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Attorneys for Plaintiffs and the Class

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

ARNOLD SAURIN, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;
AJAYZEAU BROWN, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiffs,

vs.

VALLEY PRESBYTERIAN HOSPITAL, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendant.

Case No.: 21STCV22597

Honorable William F. Highberger
Department SSC10

CLASS ACTION

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

[Plaintiffs' Motion for Final Approval of Class
Action Settlement, Attorneys' Fees and Costs,
and Enhancement Payments; Plaintiffs'
Opposition to Objection to Settlement Filed by
Class Member Mohammed Tekfaoui;
Declarations of Class Counsel (Edwin
Aiwaizian and Brian J. St. John); Declarations
of Class Representatives (Arnold Saurin and
Ajayzeau Brown); Declaration of Settlement
Administrator (Jennifer Beliveau); and
[Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: March 11, 2024
Time: 11:00 a.m.
Department: SSC10

Complaint Filed: June 15, 2021
FAC Filed: August 30, 2023
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 Arnold Saurin and Ajayzeau Brown (together “Plaintiffs”) and the Class in the above-captioned action. 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 thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On September 19, 2023, in Department SSC10 of the above-entitled Court, the Honorable William F. Highberger preliminarily approved the Class, Collective, and PAGA Representative Action Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between the Plaintiffs and Defendant Valley Presbyterian Hospital (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Arnold Saurin and Ajayzeau Brown to represent the Class (together, “Class Representatives”). The Court also preliminarily appointed 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”), and 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 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 Enhancement Payments (“Motion for Final Approval”), no objections have been raised regarding the terms of the Settlement, amount of the settlement recovery, or any disbursements or allocations therefrom. A single objection has been asserted, which concedes that the Settlement can be granted approval, but raises an irrelevant attack on counsel, which is devoid of merit and is not based on any conduct by counsel in the case nor result or outcome in the case. For the reasons discussed in the accompanying Plaintiffs’ Opposition to Objection to Settlement Filed by Class Member Mohammed Tekfaoui and

Declaration of Edwin Aiwarzian in Support of Plaintiffs' Opposition to Objection to Settlement
Filed by Class Member Mohammed Tekfaoui, the objection lacks merit and should be overruled
and denied in its entirety.

WORK PERFORMED BY LAWYERS FOR JUSTICE, PC

4. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$1,570,800.00, which is thirty-three percent (33%) of the original Total Settlement Amount of \$4,760,000.00 (which was increased by \$176,563.22 to \$4,936,563.22 pursuant to Section V.A.2 of the Settlement Agreement). Pursuant to the contingency-fee agreements entered into by and between Plaintiffs and Lawyers for Justice, PC, Plaintiffs have each agreed to a contingency fee of at least thirty-three percent (33%) of the recovery.

5. The attorneys' fees that are sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation of the case; (5) the value of the settlement that Class Counsel has achieved; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to the case. The nature of the work performed, skill exercised, and the outcome in this matter—which involves an outstanding monetary recovery involving an **escalated Total Settlement Amount of \$4,936,563.22** (with a Class Settlement Fund of **at least \$2,812,622.47 to be paid to Settlement Class Members** with an average payment of approximately \$839.25 per Settlement Class Member, a **payment of \$125,000.00 to PAGA Group Members** with an average payment of \$37.72 per PAGA Group Member, and **payment of \$375,000.00 to the State of California**)—support the percentage fee sought and the application of a lodestar multiplier.

6. 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 case, 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 **644.70 hours** performing tasks

1 and obtaining recovery in this matter. Attached hereto as “**EXHIBIT A**” is an Attorney Task and
2 Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers
3 *for Justice*, PC, and the time incurred in performing those services. The hours include work done
4 by myself and several other attorneys at Lawyers *for Justice*, PC. Additionally, separate from the
5 hours of work referenced herein and in the attached chart, Lawyers *for Justice*, PC had litigation
6 support personnel actively engaged in assisting with the prosecution of this matter.

