Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval (“Class Notice”), 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 and PAGA Settlement, Class Counsel Award, and Enhancement Award (“Motion for Final Approval”), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Class Counsel Award, Enhancement Award, and Settlement Administrator Costs, or the allocation for the PAGA Penalty Amount.

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WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers for Justice, PC have been actively performing work in the above captioned action entitled *Sinora Freeland v. Momentum for Mental Health*, filed in the Superior Court of the State of California, County of Santa Clara, Case No. 21CV376550 (“Class Action”), which was filed on February 26, 2021, and the representative Private Attorneys General Act (“PAGA”) action entitled *Sinora Freeland v. Momentum for Mental Health*, filed in the Superior Court of the State of California, County of Santa Clara, Case No. 21CV384331 (“PAGA Action”) (together with the Class Action, the “Actions”), which was filed on June 16, 2021, since prior to their commencement.

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

7. Collectively, Class Counsel conducted significant formal and informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and were preparing the cases for class certification and trial, prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. The volume of records and

documents that Class Counsel reviewed and analyzed included, and were not limited to: a sampling of Class Members' time and payroll data, Plaintiff's personnel records, earning statements, company policy acknowledgements (e.g., Meal and Rest Period Policy and Acknowledgement), job descriptions, Defendant's operations and employment practice, policies, and procedures (e.g., Expense Reimbursement Form, Meal Periods and Rest Periods, Arbitration Agreement, Agreement to Waive Off Duty Meal Break on NOC Shift, Personnel Policy Guidelines, Attendance and Reporting Time, Standards of Performance and Discipline, Training and Education, Work Week and Overtime Compensation, Time Cards and Time Clock, Final Paycheck, Cellular Telephones, Service Employees International Union Local 2019-2022 Collective Bargaining Agreement with Momentum for Mental Health), among other information and documents. Class Counsel had the opportunity to interview and obtain information from Plaintiff and percipient witnesses, and reviewed and analyzed a large volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. Class Counsel developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation 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, formal and informal discovery, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement, especially in light of Defendant's financial condition. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, the mediation 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; reviewing Defendant's responses to written discovery requests and deposition notices; preparing Plaintiff's responses to the formal written discovery requests served by Defendant on Plaintiff; preparing for and defending the deposition of Plaintiff; and preparing for and attending court proceedings, mediation, 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, mediation, and extensive

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

12 9. After conducting significant investigation of the facts and law during the prosecution
13 of this matter, counsel for the Parties engaged in extensive settlement negotiations to try to resolve
14 the cases. These efforts included participating in a mediation session conducted by Hon. Amy D.
15 Hogue (Ret.), a well-regarded mediator experienced in handling complex labor and employment
16 matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in
17 an adversarial position. In the course of the mediation and settlement negotiations, the Parties
18 exchanged documents and data, and discussed various aspects of the cases, including and not limited
19 to, the risks and delays of further litigation, the risks and expenses to the Parties of proceeding with
20 class certification, representative adjudication, and trial; the law relating to class certification,
21 manageability, off-the-clock theory, regular rates of pay, meal and rest periods (including *inter alia*,
22 on premises breaks), expense reimbursements, recordkeeping and wage statement requirements,
23 representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiff's
24 claims and allegations, and Defendant's defenses thereto; Defendant's financial condition; as well as
25 the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at
26 a settlement that was acceptable to the Parties was not easy. Defendant contended that individualized
27 questions of fact predominate over any common issues, and these issues would pose challenges to
28 class certification and representative adjudication. Defendant and its counsel felt strongly about

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

10 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks
11 attorneys' fees in the amount of \$603,750.00, which is thirty-five percent (35%) of the Total
12 Settlement Amount of \$1,725,000.00. Pursuant to the contingency-fee agreement entered into by
13 and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-
14 five percent (35%) of the recovery.

15 11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
16 took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the
17 cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel
18 has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved
19 in this matter; and (6) the other cases that Class Counsel has turned down in order to devote their
20 time and efforts to these cases. The nature of the work performed, skill exercised, and the outcome
21 in this matter which involves an outstanding monetary recovery involving a Total Settlement
22 Amount of \$1,725,000.00 (with a Net Settlement Amount of approximately at least \$692,728.96 to
23 be paid to Settlement Class Members (with gross Individual Settlement Payments averaging
24 approximately \$560.91), payment of \$100,000.00 to PAGA Group Members (with Individual
25 PAGA Payment averaging approximately \$110.13) and payment of \$300,000.00 to the State of
26 California)—support the percentage fee sought and the application of a lodestar multiplier.

