

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 Alberto Gonzalez and James Picarello and the Class

[Additional Counsel listed on following page]

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

ALBERTO GONSALEZ, individually, and on
behalf of other aggrieved employees pursuant to
the California Private Attorneys General Act;

Plaintiff,

vs.

CARLTON FORGE WORKS, a California
corporation; PRECISION CASTPARTS
CORP., an unknown business entity; and DOES
1 through 100, inclusive,

Defendants.

DONALD BENNETT, as an aggrieved
employee pursuant to the Private Attorneys
General Act ("PAGA"), on behalf of the State
of California and other aggrieved employees,

Plaintiff,

vs.

CARLTON FORGE WORKS, a California
corporation; PRECISION CASTPARTS
CORP., an Oregon corporation; WYMAN-
GORDAN COMPANY, a Massachusetts
corporation; and DOES 1 through 10 inclusive,

Defendants.

Case No.: 21CMCV00141

Honorable Fumiko Wasserman
Department B

CLASS ACTION

**DECLARATION OF JOANNA GHOSH
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT, CLASS
COUNSEL FEES PAYMENT, CLASS
COUNSEL LITIGATION EXPENSES
PAYMENT, AND CLASS
REPRESENTATIVE SERVICE
PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement, Class
Counsel Fees Payment, Class Counsel
Litigation Expenses Payment, and Class
Representative Service Payments;
Declaration of Class Counsel (Raul Perez);
Declarations of Class Representatives
(Alberto Gonzalez and James Picarello);
Declaration of Settlement Administrator
(Jennifer Beliveau); and [Proposed] Final
Approval Order and Judgment filed
concurrently herewith]

Reservation ID: Scheduled by Court
Date: March 19, 2024
Time: 8:30 a.m.
Department: B

**DECLARATION OF JOANNA GHOSH IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT, CLASS COUNSEL FEES PAYMENT, CLASS
COUNSEL LITIGATION EXPENSES PAYMENT, AND CLASS REPRESENTATIVE SERVICE
PAYMENTS**

JAMES PICARELLO, individually, an on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

CARLTON FORGE WORKS, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Gonsalez Action Filed:
Bennett Action Filed:
Picarello Action Filed:
Trial Date:

June 7, 2021
June 25, 2021
July 26, 2021
None Set

Raul Perez (SBN 174687)
Raul.Perez@capstonelawyers.com
CAPSTONE LAW APC
1875 Century Park East, Suite 1000
Los Angeles, California 90067
Telephone: (310) 556-4811
Facsimile: (310) 943-0396

Attorneys for Plaintiff Donald Bennett and the Class

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 Plaintiff Alberto Gonzalez in the action entitled *Alberto Gonzalez v. Carlton Forge Works, et al.*, Los Angeles County Superior Court Case No. 21CMCV00141 (“*Gonzalez Action*”) and Plaintiff James Picarello in the action entitled *James Picarello v. Carlton Forge Works, Inc.*, Los Angeles County Superior Court Case No. 21STCV27273 (“*Picarello Action*”), which are being settled along with *Donald Bennett v. Carlton Forge Works, et al.*, Los Angeles County Superior Court Case No. 21STCV23764 (“*Bennett Action*”) (together, the *Gonzalez Action*, *Picarello Action*, and *Bennett Action* are referred to as the “*Actions*”). 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 17, 2023, in Department B of the above-entitled Court, the Honorable Fumiko Wasserman preliminarily approved the Class and PAGA Action Settlement Agreement (“*Settlement*,” “*Agreement*,” or “*Settlement Agreement*”) entered into between Plaintiff Alberto Gonzalez, James Picarello, and Donald Bennett (collectively, “*Plaintiffs*”) and Defendants Carlton Forge Works, Carlton Forge Works Inc., Precision Castparts Corp., and Wyman-Gordon Company (collectively, “*Defendants*,” together with Plaintiffs referred to as the “*Parties*”) and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Alberto Gonzalez, James Picarello, and Donald Bennett as the representatives of the Class (collectively, “*Class Representatives*”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC and Capstone Law APC as counsel for the Class (together, “*Class Counsel*”). The Court approved and ordered the mailing of the Court Approved Notice of Class and PAGA Action Settlement and Hearing Date for Final Court Approval (“*Class Notice*”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc.

1 (“Simpluris” or “Administrator”) to serve as the third-party settlement administrator and handle
2 the notice and settlement administration process.

3 3. As of the date of filing the accompanying Motion for Final Approval of Class
4 Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment,
5 and Class Representative Service Payments (“Motion for Final Approval”), no Class Members
6 have objected to the Class Settlement or the request for Class Counsel Fees Payment, Class
7 Counsel Litigation Expenses Payment, Class Representative Service Payments, Administration
8 Expenses Payment, or allocation for penalties under the Private Attorneys General Act of 2004,
9 California Labor Code section 2698, *et seq.* (“PAGA”).

