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Attorneys for Plaintiffs Carolina Medina and Anthony Naylor

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

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

Plaintiff,

vs.

5648 EAST GOTHAM STREET, LLC, a
California limited liability company;
BRIARCREST NURSING CENTER, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No. 21NWCV00450
[Consolidated With Case No. 21NWCV00755]

*Assigned for All Purposes to: Lee W. Tsao, Dept.
F*

**DECLARATION OF ALICIA BRUSH IN
SUPPORT OF MOTION AND MOTION FOR
ORDER APPROVING SETTLEMENT
PURSUANT TO CALIFORNIA LABOR
CODE PRIVATE ATTORNEYS GENERAL
ACT AND ENTERING JUDGMENT**

Date: September 23, 2025
Time: 9:30 a.m.
Place: Department C

Medina Complaint Filed: July 12, 2021
Trial Date: None Set

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I, Alicia Brush, 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 Carolina Medina (“Plaintiff Medina”) and Anthony Naylor (“Plaintiff Naylor”) (together Plaintiff Naylor and Plaintiff Medina are referred to as “Plaintiffs”) in the action entitled *Carolina Medina v. 5648 East Gotham Street, LLC, et al.*, Los Angeles County Superior Court Case No. 21NWCV00450 (“*Medina* Action”) and *Anthony Naylor v. 5648 East Gotham Street, LLC, et al.*, Los Angeles County Superior Court Case No. 21NWCV00755 (“*Naylor* Action”) (collectively, the *Medina* Action and *Naylor* Action, which have been consolidated, 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 thereto.

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

2. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment representative and class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in dozens of employment-related representative and/or 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

1 California.

2 3. Edwin Aiwazian is a Managing Member and Shareholder of Lawyers *for* Justice,
3 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
4 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He
5 has extensive formal training in dispute resolution and negotiation from the Straus Institute for
6 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
7 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
8 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
9 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
10 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
11 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
12 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
13 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
14 Appellate District. In December of 2004, he obtained a license to practice law from the
15 California State Bar. For over a decade, through his work at Lawyers *for* Justice, PC, he has
16 almost exclusively focused on the prosecution of consumer and employment class actions.
17 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
18 has successfully litigated cases involving the executive, administrative, and other overtime
19 exemptions to the State of California and federal overtime compensation requirements. Under
20 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
21 contested motion practice in approximately sixteen (16) cases in the last decade and litigated
22 over 1,000 class action or representative action cases.

23 4. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
24 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
25 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
26 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to
27 the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate
28 District. From approximately August 2008 to approximately December 2008, he served as a

1 Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals
2 for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to
3 practice before all courts of the State of California and all United States District Courts in the
4 State of California. He has worked on many wage-and-hour class action and representative
5 action cases, taking the lead in taking and defending depositions, arguing motions, and attending
6 mediations. He has played an integral role in preparing matters for class certification, including
7 and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles
8 County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles
9 County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda
10 County Superior Court Case No. RG13680477). Under his supervision, dozens of class action
11 or representative cases have resulted in settlements that have been granted court approval. He
12 has handled over one hundred and fifty (150) mediations and worked on over two hundred and
13 fifty (250) class action or representative action cases which have resulted in settlement.

14 5. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
15 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
16 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
17 Georgetown University Law Center in 2010. She is admitted to practice in California (since
18 2010) and in New York (since 2013) and she is admitted to practice in all U.S. District Courts
19 in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S.
20 Supreme Court. She has taken and defended dozens of depositions and successfully handled
21 motion practice in class action cases regarding discovery (including and not limited to, regarding
22 class contact information), class certification (both contested class certification and stipulated
23 class certification), arbitration agreements, coordination, and intervention. She has successfully
24 handled briefing and oral argument on appeal and obtained notable decisions regarding Private
25 Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g.,
26 *Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert.
27 denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*
28 (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited

1 to working on cases to obtain class certification through contested motion practice and working
2 on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical
3 sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving
4 a certified class consisting of approximately 2,600 individuals). She also has extensive
5 experience with class action and/or representative action settlements, and she has handled this
6 process in over five hundred (500) cases. Under Edwin Aiwasian, Arby Aiwasian, and her
7 supervision, Lawyers *for* Justice, PC has handled the class certification and court approval
8 process for hundreds of class action and/or representative action matters that have successfully
9 resolved. She is a member of the California Employment Lawyers Association and, on several
10 occasions, has been a speaker regarding topics in wage and hour law at the organization's
11 continuing legal education events.

