

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Selena Matavosian (SBN 348044)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

TERESA BOND, JESSE ZAMARRIPA,
individually, and on behalf of other members
of the general public similarly situated;
REYNEIRO LARIOS, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act,

Plaintiffs,

vs.

HANGER, INC., an unknown business entity;
HANGER ORTHOPEDIC GROUP, INC., an
unknown business entity; HANGER
PROSTHETICS & ORTHOTICS, INC., a
Delaware corporation; HANGER
PROSTHETICS & ORTHOTICS WEST,
INC., a California corporation; HANGER
FABRICATION NETWORK, LLC, an
unknown business entity; and DOES 2
through 100, inclusive,

Defendants.

Case No.: 34-2021-00303204-CU-OE-GDS

Honorable Lauri A. Damrell
Department 22

CLASS ACTION

**DECLARATION OF JOANNA GHOSH
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND INCENTIVE
AWARDS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and Incentive
Awards; Declarations of Class Representatives
(Teresa Bond, Jesse Zamarripa, and Reyneiro
Larios); Declaration of Settlement Administra-
tor (Jennifer Beliveau of Simpluris); and [Pro-
posed] Final Approval Order and Judgment
filed concurrently
herein]

Date: April 19, 2024
Time: 9:00 a.m.
Department: 22

Complaint Filed: June 23, 2020
FAC Filed: December 27, 2022
Trial Date: None Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Teresa Bond, Reyneiro Larios, and Jesse Zamarripa (collectively, “Plaintiffs”) 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 October 20, 2023, in Department 28 of the above-entitled Court, the Honorable Lauri A. Damrell preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendants Hanger, Inc., Hanger Orthopedic Group, Inc., Hanger Prosthetics & Orthotics, Inc., Hanger Prosthetics & Orthotics West, Inc., and Hanger Fabrication Network, LLC (collectively, “Defendants”) (collectively with Plaintiffs, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Teresa Bond, Reyneiro Larios, and Jesse Zamarripa as the representatives of the Class (collectively, “Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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

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WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers for Justice, PC have been actively engaged in litigating this matter since prior to the commencement of Plaintiff Teresa Bond's ("Plaintiff Bond") putative class action that was filed on June 23, 2020, *Teresa Bond v. Hanger Prosthetics & Orthopedics, Inc., et al.*, Superior Court of California for the County of Riverside, Case No. RIC2002278 ("Class Action"), and Plaintiff Reyneiro Larios' ("Plaintiff Larios") representative PAGA action that was filed on June 25, 2021, *Reyneiro Larios v. Hanger, Inc., et al.*, Superior Court of California for the County of Sacramento, Case No. 34-2021-00303204 ("PAGA Action") (together, the Class Action and PAGA Action are referred to as the "Actions").

5. Before initiating the cases, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff Larios and Plaintiff Bond and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour law and enforcement, Plaintiff Larios and Plaintiff Bond's claims and allegations, and potential defenses. After conducting initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiff Larios and Plaintiff Bond 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, non-exempt employees of Defendants in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses.

6. Class Counsel conducted significant investigation and formal and informal discovery into the facts of the cases, to assess the veracity, strength, and scope of the claims, and was preparing for class certification and trial prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of litigation and in connection with mediation and settlement negotiations. Class Counsel propounded multiple sets of written discovery requests on Defendant Hanger Prosthetics & Orthotics, Inc.,

(Defendant Hanger Prosthetics & Orthotics, Inc., and Defendant Hanger P&O West, and reviewed Defendants Hanger Prosthetics & Orthotics, Inc.'s and Hanger P&O West's objections and responses thereto. Class Counsel reviewed and analyzed information, documents, and data obtained from Plaintiffs, Defendants, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included, and were not limited to, Plaintiffs' employment records, a sampling of Class Members' time and pay data, and documents regarding Defendants' operations and employment practices, policies, and procedures, among other information and documents. Class Counsel developed liability, damages, and penalties valuation models in the course of litigation and in connection with mediation and settlement negotiations, and met and conferred with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery and the production of information, documents, and data in the course of litigation and mediation and settlement negotiations, and mediation and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings, motion-related papers, mediation brief, and settlement-related papers; and preparing for and attending court proceedings and mediation and settlement negotiations, among other tasks.

7. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating the cases, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiffs, Defendants, and other sources. The information, documents, and data that were considered, provided a critical understanding of the nature of the work performed by the Class Members and PAGA Group Members, as well as Defendants' operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and other valuation issues in connection with multiple phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Class Counsel also performed research regarding applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, regular rate, meal and rest periods, representative PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiffs'

claims and allegations, and Defendants' defenses thereto, as well as facts discovered. Accordingly, sufficient research, investigation, and review and analysis of information have taken place in order for the Parties to be adequately informed of the nature and extent of the claims and to enable the Parties to fully evaluate the Settlement for its fairness, adequacy, and reasonableness.

8. After conducting significant investigation of the facts and law during the prosecution of the cases, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in a formal mediation conducted on May 4, 2022 by Jeffrey Krivis, Esq., a well-regarded mediator experienced in mediating complex labor and employment matters. Initially, the mediation was scheduled to occur on September 30, 2021, however, a few weeks prior to the scheduled mediation, Defendant canceled it, as such, the mediation was re-scheduled and eventually took place on May 4, 2022. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and settlement negotiations, the Parties exchanged information, documents, and data, and discussed all aspects of the cases, including and not limited to, the risks and delays of further litigation, the risks to the Parties of proceeding with class certification and trial, the law relating to class certification, manageability, off-the-clock theory, regular rate, meal and rest periods, representative PAGA claims, and wage-and-hour law and enforcement, as well 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. Defendants contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendants and their counsel felt strongly about Defendants' ability to avoid class certification and representative adjudication and prevail on the merits, while Plaintiffs and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that the cases were well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a

determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the cases, and the real possibility of no monetary recovery after years of litigation.

