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

PEDRO GERMAN, 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;

Plaintiff,

v.

FRESH LINK LOGISTICS, LLC, a
California limited liability company; and
DOES 1 through 100, inclusive,

Defendant.

Case No.: BC719412

Honorable Lawrence P. Riff
Department SSC7

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES, COSTS, AND SERVICE AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Service Award;
Declaration of Class Representative (Pedro
German); Declaration of Settlement
Administrator (Lindsey Kline); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: December 27, 2022
Time: 11:00 a.m.
Department: SSC7

Complaint Filed: August 28, 2018
FAC Filed: January 14, 2019
SAC Filed: October 21, 2021
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, 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 Pedro German (“Plaintiff”) and the Class. 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 June 16, 2022, in Department SSC7 of the above-entitled Court, the Honorable Amy D. Hogue preliminarily approved the First Amended Stipulation of Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Fresh Link Logistics, LLC (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Pedro German to represent the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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

WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned action since prior to its commencement on August 28, 2018.

5. Before initiating the case, Lawyers *for* Justice, PC investigated and researched the

1 facts and circumstances underlying the pertinent factual and legal issues and applicable law. This
2 required thorough discussions and interviews between attorneys at our firm and Plaintiff and
3 research into the various legal issues involved in the case, namely, the current state of the law as
4 it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement
5 and penalties, Plaintiff's claims and allegations, and potential defenses. After conducting initial
6 investigation, our firm determined that the claims of Plaintiff were well-suited for class-wide
7 adjudication owing to what appeared to be a common course of conduct affecting a similarly
8 situated group of current and former hourly non-exempt employees employed by Defendant, who
9 were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest
10 periods, and business expenses.

11 6. Class Counsel investigated the veracity, strength, and scope of the claims, and was
12 preparing the matter for class certification and trial, prior to reaching the Settlement. The case
13 has involved significant investigations, extensive research into legal and factual issues (including
14 the federal exemptions applicable to commercial drivers, who made up a large portion of the
15 putative class), extensive motion practice (including successfully opposing Defendant's attempts
16 to demurrer, move to strike, and obtain summary judgment and summary adjudication),
17 significant formal and informal discovery (including, and not limited to, regarding joint employer
18 and alter ego issues), and also formal and informal exchange of information and data in
19 preparation for a mandatory settlement conference and mediation. Class Counsel propounded
20 multiple sets of written discovery requests on Defendant and previous defendant Field Fresh
21 Foods, Inc. ("Field Fresh") (Defendant Fresh Link Logistics, LLC and Field Fresh are together
22 referred to as "Defendants"), specifically, Requests for Production of Documents (Sets One and
23 Two), Special Interrogatories (Sets One, Two, and Three), and Form Interrogatories-General (Set
24 One), and served notices of deposition of Defendants' person(s) most knowledgeable designees
25 along with requests for production of documents. Class Counsel reviewed Defendants' responses
26 and objections to discovery requests and deposition notices, and also worked with Plaintiff to
27 provide responses and objections to discovery requests and deposition notices that were served
28 on Plaintiff by Defendants. Class Counsel prepared for and took the deposition of Defendants'

1 Person Most Knowledgeable witnesses and prepared for and defended a full-day deposition of
2 Plaintiff. Class Counsel also interviewed and obtained information from Plaintiff and other Class
3 Members, including and not limited to the names of potential witnesses, and reviewed and
4 analyzed a large volume of documents and data obtained from Plaintiff, Defendants, and other
5 sources. The documents and data reviewed and analyzed by Class Counsel included, and were
6 not limited to, employment records of Plaintiff, a detailed sampling of Class Members' time and
7 pay data and records, multiple iterations of Defendant's Employee Handbook, company policy
8 acknowledgements, internal memoranda, job descriptions, new hire orientation video and training
9 documents, Defendant's operations and employment policies, practices, procedures, and
10 forms(including but not limited to Defendant's Good Manufacturing Practices, Meal and Rest
11 Period Acknowledgement, Employee Performance Review, and Voicemail and Email Policy),
12 among other information and documents. Class Counsel researched applicable law, evaluated
13 liability, damages, and penalties issues in preparation for the mandatory settlement conference
14 and prepared liability, damages, and penalties valuation models in preparation for mediation, and
15 met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues
16 relating to the pleadings, case management, discovery, *Belaire-West* process, and production of
17 various documents and data prior to the mandatory settlement conference and mediation. Other
18 work performed by Class Counsel included, and was not limited to, case strategy and analysis;
19 drafting, reviewing, and revising pleadings, motion-related papers, the mandatory settlement
20 conference statement, and the mediation brief; preparing and appearing for court proceedings;
21 and preparing for and attending the mandatory settlement conference, mediation, and settlement
22 negotiations, among other tasks.