27 12. While not necessarily required to be demonstrated because a percentage fee is proper
28 for this settlement, it should be noted that Class 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 **434.60 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 Private Attorneys General Act (“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-

1 five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction
2 with co-counsel, he has successfully litigated cases involving the executive, administrative, and other
3 overtime exemptions to the State of California and federal overtime compensation requirements.
4 Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
5 contested motion practice in approximately sixteen (16) cases in the last decade, and litigated over
6 1,000 class action or representative action cases.

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

26 17. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
27 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science
28 degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown

University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013). She is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

18. I, Helene Mayer, am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree from University of San Diego in 2017, and I earned my Juris Doctor degree from University of San Diego School of Law in 2020. I was admitted to practice law in California in 2021. I am admitted to practice before all courts of the State of California and all U.S. Federal District Courts in the State of California. I have worked on wage-and-hour class action and PAGA representative cases, and my work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting,

1 negotiating, and finalizing stipulations and settlement agreements, and making court appearances. Prior
2 to working at Lawyers *for* Justice, PC, I worked at law firms focused primarily on family law matters,
3 including, *inter alia*, representing clients in divorce, parentage, child custody, and domestic violence
4 restraining order proceedings, researching, and drafting pleadings, negotiating and finalizing marital
5 settlement agreements, engaging in motion practice, and making court appearances.

6 **LITIGATION COSTS AND EXPENSES INCURRED BY**
7 **LAWYERS *for* JUSTICE, PC**

8 19. To date, Class Counsel has borne all of the risks and costs of litigation and will not
9 receive any compensation until recovery is obtained in this matter. The Settlement provides for
10 reimbursement of litigation costs and expenses of up to \$30,000.00. Lawyers *for* Justice, PC seeks
11 reimbursement of **\$11,934.04** in litigation costs and expenses incurred in the matter, as reflected in
12 **“EXHIBIT 2”** attached hereto. These expenses were reasonable and necessary in the prosecution of
13 the matter and to obtain the Settlement. The cost savings of \$18,065.96 will be part of the Net
14 Settlement Amount, which will be distributed to the Settlement Class Members in accordance with
15 the Settlement.

16 **ENHANCEMENT AWARD TO PLAINTIFF**

17 20. In recognition of her efforts and work spearheading the prosecution of this matter and
18 serving as the Class Representative, as well as her broader individual waiver and release of claims
19 with a California Civil Code Section 1542 waiver (set forth in Paragraph IV.C. of the Settlement
20 Agreement), the Settlement provides for an Enhancement Award in the amount of up to \$10,000.00
21 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing her employment with
22 Class Counsel, gathering and providing relevant documents and information, and providing facts and
23 evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel
24 needed her and actively tried to obtain and provide information that would help obtain a recovery in
25 this matter. For example, Plaintiff spent significant time preparing responses and producing
26 documents in response to Defendant’s formal discovery requests. In addition, Plaintiff prepared for
27 and attended a deposition. Accordingly, it is appropriate for Plaintiff to receive \$10,000.00 as a
28 reasonable Enhancement Award for her broader waiver and release of claims and services performed

1 in this matter, in addition to her individual settlement payment(s).

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

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

6 Executed this 14th day of April 2026, at Mooresville, North Carolina.

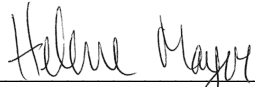
7 
8 _____
9 Helene Mayer

EXHIBIT 1

SINORA FREELAND V. MOMENTUM FOR MENTAL HEALTH
Santa Clara County Superior Court Case No. 21CV376550 (“Class Action”)
Santa Clara County Superior Court Case No. 21CV384331 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Sinora Freeland (“Plaintiff”)	44.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	6.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Claims, Conduct Legal Research and Analysis Regarding Class Claims, and Draft, Review, and/or Revise Plaintiff’s Class Action Complaint for Damages (filed on February 26, 2021) (Class Action)	7.50
Review Court’s Civil Lawsuit Notice (filed on March 1, 2021) (Class Action)	0.10
Review Court’s Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadline (filed on March 2, 2021) (Class Action)	0.20
Review Defendant Momentum for Mental Health’s (“Defendant”) Notice of Appearance (filed on May 17, 2021) (Class Action)	0.10
Draft Plaintiff’s Notice of Posting Jury Fees (filed on June 14, 2021) (Class Action)	0.20
Investigate the Merits of Plaintiff’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding PAGA Claim, and Draft, Review, and/or Revise Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on June 16, 2021) (PAGA Action)	6.80