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$750,000.00, which is one-third (1/3) of the Gross Settlement Amount of \$2,250,000.00. Pursuant to the contingency-fee agreements entered into by and between Plaintiffs and Class Counsel, Plaintiffs have each agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the cases; and (6) the other cases that Class Counsel has turned down in order to devote its time and efforts to this matter. The nature of the work performed, skill exercised, and the outcome in this matter support the percentage fee sought and the application of a lodestar multiplier. An outstanding monetary recovery has been obtained in this matter, involving a **Gross Settlement Amount of \$2,250,000.00** (with a Net Settlement Amount of **at least approximately \$985,010.66 to be paid to Settlement Class Members** with an average payment of at least approximately \$1,283.08 per Settlement Class Member, a **payment of \$112,500.00 to PAGA Group Members** with an average payment of \$204.55 per PAGA Group Member, and **payment of \$337,500.00 to the State of California**).

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **583.00 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred in performing those services. The hours

attributable to Lawyers for Justice, PC include work done by several attorneys. Additionally, separate from the hours of work referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The attorneys identified below have performed work in this matter.

LAWYERS for JUSTICE, PC – Attorney Hours, Rates, and Lodestar

Attorney	Title	CA Bar No.	Admit Year	Rate	Total Hours	Lodestar
Edwin Aiwarzian	Managing Attorney & Shareholder	232943	2004	\$1,495	172.60	\$258,037.00
Arby Aiwarzian	Shareholder	269827	2010	\$1,295	84.40	\$109,298.00
Joanna Ghosh	Attorney	272479 (CA); 518149 (NY)	2010 (CA); 2013 (NY)	\$1,295	17.20	\$22,274.00
Elizabeth M. R-H Parker-Fawley	Attorney	301592	2014	\$850	25.00	\$21,250.00
Melissa A. LeBlanc-Mansell	Attorney	283080 (CA); 59808 (WA); 230652 (OR)	2012 (CA); 2022 (WA); 2023 (OR)	\$850	7.70	\$6,545.00
Brian J. St. John	Attorney	304112	2015	\$850	15.30	\$13,005.00
Won Christina Chang	Attorney	327168	2019	\$575	25.50	\$14,662.50
Arman Marukyan	Attorney	327150	2019	\$575	21.40	\$12,305.00
Selena L. Matavosian	Attorney	348044	2022	\$575	60.00	\$34,500.00
Ryan Slinger	Attorney	351297	2023	\$575	3.60	\$2,070.00
Cornelo Dilag	Attorney (formerly)	331559	2020	\$575	61.20	\$35,190.00
Julia Franco	Attorney (formerly)	334676	2021	\$575	37.60	\$21,620.00
Janardana Burns	Attorney (formerly)	337696	2021	\$575	41.20	\$23,690.00
Weslina Hung	Attorney (formerly)	343979	2022	\$575	4.90	\$2,817.50
Giovani Pimentel-Galvan	Attorney (formerly)	345232	2022	\$575	61.20	\$35,190.00
Total:					583.00	\$580,369.00

13. The billing rates for each of the attorneys listed above, who worked on this matter, are reasonable and commensurate with the individual backgrounds, training, and experience of the attorneys, in litigating complex wage-and-hour actions, and in particular, employment class

actions and representative actions. The work performed in this matter, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys worked on this matter, support a reasonable blended hourly rate of compensation of at least \$800 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 \$800 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and/or 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; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved compensation at the rate of \$831.38 per hour; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved compensation at the rate of \$845.64 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 attorney of record in dozens of 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

1 focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”)
2 representative actions. The firm has successfully litigated cases involving nearly every aspect of
3 California wage and hour law, including payment of overtime and minimum wages, provision of
4 meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of
5 compliant wage statements, reimbursement of business expenses, executive, administrative, and
6 other overtime exemptions to the State of California and federal overtime compensation
7 requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has
8 recovered (sometimes in association with other law firms) millions of dollars on behalf of
9 thousands of individuals in California.

10 15. Below is a summary of the experience and qualifications of attorneys at Lawyers
11 *for* Justice, PC who have most recently performed work in this matter. Additional attorneys and
12 non-attorney staff have also worked on the matter.

13 16. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice,
14 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
15 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
16 extensive formal training in dispute resolution and negotiation from the Straus Institute for
17 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
18 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
19 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
20 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
21 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
22 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
23 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
24 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
25 Appellate District. In December of 2004, he obtained a license to practice law from the California
26 State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he
27 has almost exclusively focused on the prosecution of consumer and employment class actions.
28 While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken

1 or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for
2 deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with
3 other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully
4 litigated cases involving the executive, administrative, and other overtime exemptions to the State
5 of California and federal overtime compensation requirements. Under his supervision, Lawyers
6 *for Justice, PC* has successfully obtained class certification by contested motion practice in
7 approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or
8 representative action cases.

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

1 18. Brian J. St. John is a Member of Lawyers *for* Justice, PC. He received his
2 Bachelor's degree from the University of California, San Diego in 2010 and earned his Juris
3 Doctor degree from the University of California, Berkeley, School of Law in 2013. He was
4 admitted to practice law in California in 2015. He is admitted to practice before all courts of the
5 State of California and the Northern and Southern Federal District Courts in the State of
6 California. He has worked on many wage and hour class action and PAGA representative
7 matters, and his work has included, *inter alia*, researching and drafting pleadings, administrative
8 notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements,
9 engaging in motion practice, claims evaluation and analysis, and making court appearances. Prior
10 to working at Lawyers *for* Justice, PC, he spent several years working for a boutique employment
11 and labor law firm representing employers, and, in 2019 and 2020, he was employed as general
12 counsel for a DMHC licensed discount dental plan. He has successfully overseen the settlement
13 of dozens of class action and PAGA cases, and supervises a team of attorneys.

14 19. Selena Matavosian is a Member of Lawyers *for* Justice, PC. She received a
15 Bachelor of Science degree from California State University, Northridge in 2019 and earned a
16 Juris Doctor degree from Southwestern Law School in 2022. She was admitted to practice law
17 in California in 2022. She is admitted to practice before all courts of the State of California and
18 all federal district courts in the State of California. She has worked on many wage-and-hour class
19 action and PAGA representative cases, and her work on these cases has included researching and
20 drafting pleadings and motions, administrative notice exhaustion, drafting, negotiating, and
21 finalizing stipulations and settlement agreements, claims evaluation and analysis, and making
22 court appearances.

23 20. I am a Managing Member of Lawyers *for* Justice, PC. I received a Bachelor of Arts
24 degree from California State University, Los Angeles in 2006, a Master of Science degree from
25 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University
26 Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since
27 2013) and am admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy
28 Court for the Central District of California, and the U.S. Supreme Court. I have 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. I have successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). I have 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). I also have extensive experience with class action and/or representative action settlements, and have handled this process in over three hundred (300) cases. Under Edwin Aiwasian, Arby Aiwasian, and my 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. I am a member of the California Employment Lawyers Association.