10 **WORK PERFORMED BY CLASS COUNSEL**

11 4. I and several other attorneys at Lawyers *for* Justice, PC have been actively
12 engaged in litigating this matter since prior to the commencement of Plaintiff Alberto
13 Gonzalez’s representative action under PAGA, the *Gonzalez* Action, on June 7, 2021. On
14 August 9, 2021, the *Gonzalez* Action and *Bennett* Action were deemed related and the *Gonzalez*
15 Action was designated as the lead case. The *Gonzalez* Action was consolidated with the *Bennett*
16 Action on January 20, 2022, and consolidated with the *Picarello* Action on December 20, 2022.

17 5. Since joining forces with Capstone Law APC, counsel for Plaintiff Donald
18 Bennett, who were pursuing the *Bennett* Action, we have worked cooperatively with them to
19 strategize and prosecute the cases. Our work with them has been a coordinated and combined
20 effort. Ultimately, Class Counsel’s efforts and the efforts of Plaintiffs have been successful in
21 reaching the Settlement.

22 6. Before initiating the *Gonzalez* Action and *Picarello* Action, Lawyers *for* Justice,
23 PC investigated and researched the facts and circumstances underlying the pertinent factual and
24 legal issues and applicable law. This required thorough discussions and interviews between
25 attorneys at our firm and Plaintiffs Alberto Gonzalez and James Picarello and research into the
26 various legal issues involved in the cases, namely, the current state of the law as it applied to
27 class certification, off-the-clock theory, meal and rest periods, representative PAGA claims,
28 wage-and-hour law and enforcement and penalties, Plaintiffs’ claims and allegations, and

1 potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined
2 that the claims of Plaintiffs Alberto Gonzalez and James Picarello were well-suited for class-
3 wide and/or representative adjudication owing to what appeared to be a common course of
4 conduct affecting a similarly situated group of current and former non-exempt, hourly-paid
5 employees of Defendant Carlton Forge Works, Inc. in California, who were not properly
6 compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business
7 expenses.

8 7. Collectively, Class Counsel conducted significant formal and informal discovery
9 and investigation into the facts of the cases, to assess the veracity, strength, and scope of the
10 claims, were preparing the *Picarello* Action for class certification, and were preparing the the
11 cases for trial prior to reaching the Settlement. The Parties exchanged a large volume of
12 information, documents, and data throughout the course of the litigation and in connection with
13 mediation and settlement negotiations. Class Counsel reviewed and analyzed a large volume of
14 information, data, and documents obtained from Plaintiffs, Defendants, and other sources.
15 Lawyers *for* Justice, PC propounded multiple sets of written discovery requests on Defendants
16 Carlton Forge Works and Precision Castparts Corp. (including, but not limited to: Form
17 Interrogatories – General (Set One), Special Interrogatories (Sets One and Two), and Requests
18 for Production of Documents (Sets One and Two)), and prepared and served multiple deposition
19 notices. The information, documents, and data reviewed and analyzed by Class Counsel
20 included, and were not limited to, Plaintiffs’ employment records, a sampling of Class
21 Members’ time and pay data, and documents regarding Defendant’s operations and employment
22 practices, policies, and procedures, among other information and documents. Class Counsel
23 developed liability, damages, and penalties valuation models in the course of litigation and in
24 connection with mediation and settlement negotiations, and met and conferred with Defendants’
25 counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, motion practice,
26 case management, discovery, and the production of information, documents, and data in the
27 course of litigation and mediation and settlement negotiations. Other work performed by Class
28 Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and

1 revising the pleadings, motion-related papers, the mediation brief, and settlement documents;
2 and preparing for and attending court proceedings and mediation and settlement negotiations,
3 among other tasks.

4 8. As outlined herein, the Parties have conducted significant investigation and formal
5 and informal discovery during the course of litigating the cases and mediation and settlement
6 negotiations. Class Counsel analyzed a large volume of information, documents, and data
7 obtained from Plaintiffs, Defendants, and other sources. The information, documents, and data
8 that were considered, provided a critical understanding of the nature of the work performed by
9 the Class Members and Aggrieved Employees, as well as Defendants' operations and
10 employment policies, practices, and procedures, and were used in analyzing liability, damages,
11 penalties, and valuation issues in connection with all phases of the litigation, and ultimately in
12 connection with the mediation and settlement negotiation process. Class Counsel also
13 performed research regarding applicable law, which is evolving as it relates to class certification,
14 manageability, off-the-clock theory, meal and rest periods, on-premises breaks, rounding,
15 representative PAGA claims and penalties, arbitration agreements, wage-and-hour law and
16 enforcement, Plaintiffs' claims and allegations, and Defendants' defenses thereto, as well as
17 facts discovered.