12 6. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Science
13 degree and Bachelor of Arts degree from Minnesota State University, Mankato in 2008, and
14 earned my Juris Doctor degree from University of California, Los Angeles School of Law in
15 2018. I was admitted to practice law in California in 2018. I am admitted to practice before all
16 courts of the State of California and the United States District Court for the Central District of
17 California. After graduating from law school, I was a post-bar law clerk in the Immigration
18 Unit at the Los Angeles County Public Defender's Office. Prior to joining Lawyers *for* Justice,
19 PC, I was Deputy Public Defender, practicing criminal law, and I was an associate attorney at a
20 well-reputed, boutique plaintiffs' side firm, representing clients in single-plaintiff employment
21 lawsuits. At Lawyers *for* Justice, PC, I have worked on many wage-and-hour class action and
22 PAGA representative action cases, and my work on these cases has included interviewing and
23 advising clients, negotiating, obtaining, and analyzing time and pay records and employment
24 policies, practices, and procedures, conducting claims evaluation, drafting and editing briefs,
25 participating in dozens of mediations, drafting, negotiating, and finalizing stipulations and
26 settlement agreements, and making court appearances.

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1 **NOTICE TO THE CALIFORNIA LABOR AND WORKFORCE DEVELOPMENT**
2 **AGENCY AND THE EMPLOYER**

3 7. Plaintiff Medina has satisfied the prerequisites under California Labor Code
4 section 2699.3(a), including, and not limited to, providing the California Labor and Workforce
5 Development Agency (“LWDA”) and the employer with written notice of the specific
6 provisions of the California Labor Code that are alleged to have been violated, including the
7 facts and theories to support the alleged violations, by way of written correspondence on May
8 6, 2021 (“Medina PAGA Notice”). The PAGA Notice was sent by U.S. Certified Mail to the
9 employer and submitted to the LWDA by way of online submission on the LWDA’s website.
10 A true and correct copy of the May 6, 2021, Medina PAGA Notice is attached hereto as
11 **“EXHIBIT 1.”**

12 8. Plaintiff Naylor has satisfied the prerequisites under California Labor Code
13 section 2699.3(a), including, and not limited to, providing the California Labor and Workforce
14 Development Agency (“LWDA”) and the employer with written notice of the specific
15 provisions of the California Labor Code that are alleged to have been violated, including the
16 facts and theories to support the alleged violations, by way of written correspondence on
17 September 10, 2021 (“Naylor PAGA Notice”). The PAGA Notice was sent by U.S. Certified
18 Mail to the employer and submitted to the LWDA by way of online submission on the LWDA’s
19 website. A true and correct copy of the September 10, 2021, Naylor PAGA Notice is attached
20 hereto as **“EXHIBIT 2.”**

21 **THE LITIGATION AND WORK PERFORMED**
22 **BY PLAINTIFFS’ COUNSEL**

23 9. Attorneys at Lawyers *for* Justice, PC have fully and actively participated in the
24 litigation process from the inception of the *Medina* Action, which was filed on July 12, 2021,
25 and the *Naylor* Action, which was filed on November 15, 2021. On December 20, 2024, the
26 *Medina* Action and *Naylor* Action were consolidated, *Medina* Action was designated as the lead
27 case. Since joining forces with and associating the attorneys at Protection Law Group, LLP as
28 co-counsel in the *Medina* Action, we have worked cooperatively with them to strategize and

1 prosecute the Actions, and our work with them has been a coordinated and combined effort.
2 Together, Lawyers *for* Justice, PC and Protection Law Group, LLP are referred to as “Plaintiffs’
3 Counsel.” Ultimately, the efforts of Plaintiffs and Plaintiffs’ Counsel have resulted in a
4 settlement recovery in the Actions.