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

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

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

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

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

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

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

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

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

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

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

17 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
18 wage-and-hour class and PAGA representative action against a national retailer of upscale
19 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
20 court granted final approval of the class and PAGA representative action settlement. The Los
21 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
22 Council Coordination Proceeding Number is 4794.

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

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1 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
3 involving allegations of misclassification of the “Department Manager” position. On August 12,
4 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
5 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
6 County Superior Court Case Number is RG13680477.

7 m) LFJ represented the plaintiff in a PAGA representative action against a real
8 estate and property management company, on behalf of non-exempt employees. On November
9 4, 2016, the court granted approval of the PAGA representative action settlement. The Orange
10 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

20 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
21 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
22 the employer’s motion to compel arbitration, which resulted in a published opinion by the
23 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
24 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
25 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
26 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
27 5046.

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

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

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

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

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

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

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

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

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

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

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

26 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
28 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.

1 The Tulare County Superior Court Case Number is VCU264528.

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

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

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

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

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

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

6 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
7 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
8 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
9 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
10 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
11 approval of the PAGA representative action settlement. The San Diego County Superior Court
12 Case Number is 34-2015-00175330.

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

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

25 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against manufacturer and supplier of power products and services on
27 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
28 motion for class certification and certified a class. On August 27, 2021, the court granted final

1 approval of the class action settlement. The San Diego County Superior Court Case Number is
2 37-2015-00025968-CU-OE-CTL.

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

7 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
8 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for
9 the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On
10 July 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class.
11 The Los Angeles County Superior Court Case Number is BC707670.

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

13 22. To date, Class Counsel has borne all of the risks and costs of litigation and will not
14 receive any compensation until recovery is obtained in this matter. Class Counsel seeks
15 reimbursement of **\$24,994.34** in litigation costs and expenses incurred in the Actions, as reflected
16 in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the
17 prosecution of the Actions and to obtain the Settlement.

18 **INCENTIVE AWARDS TO PLAINTIFFS**

19 23. In recognition of their efforts and work serving as the Class Representatives, the
20 Settlement provides for Incentive Awards in the amount of \$10,000.00 each to Plaintiffs (for a
21 total of \$30,000.00). The requested Incentive Awards are fair and appropriate. Plaintiffs spent a
22 substantial amount of time and effort to produce relevant documents and information, and
23 provided facts and evidence to support the prosecution of the claims. Plaintiffs were available
24 whenever Class Counsel needed them and actively tried to obtain and provide information that
25 would facilitate the pursuit of the cases. Accordingly, it is appropriate for Plaintiffs Teresa Bond,
26 Reyneiro Larios, and Jesse Zamarripa to receive \$10,000.00 each as reasonable Incentive Awards
27 for their services in the cases, in addition to their individual settlement payments.

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1 24. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
2 Settlement is in the best interests of Plaintiffs, Class Members, PAGA Group Members, and the
3 State of California.

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

6 Executed this 27th day of March 2024, at Glendale, California.

7 

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9 _____
Joanna Ghosh

EXHIBIT A

REYNEIRO LARIOS, ET AL. V. HANGER, INC., ET AL. (“Larios Action”)
Sacramento County Superior Court Case No. 34-2021-00303204-CU-OE-GDS

TERESA BOND V. HANGER PROSTHETICS & ORTHOTICS INC., ET AL. (“Bond Action”)
Riverside County Superior Court Case No. RIC 2002278

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts With a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality, and Manageability • Edwin Aiwazian (February 2020 – June 2020) – 5.50 hours • Arby Aiwazian (February 2020 – June 2020) – 3.60 hours	9.10
Pre-Lawsuit Investigation of the Merits of Plaintiff Teresa Bond’s (“Plaintiff Bond”) Claims and the Merits of the Claims of the Putative Class Members • Edwin Aiwazian (February 2020 – June 2020) – 3.80 hours • Arby Aiwazian (February 2020 – June 2020) – 3.50 hours • Elizabeth M. R-H Parker-Fawley (February 2020 – June 2020) – 1.20 hours	8.50
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendants Hanger, Inc., Hanger Orthopedic Group, Inc., Hanger Prosthetics & Orthotics, Inc., Hanger Prosthetics & Orthotics West, Inc., Hanger Fabrication Network, LLC, and Hanger P&O West (collectively, “Defendants”) with Respect to Plaintiff Bond and the Aggrieved Employees • Edwin Aiwazian (February 2020 – June 2020) – 4.50 hours • Arby Aiwazian (February 2020 – June 2020) – 4.10 hours	8.60

Pre-Notice Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California With Respect to Plaintiff Reyneiro Larios (“Plaintiff Larios”) and the Aggrieved Employees • Edwin Aiwarzian (February 2021 – June 2021) – 3.10 hours • Arman Marukyan (February 2021 – June 2021) – 4.40 hours	7.50
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendants With Respect to Plaintiff Larios and the Aggrieved Employees • Edwin Aiwarzian (February 2021 – June 2021) – 4.20 hours • Arman Marukyan (February 2021 – June 2021) – 4.30 hours	8.50
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, Wage Orders, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials • Edwin Aiwarzian (February 2020 – June 2022) – 3.50 hours • Elizabeth M. R-H Parker-Fawley (February 2020 – October 2021) – 4.10 hours	7.60
Investigation of Defendants, Their Products and Services, Their Business Relationships, and the Industries/Markets in Which They Operate • Edwin Aiwarzian (February 2020 – June 2022) – 3.50 hours • Arby Aiwarzian (February 2020 – June 2022) – 3.90 hours	7.40
Investigation of Defendants’ Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees • Edwin Aiwarzian (February 2020 – June 2022) – 3.80 hours	3.80
Investigation, Research, and Analysis Regarding Defendants’ Executives, Officers, and Leadership With a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity • Edwin Aiwarzian (February 2020 – June 2022) – 4.20 hours	4.20