23 7. As outlined herein, the parties have conducted significant formal and informal
24 discovery and investigation during the course of litigating the case. Class Counsel analyzed a
25 large volume of information, documents, and data obtained from Plaintiff, Defendants, and other
26 sources. These documents and data provided a critical understanding of the nature of the
27 employment relationship and work performed by the Class Members, as well as Defendant's
28 operations and employment policies, practices, and procedures, and were used in analyzing

1 liability, damages, and penalties valuation issues in connection with all phases of the litigation,
2 and ultimately, in connection with the mediation and settlement negotiation process. Class
3 Counsel also performed significant research into the applicable law, which is constantly evolving
4 as it relates to certification, off-the-clock theory, meal and rest periods, arbitration agreements,
5 PAGA claims and penalties, joint employer/alter ego, wage-and-hour enforcement, federal and
6 state transportation regulations, federal preemption, Plaintiff's claims and damages, and
7 Defendant's defenses.

8 8. After conducting significant investigation of the facts and law during the
9 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
10 try to resolve the entire matter. These efforts included participating in a court-supervised
11 mandatory settlement conference conducted by Hon. Lisa Hart Cole, and also participating in a
12 formal, full-day mediation conducted by Eve Wagner, Esq.—both neutrals are well-regarded and
13 experienced in mediating complex labor and employment matters. During all settlement
14 discussions, the parties conducted their negotiations at arm's length in an adversarial position. In
15 the course of settlement discussions and mediation, the parties exchanged information and data,
16 and discussed all aspects of the case, including the risks and delays of further litigation, the risks
17 to the parties of proceeding with class certification and trial, the law relating to off-the-clock
18 theory, meal and rest periods, arbitration agreements representative PAGA claims, joint
19 employer/alter ego, wage-and-hour enforcement, federal and state transportation regulations, and
20 federal preemption, the evidence produced and analyzed, and the possibility of appeals, among
21 other things. Arriving at a settlement that was acceptable to the parties was not easy. Defendants
22 contended that Defendant Fresh Foods, Inc. was a separate business and not an employer of the
23 putative class, and they further contended that individualized questions of fact predominate over
24 any common issues, and these issues would pose challenges to class certification and
25 representative adjudication. Defendants and their counsel felt very strongly about Defendants'
26 ability to prevail on the merits (including, and not limited to, demonstrating that Field Fresh
27 Foods, Inc. could not be held liable) and to obtain a denial of class certification, while Plaintiff
28 and Class Counsel believed that class certification would be obtained and that they would prevail

at trial. With the aid of the mediator's evaluation, the parties agreed that the case was well-suited for settlement given the legal issues relating to Plaintiff's principal claims, factual circumstances, 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 case, and the real possibility of no recovery after years of litigation.

9. As set forth more fully in the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$161,875.00, which is thirty-five percent (35%) of the Gross Fund Value of \$462,500.00, as set forth in the Settlement Agreement and the Class Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter.

10. I am aware that the common and acceptable rate for contingency representation in wage and hour class action litigation is normally 40% before trial, with the range being from 33.3% up to 50%.

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a simple lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **695.80 hours** performing tasks and obtaining recovery in the case. Attached hereto as **"EXHIBIT A"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred in performing those services. These hours include

work done by myself and several other attorneys at the firm. Also, separate from the hours reference herein, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this case, in litigating complex wage-and-hour matters, and in particular, employment class and representative actions, support a reasonable blended hourly rate of compensation at the rate of \$700 for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$700 per hour for legal services performed, by courts granting approval of wage and hour settlements in other cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; 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 an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v.*

1 *Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15,
2 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of
3 the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers*
4 (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017,
5 and the award of attorneys' fees involved an hourly rate of \$845.64.

6 **ADEQUACY OF LAWYERS for JUSTICE, PC**

7 **EDUCATION**

8 13. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris
9 Doctor degree. I have extensive formal training in dispute resolution and negotiation from the
10 Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree
11 program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles
12 County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from
13 the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard*
14 *University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a
15 concentration in Natural Sciences from *Pepperdine University*.

