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Attorneys for Plaintiffs Amanda Olvera and Sabrina Mendiola and the Class

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

BRANDON HAWKINS AND BRIAN
CANADY, individually, and on behalf of
others similarly situated;

Plaintiffs,
vs.

ONTEL SECURITY SERVICES, INC., a
California corporation; and DOES 1
through 100, inclusive,

Defendant.

Case No. CV-20-005404
Consolidated with Case No. CV-21-002299

Honorable John D. Freeland
Department 23

CLASS ACTION

**DECLARATION OF YASMIN HOSSEINI IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT, CLASS
COUNSEL AWARD AND CLASS
REPRESENTATIVE ENHANCEMENT
AWARDS**

Date: April 11, 2025
Time: 8:30 a.m.
Department: 23

AMANDA OLVERA and SABRINA
MENDIOLA 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;

Plaintiffs,
vs.

ONTEL SECURITY SERVICES, INC., a
California corporation; and DOES 1
through 100, inclusive,

Defendant.

Hawkins Complaint
Filed: December 3, 2020
Hawkins FAC
Filed: January 8, 2021
Olvera Complaint
Filed: April 29, 2021
Olvera FAC Filed: June 24, 2021
Olvera SAC Filed: January 5, 2022

DECLARATION OF YASMIN HOSSEINI

I, Yasmin Hosseini, 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 Amanda Olvera (“Plaintiff Olvera”) and Sabrina Mendiola (“Plaintiff Mendiola”), and the Class in the action entitled *Olvera, et al. v. Ontel Security Services, Inc.*, Stanislaus County Superior Court Case No. CV-21-002299 (“*Olvera* 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 as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On December 9, 2024, in Department 23 of the above-entitled Court, the Honorable John D. Freeland preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement Agreement and Release of Claims (“Agreement,” “Settlement,” or “Settlement Agreement”) entered into between Plaintiffs Brian Canady, Brandon Hawkins, Amanda Olvera, and Sabrina Mendiola (collectively, “Plaintiffs”) and Defendant Ontel Security Services, Inc. (“Defendant”) (together with Plaintiffs, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs as the representatives of the Class (“Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC, Polaris Law Group, and Hyun Legal APC, as counsel for the Class (collectively, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Class and PAGA Action Settlement, adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Xpand Legal Consulting (“Xpand” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement, Class Counsel Award, and Class Representative Enhancement Awards (“Motion for Final Approval”), no Class Members have opted-out or objected to the Class Settlement or the contemplated request for Class Counsel Award, Class Representative Enhancement Awards, Settlement Administration Costs, or allocation for penalties under the

Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the *Olvera* Action since prior to its commencement on April 29, 2021.

5. Before initiating the *Olvera* Action, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiff *Olvera* and Plaintiff *Mendiola* and research into the various legal issues involved in this matter, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, on-duty rest periods, representative PAGA claims, wage-and-hour law and enforcement, Plaintiff *Olvera* and Plaintiff *Mendiola*’s claims and allegations, and potential defenses. After conducting an initial investigation, our firm determined that Plaintiff *Olvera* and Plaintiff *Mendiola*’s claims were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former non-exempt employees in California of Defendant during the Class Period, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, business expenses, and reporting time wages.

6. Lawyers *for* Justice, PC conducted significant investigation and formal and informal discovery regarding the facts of the cases, to assess the veracity, strength, and scope of the claims, and were preparing the cases for class certification discovery, class certification, and trial prior to reaching the Agreement. The Parties exchanged a large volume of documents, data, and information in the course of the litigation and in connection with the mediation and settlement negotiations. Lawyers *for* Justice, PC had the opportunity to interview and obtain information from Plaintiff *Olvera*, Plaintiff *Mendiola* and percipient witnesses, and reviewed and analyzed a large volume of information, data, and documents obtained from Plaintiff *Olvera*, Plaintiff *Mendiola*, Defendant, and other sources. The large volume of documents, data, and information that Lawyers *for* Justice, PC reviewed and analyzed included, but was not limited to: Plaintiff *Mendiola*’s employment records, time and pay data the Class, company policy acknowledgments, forms,

procedures and policies, among other information and documents. On June 3, 2022, Plaintiff Olvera and Plaintiff Mendiola each served Defendant with Form Interrogatories – General (Set One), Requests for Admission (Set One), Requests for Document Production (Set One), Special Interrogatories (Sets One & Two) and reviewed Defendant’s responses thereto. Additionally, on July 20, 2022, Defendant served Form Interrogatories—General (Set One), Requests for Document Production (Set One), and Special Interrogatories (Set One) on Plaintiff Olvera and Plaintiff Mendiola. Class Counsel also developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations and met and conferred with Defendant’s counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation brief, and settlement documents; preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

7. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating the cases, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff Olvera, Plaintiff Mendiola, Defendant, and other sources. The information, documents, and data provided a critical understanding of the nature of the work performed by the Class Members and Aggrieved Employees, as well as Defendant’s operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, off-the-clock theory, regular rate of pay, meal and rest periods, representative PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiff Olvera’s and Plaintiff Mendiola’s claims and allegations, and Defendant’s defenses thereto, as well as facts discovered.

8. After conducting significant investigation of the facts and law during the prosecution of the cases, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in a formal, full-day mediation conducted on August 21, 2023 by the Honorable Daniel Buckley (Ret.), a well-regarded mediator experienced in mediating complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and settlement discussions, the Parties exchanged information, documents, and data, and discussed various aspects of the cases, including and not limited to, the risks and delays of further litigation, the risks and expenses to the Parties of proceeding with class certification and trial, the law relating to class certification, off-the-clock theory, regular rate of pay, meal and rest periods, representative PAGA claims, and wage-and-hour law and enforcement, as well as the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class certification and prevail on the merits, while Plaintiffs' and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that the cases were well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the cases, and the real possibility of no monetary recovery after years of litigation.

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$262,500.00, which is 35% of the Maximum Settlement Amount of \$750,000.00. Pursuant to the contingency-fee agreements entered into by and between Plaintiff Olvera, Plaintiff Mendiola and Lawyers for Justice, PC, Plaintiff Olvera and Plaintiff Mendiola

1 have both agreed to a contingency fee of at least thirty-five percent (35%) of the Maximum
2 Settlement Amount.

3 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
4 took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to
5 the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
6 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
7 has achieved in the cases; and (6) the other cases that Class Counsel has turned down in order to
8 devote their time and efforts to this matter.

9 11. While not necessarily required to be demonstrated because the percentage fee is
10 proper for this settlement, Class Counsel has incurred many hours of work in connection with
11 prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar
12 analysis Attorneys at Lawyers *for* Justice, PC have spent a total of **257.60 hours** performing tasks
13 and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and
14 Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers
15 *for* Justice, PC and the time incurred by them in performing those services. These hours include
16 work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours
17 referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively
18 engaged in assisting with the prosecution of this matter.

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

1 compensation at the rate of \$936.47 per hour; final approval of the class and representative action
2 settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No.
3 BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved
4 compensation at the rate of \$919.57 per hour; and final approval of the class and representative
5 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
6 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved
7 compensation at the rate of \$855.96 per hour.

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

10 13. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the
11 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
12 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is
13 attorney of record in dozens of employment-related putative class actions in both state and federal
14 courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who focus on
15 litigating complex wage-and-hour class and PAGA representative actions. The firm has
16 successfully litigated cases involving nearly every aspect of California wage and hour law,
17 including payment of overtime and minimum wages, provision of meal and rest breaks and/or
18 premiums wages for same, timely payment of wages, provision of compliant wage statements,
19 reimbursement of business expenses, executive, administrative, and other overtime exemptions to
20 the State of California and federal overtime compensation requirements, PAGA claims, and sister
21 statutes under federal law. Lawyers for Justice, PC, sometimes in association with other law firms,
22 has recovered millions of dollars on behalf of thousands of individuals in California.

23 14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice,
24 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
25 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
26 extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute
27 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
28 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 100 motions, taken or defended over 150 depositions, prepared dozens of expert witnesses for deposition or trial, and attended over 175 mediations. Together with other attorneys at the firm, and in many cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade and litigated over 1,000 class action or representative action cases.

15. 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. 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.

16. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She 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. She is admitted to practice in California (since 2010) and in New York (since 2013), and she is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration of PAGA claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and has handled this process in over 500 cases.

Under Edwin Aiwarzian, Arby Aiwarzian, and her 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. She is a member of the California Employment Lawyers Association, and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

17. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from Pepperdine University School of Law in 2017. I was admitted to practice law in California in 2019. I am admitted to practice before all courts of the State of California and all federal district courts in the State of California. I have worked on many wage and hour class action and PAGA representative matters, and my 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, I represented filmmakers and talent, negotiating and structuring various types of agreements on their behalf. I am a member of the California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian American Bar Association.