Draft, Review, and/or Revise Initial Case Management Statement (filed on June 18, 2021) (Class Action)	1.20
Review Defendant's Initial Case Management Conference Statement (served on June 21, 2021) (Class Action)	0.30
Review Court's Minute Order Re: Case Management Conference (filed on June 23, 2021) (Class Action)	0.20
Review Court's Notice of Further Case Management Conference (filed on July 7, 2021) (Class Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint (filed on July 23, 2021) and Research Affirmative Defenses in Defendant's Answer (Class Action)	1.30
Review Court's Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadline and Order and Notice of Reassignment of Case (filed on September 16, 2021) (PAGA Action)	0.30
Draft Plaintiff's Notice of Posting Jury Fees (filed on October 8, 2021) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on October 22, 2021) (Class Action)	1.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on October 22, 2021) (PAGA Action)	0.90
Review Court's Minute Order Re: Case Management Conference (filed on October 27, 2021) (Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on October 27, 2021) (PAGA Action)	0.20
Review Court's Notice of Further Case Management Conference (filed on November 1, 2021) (Class Action)	0.10
Review Court's Notice of Further Case Management Conference (filed on November 1, 2021) (PAGA Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff's PAGA Complaint (filed on November 29, 2021), and Research Affirmative Defenses in Defendant's Answer (PAGA Action)	1.20

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on February 23, 2022) (Class Action)	1.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on February 23, 2022) (PAGA Action)	0.80
Review Court's Minute Order Re: Case Management Conference (filed on February 23, 2022) (Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on February 23, 2022) (PAGA Action)	0.10
Review Court's Notice of Further Case Management Conference (filed on February 28, 2022) (Class Action & PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on June 17, 2022) (Class Action)	1.30
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on June 17, 2022) (PAGA Action)	0.90
Review Court's Notice of Rescheduled Case Management Conferences (filed on June 21, 2022) (Class Action & PAGA Action)	0.10
Review Court's Order to Continue Case Management Conference (filed on June 21, 2022) (Class Action)	0.10
Review Court's Order to Continue Case Management Conference (filed on June 21, 2022) (PAGA Action)	0.10
Draft Notice of Entry of Judgment or Order Re: Order to Continue Case Management Conference (filed on June 21, 2022) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order Re: Order to Continue Case Management Conference (filed on June 21, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on October 14, 2022) (Class Action)	1.20

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on October 14, 2022) (PAGA Action)	0.80
Review Court's Notice of Rescheduled Case Management Conferences (filed on October 17, 2022) (Class Action & PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on March 29, 2023) (Class Action)	1.50
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on March 29, 2023) (PAGA Action)	0.90
Review Court's Order to Continue Case Management Conference (filed on April 4, 2023) (Class Action)	0.30
Review Court's Order to Continue Case Management Conference (filed on April 4, 2023) (PAGA Action)	0.30
Review Court's Notice of Rescheduled Case Management Conferences (filed on April 4, 2023) (Class Action & PAGA Action)	0.30
Draft Notice of Entry of Judgment or Order Re: Order to Continue Case Management Conference (filed on April 6, 2023) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order Re: Order to Continue Case Management Conference (filed on April 6, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement and Case Management Statement (filed on April 13, 2023) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement and Case Management Statement (filed on April 13, 2023) (PAGA Action)	0.70
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on July 7, 2023) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on July 7, 2023) (PAGA Action)	0.50