7 7. The work performed in this matter, the background of Lawyers *for Justice*, PC, as
8 well as the individual backgrounds, training, and experience of the attorneys who worked on this
9 matter, in litigating complex wage-and-hour cases, and in particular, employment class actions
10 and representative actions, support a reasonable blended hourly rate of compensation at the rate of
11 at least \$850 per hour for work performed by Lawyers *for Justice*, PC. Lawyers *for Justice*, PC
12 has been awarded attorneys’ fees, compensating the firm at the rate of at least \$850 per hour for
13 legal services performed, by courts granting approval of settlements in other wage-and-hour class
14 action and/or representative action cases: final approval of the class and representative action
15 settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No.
16 19STCV01591) was granted on July 8, 2021, and the award of attorneys’ fees involved
17 compensation at the rate of \$936.47 per hour; final approval of the class and representative action
18 settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No.
19 BC715157) was granted on April 20, 2021, and the award of attorneys’ fees involved
20 compensation at the rate of \$919.57 per hour; and final approval of the class and representative
21 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
22 SCV258764) was granted on February 6, 2019, and the award of attorneys’ fees involved
23 compensation at the rate of \$855.96 per hour.

24 **EXPERIENCE AND ADEQUACY OF**
25 **LAWYERS *for Justice*, PC**

26 8. For over a decade, Lawyers *for Justice*, PC has almost exclusively focused on the
27 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
28 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for Justice*, PC

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

12 9. Edwin Aiwazian is a Managing Member and Shareholder of *Lawyers for Justice,*
13 *PC.* He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
14 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
15 extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute
16 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
17 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October
18 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During
19 the summer of 2000, he studied Legal Writing at Harvard University. From approximately
20 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable
21 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From
22 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the
23 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
24 In December of 2004, he obtained a license to practice law from the California State Bar. Since
25 in or around October of 2008, through his work at *Lawyers for Justice, PC,* he has almost
26 exclusively focused on the prosecution of consumer and employment class actions. While
27 employed by *Lawyers for Justice PC,* he has argued over one hundred (100) motions, taken or
28 defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for

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

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

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1 11. 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 California.
6 He has worked on many wage and hour class action and PAGA representative matters, and his
7 work has included, *inter alia*, researching and drafting pleadings, administrative notice
8 exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging
9 in motion practice, claims evaluation and analysis, and making court appearances. Prior to
10 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 12. I am a Managing Member of Lawyers *for* Justice, PC. I received a Bachelor of Arts
15 degree from California State University, Los Angeles in 2006, a Master of Science degree from
16 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University
17 Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since
18 2013) and am admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy
19 Court for the Central District of California, and the U.S. Supreme Court. I have taken and
20 defended dozens of depositions and successfully handled motion practice in class action cases
21 regarding discovery (including and not limited to, regarding class contact information), class
22 certification (both contested class certification and stipulated class certification), arbitration
23 agreements, coordination, and intervention. I have successfully handled briefing and oral
24 argument on appeal and obtained notable decisions regarding the Private Attorneys General Act
25 and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9
26 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied
27 (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). I have significant
28 experience with class actions, including and not limited to working on cases to obtain class

1 certification through contested motion practice and working on cases in the post-certification stage
2 (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation
3 in conjunction with co-counsel in a case involving a certified class consisting of approximately
4 2,600 individuals). I also have extensive experience with class action and/or representative action
5 settlements, and have handled this process in over three hundred (300) cases. Under Edwin
6 Aiwasian, Arby Aiwasian, and my supervision, Lawyers *for* Justice, PC has handled the class
7 certification and court approval process for hundreds of class action and/or representative action
8 matters that have successfully resolved. I am a member of the California Employment Lawyers
9 Association.

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

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

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

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

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

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

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

11 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
12 wage-and-hour class and PAGA representative action against a national wholesale distributor of
13 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
14 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
15 representative action settlement. The Sacramento County Superior Court Case Number is 34-
16 2012-00136285.