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS FOR JUSTICE, PC

18. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$8,576.11** in litigation costs and expenses incurred in this matter, as reflected in "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement Agreement.

CLASS REPRESENTATIVE ENHANCEMENT AWARDS

19. In recognition of their efforts and work serving as Class Representatives, the Settlement Agreement provides for a Class Representative Enhancement Award in the amount of \$10,000.00 to each Plaintiff. The requested Class Representative Enhancement Awards are fair

1 and appropriate. Plaintiff Olvera and Plaintiff Mendiola spent a substantial amount of time and
2 effort to produce relevant documents and information and provided facts and evidence to support
3 the prosecution of the claims. Plaintiff Olvera and Plaintiff Mendiola were available whenever
4 Lawyers *for* Justice, PC needed them and actively tried to obtain and provide information that
5 would facilitate the pursuit of the cases. Plaintiff Olvera and Plaintiff Mendiola spent numerous
6 hours speaking with Lawyers *for* Justice, PC about their claims, describing their work experiences
7 with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for
8 Plaintiffs to each receive \$10,000.00 as a Class Representative Enhancement Awards for their
9 services in the cases, in addition to their individual settlement payments.

10 **GENERAL RELEASE PAYMENT TO PLAINTIFF MENDIOLA**

11 20. In recognition of her broader individual waiver and release of potential claims
12 involving LGBTQ+ harassment with a California Civil Code Section 1542 waiver (set forth in
13 Section 3(a) of the Settlement Agreement), the Settlement provides a General Release Payment to
14 Plaintiff Mendiola in the amount of \$10,000.00, to be paid out of the Maximum Settlement
15 Amount, subject to approval by the Court. The requested General Release Payment is fair and
16 appropriate because the California Civil Code Section 1542 waiver will cause Plaintiff Mendiola
17 to release Defendant from potential claims that the other Plaintiffs do not have. Accordingly, it is
18 appropriate for Plaintiff Mendiola to receive \$10,000.00 as a General Release Payment in addition
19 to her Class Representative Enhancement Award and individual settlement payments.

20 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
21 interests of Plaintiffs, Class Members, Aggrieved Employees, and the State of California.

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

24 Executed this 19th day of March 2025, at Glendale, California.

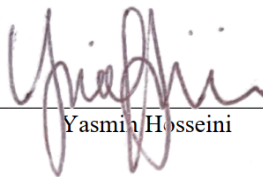
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EXHIBIT A

BRANDON HAWKINS V. ONTEL SECURITY SERVICES INC., ET AL.
Stanislaus County Superior Court Case No. CV-20-005404 (“Current State Action”)

AMANDA OLVERA V. ONTEL SECURITY SERVICES INC., ET AL.
Stanislaus County Superior Court Case No. CV-21-002299 (“Class Action”)

SABRINA MENDIOLA V. ONTEL SECURITY SERVICES INC., ET AL.
Stanislaus County Superior Court Case No. CV-21-005113 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Amanda Olvera (“Plaintiff Olvera”) During the Case	37.50
Meet and Communicate with Plaintiff Sabrina Mendiola (“Plaintiff Mendiola”) During the Case	36.80
Investigate, Communicate with, and/or Interview Class Members, Aggrieved Employees, and/or Percipient Witnesses	8.50
Review and Analyze Court Papers Filed in <i>Brandon Hawkins, et al. v. Ontel Security Services, Inc.</i> , Stanislaus County Superior Court Case No. CV-20-005404	1.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiffs Amanda Olvera and Sabrina Mendiola (together, “Plaintiffs Olvera and Mendiola”) Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft Plaintiffs’ Class Action Complaint for Damages (filed on April 29, 2021) (Class Action)	7.50
Review Court’s Notice of Case Management Conference (filed on April 29, 2021) (Class Action)	0.10