Analysis of Competitors in Various Relevant Geographic Areas Within Which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures With the Policies, Practices, and Procedures of Defendants' Competitors • Arby Aiwazian (February 2020 – June 2022) – 4.80 hours	4.80
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendants in California During the Class Period, Including Layout, Configuration, and Any Differences Between Them (If Applicable) to Assess Whether Individual Issues Predominate Over Common Issues • Edwin Aiwazian (February 2020 – June 2022) – 4.30 hours	4.30
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other Postings and Reviews Regarding Defendants in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks • Edwin Aiwazian (February 2020 – June 2022) – 5.60 hours	5.60
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California • Edwin Aiwazian (February 2020 – June 2022) – 5.10 hours	5.10

Research and Investigation Re: Defendants’ Written and Non-Written Policies, Practices, and Procedures Relating to Operating Hours, Opening and Closing Procedures, Customer and Patient Service, Productivity Quotas, Production Deadlines, Scheduling and Attendance, Data Entry/Reporting/Charting, Timekeeping, Meal/Rest Breaks, On-Premises Breaks, Break Areas, Non-Discretionary Bonuses/Incentive/Shift Differential Pay, Regular Rate Calculation, Overtime Compensation, Dress Code/Uniform, Use of Personal Cell Phones, Use of Personal Vehicles, and Reimbursement of Business-Related Expenses • Edwin Aiwazian (February 2020 – June 2022) – 4.50 hours • Arby Aiwazian (February 2020 – June 2022) – 3.90 hours • Elizabeth M. R-H Parker-Fawley (February 2020 – October 2021) – 3.60 hours • Won Christina Chang (April 2020 – October 2020) – 3.10 hours • Arman Marukyan (February 2020 – June 2020) – 3.90 hours • Julia Franco (April 2022 – May 2022) – 4.30 hours • Weslina Hung (April 2022 – May 2022) – 4.60 hours	27.90
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendants Use to Conduct Everyday Business, Including Timekeeping, Payroll, Sales, Customer Relations Management, Scheduling, Call Distribution, Resource Management, Operations and Production Management, Maintenance, Quality Control, Inventory, Communications, Information and Technology, Patient Care/Health Information, Surveillance, Controlled Access, and Safety and Security Systems, With a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks • Edwin Aiwazian (February 2020 – June 2022) – 2.10 hours • Arby Aiwazian (February 2020 – June 2022) – 1.30 hours	3.40
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies • Edwin Aiwazian (February 2020 – June 2022) – 4.10 hours • Arby Aiwazian (February 2020 – June 2022) – 1.50 hours • Julia Franco (April 2022 – May 2022) – 3.10 hours	8.70

Research and Investigation Re: Post-<i>Duran v. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose Edwin Aiwazian (February 2020 – June 2022) – 4.50 hours	4.50
Meet and Communicate with Plaintiff Teresa Bond During the Case - Edwin Aiwazian (February 2020 – June 2022) – 4.10 hours - Arby Aiwazian (February 2020 – June 2022) – 4.50 hours - Elizabeth M. R-H Parker-Fawley (February 2020 – January 2021) – 2.10 hours - Won Christina Chang (April 2020 – January 2022) – 5.30 hours - Julia Franco (January 2022 – June 2022) – 4.30 hours - Weslina Hung (June 2022 – September 2022) – 4.20 hours - Janardana Burns (September 2022 – February 2023) – 5.20 hours - Selena Matavosian (February 2023 – March 2024) – 5.40 hours	35.10
Meet and Communicate with Plaintiff Reyneiro Larios Throughout the Pendency of the Case - Edwin Aiwazian (February 2021 – June 2022) – 3.80 hours - Arby Aiwazian (February 2021 – June 2022) – 3.50 hours - Won Christina Chang (February 2021 – January 2022) – 5.10 hours - Arman Marukyan (February 2021 – April 2021) – 4.30 hours - Julia Franco (January 2022 – June 2022) – 5.20 hours - Weslina Hung (June 2022 – September 2022) – 4.50 hours - Janardana Burns (September 2022 – February 2023) – 5.10 hours - Selena Matavosian (February 2023 – March 2024) – 4.30 hours	35.80

Meet and Communicate With Plaintiff Jesse Zamarripa (“Plaintiff Zamarripa”) Throughout the Pendency of the Case • Edwin Aiwazian (April 2020 – October 2020) – 10.80 hours • Arby Aiwazian (April 2020 – October 2020) – 2.50 hours • Julia Franco (January 2022 – June 2022) – 8.70 hours • Janardana Burns (September 2022 – February 2023) – 5.90 hours • Selena Matavosian (February 2023 – March 2024) – 5.60 hours	33.50
Investigate, Meet, Communicate With, and/or Conduct Interviews of Putative Class Members and/or Percipient Witnesses • Edwin Aiwazian (February 2020 – June 2022) – 5.90 hours • Arby Aiwazian (February 2020 – June 2022) – 4.80 hours • Arman Marukyan (March 2021) – 1.10 hours • Cornelo Dilag (March 2021) – 5.40 hours • Julia Franco (May 2022 – June 2022) – 1.10 hours	18.30
Pleadings and Court Filings	
Research and Draft Plaintiff Bond’s Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on June 23, 2020) (Bond Action) • Edwin Aiwazian (April 2020 – June 2020) – 2.10 hours • Elizabeth M. R-H Parker-Fawley (April 2020 – June 2020) – 5.40 hours	7.50
Review Court’s Notice of Assignment to Department and Case Management Conference (filed on July 2, 2020) (Bond Action) • Edwin Aiwazian (July 8, 2020) – 0.10 hour	0.10

Review and Analyze Defendants Hanger Prosthetics & Orthotics, Inc. and Hanger P&O West Answer to Plaintiff's Complaint for Damages and Research Affirmative Defenses in the Answer (served on August 20, 2020) (Bond Action) Edwin Aiwazian (August 25, 2020) – 1.70 hours	1.70
Meet and Confer With Defendants' Counsel, and Draft Joint Case Management Statement (filed on August 21, 2020) (Bond Action) Elizabeth M. R-H Parker-Fawley (August 20, 2020 – August 21, 2020) – 1.50 hours	1.50
Review Court's Case Management Order (filed on August 25, 2020) (Bond Action) Elizabeth M. R-H Parker-Fawley (August 28, 2020) – 0.30 hour	0.30
Review Court's Minute Order Re: Court On Its Own Motion: Continues Case Management Conference Hearing (filed on August 27, 2020) (Bond Action) Elizabeth M. R-H Parker-Fawley (August 31, 2020) – 0.10 hour	0.10
Meet and Confer With Defendants' Counsel, and Draft Joint Case Management Statement (filed on October 20, 2020) (Bond Action) Elizabeth M. R-H Parker-Fawley (October 19, 2020 – October 20, 2020) – 1.50 hours	1.50
Draft Plaintiff Bond's Notice of Posting Jury Fees (filed on December 24, 2020) (Bond Action) Edwin Aiwazian (December 24, 2020) – 0.10 hour	0.10
Meet and Confer With Defendants' Counsel, and Draft Joint Case Management Statement (filed on January 11, 2021) (Bond Action) - Elizabeth M. R-H Parker-Fawley (January 8, 2021 – January 11, 2021) – 0.20 hour - Won Christina Chang (January 8, 2021 – January 11, 2021) – 1.30 hours	1.50