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

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

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

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

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

17 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
18 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
19 involving allegations of misclassification of the “Department Manager” position. On August 12,
20 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class. On
21 August 6, 2019, the court granted final approval of the class action settlement. The Alameda
22 County Superior Court Case Number is RG13680477.

23 m) LFJ represented the plaintiff in a PAGA representative action against a real
24 estate and property management company, on behalf of non-exempt employees. On November 4,
25 2016, the court granted approval of the PAGA representative action settlement. The Orange
26 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

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

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

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

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

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

11 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
12 representative action against a food company on behalf of non-exempt employees. On June 30,
13 2017, the court granted final approval of the class and PAGA representative action settlement. The
14 Sacramento County Superior Court Case Number is 34-2015-00175871.

15 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a chocolate company on behalf of non-exempt employees. On July
17 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
18 The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

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

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

26 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 PAGA representative action against a global provider of products and services to the energy
28 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court

1 granted approval of the PAGA representative action settlement. The Kern County Superior Court
2 Case Number is S-1500-CV-280215-SDC.

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

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

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

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

24 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
25 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
26 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
27 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
28 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval

1 of the PAGA representative action settlement. The San Diego County Superior Court Case
2 Number is 34-2015-00175330.

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

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

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

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

25 nn) LfJ represents the plaintiffs in a wage-and-hour class action against a
26 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the
27 restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July
28 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The

Los Angeles County Superior Court Case Number is BC707670.

**LITIGATION COSTS AND EXPENSES INCURRED BY
LAWYERS FOR JUSTICE, PC**

14. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation and will not receive any compensation until a recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$13,640.75** in litigation costs and expenses incurred in the case, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of the case and to obtain the Settlement.

15. I submit that the settlement is fair, reasonable, and adequate, and in the best interests of Plaintiffs, the Class Members, PAGA Group Members, and the State of California.

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

Executed this 15th day of February 2024, at Glendale, California.



Joanna Ghosh

EXHIBIT A

ARNOLD SAURIN, ET AL. V. VALLEY PRESBYTERIAN HOSPITAL
Los Angeles County Superior Court Case No. 21STCV22597

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, and Commonality	12.50
Pre-Lawsuit Investigation of the Merits of Plaintiffs Arnold Saurin (“Plaintiff Saurin”) Claims and the Merits of the Claims of the Putative Class Members	11.50
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Valley Presbyterian Hospital (“Defendant”) with Respect to the Damages Sustained by Plaintiff Saurin and the Putative Class Members	9.50
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 Saurin and the Aggrieved Employees	8.50
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to the Employment of Plaintiff Saurin and the Aggrieved Employees	7.50
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, IWC Wage Orders, Representative PAGA, Class Certification, and Manageability in California, Including all New and Relevant Enforcement Guidance and Division of Labor Standard Enforcement (DLSE) Materials	8.50
Investigation of Defendant, Its Business Relationships, Its Licenses/Registrations, and the Industry in which It Operates	6.50

Investigation of Defendant's Organizational, Corporate, and Executive Reporting Structures, as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	4.10
Investigation Regarding Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues to Evaluate Willfulness and Uniformity, and Research and Analysis of Defendant's Past and Recent Litigation History Involving Labor, Wage-and-Hour, and Other Related Employment Issues and History of Investigations By and/or Proceedings in, as well as Self-Disclosures to, Administrative/Regulatory Bodies	5.50
Analysis of Competitors in Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	4.50
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period (e.g., Spanning Clinical Services, Administrative/Hospital Operations, Janitorial/Facilities Management, Culinary, Transportation, etc.), Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	7.80
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, Patient and Consumer Ratings and Reviews, and Other Online Postings Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	5.20
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members and Aggrieved Employees Worked Throughout California	5.90

Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Scheduling, Timekeeping, Automated Time/Meal/Rest Attestations, Rounding, Required Recordkeeping and Notices, Meal/Rest Breaks, On-Premises Breaks, Auto-Deduction of Meals, Meal/Rest Premiums, Meal/Rest Waivers (6-Hour, 12-Hour, Less Than 12 Hours, and Non-Health Care), On-Duty Meal Period Agreement, Non-Discretionary Bonus/Incentive/Shift Differential Pay, Regular Rate Calculation, Overtime Compensation, Alternate Workweek Schedules, Day of Rest, On-Call, Reporting Time Pay, Sick Leave/Pay, Emergencies, Health and Safety, COVID-19 Protocols and Screenings, Donning and Doffing, Dress Code, Use of Personal Cell Phones, and Reimbursement of Business-Related Expenses	18.50
Research and Investigation Re: Various Software Programs, Applications, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Patient Care, Health Information Management, Document and Information Management, Communications, Timekeeping, Inventory, Resource Management, Phone/Call Distribution, Scheduling, Surveillance, Controlled Access, and Security Systems with a Focus on What Records (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	3.90
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	8.10
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	5.20
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' and Aggrieved Employees' Work	8.50
Review Register of Actions and Filings in <i>Latosha Austin v. Valley Presbyterian Hospital</i> , Los Angeles Superior Court, Case No. 21STCV22288	2.50
Review Register of Actions and Filings in <i>Evelyn Sosa v. Valley Presbyterian Hospital</i> , Los Angeles Superior Court, Case Nos. 22STCV40798 and 23STCV05290	2.90

Review Register of Actions and Filings in <i>Quirico Pedro v. Valley Presbyterian Hospital</i> , Los Angeles Superior Court, Case No. 23STCV12270	2.30
Communicate with Plaintiff Saurin During the Pendency of the Case	38.50
Communicate with Plaintiff Ajayzeau Brown (“Plaintiff Brown”) During the Pendency of the Case	27.50
Investigate and/or Communicate with Putative Class Members and Percipient Witnesses	16.50
Pleadings and Court Filings	
Draft Plaintiff Saurin’s Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on June 15, 2021)	8.10
Review Court’s Notice of Case Assignment (filed on June 15, 2021)	0.10
Review Court’s Minute Order Re: Setting Initial Status Conference (filed on June 28, 2021)	0.10
Review Court’s Initial Status Conference Order (filed on June 28, 2021)	0.20
Review Defendant’s Notice of Appearance (filed on July 20, 2021)	0.10
Review Defendant’s Peremptory Challenge to Judicial Officer (Code Civ. Proc., Section 170.6) (filed on July 20, 2021)	0.10
Review Court’s Minute Order Re: Peremptory Challenge to Judicial Officer (Code Civ. Proc., Section 170.6) (filed on July 23, 2021)	0.10
Review Defendant’s Notice of Ruling Re: Court’s July 23, 2021 Minute Order (filed on July 27, 2021)	0.10
Draft Plaintiff Saurin’s Peremptory Challenge to Judicial Officer (Code Civ. Proc., Section 170.6) (filed on August 3, 2021)	0.30

Review Court's Minute Order Re: Case Reassignment (filed on August 6, 2021)	0.10
Review Court's Minute Order Re: Peremptory Challenge to Judicial Officer (Code Civ. Proc., Section 170.6) (filed on August 6, 2021)	0.10
Draft Plaintiff Saurin's Notice of Ruling Re: Court's August 6, 2021 Minute Order (filed on August 17, 2021)	0.20
Review Defendant's Notice of Related Case (filed on October 6, 2021)	0.10
Review Court's Minute Order Re: Initial Status Conference Order (filed on October 7, 2021)	0.10
Review Defendant's Notice of Related Case (filed on October 18, 2021)	0.10
Review Court's Minute Order (filed on October 26, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Initial Status Conference (filed on December 23, 2021)	1.50
Review Court's Order Granting Stipulation to Continue Initial Status Conference (filed on December 23, 2021)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on July 27, 2022)	0.10
Review Court's Minute Order Re: Nunc Pro Tunc Order (filed on July 27, 2022)	0.10
Review Court's Minute Order Re: Further Status Conference (filed on August 24, 2022)	0.10
Review Court's Message Board Posting Re: Time Change for Sept. 21, 2022 (submitted on September 15, 2022)	0.10
Review Court's Message Board Posting Re: Time Change for Sept. 21, 2022 (submitted on September 20, 2022)	0.10