Review and Analyze Defendant Ontel Security Services, Inc.'s ("Defendant") Answer to Plaintiffs Olvera and Mendiola's Class Action Complaint for Damages and Research Affirmative Defenses to Defendant's Answer (served on June 24, 2021) (Class Action)	2.20
Research and Draft First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, Cal. Labor Code § 2698 Et Seq. (filed on June 24, 2021) (Class Action)	3.50
Review and Analyze Defendant's Notice and Demurrer to the Seventh Cause of Action in the Class Action Complaint for Damages (served on June 24, 2021) (Class Action)	0.30
Review Court's Notice of Dropped Hearing on Demurrer (filed on July 20, 2021) (Class Action)	0.10
Draft Plaintiffs Olvera and Mendiola's Case Management Statement (filed on August 13, 2021) (Class Action)	0.50
Review and Analyze Defendant's Answer to Plaintiffs Olvera and Mendiola's Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on August 13, 2021) (Class Action)	1.10
Review and Analyze Defendant's Notice and Demurrer to the Seventh Cause of Action in the Class Action Complaint for Damages (served on August 13, 2021) (Class Action)	0.70
Review and Analyze Defendant's Case Management Conference Statement (served on August 16, 2021) (Class Action)	0.10
Draft Plaintiff Sabrina Mendiola's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq., and Conduct Legal Research and Analysis of All Claims Involved (filed on September 17, 2021) (PAGA Action)	4.50
Review Court's Notice of Case Management Conference (filed on September 17, 2021) (PAGA Action)	0.10
Draft Plaintiffs Olvera and Mendiola's Case Management Statement (filed on January 3, 2022) (PAGA Action)	0.50

Research and Draft Plaintiffs Olvera and Mendiola's Second Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, Cal. Labor Code § 2698 Et Seq. (filed on January 5, 2022); Meet and Confer with Defendant's Counsel and Draft and Review Joint Stipulation Granting Plaintiffs Olvera and Mendiola's Leave to File a Second Amended Complaint; [Proposed] Order (submitted on December 20, 2021) (Class Action)	3.80
Review and Analyze Defendant's Case Management Conference Statement (filed on February 1, 2022) (Class Action)	0.10
Review and Analyze Defendant's Answer to Plaintiffs Olvera and Mendiola's Second Amended Complaint (served on February 4, 2022) (Class Action)	1.10
Draft and Review Plaintiffs Olvera and Mendiola's Case Management Statement (filed on February 14, 2022) (Class Action)	0.50
Draft Plaintiffs Olvera and Mendiola's Request for Dismissal (filed on February 18, 2022) (PAGA Action)	0.20
Draft Plaintiffs Olvera and Mendiola's Notice of Ruling from February 24, 2022 Hearing on Court's Motion to Dismiss (filed on February 24, 2022) (PAGA Action)	0.10
Draft Plaintiffs Olvera and Mendiola's Notice of Entry of Dismissal (filed on March 2, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on December 22, 2022) (Class Action)	1.30
Review Court's Order to Continue Case Management Conference (filed on December 30, 2022) (Class Action)	0.10
Draft Plaintiffs Olvera and Mendiola's Notice of Entry of Judgment or Order re: Order Granting to Continue Case Management Conference (filed on January 9, 2023) (Class Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (filed on May 1, 2023) (Class Action)	1.40
Review and Analyze Defendant's Case Management Conference Statement (served on May 4, 2023) (Class Action)	0.20
Review Court's Order to Continue Case Management Conference (filed on May 4, 2023) (Class Action)	0.10
Review and Analyze Defendant's Case Management Conference Statement (served on October 16, 2023) (Class Action)	0.20
Draft Plaintiffs Olvera and Mendiola's Case Management Statement (filed on October 16, 2023) (Class Action)	0.70
Meet and Confer with Defendant's Counsel, and Draft and Review Joint Notice of Settlement (filed on October 25, 2023) (Class Action)	1.10
Meet and Confer with Defendant's Counsel and Draft Joint Response to Order to Show Cause Regarding Motion to Dismiss (filed on March 22, 2024) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (filed on August 8, 2024) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft and Review Joint Stipulation to Consolidate Case Numbers CV-20-005404 and CV-21-002299; [Proposed] Order (filed on September 23, 2024) (Current State Action)	1.40
Review Court Order Granting Joint Stipulation to Consolidate Case Numbers CV-20-005404 and CV-21-002299 (filed on September 23, 2024) (Current State Action)	0.10
Appearances	
Prepare for and Remotely Attend Initial Case Management Conference (August 30, 2021) (Class Action)	0.50