Review Court's Order to Continue Case Management Conference (filed on July 11, 2023) (Class Action)	0.20
Review Court's Order to Continue Case Management Conference (filed on July 11, 2023) (PAGA Action)	0.20
Review Court's Notice of Rescheduled Case Management Conferences (filed on July 12, 2023) (Class Action & PAGA Action)	0.20
Draft Notice of Entry of Judgment or Order Re: Order to Continue Case Management Conference (filed on July 13, 2023) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order Re: Order to Continue Case Management Conference (filed on July 13, 2023) (PAGA Action)	0.10
Review Court's Notice of Rescheduled Case Management Conferences (filed on August 14, 2023) (Class Action & PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on October 27, 2023) (Class Action)	1.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on October 27, 2023) (PAGA Action)	0.70
Review Court's Notice of Rescheduled Case Management Conferences (filed on October 30, 2023) (Class Action & PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on January 31, 2024) (Class Action)	1.30
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on January 31, 2024) (PAGA Action)	0.80
Review Court's Minute Order Re: Case Management Conference (filed on February 7, 2024) (Class Action)	0.30
Review Court's Minute Order Re: Case Management Conference (filed on February 7, 2024) (PAGA Action)	0.30

Review Court's Notice of Further Case Management Conferences (filed on February 27, 2024) (Class Action & PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on May 1, 2024) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on May 1, 2024) (PAGA Action)	0.70
Review Court's Notice of Rescheduled Case Management Conferences (filed on May 2, 2024) (Class Action & PAGA Action)	0.30
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on September 24, 2024) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on September 24, 2024) (PAGA Action)	0.70
Review Court's Notice of Rescheduled Case Management Conferences (filed on September 25, 2024) (Class Action & PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on January 24, 2025) (Class Action)	0.90
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on January 24, 2025) (PAGA Action)	0.50
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on May 14, 2025) (Class Action)	0.90
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on May 14, 2025) (PAGA Action)	0.50
Review Court's Notice of Reset Hearing (filed on May 19, 2025) (Class Action)	0.20
Review Court's Notice of Reset Hearing (filed on May 19, 2025) (PAGA Action)	0.10
Review Court's Notice of Reset Hearing (filed on June 6, 2025) (Class Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on July 30, 2025) (Class Action)	0.80
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on July 30, 2025) (PAGA Action)	0.50
Review Court's Minute Order Re: Further Case Management Conference (filed on August 6, 2025) (Class Action)	0.20
Review Court's Minute Order Re: Further Case Management Conference (filed on August 6, 2025) (PAGA Action)	0.20
Appearances	
Prepare for and Remotely Attend Case Management Conference (June 23, 2021) (Class Action)	1.10
Prepare for and Remotely Attend Case Management Conference (October 27, 2021) (Class Action & PAGA Action)	2.10
Prepare for and Remotely Attend Case Management Conference (February 23, 2022) (Class Action & PAGA Action)	1.30
Prepare for and Remotely Attend Case Management Conference (February 7, 2024) (Class Action & PAGA Action)	1.50
Prepare for and Remotely Attend Case Management Conference (August 6, 2025) (PAGA Action)	0.60
Discovery and Deposition	
Draft, Review, and/or Revise Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sinora Freeland (served on December 22, 2020)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sinora Freeland (served on January 20, 2021)	5.50
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on January 25, 2022) (Class Action)	4.50

Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for February 28, 2022) (served on January 25 2022) (Class Action)	1.20
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for March 1, 2022) (served on January 25, 2022) (Class Action)	1.40
Review and Analyze Defendant's Requests for Production of Documents (Set One) to Plaintiff (served on January 25, 2022) (Class Action)	0.70
Review and Analyze Defendant's Notice of Deposition of Plaintiff and Request for Production of Documents (noticed for February 11, 2022) (served on January 25, 2022) (Class Action)	1.10
Draft, Review, and/or Revise Plaintiff's Objections to Defendant's Notice of Deposition and Request for Production of Documents (served on February 1, 2022) (Class Action)	2.80
Review and Analyze Defendant's Objection to Plaintiff's Notice of Deposition of Defendant's Person Most Knowledgeable and Request for Production of Documents (February 28, 2022) (served on February 22, 2022) (Class Action)	0.90
Review and Analyze Defendant's Objection to Plaintiff's Notice of Deposition of Defendant's Person Most Knowledgeable and Request for Production of Documents (March 1, 2022) (served on February 22, 2022) (Class Action)	1.10
Draft, Review, and/or Revise Plaintiff's Responses to Defendant's Request for Production of Documents (Set One) (served on February 28, 2022) (Class Action)	9.50
Review and Analyze Defendant's Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on March 25, 2022) (Class Action)	3.80
Review and Analyze Documents Produced by Defendant (served on April 15, 2022)	5.80
Review Defendant's Notice of Deposition of Plaintiff (noticed for February 11, 2022) (served on December 23, 2022) (Class Action)	0.20