5 10. Before initiating the Actions, Lawyers *for* Justice, PC conducted extensive
6 investigation and research into the facts and circumstances underlying the pertinent factual and
7 legal issues and applicable law. This required thorough discussions and interviews between
8 attorneys Lawyers *for* Justice, PC and Plaintiffs, and research into the various legal issues
9 involved in the Actions, namely, the current state of the law as it applied to off-the-clock theory,
10 meal and rest periods, PAGA claims, wage-and-hour enforcement, Plaintiffs’ allegations, and
11 potential defenses. Plaintiffs’ core allegation is that Defendants have violated the California
12 Labor Code by engaging in a uniform practice and procedure, with respect to Plaintiffs and other
13 aggrieved employees, of, *inter alia*, failing to pay overtime and minimum wages, failing to
14 provide compliant meal and rest periods and associated premiums, failing to pay timely wages
15 during employment and upon termination of employment, failing to provide complete and
16 accurate itemized wage statements, failing to keep complete and accurate payroll records, and
17 failing to reimburse necessary business-related expenses and costs.

18 11. Collectively, Plaintiffs’ Counsel investigated the veracity, strength, and scope of
19 the PAGA claims in the Actions, and was also preparing the case for trial, prior to reaching the
20 settlement. Plaintiffs’ Counsel conducted extensive investigation, research into legal and factual
21 issues, served formal discovery requests and notices of deposition, reviewed and analyzed
22 Defendants’ responses and objections to discovery requests and notices of deposition, and
23 conducted extensive informal discovery and review and analysis of a volume of information,
24 documents, and data. Plaintiffs’ Counsel also met and conferred with Defendants’ counsel on
25 numerous occasions, e.g., to discuss issues relating to the pleadings, motion practice, case
26 management, trial court proceedings, formal and informal discovery and the production of
27 information, documents, and data in the course of litigation and in connection with mediation
28 and settlement discussions, and mediation and settlement negotiations. Other work that Lawyers

1 *for Justice*, PC has performed includes, and is not limited to, case strategy and analysis; case
2 management; drafting, reviewing, and revising the pleadings, motion-related papers (e.g.,
3 relating to Defendants' motions seeking to compel arbitration and dismissal and/or stay of the
4 Plaintiffs' claims and the Actions and Defendants' Notice of Related Case in the *Medina*
5 Action); claims assessment and evaluation; and preparing for and attending mediation and
6 settlement negotiations (including and not limited to, the July 17, 2023 mediation conducted by
7 Eve Wagner, Esq. and extensive settlement negotiations thereafter). *Lawyers for Justice*, PC
8 also expended time researching applicable law, which is evolving as it relates to PAGA
9 representative actions, arbitration agreements, wage-and-hour enforcement, Plaintiffs'
10 allegations, and Defendants' defenses thereto, as well as the facts discovered.

11 12. After engaging in extensive investigations and formal and informal discovery and
12 exchange of information, the parties in the Actions participated in settlement negotiations to try
13 to resolve the matter. These efforts included participating in a mediation on July 17, 2023,
14 conducted by Eve Wagner, Esq., a well-respected mediator experienced in mediating complex
15 labor and employment matters, and extensive settlement negotiations thereafter. In the course
16 of mediation and settlement negotiations, the parties discussed all aspects of the Actions,
17 including the risks and delays of further litigation and proceeding with trial, as well as the law
18 relating to representative PAGA actions, off-the-clock theory, meal and rest breaks, wage-and-
19 hour enforcement, the evidence produced and analyzed, and the possibility of bifurcation of
20 discovery and/or trial and appeals, among other things. During all settlement discussions, the
21 parties conducted their negotiations at arm's length in an adversarial position. The parties
22 ultimately reached a settlement by accepting the mediator's proposal on or about July 13, 2024.