Draft Declaration of Won Christina Chang in Support of Parties' Response to Order to Show Cause Re Failure to File Joint Status Report Pursuant to CMO Filed 8/25/2020 (filed on January 12, 2021) (Bond Action) - Elizabeth M. R-H Parker-Fawley (January 11, 2021 – January 12, 2021) – 0.70 hour - Won Christina Chang (January 11, 2021 – January 12, 2021) – 0.90 hour	1.60
Review Court's Minute Order Re: Status Conference (filed on January 25, 2021) (Bond Action) Won Christina Chang (January 29, 2021) – 0.10 hour	0.10
Review Court's Notice of Order to Show Cause Hearing (filed on February 23, 2021) (Bond Action) Won Christina Chang (February 26, 2021) – 0.20 hour	0.20
Draft Declaration of Won Christina Chang in Support of Parties' Response to Order to Show Cause Re Failure to File Joint Status Report Five Court Days in Advance (filed on April 6, 2021) (Bond Action) - Elizabeth M. R-H Parker-Fawley (April 5, 2021 – April 6, 2021) – 1.10 hours - Won Christina Chang (April 2, 2021 – April 6, 2021) – 1.50 hours	2.60
Meet and Confer With Defendants' Counsel, and Draft Joint Case Management Statement (filed on April 6, 2021) (Bond Action) Won Christina Chang (April 5, 2021 – April 6, 2021) – 1.50 hours	1.50
Review Court's Minute Order (filed on April 7, 2021) (Bond Action) Won Christina Chang (April 12, 2021) – 0.10 hour	0.10
Review Court's Minute Order (filed on April 12, 2021) (Bond Action) Won Christina Chang (April 19, 2021) – 0.10 hour	0.10

Draft Plaintiff Larios' Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on June 25, 2021) (Larios Action) Edwin Aiwazian (April 2021 – June 2021) – 6.80 hours	6.80
Review Court's Order re: Delay in Scheduling Initial Case Management Conference (filed on June 25, 2021) (Larios Action) Edwin Aiwazian (June 30, 2021) – 0.10 hour	0.10
Review and Analyze Defendants' Answer to Plaintiff Larios' Complaint and Research Affirmative Defenses in Defendants' Answer (served on October 8, 2021) (Larios Action) Edwin Aiwazian (October 12, 2021) – 1.60 hours	1.60
Meet and Confer With Defendants' Counsel, and Draft Joint Case Management Statement (filed on October 14, 2021) (Bond Action) - Elizabeth M. R-H Parker-Fawley (October 13, 2021 – October 14, 2021) – 0.10 hours - Won Christina Chang (October 13, 2021 – October 14, 2021) – 1.10 hours	1.20
Draft Plaintiff Larios' Notice of Posting Jury Fees (filed on October 18, 2021) (Larios Action) Edwin Aiwazian (October 18, 2021) – 0.10 hour	0.10
Review Court's Minute Order Re: Status Conference (filed on October 20, 2021) (Bond Action) Won Christina Chang (October 25, 2021) – 0.10 hour	0.10
Review Court's Order Re: Case Management Conference (filed on February 23, 2022) (Larios Action) Edwin Aiwazian (March 1, 2022) – 0.10 hour	0.10

Meet and Confer With Defendants' Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on March 30, 2022) (Larios Action) Julia Franco (March 29, 2022 – March 30, 2022) – 1.40 hours	1.40
Review Court's Tentative Ruling Re: Case Management Conference (published on April 5, 2022) (Larios Action) Julia Franco (April 5, 2022) – 0.10 hour	0.10
Review Court's Order on Joint Stipulation to Continue Case Management Conference (filed on April 12, 2022) Julia Franco (April 14, 2022) – 0.10 hour	0.10
Review Court's Minute Order Re: Case Management Conference (filed on April 15, 2022) (Larios Action) Julia Franco (April 21, 2022) – 0.10 hour	0.10
Review Court's Notice of Department Reassignment for All Purposes (filed on May 2, 2022) (Bond Action) Julia Franco (May 6, 2022) – 0.10 hour	0.10
Draft Plaintiff Larios' Notice of Entry of Judgment or Order (filed on May 17, 2022) (Larios Action) Julia Franco (May 16, 2022) – 0.10 hour	0.10
Meet and Confer With Defendants' Counsel, and Draft Joint Stipulation to Continue Post-Mediation Status Conference; [Proposed] Order (filed on June 8, 2022) (Bond Action) - Edwin Aiwarzian (June 7, 2022 – June 8, 2022) – 0.20 hour - Weslina Hung (June 7, 2022 – June 8, 2022) – 1.30 hours	1.50
Review Court's Minute Order (filed on June 13, 2022) (Bond Action) Weslina Hung (June 21, 2022) – 0.10 hour	0.10

Review Court's Notice of Case Reassignment for All Purposes (filed on June 14, 2022) (Bond Action) Weslina Hung (June 21, 2022) – 0.10 hour	0.10
Meet and Confer With Defendants' Counsel, and Draft Joint Case Management Conference Statement and Notice of Settlement (filed on June 23, 2022) (Larios Action) Weslina Hung (June 22, 2022 – June 23, 2022) – 1.10 hours	1.10
Review Court's Tentative Ruling Re: Case Management Conference (published on June 27, 2022) (Larios Action) Weslina Hung (June 27, 2022) – 0.10 hour	0.10
Meet and Confer With Defendants' Counsel, and Draft Joint Status Report and Notice of Settlement (filed on July 13, 2022) (Bond Action) Weslina Hung (July 13, 2022) – 1.10 hours	1.10
Review Court's Minute Order (filed on July 20, 2022) (Bond Action) Weslina Hung (July 29, 2022) – 0.10 hour	0.10
Meet and Confer With Defendants' Counsel, and Draft Joint Status Conference Statement (filed on October 6, 2022) (Bond Action) - Joanna Ghosh (October 5, 2022 – October 6, 2022) – 0.20 hour - Janardana Burns (October 5, 2022 – October 6, 2022) – 0.90 hour	1.10
Review Court's Minute Order Re: Status Conference Re: Motion for Preliminary Approval (filed on October 6, 2022) (Bond Action) Janardana Burns (October 10, 2022) – 0.10 hour	0.10