Review Court's Minute Order Re: Further Status Conference (filed on September 21, 2022)	0.10
Review Defendant's Notice of Order to Show Cause Re: Related Case (filed on September 28, 2022)	0.10
Draft Plaintiffs' Response to Order to Show Cause Re: Reconsider Relating <i>Austin</i> Case (21STCV22288) (filed on October 5, 2022)	1.90
Review Court's Message Board Posting Re: Order to Show Cause Taken Off Calendar (submitted on October 7, 2022)	0.10
Review Court's Minute Order Re: Order to Show Cause Re: Reconsider Relating <i>Austin</i> Case (21STCV22288) (filed on October 10, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on January 11, 2023)	1.40
Review Court's Message Board Posting Re: Order Vacating Hearing on January 18, 2023 (submitted on January 17, 2023)	0.10
Review Court's Message Board Posting Re: Continuance Request Granted (submitted on January 17, 2023)	0.10
Review Court's Minute Order Re: Court Order Vacating Hearing on January 18, 2023 (filed on January 18, 2023)	0.10
Review Defendant's Notice of Related Case (filed on May 19, 2023)	0.20
Review Court's Minute Order Re: Notice of Related Case (filed on June 8, 2023)	0.10
Review and Analyze Quirico Pedro's Opposition/Objection to Notice of Related Case Filed by Defendant and Declaration of Quirico Pedro in Support Thereof (filed on September 28, 2023)	1.80

Draft Plaintiff Saurin and Plaintiff Brown's (together, "Plaintiffs") First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on August 30, 2023)	4.90
Appearances	
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (August 16, 2023)	0.70
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (September 15, 2023)	0.70
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payments (March 11, 2024) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Arnold Saurin (served on January 21, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Arnold Saurin (served on March 9, 2021)	5.40
Draft Plaintiffs' Form Interrogatories - General (Set One), Request for Admissions (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on May 16, 2022)	7.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ajayzeau Brown (served on June 13, 2022)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ajayzeau Brown (served on July 18, 2022)	4.80

Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Arnold Saurin for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on April 5, 2021)	4.70
Draft Additional Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Arnold Saurin for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on January 3, 2023)	3.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	24.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant (approximately 78,300 pages), and Other Sources Prior to May 2022 Mediation • Employment and Operations Policies, Practices, and Procedures Documents • Employee Time Data • Employee Pay Data	108.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages Analysis/Calculations (submitted on May 2, 2022)	45.50
Remotely Attend Mediation Session (May 6, 2022; Zoom Video Conference)	14.50
Prepare for Zoom Meeting and Presentation Regarding Class Certification and Merits Issues for Purposes of Meeting and Settlement Negotiations with Defendant's Counsel (July 21, 2022)	12.50
Prepare for Meeting and Presentation Regarding Class Certification and Merits Issues for Purposes of Meeting and Settlement Negotiations with Defendant's Counsel (August 8, 2022)	14.50
Review and Analyze Additional Confidential Memorandum and Information, Data, and Documents Obtained from Meeting with Defendant's Counsel (August 8, 2022)	10.50

Review and Analyze Additional Confidential Memorandum and Information, Data, and Documents Obtained from Defendant's Counsel (August 15, 2022)	13.50
Prepare for Meeting and Presentation Regarding Class Certification and Merits Issues for Purposes of Meeting and Settlement Negotiations with Defendant's Counsel (August 17, 2022)	12.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed on November 3, 2022)	4.30
Draft, Review, Revise, Negotiate, and Finalize Class, Collective, and PAGA Representative Action Settlement and Release (executed on February 15, 2023) and Notice of Class Action Settlement	20.50
Law and Motion	
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Brian J. St. John in Support Thereof, Declaration of Arnold Saurin in Support Thereof, Declaration of Ajayzeau Brown in Support Thereof, and [Proposed] Order Thereon (filed on April 14, 2023)	21.50
Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Preliminary Approval (filed on May 4, 2023)	0.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on June 7, 2023)	0.10
Draft Plaintiffs' Supplemental Declaration of Brian J. St. John in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed] Order (filed on July 3, 2023)	1.10
Review Court's Message Board Posting Re: Hearing Continued Due to Calendar Congestion (submitted on July 28, 2023)	0.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on July 31, 2023)	0.10

Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on August 16, 2023)	0.20
Review Defendant's Notice of Ruling Re: Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on August 17, 2023) (filed on August 17, 2023)	0.30
Meet and Confer with Defendant's Counsel and Draft Revised Notice of Class Action Settlement; and Draft Further Supplemental Declaration of Brian J. St. John in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on August 30, 2023)	5.60
Review Court's Message Boarding Posting Re: Tentative Ruling Re: Plaintiffs' Motion for Preliminary Approval of Settlement (submitted on September 14, 2023)	0.20
Review Court's Minute Order Re: Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on September 15, 2023)	0.20
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on September 19, 2023)	0.20
Draft Plaintiffs' Notice of Entry of Order Granting Preliminary Approval of Class Action Settlement (filed on October 20, 2023)	0.10
Review and Analyze Objection to Settlement Filed by Class Member Mohammed Tekfaoui, Declaration of Mohammed Tekfaoui in Support Thereof, Declaration of Paul K. Haines in Support Thereof (filed on January 8, 2024)	2.50

Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payments, Declaration of Joanna Ghosh in Support Thereof, Declaration of Brian J. St. John in Support Thereof, Plaintiffs' Opposition to Objection to Settlement Filed by Mohammed Tekfaoui, Declaration of Edwin Aiwarzian in Support of Opposition to Objection to Settlement Filed by Mohammed Tekfaoui, and [Proposed] Final Approval Order and Judgment (filed on February 15, 2024) (Anticipated)	43.50
Total Hours:	644.70

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Saurin vs. Valley Presbyterian Hospital

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/21/2021	U.S. Postmaster	Attorney Service	\$7.50
4/5/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
4/5/2021	U.S. Postmaster	Postage	\$7.20
6/15/2021	Legal Document Server, Inc.	Attorney Service	\$180.23
6/15/2021	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
6/15/2021	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
7/7/2021	ProLegal	Attorney Service	\$100.30
7/27/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
8/3/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
8/17/2021	Legal Document Server, Inc.	Attorney Service	\$220.00
12/2/2021	Legal Document Server, Inc.	Attorney Service	\$15.20
12/15/2021	Ortman Mediation	Mediation Fee	\$6,666.67
12/23/2021	Legal Document Server, Inc.	Attorney Service	\$16.15
12/23/2021	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
2/7/2022	Ortman Mediation	Supplemental Mediation Fee	\$3,333.33
5/23/2022	Los Angeles Superior Court	Document Download Fee	\$13.80
6/20/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
10/6/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
10/11/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
11/9/2022	Case Anywhere LLC	Attorney Service	\$122.70
1/12/2023	Legal Document Server, Inc.	Attorney Service	\$140.95
2/9/2023	Case Anywhere LLC	Attorney Service	\$141.00
2/14/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
2/14/2023	Legal Document Server, Inc.	Attorney Service	\$17.30
4/17/2023	Legal Document Server, Inc.	Attorney Service	\$217.57
4/17/2023	Los Angeles Superior Court	Motion Fee	\$60.00
5/9/2023	Case Anywhere LLC	Attorney Service	\$183.00
7/3/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
8/6/2023	Case Anywhere LLC	Attorney Service	\$153.00
8/31/2023	Legal Document Server, Inc.	Attorney Service	\$32.30
9/18/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
10/20/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
11/4/2023	Case Anywhere LLC	Attorney Service	\$147.00
Total:			\$13,640.75