23 13. As set forth more fully in the accompanying motion, Plaintiffs seek an award of
24 attorneys' fees to Plaintiffs' Counsel in the amount of One Hundred and Five Thousand Dollars
25 and No Cents (\$105,00.00), which represents approximately thirty-five percent (35%) of the
26 Gross Settlement Amount, as provided by the Settlement Agreement. Pursuant to the
27 contingency-fee agreement entered into by and between Plaintiff *Medina* and *Lawyers for*
28 *Justice*, PC and the contingency-fee agreement entered into by and between Plaintiff *Naylor* and

1 Lawyers *for* Justice, PC, Plaintiffs have each agreed to a contingency fee of at least thirty-five
2 percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk
3 that Plaintiffs' Counsel took in commencing the cases; (2) the time, effort, and expense that
4 Plaintiffs' Counsel dedicated to the cases; (3) the skill and determination that Plaintiffs' Counsel
5 have shown; (4) the results that Plaintiffs' Counsel have achieved throughout the litigation; (5)
6 value of the settlement that Plaintiffs' Counsel have achieved in the cases; and (6) the other
7 cases that Plaintiffs' Counsel have turned down in order to devote their time and efforts to the
8 cases.

9 14. While not necessarily required to be demonstrated because a percentage of the
10 fund is proper for the settlement in this matter, it should be noted that Plaintiffs' Counsel have
11 performed many hours of work in connection with prosecuting the cases such that the requested
12 attorneys' fees award is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice,
13 PC have spent a total of **178.20 hours** performing tasks to obtain a recovery in this matter. An
14 Attorney Task and Time Chart is attached to the accompanying Declaration of Heather Davis in
15 Support of Plaintiffs' Motion for Order Approving Settlement Pursuant to California Labor
16 Code Private Attorneys General Act and Entering Judgment. The chart sets forth in detail the
17 nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and Protection Law
18 Group, LLP, and the time incurred in performing those services. The hours attributable to
19 Lawyers *for* Justice, PC include work done by myself and several other attorneys at Lawyers
20 *for* Justice, PC. Additionally, separate from the hours referenced herein and, in the chart,
21 Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the
22 prosecution of the matter.

23 15. The work performed in this particular matter, the background of Lawyers *for*
24 Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys
25 who worked on this matter, in litigating complex wage-and-hour class and PAGA representative
26 actions, support a reasonable blended hourly rate of compensation of at least \$850 per hour for
27 work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded
28 attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services

1 performed, by courts granting approval of wage and hour class action and/or representative
2 action settlements in other cases, including and not limited to, the following: final approval of
3 the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.*
4 (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the
5 award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval
6 of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan*
7 (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award
8 of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final approval of
9 the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County
10 Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys'
11 fees involved compensation at the hourly rate of \$855.96 per hour.

12 **LITIGATION COSTS AND EXPENSES INCURRED**

13 **BY LAWYERS *for* JUSTICE, PC**

14 16. To date, Plaintiffs' Counsel have, collectively, borne all of the risks and costs of
15 litigation in the actions and will not receive any compensation until recovery is obtained in the
16 matter. Lawyers *for* Justice, PC seeks reimbursement in the amount of Nine Hundred Eight-Two
17 Dollars and Twenty-Three Cents (\$982.23) for litigation costs and expenses incurred in the
18 *Medina* Action and One Thousand Eight Hundred Forty-Three Dollars and Twenty-Nine Cents
19 (\$1,843.29) for litigation costs and expenses incurred in the *Naylor* Action, as reflected in the
20 Case Cost Detail attached hereto as "**EXHIBIT 1.**" These expenses were reasonable and
21 necessary in the prosecution of the Actions and to obtain the Settlement.