Prepare for and Remotely Attend Initial Case Management Conference (January 18, 2022) (PAGA Action)	0.50
Prepare for and Remotely Attend Hearing re: Dismissal (February 24, 2022) (PAGA Action)	0.80
Prepare for and Remotely Attend Case Management Conference (February 28, 2022) (Class Action)	0.50
Prepare for and Remotely Attend Hearing re: Dismissal (October 30, 2023) (Class Action)	0.30
Prepare for and Remotely Attend Hearing on Order to Show Cause Regarding Motion to Dismiss (March 29, 2024) (Class Action)	0.50
Prepare for and Remotely Attend Hearing on Order to Show Cause Regarding Motion to Dismiss (August 22, 2024) (Class Action)	1.00
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Amanda Olvera (served on March 5, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sabrina Mendiola (served on March 5, 2021)	1.90
Draft Plaintiff Olvera's Form Interrogatories—General (Set One), Special Interrogatories (Sets One and Two), Requests for Production of Documents (Set One), and Requests for Admission (Set One) (served on June 6, 2022) (Class Action)	5.80
Draft Plaintiff Mendiola's Form Interrogatories—General (Set One), Special Interrogatories (Sets One and Two), Requests for Production of Documents (Set One), and Requests for Admission (Set One) (served on June 6, 2022) (Class Action)	5.80
Review and Analyze Defendant's Responses to Plaintiff Olvera's Form Interrogatories—General (Set One), Special Interrogatories (Sets One and Two), Requests for Production of Documents (Set One), and Requests for Admission (Set One) (served on July 8, 2022) (Class Action)	1.70

Review and Analyze Defendant’s Responses to Plaintiff Mendiola’s Form Interrogatories—General (Set One), Special Interrogatories (Sets One and Two), Requests for Production of Documents (Set One), and Requests for Admission (Set One) (served on July 8, 2022) (Class Action)	1.70
Review and Analyze Defendant’s Form Interrogatories—General (Set One), Special Interrogatories (Set One), Requests for Production of Documents (Set One), and Special Interrogatories (Set One) to Plaintiff Olvera (served on July 20, 2022) (Class Action)	2.10
Review and Analyze Defendant’s Form Interrogatories—General (Set One), Special Interrogatories (Set One), Requests for Production of Documents (Set One), and Special Interrogatories (Set One) to Plaintiff Mendiola (served on July 20, 2022) (Class Action)	2.10
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency re: Claims of Plaintiff Mendiola for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (“PAGA”) (served on July 14, 2021) (PAGA Action)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant’s Counsel	21.60
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs Olvera and Mendiola, Defendant, and Other Sources Prior to Mediation	38.30
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/Calculations (submitted on August 24, 2023)	25.70
Attend Mediation Session (August 31, 2023; Zoom Video Conference)	8.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding Following Mediation (executed on May 6, 2024)	4.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (executed on August 12, 2024) and Notice of Class Action and PAGA Settlement	16.50

Law and Motion	
Review and Analyze Defendant's Notice and Motion to Stay Proceedings, Memorandum of Law in Support Thereof, Declaration of Sarah A. Ornelas, Declaration of David McCann (filed on June 25, 2021) (Class Action)	6.50
Review Court's Notice of Dropped Hearing on Motion to Stay Proceedings (filed on July 20, 2021) (Class Action)	0.10
Review and Analyze Defendant's Notice and Motion to Stay Proceedings, Memorandum of Law in Support Thereof, Declaration of Sarah A. Ornelas, Declaration of David McCann (served on August 13, 2021) (Class Action)	7.70
Draft Plaintiffs' Opposition to Defendant Ontel Security Services, Inc.'s Demurrer to Plaintiffs Olvera and Mendiola's Seventh Cause of Action in the First Amended Complaint (filed on September 23, 2021) (Class Action)	1.10
Draft Declaration of Charles T. Sweeny in Support of Plaintiffs Olvera and Mendiola's Opposition to Defendant's Motion to Stay Proceedings (filed on September 23, 2021) (Class Action)	2.10
Draft Plaintiffs' Opposition to Defendant's Demurrer to Plaintiffs Olvera and Mendiola's Seventh Cause of Action in the First Amended Complaint (filed on September 23, 2021) (Class Action)	2.70
Review and Analyze Defendant's Reply to Plaintiffs Olvera and Mendiola's Opposition to Motion to Stay Proceedings (served on September 28, 2021) (Class Action)	1.50
Review and Analyze Defendant's Reply to Plaintiffs Olvera and Mendiola's Opposition to the Demurrer to the Seventh Cause of Action in the Class Action Complaint for Damages (served on September 28, 2021) (Class Action)	0.20
Draft [Proposed] Order Overruling Defendant's Demurrer to the Seventh Cause of Action in the Plaintiffs Olvera and Mendiola's Class Action Complaint for Damages and Denying Defendant's Motion to Stay Proceedings (submitted on November 24, 2021) (Class Action)	1.10