Meet and Confer With Defendants' Counsel, and Joint Case Management Statement (filed on November 17, 2022) (Larios Action) • Janardana Burns (November 15, 2022) – 1.10 hours	1.10
Review Court's Tentative Ruling Re: Case Management Conference (published on November 18, 2022) (Larios Action) • Janardana Burns (November 18, 2022) – 0.10 hour	0.10
Review Court's Minute Order Re: Case Management Conference (filed on November 18, 2022) (Larios Action) • Janardana Burns (December 1, 2022) – 0.10 hour	0.10
Draft Plaintiff Bond's, Plaintiff Larios' and Plaintiff Jesse Zamarripa's (collectively, "Plaintiffs") First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on December 27, 2022); and Meet and Confer With Defendants' Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order Thereon (filed on December 16, 2022) (Larios Action) • Joanna Ghosh (October 2022 – December 2022) – 1.10 hours • Janardana Burns (October 2022 – December 2022) – 3.20 hours	4.30
Review Court's Order Granting Plaintiffs Leave to File First Amended Complaint (filed on December 22, 2022) (Larios Action) • Janardana Burns (December 23, 2022) – 0.10 hour	0.10
Meet and Confer With Defendants' Counsel, and Draft Joint Status Conference Statement (filed on December 27, 2022) (Bond Action) • Janardana Burns (December 29, 2022) – 0.80 hour	0.80

Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on December 28, 2022) (Larios Action)	0.10
Janardana Burns (December 28, 2022) – 0.10 hour	
Review Court's Order of Dismissal (filed on January 4, 2023) (Bond Action)	0.20
- Joanna Ghosh (January 9, 2023) – 0.10 hour - Janardana Burns (January 9, 2023) – 0.10 hour	
Draft Plaintiffs' Notice of Paying Complex Fee (filed on May 30, 2023) (Larios Action)	0.20
Selena Matavosian (May 30, 2023) – 0.20 hour	
Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on October 24, 2023) (Larios Action)	0.10
Selena Matavosian (October 23, 2023) – 0.10 hour	
Review Court's Notice of Department Relocation (filed on January 8, 2024) (Larios Action)	0.10
Selena Matavosian (January 16, 2024) – 0.10 hour	
Appearances	
Prepare for and Telephonically Attend Status Conference (November 2, 2022) (Bond Action)	2.50
Janardana Burns (November 2, 2022) – 2.50 hours	
Prepare for and Telephonically Attend Case Management Conference (November 18, 2022) (Larios Action)	0.50
Janardana Burns (November 18, 2022) – 0.50 hour	
Prepare for and Telephonically Attend Status Conference (January 4, 2023) (Bond Action)	1.10
Janardana Burns (January 4, 2023) – 1.10 hours	

Discovery and Deposition	
Draft Letter to Defendant Hanger Prosthetics & Orthotics, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Bond (served on February 27, 2020) Edwin Aiwarzian (February 27, 2020) – 1.90 hours	1.90
Review and Analyze Documents Produced by Defendant Hanger Prosthetics & Orthotics, Inc. in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Bond (served on March 13, 2020) Edwin Aiwarzian (March 18, 2020 – March 19, 2020) – 3.60 hours	3.60
Draft Plaintiff Bond’s Special Interrogatories (Set One) to Defendant Hanger Prosthetics & Orthotics, Inc. (served on September 9, 2020) (Bond Action) Won Christina Chang (September 8, 2020 – September 9, 2020) – 1.10 hours	1.10
Draft Plaintiff Bond’s Special Interrogatories (Set One) to Defendant Hanger P&O West (served on September 9, 2020) (Bond Action) Won Christina Chang (September 8, 2020 – September 9, 2020) – 0.90 hour	0.90
Review Defendant Hanger Prosthetics & Orthotics, Inc.’s Response to Plaintiff Bond’s Special Interrogatories (Set One) (served on October 14, 2020) (Bond Action) Won Christina Chang (October 21, 2020) – 0.60 hour	0.60
Review Defendant Hanger P&O West’s Response to Plaintiff Bond’s Special Interrogatories (Set One) (served on October 14, 2020) (Bond Action) Won Christina Chang (October 21, 2020) – 0.30 hour	0.30
Draft Letter to Defendant Hanger Prosthetics & Orthotics, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Larios (served on February 19, 2021) Edwin Aiwarzian (February 19, 2021) – 1.90 hour	1.90

Draft Letter to Defendant Hanger Prosthetics & Orthotics, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on March 12, 2021) Edwin Aiwarzian (March 12, 2021) – 1.90 hours	1.90
Review and Analyze Documents Produced by Defendant Hanger Prosthetics & Orthotics, Inc. in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Larios (served on March 19, 2021) Edwin Aiwarzian (March 26, 2021) – 5.70 hours	5.70
Draft Letter to Defendant Hanger Prosthetics & Orthotics, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Zamarripa (served on March 25, 2021) Edwin Aiwarzian (March 25, 2021) – 1.90 hours	1.90
Draft Letter to Defendant Hanger Prosthetics & Orthotics, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on March 31, 2021) Edwin Aiwarzian (March 31, 2021) – 1.90 hours	1.90
Review and Analyze Documents Produced by Defendant Hanger Prosthetics & Orthotics, Inc. in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on April 6, 2021) Edwin Aiwarzian (April 13, 2021) – 2.60 hours	2.60
Review and Analyze Documents Produced by Defendant Hanger Prosthetics & Orthotics, Inc. in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on April 14, 2021) Edwin Aiwarzian (April 21, 2021) – 2.90 hours	2.90