22 **GENERAL RELEASE PAYMENT TO PLAINTIFFS**

23 17. For their broader individual waiver and release of claims with a California Civil
24 Code Section 1542 waiver (set forth in Sections 11 and 59(a) of the Settlement Agreement), the
25 Settlement provides for Representative Payments to Plaintiffs in the amount of Seven Thousand
26 Five Hundred Dollars and No Cents (\$7,500.00) each, or Fifteen Thousand Dollars and No Cents
27 (\$15,000.00) total, to be paid out of the Gross Settlement Amount, subject to approval by the
28 Court. It is also worth noting that Plaintiffs undertook significant efforts and work to spearhead

1 the litigation of their respective cases. By initiating and pursuing the cases, Plaintiffs stepped
2 into the shoes of the State of California and undertook the responsibilities of serving in
3 representative capacities. For example, Plaintiffs have spent a substantial amount of time and
4 effort discussing their employment with their counsel and providing the facts and evidence
5 necessary to attempt to prove the allegations. Plaintiffs were available whenever their counsel
6 needed them and actively tried to obtain and provide information that would facilitate the pursuit
7 of the PAGA claims. Accordingly, it is fair and appropriate for Plaintiffs to receive
8 Representative Payments in addition to their individual portions of the settlement as aggrieved
9 employees.

10 18. Undersigned counsel submits that the Settlement fulfills the purpose of the PAGA
11 statute, is within the accepted range of recoveries for this type of litigation, and is fair,
12 reasonable, and adequate given the substantial monetary benefits provided for by the Settlement,
13 the strengths and weaknesses of the cases, and the inherent delay, costs, risks, and uncertainty
14 associated with continued litigation.

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

17 Executed this 14th day of April 2025, at New Ulm, Minnesota.

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19 

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21 _____
Alicia Brush

EXHIBIT 1

LAWYERS for JUSTICE PC CASE COST DETAIL
Medina vs. 5648 East Gotham Street LLC (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/19/2020	U.S. Postmaster	Postage	\$7.00
12/22/2020	U.S. Postmaster	Postage	\$9.50
2/1/2021	U.S. Postmaster	Postage	\$7.20
4/6/2021	U.S. Postmaster	Postage	\$8.05
5/6/2021	U.S. Postmaster	Postage	\$14.32
5/6/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
7/13/2021	Legal Document Server, Inc.	Attorney Service	\$30.43
7/13/2021	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
8/11/2021	ProLegal	Attorney Service	\$160.10
10/1/2021	One Legal	Attorney Service	\$16.68
11/8/2021	Legal Document Server, Inc.	Attorney Service	\$21.58
11/8/2021	Los Angeles Superior Court	Jury Fee	\$150.00
11/12/2021	Legal Document Server, Inc.	Attorney Service	\$26.20
1/6/2022	General Logistics Systems US, Inc.	Courier Service	\$21.17
Total:			<u>\$982.23</u>

LAWYERS for JUSTICE PC CASE COST DETAIL
Naylor vs. 5648 East Gotham Street LLC (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/10/2021	U.S. Postmaster	Postage	\$31.00
9/10/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
11/16/2021	Legal Document Server, Inc.	Attorney Service	\$33.69
11/16/2021	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
3/3/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
3/7/2022	ProLegal	Attorney Service	\$88.42
3/7/2022	ProLegal	Attorney Service	\$138.67
4/6/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
4/6/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
5/4/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
5/25/2022	General Logistics Systems US, Inc.	Courier Service	\$22.22
6/13/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
8/1/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
11/23/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
3/15/2023	Legal Document Server, Inc.	Attorney Service	\$15.95
3/28/2023	Legal Document Server, Inc.	Attorney Service	\$15.95
4/11/2023	Coalition Court Reporters	Court Reporter	\$790.40
4/12/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
10/3/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
10/31/2024	Legal Document Server, Inc.	Attorney Service	\$19.09
10/31/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
11/4/2024	Legal Document Server, Inc.	Attorney Service	\$17.70
Total:			<u>\$1,843.29</u>