Prepare for and Defend the Deposition of Plaintiff Sinora Freeland (Video Conference; January 9, 2023) and Review Deposition Transcript	9.50
Letters and Correspondence	
Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Sinora Freeland under the Private Attorneys General Act (served on April 12, 2021)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with Defendant's Counsel	19.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	81.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations, and Preparing PowerPoint Presentation (submitted on March 29, 2023)	36.50
Attend Mediation Session (April 3, 2023; via Zoom Video Conference)	24.50
Review and Analyze Mediator's Proposal (accepted April 10, 2023)	1.50
Draft, Review, and/or Revise Memorandum of Understanding – Class Action/PAGA Settlement (executed on August 1, 2023)	3.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (executed on September 20, 2024), and Notice of Pendency of Class Action Settlement and Hearing Date for Court Approval	18.50
Coordinate Settlement Administration with Settlement Administrator, Review Weekly Reports, Monitor Settlement Administration Process, and/or Respond to Inquiries	7.50
Law and Motion	

Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Helene Mayer in Support Thereof, Declaration of Plaintiff Sinora Freeland in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on February 27, 2025) (Class Action)	18.50
Review and Analyze Court's Tentative Ruling Re: Motion for Preliminary Approval (issued on August 5, 2025) (Class Action)	0.50
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on August 6, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Supplemental Declaration of Helene Mayer in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, Supplemental Declaration of Plaintiff Sinora Freeland in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, and [Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on September 19, 2025) (Class Action)	5.50
Review and Analyze Court's Tentative Ruling Re: Motion for Preliminary Approval (issued on September 30, 2025) (Class Action)	0.50
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on October 1, 2025) (Class Action)	0.20
Draft, Review, and/or Revise [Further Revised Proposed] Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement (submitted on October 3, 2025) (Class Action)	0.40
Review Court's Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on October 21, 2025) (Class Action)	0.20
Draft Notice of Entry of Judgment or Order Re: Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on October 27, 2025) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue the Hearing on Plaintiff's Motion for Final Approval and Related Deadlines; [Proposed] Order (submitted on January 9, 2026) (Class Action)	1.50

Review Court's Order to Continue the Hearing on Plaintiff's Motion for Final Approval and Related Deadlines (filed on January 22, 2026) (Class Action)	0.30
Draft Notice of Entry of Judgment or Order Re: Order to Continue the Hearing on Plaintiff's Motion for Final Approval and Related Deadlines (filed on January 27, 2026) (Class Action)	0.10
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, Class Counsel Award, and Enhancement Award; Memorandum of Points and Authorities in Support Thereof, Declaration of Helene Mayer in Support Thereof, and [Proposed] Final Approval Order and Judgment (Class Action)	20.50
Total Hours:	434.60