16 **JUDICIAL EXTERNSHIPS**

17 14. From approximately September 2002 to approximately December 2002, I served
18 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of Appeals*
19 *for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I served as
20 a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal for the*
21 *Second Appellate District*.

22 **LITIGATION AND CLASS ACTION EXPERIENCE**

23 15. In December of 2004, I obtained a license to practice law from the California State
24 Bar. From approximately December 2004 to approximately August 2008, I was employed by
25 *Girardi & Keese*.

26 16. At *Girardi & Keese*, my practice focused on class actions and other complex cases
27 involving toxic torts and products liability. In addition, I gained substantial experience on cases
28 involving insurance bad faith, premises liability, and medical negligence. While employed by

1 *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150
2 depositions, and prepared dozens of expert witnesses for deposition or trial.

3 17. Since its inception, in or around October of 2008, *Lawyers for Justice, PC* has
4 almost exclusively focused on the prosecution of consumer and employment class actions,
5 involving wage-and-hour claims, race discrimination, unfair business practices or consumer
6 fraud. Currently, *Lawyers for Justice, PC* is the attorney of record in well over a dozen
7 employment-related putative class actions in both state and federal courts in the State of
8 California. *Lawyers for Justice, PC* has successfully litigated cases involving the executive,
9 administrative, and other overtime exemptions to the State of California and federal overtime
10 compensation requirements. During this relatively short time, in association with other law firms,
11 *Lawyers for Justice, PC* has recovered millions of dollars on behalf of thousands of individuals
12 in California.

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

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

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

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

27 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class action against a national property management company involving

1 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court
2 granted final approval of the class action settlement. The Los Angeles County Superior Court
3 Case Number is BC430918.

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

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

14 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
15 wage-and-hour class and PAGA representative action against a national wholesale distributor of
16 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
17 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
18 representative action settlement. The Sacramento County Superior Court Case Number is 34-
19 2012-00136285.

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

25 h) LFJ, in association with co-counsel therein, represented the plaintiff in a
26 wage-and-hour class and PAGA representative action against a national retailer of household
27 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted
28

1 final approval of the class and PAGA representative action settlement. The San Francisco County
2 Superior Court Case Number is CGC-13-532344.

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

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

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

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

25 m) LFJ represented the plaintiff in a PAGA representative action against a real
26 estate and property management company, on behalf of non-exempt employees. On November
27 4, 2016, the court granted approval of the PAGA representative action settlement. The Orange
28 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

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

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

23 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class and PAGA representative action against a manufacturer of food service
25 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final
26 approval of the class and PAGA representative action settlement. The Orange County Superior
27 Court Case Number is 30-2015-00810013-CU-OE-CXC.
28

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

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

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

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

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

23 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
24 representative action against a manufacturer of plastic containers on behalf of non-exempt
25 employees. On October 31, 2017, the court granted final approval of the class and PAGA
26 representative action settlement. The Los Angeles County Superior Court Case Number is
27 BC577233.
28

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

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

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

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

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

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

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

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

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

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

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

26 ii) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class and PAGA representative action against a medical equipment supplier on
28 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion

1 for class certification and certified a class. The San Bernardino County Superior Court Case
2 Number is CIVDS1505744.

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

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

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

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

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

24 19. To date, Class Counsel has borne all of the risks and costs of litigation and will not
25 receive any compensation until recovery is obtained in the above-captioned action. Lawyers *for*
26 Justice, PC seeks reimbursement of **\$35,492.41** in litigation costs and expenses incurred in this
27 matter, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and
28 necessary in the prosecution of the case and to obtain the Settlement.

SERVICE AWARD TO PLAINTIFF

20. In recognition of his efforts and work serving as the Class Representative, the Settlement provides for a Service Award in the amount of \$5,000.00 to Plaintiff Pedro German. The requested Service Award is fair and appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant documents and past employment records and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiff worked with his counsel to provide responses and supplemental responses to discovery requests propounded by Defendants and to prepare for and attend deposition. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain information that would facilitate the pursuit of the class and PAGA claims. Plaintiff spent numerous hours speaking with Class Counsel about his claims, describing his work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Pedro German to receive \$5,000.00 as a reasonable Service Award, for his services on behalf of the Class Members, State of California, and Aggrieved Employees, in addition to his Individual Settlement Payment and Individual PAGA Payment.

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

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

Executed this 2nd day of December 2022, at Glendale, California.