18 9. After conducting significant investigation of the facts and law during the
19 prosecution of the cases, counsel for the Parties engaged in extensive settlement negotiations to
20 try to resolve the cases. These efforts included participating in a formal, full-day mediation
21 conducted by Mark S. Rudy, Esq., a well-regarded mediator experienced in mediating complex
22 labor and employment matters. During all settlement discussions, the Parties conducted their
23 negotiations at arm's length in an adversarial position. In the course of mediation and settlement
24 negotiations, the Parties exchanged information, documents, and data, and discussed all aspects
25 of the case, including and not limited to, the risks and delays of further litigation, the risks to the
26 Parties of proceeding with class certification and trial, the law relating to class certification,
27 manageability, off-the-clock theory, meal and rest periods, on-premises breaks, rounding,
28 representative PAGA claims, arbitration agreements, 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 its counsel felt strongly about Defendants' ability to enforce its dispute resolution policy and related arbitration provisions, prevail on the merits, and avoid class certification and representative adjudication, while Plaintiffs and Class Counsel believed that they would be able to obtain relief in court, 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 must be arbitrated, 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.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$647,500.00, which is thirty-five percent (35%) of the Gross Settlement Amount of \$1,850,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs Alberto Gonzalez and James Picarello and Lawyers *for* Justice, PC, Plaintiffs Alberto Gonzalez and James Picarello have each agreed to contingency fees of at least thirty-five percent (35%) of the recovery.

11. 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 have shown; (4) the results that Class Counsel have achieved throughout the litigation; (5) the value of the settlement that Class Counsel have achieved in the cases; and (6) the other cases that Class Counsel have turned down in order to devote their time and efforts to the cases. The nature of the work performed, skill exercised, and the outcome in this matter—which involves an outstanding monetary recovery

1 involving a **Gross Settlement Amount of \$1,850,000.00** (with a Net Settlement Amount of **at**
2 **least \$946,610.15 to be paid to Participating Class Members** with an average payment of
3 approximately \$2,095.80 per Participating Class Member, a **payment of \$50,000.00 to**
4 **Aggrieved Employees** with an average payment of \$153.37 per Aggrieved Employee,
5 and **payment of \$150,000.00 to the State of California**)—support the percentage fee sought and
6 the application of a lodestar multiplier.

7 12. While not necessarily required to be demonstrated because the percentage fee is
8 proper for this settlement, Class Counsel have incurred many hours of work in connection with
9 prosecuting the cases such that the award of attorneys’ fees is also justified under a lodestar
10 analysis. Attorneys at Lawyers for Justice, PC have spent a total of **542.20 hours** performing
11 tasks and obtaining recovery in this matter. Attached hereto as “**EXHIBIT A**” is an Attorney
12 Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys
13 at Lawyers for Justice, PC and the time incurred in performing those services. The hours
14 attributable to Lawyers for Justice, PC include work done by several attorneys. Additionally,
15 separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation
16 support personnel actively engaged in assisting with the prosecution of this matter.

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

EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC

14. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is 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 focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

15. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern

to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers for Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers for Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers for Justice, PC has successfully obtained class certification by contested motion practice in approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or representative action cases.

16. Arby Aiwazian is a Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles

County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative cases have resulted in settlements that have been granted court approval, including and not limited to, those listed in paragraph 20 herein. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

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

18. Selena Matavosian is a Member of Lawyers *for* Justice, PC. She received a Bachelor of Science degree from California State University, Northridge in 2019 and earned a Juris Doctor degree from Southwestern Law School in 2022. She was admitted to practice law in California in 2022. She is admitted to practice before all courts of the State of California and all federal district courts in the State of California. She has worked on many wage-and-hour class action and PAGA representative cases, and her work on these cases has included researching and drafting pleadings and motions, administrative notice exhaustion, drafting,

negotiating, and finalizing stipulations and settlement agreements, claims evaluation and analysis, and making court appearances.

19. I am a Managing Member of Lawyers *for* Justice, PC. I received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since 2013) and am admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. 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.5th 175 (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 Aiwazian, Arby Aiwazian, 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**

20. 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.

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.

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

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

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

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

Council Coordination Proceeding Number is 4794.

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

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

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

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

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

p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer’s motion to compel arbitration, which resulted in a published opinion by the California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*

1 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
2 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
3 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
4 5046.

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

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

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

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

25 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
26 representative action against a food company on behalf of non-exempt employees. On June 30,
27 2017, the court granted final approval of the class and PAGA representative action settlement.
28 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.