Review and Analyze Documents Produced by Defendant Hanger Prosthetics & Orthotics, Inc. in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Zamarripa (served on April 15, 2021) • Edwin Aiwarzian (April 21, 2021) – 3.10 hours	3.10
Draft Letter to Defendant Hanger Prosthetics & Orthotics, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on May 21, 2021) • Edwin Aiwarzian (May 21, 2021) – 1.90 hours	1.90
Draft Follow-Up Letter to Defendant Hanger Prosthetics & Orthotics, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on June 2, 2021) • Edwin Aiwarzian (June 2, 2021) – 2.10 hours	2.10
Review and Analyze Documents Produced by Defendant Hanger Prosthetics & Orthotics, Inc. in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on June 11, 2021) • Edwin Aiwarzian (June 18, 2021) – 4.10 hours	4.10
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Larios for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on April 5, 2021) • Edwin Aiwarzian (April 5, 2021) – 1.10 hours • Arman Marukyan (April 5, 2021) – 3.40 hours	4.50

Meet With, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel • Edwin Aiwazian (April 2020 – October 2020) – 2.10 hours • Arby Aiwazian (April 2020 – October 2020) – 2.50 hours • Elizabeth M. R-H Parker-Fawley (April 2020 – January 2021) – 3.10 hours • Brian J. St. John (March 2023 – March 2024) – 2.50 hours • Won Christina Chang (January 2021 – January 2022) – 2.20 hours • Julia Franco (January 2022 – June 2022) – 2.10 hours • Janardana Burns (September 2022 – February 2023) – 2.90 hours • Selena Matavosian (March 2023 – March 2024) – 2.10 hours	19.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources Prior to Originally Scheduled Mediation (Scheduled for September 30, 2021; cancelled by Defendants on September 8, 2021) and Re-Scheduled Mediation (Scheduled for May 5, 2022) • Edwin Aiwazian (November 2020 – April 2022) – 22.10 hours • Arby Aiwazian (November 2020 – April 2022) – 17.50 hours • Julia Franco (August 2021 – April 2022) – 19.20 hours • Weslina Hung (March 2022 – April 2022) – 16.80 hours	75.60
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling Exhibits in Support of Mediation Brief, Performing Damages and Penalties Analysis and Calculations, and Preparing PowerPoint Presentation (submitted on April 27, 2022) • Edwin Aiwazian (March 2022 – April 2022) – 7.50 hours • Arby Aiwazian (March 2022 – April 2022) – 10.30 hours • Julia Franco (March 2022 – April 2022) – 10.80 hours • Weslina Hung (March 2022 – April 2022) – 7.20 hours	35.80

Remotely Attend Mediation Session (May 4, 2022; Zoom Video Conference) - Arby Aiwazian (May 4, 2022) – 8.10 hours - Julia Franco (May 4, 2022) – 0.50 hour	8.60
Additional Discussions With, and Settlement Negotiations Through, Mediator; and Review and Analyze Mediator’s Proposal (Issued on June 8, 2022; Accepted on June 12, 2022) - Arby Aiwazian (May 2022 – June 2022) – 4.10 hours - Melisaa A. LeBlanc-Mansell (May 2022 – June 2022) – 4.50 hours	8.60
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action/PAGA Settlement (fully executed on August 17, 2022) Melissa A. LeBlanc-Mansell (July 2022 – August 2022) – 3.20 hours	3.20
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on April 26, 2023) and Notice of Class Action Settlement - Edwin Aiwazian (September 2022 – April 2023) – 0.50 hour - Joanna Ghosh (September 2022 – April 2023) – 6.50 hours - Janardana Burns (September 2022 – April 2023) – 7.80 hours - Giovani Pimentel-Galvan (September 2022 – April 2023) – 4.90 hours	19.70
Draft, Review, Revise, Negotiate, and Finalize Revised Notice of Class Action Settlement (finalized October 19, 2023) Selena Matavosian (October 19, 2023) – 0.10 hour	0.10
Monitor Settlement Notice Administration Process and Review Weekly Reports - Joanna Ghosh (October 2023 – March 2024) – 0.70 hours - Brian J. St. John (October 2023 – March 2024) – 2.40 hours - Selena Matavosian (October 2023 – March 2024) – 4.80 hours	7.90

Law and Motion	
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Selena Matavosian in Support Thereof, Declaration of Jesse Zamarripa in Support Thereof, Declaration of Reyneiro Larios in Support Thereof, Declaration of Teresa Bond in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on April 26, 2023) (Larios Action) • Brian J. St. John (February 2023 – April 2023) – 5.40 hours • Selena Matavosian (February 2023 – April 2023) – 16.90 hours	22.30
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on May 17, 2023) (Larios Action) • Joanna Ghosh (May 17, 2023) – 0.10 hour • Selena Matavosian (May 17, 2023) – 0.10 hour	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on May 18, 2023) (Larios Action) • Selena Matavosian (May 19, 2023) – 0.10 hour	0.10
Revise Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Selena Matavosian in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on June 5, 2023) (Larios Action) • Selena Matavosian (June 5, 2023) – 0.50 hour	0.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on August 3, 2023) (Larios Action) • Joanna Ghosh (August 3, 2023) – 0.20 hour • Selena Matavosian (August 3, 2023) – 0.20 hour	0.40

Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on August 4, 2023) (Larios Action) Selena Matavosian (August 11, 2023) – 0.10 hour	0.10
Review Declaration of D. Chad Anderton, and Research and Draft Plaintiffs' Supplemental Brief in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Selena Matavosian in Support Thereof, and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on September 15, 2023) (Larios Action) - Brian J. St. John (August 2023 – September 2023) – 2.50 hours - Selena Matavosian (August 2023 – September 2023) – 7.10 hours	9.60
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on October 4, 2023) (Larios Action) - Joanna Ghosh (October 4, 2023) – 0.10 hour - Selena Matavosian (October 4, 2023) – 0.10 hour	0.20
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on October 6, 2023) (Larios Action) Selena Matavosian (October 13, 2023) – 0.10 hour	0.10
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on October 19, 2023) (Larios Action) - Joanna Ghosh (October 19, 2023) – 0.50 hour - Selena Matavosian (October 19, 2023) – 0.60 hour	1.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on October 20, 2023) (Larios Action) Selena Matavosian (October 23, 2023) – 0.10 hour	0.10