Review the Court's Order Overruling Defendant's Demurrer to the Seventh Cause of Action in the Plaintiffs Olvera and Mendiola's Class Action Complaint for Damages and Denying Defendant's Motion to Stay Proceedings (filed on November 29, 2021) (Class Action)	0.10
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Elizabeth Parker-Fawley in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 15, 2024) (Class Action)	4.20
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on December 9, 2024) (Class Action)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement, Class Counsel Award and Class Representative Enhancement Awards, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on March 19, 2025) (Class Action)	18.20
Total Hours:	257.60

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Olvera, et al. vs. Ontel Security Services, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/5/2021	U.S. Postmaster	Postage	\$7.00
4/1/2021	U.S. Postmaster	Postage	\$14.40
4/1/2021	Labor & Workforce Development Age	PAGA Filing Fee	\$75.00
4/29/2021	Legal Document Server, Inc.	Attorney Service	\$64.97
4/29/2021	Stanislaus Superior Court	Complex Filing Fee	\$1,000.00
4/29/2021	Stanislaus Superior Court	Complaint Filing Fee	\$435.00
5/10/2021	Legal Document Server, Inc.	Attorney Service	\$150.00
6/11/2021	Legal Document Server, Inc.	Attorney Service	\$11.00
6/14/2021	Legal Document Server, Inc.	Attorney Service	\$29.50
6/25/2021	Legal Document Server, Inc.	Attorney Service	\$14.75
8/4/2021	Legal Document Server, Inc.	Attorney Service	\$11.00
8/5/2021	Legal Document Server, Inc.	Attorney Service	\$14.75
8/6/2021	Legal Document Server, Inc.	Attorney Service	\$14.75
8/13/2021	Legal Document Server, Inc.	Attorney Service	\$14.75
8/27/2021	Stanislaus Superior Court	Remote Appearance Fee	\$96.35
9/24/2021	Legal Document Server, Inc.	Attorney Service	\$29.50
11/29/2021	Legal Document Server, Inc.	Attorney Service	\$14.75
12/9/2021	Legal Document Server, Inc.	Attorney Service	\$11.00
12/20/2021	Legal Document Server, Inc.	Attorney Service	\$15.70
12/20/2021	Stanislaus Superior Court	Stipulation & Order Fee	\$20.00
1/6/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
2/18/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
6/6/2022	General Logistics Systems US, Inc.	Courier Service	\$28.84
12/30/2022	Legal Document Server, Inc.	Attorney Service	\$16.85
12/30/2022	Stanislaus Superior Court	Stipulation & Order Fee	\$20.00
1/10/2023	Legal Document Server, Inc.	Attorney Service	\$15.50
5/4/2023	Legal Document Server, Inc.	Attorney Service	\$17.09
5/4/2023	Stanislaus Superior Court	Stipulation & Order Fee	\$20.00
8/8/2023	Signature Resolution LLC	Mediation Fee	\$5,437.50
10/17/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
10/27/2023	Stanislaus Superior Court	Remote Appearance Fee	\$30.35
10/30/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
3/20/2024	Stanislaus Superior Court	Remote Appearance Fee	\$60.70
3/21/2024	Stanislaus Superior Court	Remote Appearance Fee	\$30.35
3/25/2024	Legal Document Server, Inc.	Attorney Service	\$15.55

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Olvera, et al. vs. Ontel Security Services, Inc.

8/9/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
8/13/2024	Stanislaus Superior Court	Remote Appearance Fee	\$37.35
8/16/2024	Stanislaus Superior Court	Remote Appearance Fee	\$37.35
Total:			<u>\$7,887.90</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Mendiola vs. Ontel Security Services, Inc. (PAGA) (Dismissed)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/5/2021	U.S. Postmaster	Postage	\$7.00
7/14/2021	U.S. Postmaster	Postage	\$15.00
7/14/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
9/20/2021	One Legal	Attorney Service	\$29.05
9/20/2021	Stanislaus Superior Court	Complaint Filing Fee	\$435.00
9/24/2021	One Legal	Attorney Service	\$16.06
1/4/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
2/8/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
3/1/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
3/2/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
3/2/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
11/19/2024	Stanislaus Superior Court	Remote Appearance Fee	\$37.35
Total			<u>\$688.21</u>