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

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

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

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

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

1 BC498401.

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

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

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

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

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

26 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a national retailer of apparel and
28 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted

the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

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

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

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

///

1 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class action against manufacturer and supplier of power products and services
3 on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
4 motion for class certification and certified a class. On August 27, 2021, the court granted final
5 approval of the class action settlement. The San Diego County Superior Court Case Number is
6 37-2015-00025968-CU-OE-CTL.

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

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

16 **LITIGATION COSTS AND EXPENSES INCURRED BY**

17 **LAWYERS FOR JUSTICE, PC**

18 21. To date, Class Counsel have borne all of the risks and costs of litigation and will
19 not receive any compensation until recovery is obtained in this matter. Lawyers for Justice, PC
20 seeks reimbursement of **\$12,744.86** in litigation costs and expenses incurred in the *Gonsalez*
21 *Action* and *Picarello Action*, as reflected in "**EXHIBIT B**" attached hereto. These expenses
22 were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

23 **CLASS REPRESENTATIVE SERVICE PAYMENTS TO PLAINTIFFS**

24 22. In recognition of their efforts and work serving as the Class Representatives, the
25 Settlement provides for Class Representative Service Payments in the amount of \$10,000.00
26 each to Plaintiffs (for a total of \$30,000.00). The requested Class Representative Service
27 Payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort to
28 produce relevant documents and information, and provided facts and evidence to support the

prosecution of the claims. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would facilitate the pursuit of the cases. For example, Plaintiffs Alberto Gonzalez and James Picarello spent numerous hours speaking with Lawyers for Justice, PC about their claims, describing their work experiences with Defendants, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs Alberto Gonzalez, James Picarello, and Donald Bennett to receive \$10,000.00 each as reasonable Class Representative Service Payments, for their services in the cases, in addition to their individual settlement payments.

23. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiffs, Class Members, Aggrieved Employees, 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 26th day of February 2024, at Glendale, California.



Joanna Ghosh

EXHIBIT A

***ALBERTO GONSALEZ V. CARLTON FORGE WORKS, ET AL.* (“Gonsalez Action”)
Los Angeles County Superior Court Case No. 21CMCV00141**

***JAMES PICARELLO V. CARLTON FORGE WORKS, INC.* (“Picarello Action”)
Los Angeles County Superior Court Case No. 21STCV27273**

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	11.50
Pre-Lawsuit Investigation of the Merits of Plaintiff James Picarello’s (“Plaintiff Picarello”) Claims and the Merits of the Claims of the Putative Class Members	10.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Alberto Gonsalez’s (“Plaintiff Gonsalez”) (together, with Plaintiff Picarello, “Plaintiffs”) Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Aggrieved Employees	9.50
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendants Carlton Forge Works, Precision Castparts Corp., Carlton Forge Works, Inc., and Wyman-Gordon Company (together “Defendants”) with Respect to Plaintiffs, Putative Class Members, and Aggrieved Employees	10.80
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, Wage Orders, PAGA, Class Certification, and Arbitration Agreements in California, Including all New and Relevant DLSE Materials	8.50
Investigation of Defendants, Defendants’ Business Relationships, and the Industry in Which Defendants Operate	3.50

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	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	3.60
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	4.30
Research and Investigation Re: Location(s), Department(s), and/or Division(s) Owned, Managed, Serviced, and/or Operated by Defendants in California During the Class Period, Including Layout, Configuration, and Differences Between Them (if Applicable) to Assess Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	6.50
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	5.90
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California	5.10
Research and Investigation Re: Defendants' Written and Non-Written Policies, Practices, and Procedures Relating to Scheduling and Attendance, Performance Targets, Non-Discretionary Bonus/Incentive/Performance/Shift Differential Pay, Timekeeping, Rounding, Meal/Rest Breaks, Breakroom, On-Premises Breaks, Meal Waiver Agreements, Meetings, Equipment Check and Logging, Breakdowns Overtime Compensation, Maintenance and Repairs, Radio/Walkie-Talkies/Communication Devices, Donning and Doffing, Dress Code/Uniform, Steel-Toe Boots/Footwear, PPE, Tools/Supplies/Equipment, Use of Personal Cell Phones and Devices, Reimbursement of Business-Related Expenses, Dispute Resolution Policy (DRP)/Arbitration Provision(s), and DRP Opt-Out Process	16.50

Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendants Use to Conduct Everyday Business, Including Timekeeping, Communications, Resource Management, Operations and Production Management, Maintenance, Quality Control, 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	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	7.80
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, Including Research Regarding Which Experts to Retain and For What Purpose	5.20
Review Register of Actions, Docket, and Papers Filed in <i>Donald Bennett v. Carlton Forge Works, et al.</i> , Los Angeles County Superior Court Case No. 21STCV23764 (“Bennett Action”)	1.10
Meet and Communicate with Plaintiff Alberto Gonzalez During the Pendency of the Cases	48.50
Meet and Communicate with Plaintiff James Picarello During the Pendency of the Cases	49.50
Investigate, Meet and Communicate With, and/or Conduct Interviews of Putative Class Members, Aggrieved Employees, and Percipient Witnesses	10.50
Pleadings and Court Filings	
Draft Plaintiff Gonzalez’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on June 7, 2021) (Gonzalez Action)	7.50
Review Court’s Notice of Case Assignment (filed on June 7, 2021) (Gonzalez Action)	0.10
Review Court’s Notice of Case Management Conference (filed on June 8, 2021) (Gonzalez Action)	0.10
Review Court’s Notice of Case Reassignment and Order for Plaintiff to Give Notice (Dates Remain) (filed on July 1, 2021) (Gonzalez Action)	0.10

Draft Plaintiff Picarello's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on July 26, 2021) (Picarello Action)	7.80
Review Court's Notice of Case Assignment (filed on July 26, 2021) (Picarello Action)	0.10
Review Defendants' Notice of Related Case (served on July 28, 2021) (Gonzalez Action)	0.10
Review Defendants Carlton Forge Works and Precision Castparts Corp.'s Answer to Plaintiff Gonzalez's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq and Legal Research and Analysis of Affirmative Defenses in Defendants Carlton Forge Works and Precision Castparts Corp.'s Answer (served on July 28, 2021) (Gonzalez Action)	1.60
Review Court's Minute Order Re: Defendants' Notice of Related Case with Case No. 21STCV23764 (filed on August 9, 2021) (Gonzalez Action)	0.10
Review Court's Initial Status Conference Order (Complex Litigation Program) and Minute Order Re: Newly Filed Class Action (filed on August 9, 2021) (Picarello Action)	0.20
Review Defendant Carlton Forge Works, Inc.'s Notice of General Appearance (served on September 1, 2021) (Picarello Action)	0.10
Review Court's Minute Order Re: Notice of Related Case (filed on September 27, 2021) (Picarello Action)	0.10
Review Defendant Carlton Forge Works, Inc.'s Notice of Ruling Regarding Cases Not Related (served on October 7, 2021) (Picarello Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Initial Status Conference Report (filed on November 3, 2021) (Picarello Action)	1.60
Review Court's Case Management Order and Minute Order Re: Initial Status Conference (filed on November 10, 2021) (Picarello Action)	0.20
Review Defendants Carlton Forge Works, Inc. and Precision Castparts Corp.'s Notice of Ruling Re: Order to Show Cause and Case Management Conference in Case No. 21STCV23764 (Bennett) (served on November 19, 2021) (Gonzalez Action)	0.10

Review Defendants Carlton Forge Works, Inc. and Precision Castparts Corp.'s Case Management Statement (served on November 23, 2021) (Gonsalez Action)	0.10
Draft Plaintiff Gonsalez's Case Management Statement (filed on November 24, 2021) (Gonsalez Action)	0.50
Review Defendant Carlton Forge Works, Inc.'s Answer to Plaintiff Picarello's Class Action Complaint and Legal Research and Analysis of Affirmative Defenses in Defendant Carlton Forge Works, Inc.'s Answer (served on December 8, 2021) (Picarello Action)	1.60
Review Court's Minute Order Re: Case Management Conference (filed on December 8, 2021) (Gonsalez Action)	0.10
Review Court's Minute Order Re: Case Management Conference; Hearing on Motion to Consolidate Related PAGA Cases and Staying PAGA Cases in Favor of Class Action with Case 21STCV23764 (filed on January 20, 2022) (Gonsalez Action)	0.20
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (Dates Remain) (filed on July 8, 2022) (Gonsalez Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Notice of Settlement (filed on July 8, 2022) (Picarello Action)	0.80
Review Court's Order to Show Cause Re: Dismissal (Settlement) (filed on July 8, 2022) (Gonsalez Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Notice of Settlement (filed on July 8, 2022) (Picarello Action)	0.80
Review Court's Minute Order Re: Joint Notice of Settlement (filed on July 11, 2022) (Picarello Action)	0.10
Meet and Confer with Defendants' Counsel and Other Plaintiff's Counsel, and Draft Joint Notice of Settlement (filed on July 8, 2022) (Gonsalez Action)	0.90
Review Court's Minute Order Re: Court Order (filed on July 12, 2022) (Gonsalez Action)	0.10
Draft Plaintiff Gonsalez's Notice of Case Reassignment (filed on July 19, 2022) (Gonsalez Action)	0.20
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (Dates Remain) (filed on September 22, 2022) (Gonsalez Action)	0.10