Edwin Aiwasian

EXHIBIT A

GERMAN V. FIELD FRESH FOODS, INC., ET AL.
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. BC719412)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality	10.20
Pre-Lawsuit Investigation of the Merits of Plaintiff Pedro German’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	9.10
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Former Defendant Field Fresh Foods, Inc. (“Defendant Field Fresh”) and Defendant Fresh Link Logistics, LLC (“Defendant Fresh Link”) (Defendant Field Fresh and Defendant Fresh Link are together referred to as “Defendants”)) with Respect to Plaintiff and the Putative Class Members	12.50
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Private Attorneys General Act (“PAGA”), Joint Employer, Alter Ego, and Certification Decisions in California, Including all New and Relevant DLSE Materials	9.50
Investigation of Defendants, Defendants’ Business Relationships, and the Industry in which Defendants Operate	3.40
Investigation of Defendants’ Organizational and Corporate Structures, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members	3.80

Investigation of Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	3.10
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	5.20
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 Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	5.70
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Consumer 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	6.90
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	5.30
Research and Investigation Re: Defendants' Policies, Practices, and Procedures Relating to Customer Service, Orders/Invoices, Deliveries, Routes, Timekeeping, Scheduling, Pre- and Post-Trip Inspections, Meetings, Meal/Rest Breaks, On-Premises Breaks, Idle Time, Driver Logs, Meal Period Waivers, Meal/Rest Premiums, Overtime Compensation, Non-Discretionary Bonuses/Incentive/Shift Premiums, Safety and Compliance, Dress Code/Uniform, Footwear and PPE, Electronic Logging and Company-Issued Smartphones, Use of Personal Cell Phone, Reimbursement of Business-Related Expenses, Shared Services and Business-to-Business Contract, and Arbitration Agreements	18.50
Research and Investigation Re: Software Programs and Other Technology Defendant Uses to Conduct Everyday Business, Including Logistics, GPS/Location/Routing, Timekeeping, Sales, Inventory, Document and Information Management, and Customer Relations Management Systems, with a Focus on	5.50

What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked and Off-the-Clock Time Worked Pre/Post-Shift and During Meal Breaks	
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, Release, Pre-Emption, Compliant Policies, Arbitration Agreements, and Federal and State Regulations Re: Commercial Vehicle Drivers and Motor Vehicle Safety	10.10
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	5.40
Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, and the <i>Angela Koh v. Field Fresh</i> Class Action Lawsuit and Settlement	5.80
Meet and Communicate with Plaintiff Pedro German Throughout the Pendency of the Case	22.50
Investigate, Meet and Communicate with, and Conduct Interviews of Putative Class Members and Percipient Witnesses	16.70
Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on August 28, 2018)	7.50
Review Court's Notice of Case Assignment (filed on August 28, 2018)	0.10
Review Court's Initial Status Conference Order (filed on September 10, 2018)	0.20
Review Court's Minute Order Re: Order Regarding Newly Filed Class Action (filed on September 10, 2018)	0.10
Draft Plaintiff's Notice of Related Case (filed on September 13, 2018)	0.30

Review Defendants' Response and Opposition to Plaintiff's Notice of Related Case (served on September 24, 2018)	0.70
Draft Plaintiff's Reply to Defendants' Opposition to the Notice of Related Actions (filed on September 27, 2018)	0.80
Review Defendants' Declaration of Marjorie C. Soto Regarding Defendants' Efforts to Meet and Confer Pursuant to Cal. Code of Civ. Pro. §§430.41(A)(2) and 435.5(A)(2) (served on October 5, 2018)	0.50
Review Defendants' Notice of Appearance (served on October 16, 2018)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Initial Status Conference Statement (submitted on December 7, 2018)	1.60
Review Court's Minute Order Re: Initial Status Conference (filed on December 14, 2018)	0.10
Review Court's Minute Order Re: Further Status Conference (filed on December 14, 2018)	0.10
Review Defendants' [Proposed] Order Authorizing Electronic Service: Case Anywhere (served on December 31, 2018)	0.20
Review Court's Minute Order Re: Non- Appearance Case Review Re: Notice of Related Case (filed on January 4, 2019)	0.10
Review Court's Order Authorizing Electronic Service: Case Anywhere (filed on January 4, 2019)	0.10
Draft Plaintiff's First Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on January 14, 2019)	4.50
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on January 15, 2019)	0.10