Draft Plaintiffs' Further Supplemental Declaration of Selena Matavosian in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on October 20, 2023) (Larios Action) Selena Matavosian (October 2023) – 0.30 hour	0.30
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on October 23, 2023) (Larios Action) Selena Matavosian (October 25, 2023) – 0.10 hour	0.10
Meet and Confer With Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiffs' Hearing and Deadline to File Plaintiffs' Motion for Final Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on February 8, 2024) (Larios Action) - Joanna Ghosh (February 8, 2024) – 0.10 hour - Selena Matavosian (February 8, 2024) – 1.20 hour	1.30
Review Court's Order on Joint Stipulation to Continue Plaintiffs' Hearing and Deadline to File Plaintiffs' Motion for Final Approval of Class Action Settlement and Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on February 15, 2024) (Larios Action) Selena Matavosian (February 15, 2024) – 0.10 hour	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Incentive Awards, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on March 27, 2024) (Larios Action) - Joanna Ghosh (February 2024 – March 2024) – 7.60 hours - Brian J. St. John (February 2024 – March 2024) – 2.50 hours - Selena Matavosian (February 2024 – March 2024) – 9.70 hours - Ryan Slinger (February 2024 – March 2024) – 3.60 hours	23.40
Total Hours:	583.00

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Bond v. Hanger Prosthetics and Orthotics, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/7/2020	U.S. Postmaster	Postage	6.95
6/8/2020	Legal Document Server, Inc.	Attorney Service	130.00
6/8/2020	Riverside Superior Court	Complaint Filing Fee	450.00
6/8/2020	Riverside Superior Court	Complex Filing Fee	1,000.00
8/3/2020	Legal Document Server, Inc.	Attorney Service	220.00
8/21/2020	Legal Document Server, Inc.	Attorney Service	130.00
10/19/2020	Legal Document Server, Inc.	Attorney Service	130.00
12/24/2020	Legal Document Server, Inc.	Attorney Service	135.25
12/24/2020	Riverside Superior Court	Jury Fee	150.00
1/11/2021	Legal Document Server, Inc.	Attorney Service	130.00
1/12/2021	Legal Document Server, Inc.	Attorney Service	150.00
1/31/2021	Simpluris, Inc.	Notice Mailing	338.50
2/23/2021	Riverside Superior Court	Document Download Fee	12.00
3/12/2021	U.S. Postmaster	Postage	7.00
3/25/2021	U.S. Postmaster	Postage	7.00
4/6/2021	Legal Document Server, Inc.	Attorney Service	315.00
7/13/2021	General Logistics Systems US, Inc.	Courier Service	30.15
9/17/2021	First Mediation Corporation	Mediation Fee	9,000.00
10/14/2021	One Legal	Attorney Service	24.70
10/15/2021	One Legal	Attorney Service	15.39
1/25/2022	Riverside Superior Court	Document Download Fee	1.00
4/22/2022	FedEx Express	Courier Service	54.16
5/10/2022	Legal Document Server, Inc.	Attorney Service	11.00
5/12/2022	Legal Document Server, Inc.	Attorney Service	14.80
6/8/2022	Legal Document Server, Inc.	Attorney Service	16.20
6/8/2022	Riverside Superior Court	Stipulation & Order Fee	20.00
6/13/2022	First Mediation Corporation	Supplemental Mediator's Fee	7,500.00
6/24/2022	Legal Document Server, Inc.	Attorney Service	11.00
6/29/2022	Legal Document Server, Inc.	Attorney Service	14.80
7/14/2022	Legal Document Server, Inc.	Attorney Service	15.55
7/29/2022	Legal Document Server, Inc.	Attorney Service	15.55
10/7/2022	Legal Document Server, Inc.	Attorney Service	15.55
10/10/2022	Riverside Superior Court	Document Download Fee	5.00
12/27/2022	Legal Document Server, Inc.	Attorney Service	15.55
Total:			20,092.10

LAWYERS for JUSTICE PC CASE COST DETAIL
Larios v. Hanger, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/19/2021	U.S. Postmaster	Postage	7.00
4/5/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
4/5/2021	U.S. Postmaster	Postage	7.20
6/25/2021	Legal Document Server, Inc.	Attorney Service	145.23
6/25/2021	Sacramento Superior Court	Complaint Filing Fee	435.00
9/3/2021	ProLegal	Attorney Service	339.80
10/18/2021	Legal Document Server, Inc.	Attorney Service	116.38
10/18/2021	Sacramento Superior Court	Jury Fee	150.00
3/24/2022	Legal Document Server, Inc.	Attorney Service	120.00
3/30/2022	Legal Document Server, Inc.	Attorney Service	121.35
3/30/2022	Sacramento Superior Court	Stipulation & Order Fee	20.00
3/30/2022	Legal Document Server, Inc.	Attorney Service	35.00
5/17/2022	Legal Document Server, Inc.	Attorney Service	120.00
6/23/2022	Legal Document Server, Inc.	Attorney Service	120.00
11/3/2022	Legal Document Server, Inc.	Attorney Service	125.00
11/17/2022	Legal Document Server, Inc.	Attorney Service	105.00
11/17/2022	Sacramento Superior Court	Document Download Fee	1.00
12/1/2022	Sacramento Superior Court	Document Download Fee	1.00
12/16/2022	Legal Document Server, Inc.	Attorney Service	146.35
12/16/2022	Sacramento Superior Court	Stipulation & Order Fee	20.00
12/23/2022	Sacramento Superior Court	Attorney Service	20.20
12/27/2022	Legal Document Server, Inc.	Attorney Service	145.00
12/28/2022	Legal Document Server, Inc.	Attorney Service	125.00
4/26/2023	Legal Document Server, Inc.	Attorney Service	271.67
4/26/2023	Sacramento Superior Court	Motion Fee	60.00
5/30/2023	Legal Document Server, Inc.	Attorney Service	194.50
5/30/2023	Sacramento Superior Court	Complex Filing Fee	1,000.00
6/5/2023	Legal Document Server, Inc.	Attorney Service	247.67
6/5/2023	Sacramento Superior Court	Motion Fee	60.00
9/15/2023	Legal Document Server, Inc.	Attorney Service	256.50
10/20/2023	Legal Document Server, Inc.	Attorney Service	146.39
10/20/2023	Sacramento Superior Court	Stipulation & Order Fee	20.00
10/24/2023	Legal Document Server, Inc.	Attorney Service	145.00
Total:			4,902.24