Draft Plaintiff Gonzalez's Notice of Case Reassignment (filed on October 4, 2022) (Gonzalez Action)	0.20
Meet and Confer with Defendants' Counsel and Other Plaintiff's Counsel, and Draft Joint Stipulation to Consolidate Case Numbers 21CMCV00141 and 21STCV27273; [Proposed] Order Thereon (submitted on December 20, 2022) (Gonzalez Action)	1.30
Review Court's Order to Consolidate Case Numbers 21CMCV00141 and 21STCV27273 (filed on December 20, 2022) (Gonzalez Action)	0.10
Draft Plaintiff Gonzalez's Notice of Entry of Judgment or Order (filed on January 4, 2023) (Gonzalez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Non-Appearance Case Review Report (filed on January 25, 2023) (Picarello Action)	0.70
Review Court's Minute Order Re: Status Conference / Stipulated Judgment (filed on February 7, 2023) (Gonzalez Action)	0.10
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (Dates Remain) (filed on April 14, 2023) (Gonzalez Action)	0.10
Draft Plaintiff Gonzalez's Notice of Case Reassignment (filed on May 2, 2023) (Gonzalez Action)	0.20
Meet and Confer with Defendants' Counsel, Other Plaintiff's Counsel, and Draft Joint Case Management Conference Statement (filed on July 5, 2023) (Gonzalez Action)	1.10
Review Court's Minute Order Re: Status Conference / Stipulated Judgment (filed on July 10, 2023) (Gonzalez Action)	0.10
Meet and Confer with Defendants' Counsel, Other Plaintiff's Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (filed on August 14, 2023) (Gonzalez Action)	0.90
Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (Settlement) (filed on August 21, 2023) (Gonzalez Action)	0.10
Draft Plaintiffs' Notice Regarding August 21, 2023 Order to Show Cause Re: Dismissal Hearing (filed on August 23, 2023) (Gonzalez Action)	0.20

Meet and Confer with Defendants' Counsel, Other Plaintiff's Counsel, and Draft Joint Case Management Conference Statement (filed on October 10, 2023) (Gonzalez Action)	0.90
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on October 30, 2023) (Gonzalez Action)	0.10
Draft Plaintiff's Notice Regarding October 17, 2023 Hearing on Motion for Preliminary Approval of Class Action Settlement and Case Management Conference (filed on December 5, 2023) (Gonzalez Action)	0.20
Appearances	
Prepare for and Remotely Attend Initial Status Conference (November 10, 2021) (Picarello Action)	1.20
Prepare for and Remotely Attend Case Management Conference; Hearing on Motion to Consolidate Related PAGA Cases and Staying PAGA Cases in Favor of Class Action with Case No. 21STCV23764 (January 20, 2022) (Gonzalez Action)	1.80
Prepare for and Remotely Attend Status Conference / Stipulated Judgment (July 10, 2023) (Gonzalez Action)	0.90
Prepare for and Remotely Attend Order to Show Cause Re: Dismissal (Settlement) (August 21, 2023) (Gonzalez Action)	0.90
Prepare for and Remotely Attend Hearing on Motion for Preliminary Approval of Class Action Settlement and Case Management Conference (October 17, 2023) (Gonzalez Action)	2.50
Prepare for and Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payments (March 19, 2024) (Anticipated) (Gonzalez Action)	1.50
Discovery and Deposition	
Draft Letter to Defendant Carlton Forge Works Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alberto Gonzalez (served on November 18, 2020)	1.90
Review and Analyze Documents Produced by Defendant Carlton Forge Works in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alberto Gonzalez (served on November 24, 2020)	5.10

Draft Letter to Defendant Carlton Forge Works Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff James Picarello (served on January 27, 2021)	1.90
Draft Follow-Up Letter to Defendant Carlton Forge Works Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff James Picarello (served on May 12, 2021)	2.10
Review and Analyze Documents Produced by Defendant Carlton Forge Works in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff James Picarello (served on June 2, 2021)	7.50
Draft Plaintiff Gonsalez's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Carlton Forge Works (served on November 8, 2021) (Gonsalez Action)	4.30
Draft Plaintiff Gonsalez's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Precision Castparts Corp. (served on November 8, 2021) (Gonsalez Action)	2.10
Draft Plaintiff Gonsalez's Notice of Deposition of Person Most Knowledgeable at Defendant Carlton Forge Works and Requests for Production of Documents (noticed for January 4, 2022; Organizational Structure) (served on November 8, 2021) (Gonsalez Action)	2.20
Draft Plaintiff Gonsalez's Notice of Deposition of Person Most Knowledgeable at Defendant Carlton Forge Works and Requests for Production of Documents (noticed for January 5, 2022; Wage and Hour Practices) (served on November 8, 2021) (Gonsalez Action)	2.40
Draft Plaintiff Gonsalez's Notice of Deposition of Person Most Knowledgeable at Defendant Precision Castparts Corp. and Requests for Production of Documents (noticed for January 10, 2022; Organizational Structure) (served on November 8, 2021) (Gonsalez Action)	1.10
Draft Plaintiff Gonsalez's Notice of Deposition of Person Most Knowledgeable at Defendant Precision Castparts Corp. and Requests for Production of Documents (noticed for January 11, 2022; Wage and Hour Practices) (served on November 8, 2021) (Gonsalez Action)	1.20
Review and Analyze Defendant Carlton Forge Works' Responses to Plaintiff Gonsalez's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Request for Production of Documents (Set One) (served on December 10, 2021) (Gonsalez Action)	3.80