Review Defendants' Notice to Consumer or Employee and Objection Re: JC Sales, Inc. (served on February 1, 2019)	0.30
Review Defendants' Notice to Consumer or Employee and Objection Re: Tapia Co. (served on February 1, 2019)	0.30
Meet and Confer with Defendants' Counsel, and Draft Joint Further Status Conference Statement (submitted on May 2, 2019)	1.30
Review Defendants' Notice of Change of Address (served on May 23, 2019)	0.10
Review and Analyze Defendants' Answer to First Amended Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (served on June 14, 2019)	2.10
Review and Analyze Defendants' Amended Answer to First Amended Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (served on June 17, 2019)	1.80
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and Protective Order (submitted on August 14, 2019)	2.10
Review Court's Order Re: Protective Order (filed on August 15, 2019)	0.30
Meet and Confer with Defendants' Counsel, and Draft Joint Further Status Conference Statement (submitted on September 13, 2019)	1.80
Review Court's Minute Order Re: Further Status Conference (filed on September 13, 2019)	0.10
Draft Plaintiff's Notice Regarding September 19, 2019 Further Status Conference (filed on September 26, 2019)	0.60
Meet and Confer with Defendants' Counsel, and Draft Joint Further Status Conference Statement (submitted on October 23, 2019)	1.20

Review Court's Minute Order Re: Further Status Conference (filed on October 28, 2019)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to: (1) Move Class Discovery Motion to Compel Deadline and (2) Move Class Certification Deadline, an [Proposed] Order (submitted on January 17, 2020)	1.10
Review Court's Order to Move All Class Discovery Motion to Compel Deadlines and Move Class Certification Deadline (filed on January 27, 2020)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Further Status Conference Statement (submitted on January 29, 2020)	1.20
Review Court's Minute Order Re: Further Status Conference (filed on February 5, 2020)	0.10
Review Court's Minute Order Continuing Further Status Conference Hearing (filed on April 21, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (submitted on July 7, 2020)	1.20
Review Court's Minute Order Re: Further Status Conference; Hearing on Motion for Summary Judgment (filed on July 14, 2020)	0.10
Review Court's Statement of Policies and Procedures for Remote Video Conferences; Acknowledgment of Receipt and Stipulation (filed on July 28, 2020)	0.20
Review Court's Minute Order Re: Post-Mediation Status Conference (filed on September 2, 2020)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Stay Discovery and Continue Plaintiff's Motion for Class Certification Filing Deadline Pending Mediation (filed on September 3, 2020)	1.10
Review Court's Order to Stay Discovery and Continue Plaintiff's Motion for Class Certification Filing Deadline Pending Mediation (filed on September 3, 2020)	0.10

Review Court's Minute Order Re: Court Order Continuing Post-Mediation Status Conference (filed on March 2, 2021)	0.10
Review Court's Minute Order Re: Court Order Continuing Post-Mediation Status Conference (filed on March 24, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Post-Mediation Status Conference Report (submitted on April 26, 2021)	1.10
Review Court's Minute Order Re: Post-Mediation Status Conference (filed on April 29, 2021)	0.10
Review Court's Minute Order Re: Court Order Continuing Hearing Date (filed on June 3, 2021)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing for Motion for Preliminary Approval of Settlement (filed on July 20, 2021)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Status Conference Statement (submitted on August 18, 2021)	1.10
Review Court's Minute Order Re: Court Order (filed on August 19, 2021)	0.10
Draft Plaintiff's Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved; Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File a Second Amended Complaint and Dismissal of Field Fresh Foods, Inc. Without Prejudice; and [Proposed] Order (submitted on October 15, 2021)	6.40
Review Court's Order Granting Plaintiff Leave to File a Second Amended Complaint and Dismissal of Field Fresh Foods, Inc. Without Prejudice (filed on October 19, 2021)	0.20

Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to File and Serve Per Code Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on October 22, 2021)	1.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing for Motion for Preliminary Approval of Settlement (filed on October 26, 2021)	0.10
Review and Analyze Defendant Fresh Link Logistics, LLC's Answer to Second Amended Class Action Complaint for Damages and Research Affirmative Defenses in Defendant Fresh Link Logistics, LLC's Answer (served on November 4, 2021)	1.40
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing for Motion for Preliminary Approval of Settlement (filed on November 30, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on May 23, 2022)	1.10
Review Court's Order to Continue Plaintiff's Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement (filed on May 24, 2022)	0.10
Review Defendant Fresh Link Logistics, LLC's Notice of Appearance of Ashley Attia (served on June 13, 2022)	0.10
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on June 29, 2022)	0.10