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL

Freeland vs. Momentum For Mental Health

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/22/2020	U.S. Postmaster	Postage	\$6.95
1/25/2021	General Logistics Systems US, Inc.	Courier Service	\$36.61
2/27/2021	Legal Document Server, Inc.	Attorney Service	\$67.03
2/27/2021	Santa Clara Superior Court	Complex Filing Fee	\$1,000.00
2/27/2021	Santa Clara Superior Court	Complaint Filing Fee	\$435.00
4/16/2021	Legal Document Server, Inc.	Attorney Service	\$150.00
6/10/2021	Legal Document Server, Inc.	Attorney Service	\$16.80
6/14/2021	Legal Document Server, Inc.	Attorney Service	\$22.05
6/14/2021	Santa Clara Superior Court	Jury Fee	\$150.00
6/18/2021	CourtCall, LLC	Attorney Service	\$94.00
6/18/2021	Legal Document Server, Inc.	Attorney Service	\$16.80
10/22/2021	CourtCall, LLC	Attorney Service	\$94.00
10/22/2021	Legal Document Server, Inc.	Attorney Service	\$16.80
2/11/2022	FedEx Express	Courier Service	\$43.51
2/18/2022	CourtCall, LLC	Attorney Service	\$94.00
2/23/2022	Legal Document Server, Inc.	Attorney Service	\$16.80
6/20/2022	Legal Document Server, Inc.	Attorney Service	\$149.15
6/20/2022	Santa Clara Superior Court	Stipulation & Order Fee	\$20.00
6/22/2022	Legal Document Server, Inc.	Attorney Service	\$16.80
10/14/2022	Legal Document Server, Inc.	Attorney Service	\$17.55
3/29/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
3/29/2023	Santa Clara Superior Court	Stipulation & Order Fee	\$20.00
3/30/2023	Signature Resolution LLC	Mediation Fee	\$7,450.00
4/6/2023	Legal Document Server, Inc.	Attorney Service	\$17.75
4/13/2023	Legal Document Server, Inc.	Attorney Service	\$17.75
7/7/2023	Legal Document Server, Inc.	Attorney Service	\$19.75
7/7/2023	Santa Clara Superior Court	Stipulation & Order Fee	\$20.00
7/13/2023	Legal Document Server, Inc.	Attorney Service	\$17.75
10/27/2023	Legal Document Server, Inc.	Attorney Service	\$17.67
1/31/2024	Legal Document Server, Inc.	Attorney Service	\$17.67
5/1/2024	Legal Document Server, Inc.	Attorney Service	\$17.75
9/24/2024	Legal Document Server, Inc.	Attorney Service	\$17.75
1/24/2025	Legal Document Server, Inc.	Attorney Service	\$20.20
2/28/2025	Legal Document Server, Inc.	Attorney Service	\$24.37
2/28/2025	Santa Clara Superior Court	Motion Fee	\$60.00
5/14/2025	Legal Document Server, Inc.	Attorney Service	\$20.94
7/30/2025	Legal Document Server, Inc.	Attorney Service	\$20.94
9/22/2025	Legal Document Server, Inc.	Attorney Service	\$20.94

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Freeland vs. Momentum For Mental Health

9/23/2025	Legal Document Server, Inc.	Attorney Service	\$20.94
10/6/2025	Legal Document Server, Inc.	Attorney Service	\$20.94
10/27/2025	Legal Document Server, Inc.	Attorney Service	\$20.94
Total:			<u>\$10,346.80</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Freeland vs. Momentum For Mental Health (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/12/2021	U.S. Postmaster	Postage	\$14.32
4/12/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
7/14/2021	Legal Document Server, Inc.	Attorney Service	\$32.02
7/14/2021	Santa Clara Superior Court	Complaint Filing Fee	\$435.00
8/3/2021	ProLegal	Attorney Service	\$140.00
8/27/2021	Legal Document Server, Inc.	Attorney Service	\$16.80
10/8/2021	Legal Document Server, Inc.	Attorney Service	\$23.18
10/8/2021	Santa Clara Superior Court	Jury Fee	\$150.00
10/22/2021	CourtCall, LLC	Attorney Service	\$94.00
10/22/2021	Legal Document Server, Inc.	Attorney Service	\$16.80
2/18/2022	CourtCall, LLC	Attorney Service	\$94.00
2/23/2022	Legal Document Server, Inc.	Attorney Service	\$16.80
6/20/2022	Legal Document Server, Inc.	Attorney Service	\$160.15
6/20/2022	Santa Clara Superior Court	Stipulation & Order Fee	\$20.00
6/22/2022	Legal Document Server, Inc.	Attorney Service	\$16.80
10/14/2022	Legal Document Server, Inc.	Attorney Service	\$17.55
3/29/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
3/29/2023	Santa Clara Superior Court	Stipulation & Order Fee	\$20.00
4/6/2023	Legal Document Server, Inc.	Attorney Service	\$17.75
4/13/2023	Legal Document Server, Inc.	Attorney Service	\$17.75
7/7/2023	Legal Document Server, Inc.	Attorney Service	\$19.75
7/7/2023	Santa Clara Superior Court	Stipulation & Order Fee	\$20.00
7/13/2023	Legal Document Server, Inc.	Attorney Service	\$17.75
10/27/2023	Legal Document Server, Inc.	Attorney Service	\$17.67
1/31/2024	Legal Document Server, Inc.	Attorney Service	\$17.67
5/1/2024	Legal Document Server, Inc.	Attorney Service	\$17.75
9/24/2024	Legal Document Server, Inc.	Attorney Service	\$17.75
1/24/2025	Legal Document Server, Inc.	Attorney Service	\$20.20
5/14/2025	Legal Document Server, Inc.	Attorney Service	\$20.94
7/30/2025	Legal Document Server, Inc.	Attorney Service	\$20.94
Total:			<u>\$1,587.24</u>