Review and Analyze Defendant Precision Castparts Corp.'s Responses to Plaintiff Gonzalez's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Request for Production of Documents (Set One) (served on December 10, 2021) (Gonzalez Action)	3.90
Review and Analyze Defendant Carlton Forge Works' Response to Plaintiff Gonzalez's Notice of Deposition of Person Most Knowledgeable at Defendant Carlton Forge Works and Requests for Production of Documents (Wage and Hour Practices) (served on December 27, 2021) (Gonzalez Action)	1.80
Review and Analyze Defendant Carlton Forge Works' Response to Plaintiff Gonzalez's Notice of Deposition of Person Most Knowledgeable at Defendant Carlton Forge Works and Requests for Production of Documents (Organizational Structure) (served on December 27, 2021) (Gonzalez Action)	1.30
Review and Analyze Defendant Precision Castparts Corp.'s Response to Plaintiff Gonzalez's Notice of Deposition of Person Most Knowledgeable at Defendant Precision Castparts Corp.'s and Requests for Production of Documents (Wage and Hour Practices) (served on December 27, 2021) (Gonzalez Action)	1.80
Review and Analyze Defendant Precision Castparts Corp.'s Response to Plaintiff Gonzalez's Notice of Deposition of Person Most Knowledgeable at Defendant Precision Castparts Corp.'s and Requests for Production of Documents (Organizational Structure) (served on December 27, 2021) (Gonzalez Action)	1.40
Draft Plaintiff Picarello's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Carlton Forge Works, Inc. (served on February 17, 2022) (Picarello Action)	3.80
Draft Plaintiff Picarello's Notice of Deposition of Person Most Knowledgeable at Defendant Carlton Forge Works, Inc. and Requests for Production of Documents (noticed for April 4, 2022; Organizational Structure) (served on February 17, 2022) (Picarello Action)	1.10
Draft Plaintiff Picarello's Notice of Deposition of Person Most Knowledgeable at Defendant Carlton Forge Works, Inc. and Requests for Production of Documents (noticed for April 5, 2022; Wage and Hour Practices) (served on February 17, 2022) (Picarello Action)	1.20

Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Alberto Gonzalez for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on April 2, 2021)	4.50
Meet With, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	22.50
Meet With, Draft Correspondence to, and Respond to Correspondence from, Other Plaintiff's Counsel	9.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources Prior to Mediation	65.50
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 and Penalties Analysis and Calculations (submitted on May 20, 2022)	31.50
Attend Mediation Session (May 26, 2022; Zoom Video Conference)	12.50
Review and Analyze Mediator's Proposal (Issued on May 26, 2022 and accepted on June 6, 2022)	1.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action/PAGA Settlement (fully executed on August 11, 2022)	3.10
Draft, Review, Revise, Negotiate, and Finalize Class and PAGA Action Settlement Agreement (fully executed on August 16, 2023) and Court Approved Notice of Class and PAGA Action Settlement and Hearing Date for Final Court Approval	18.50
Law and Motion	
Review and Analyze Defendants' Notice of Motion and Motion for an Order: (1) Consolidating Related PAGA Cases; and (2) Staying PAGA Cases in Favor of Class Action; and Declaration of Jason A. Dalton in Support Thereof (served on December 9, 2021) (Gonzalez Action)	1.20
Draft Plaintiff Gonzalez's Opposition to Defendants' Motion to Stay PAGA Cases in Favor of Class Action and Declaration of Charles B. Aramayo in Support Thereof (filed on January 6, 2022) (Gonzalez Action)	10.60

Review and Analyze Defendants' Joint Reply to the Oppositions of Plaintiffs Alberto Gonzalez and Donald Bennett to Defendants' Motion for an Order: (1) Consolidating Related PAGA Cases; and (2) Staying PAGA Cases in Favor of Class Action (served on January 12, 2022) (Gonzalez Action)	1.30
Review Defendants' Notice of Ruling Re: Defendants' Motion for an Order: (1) Consolidating Related PAGA Cases; and (2) Staying PAGA Cases in Favor of Class Action (served on January 31, 2022) (Gonzalez Action)	0.10
Review Declarations of Raul Perez and Donald Bennett; and 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 James Picarello in Support Thereof, Declaration of Alberto Gonzalez in Support Thereof, and [Proposed] Order Thereon (filed on September 25, 2023) (Gonzalez Action)	19.50
Review Court's Minute Order Re: Hearing on Motion – Other Motion for Preliminary Approval; Case Management Conference (filed on October 17, 2023) (Gonzalez Action)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on October 17, 2023) (Gonzalez Action)	0.10
Review Settlement Administrator's Declaration Regarding Notice and Settlement Administration and Declaration of Raul Perez; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payments, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on February 26, 2024) (Anticipated) (Gonzalez Action)	21.50
Total Hours:	542.20

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Gonsalez v. Carlton Forge Works (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/18/2020	U.S. Postmaster	Postage	6.95
4/2/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
4/2/2021	U.S. Postmaster	Postage	7.20
6/8/2021	Legal Document Server, Inc.	Attorney Service	30.43
6/8/2021	Los Angeles Superior Court	Complaint Filing Fee	435.00
6/25/2021	ProLegal	Attorney Service	370.55
7/23/2021	General Logistics Systems US, Inc.	Courier Service	38.56
7/23/2021	Legal Document Server, Inc.	Attorney Service	41.40
7/26/2021	Legal Document Server, Inc.	Attorney Service	15.20
11/8/2021	General Logistics Systems US, Inc.	Courier Service	23.04
11/23/2021	Los Angeles Superior Court	Document Download Fee	3.00
1/6/2022	One Legal	Attorney Service	16.68
1/6/2022	General Logistics Systems US, Inc.	Courier Service	40.52
5/9/2022	Los Angeles Superior Court	Document Download Fee	35.60
5/17/2022	Mark S. Rudy	Mediation Fee	7,700.00
5/20/2022	FedEx Express	Courier Service	110.71
7/8/2022	Legal Document Server, Inc.	Attorney Service	15.95
7/19/2022	Legal Document Server, Inc.	Attorney Service	15.95
10/5/2022	Legal Document Server, Inc.	Attorney Service	15.95
10/17/2022	Los Angeles Superior Court	Document Download Fee	5.00
11/29/2022	One Legal	Attorney Service	16.68
12/16/2022	Legal Document Server, Inc.	Attorney Service	17.30
12/16/2022	Los Angeles Superior Court	Stipulation & Order Fee	20.00
1/4/2023	Legal Document Server, Inc.	Attorney Service	15.95
1/25/2023	Legal Document Server, Inc.	Attorney Service	15.95
1/27/2023	Legal Document Server, Inc.	Attorney Service	90.00
5/3/2023	Legal Document Server, Inc.	Attorney Service	16.15
7/5/2023	Legal Document Server, Inc.	Attorney Service	16.15
8/15/2023	Legal Document Server, Inc.	Attorney Service	16.15
8/24/2023	Legal Document Server, Inc.	Attorney Service	16.15
9/25/2023	Legal Document Server, Inc.	Attorney Service	263.65
9/26/2023	Legal Document Server, Inc.	Attorney Service	16.15
10/11/2023	Legal Document Server, Inc.	Attorney Service	16.15
10/30/2023	Legal Document Server, Inc.	Attorney Service	16.15
12/6/2023	Legal Document Server, Inc.	Attorney Service	16.15
Total:			9,571.42

LAWYERS for JUSTICE PC CASE COST DETAIL
Picarello v. Carlton Forge Works, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/26/2021	Legal Document Server, Inc.	Attorney Service	180.23
7/26/2021	Los Angeles Superior Court	Complaint Filing Fee	435.00
7/26/2021	Los Angeles Superior Court	Complex Filing Fee	1,000.00
8/27/2021	ProLegal	Attorney Service	105.55
9/9/2021	Legal Document Server, Inc.	Attorney Service	65.00
9/10/2021	Legal Document Server, Inc.	Attorney Service	60.00
10/18/2021	One Legal	Attorney Service	16.68
11/3/2021	One Legal	Attorney Service	12.35
11/4/2021	One Legal	Attorney Service	16.68
1/5/2022	Case Anywhere LLC	Attorney Service	90.00
4/9/2022	Case Anywhere LLC	Attorney Service	162.00
4/9/2022	Case Anywhere LLC	Attorney Service	162.00
7/6/2022	Case Anywhere LLC	Attorney Service	120.00
7/8/2022	Legal Document Server, Inc.	Attorney Service	15.95
10/7/2022	Case Anywhere LLC	Attorney Service	126.00
1/8/2023	Case Anywhere LLC	Attorney Service	120.00
4/16/2023	Case Anywhere LLC	Attorney Service	126.00
7/3/2023	Case Anywhere LLC	Attorney Service	120.00
10/5/2023	Case Anywhere LLC	Attorney Service	120.00
1/5/2024	Case Anywhere LLC	Attorney Service	120.00
Total:			3,173.44