Appearances	
Prepare for, Travel to/from, and Attend Initial Status Conference (December 17, 2018)	2.90
Prepare for and Telephonically Attend Further Status Conference (September 26, 2019)	0.80
Prepare for, Travel to/from, and Attend Further Status Conference (October 29, 2019)	2.90
Prepare for and Telephonically Attend Hearing on Motion for Summary Judgment and Case Management Conference (July 14, 2020)	5.10
Prepare for and Telephonically Attend Mandatory Settlement Conference (August 4, 2020)	2.50
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (June 16, 2022)	2.20
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Service Award (December 27, 2022) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Pedro German (served on July 8, 2018)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Pedro German (served on August 8, 2018)	2.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (January 21, 2019; Wage and Hour Practices) (served on December 20, 2018)	4.20

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (January 22, 2019; Organizational Structure) (served on December 20, 2018)	3.60
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Field Fresh Foods, Inc. and Requests for Production of Documents (January 23, 2019; Organizational Structure) (served on December 20, 2018)	3.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Field Fresh Foods, Inc. and Requests for Production of Documents (January 24, 2019; Job Duties) (served on December 20, 2018)	3.50
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Field Fresh Foods, Inc. (served on December 20, 2018)	7.10
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Fresh Link Logistics, LLC (served on December 20, 2018)	6.30
Review Defendant Fresh Link Logistics, LLC's Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC's and Requests for Production of Documents (January 21, 2019; Job Duties) (served on January 14, 2019)	1.90
Review Defendant Fresh Link Logistics, LLC's Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC's and Requests for Production of Documents (January 22, 2019; Organizational Structure) (served on January 14, 2019)	1.10
Review Defendant Fresh Link Logistics, LLC's Responses to Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Fresh Link Logistics, LLC's (served on January 23, 2019)	5.80

Review Defendant Fresh Link Logistics, LLC's Notice of Deposition of Plaintiff Pedro German (served on March 5, 2019)	0.50
Review Defendant Fresh Link Logistics, LLC's Special Interrogatories (Set One), Request for Production of Documents (Set One), and Declaration of Marjorie C. Soto for Additional Special Interrogatories to Plaintiff (served on March 5, 2019)	1.70
Review Defendant Fresh Link Logistics, LLC's Supplemental Responses to Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Fresh Link Logistics, LLC (served on April 18, 2019)	5.90
Review Defendant Fresh Link Logistics, LLC's Amended Supplemental Responses to Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Fresh Link Logistics, LLC (served on April 24, 2019)	3.80
Draft Plaintiff's Responses to Defendant Fresh Link Logistics, LLC's Special Interrogatories (Set One) and Request for Production of Documents (Set One) (served on April 29, 2019)	7.80
Draft Plaintiff's Objection to Defendant Fresh Link Logistics, LLC.'s Notice of Deposition of Plaintiff Pedro German (served on April 29, 2019)	0.90
Review Defendant Fresh Link Logistics, LLC's Further Supplemental Responses to Plaintiff's Special Interrogatories (Set Two) and Requests for Production of Documents (Set One) to Defendant Fresh Link Logistics, LLC (served on May 24, 2019)	1.10
Draft Plaintiff's Objections to Defendant Fresh Link Logistics, LLC's Notice of Deposition of Plaintiff Pedro German (filed on May 29, 2019)	0.90
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (March 21, 2019 and June 14, 2019)	1.80

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (July 11, 2019; Organizational Structure) (served on June 17, 2019)	2.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (July 16, 2019; Wage and Hour Practices) (served on June 17, 2019)	2.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Field Fresh Foods, Inc. and Requests for Production of Documents (July 24, 2019; Organizational Structure) (served on June 17, 2019)	2.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Field Fresh Foods, Inc. and Requests for Production of Documents (August 1, 2019; Wage and Hour Practices) (served on June 17, 2019)	2.20
Review Defendant Field Fresh Foods, Inc.'s Responses to Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), and Special Interrogatories (Set Two) to Defendant Field Fresh Foods, Inc. (served on June 21, 2019)	4.70
Draft Plaintiff's Supplemental Responses to Defendant Fresh Link Logistics, LLC's Special Interrogatories (Set One) and Request for Production of Documents (Set One) (served on June 21, 2019)	13.50
Review Defendant Fresh Link Logistics, LLC's Further Supplemental Responses to Plaintiff's Special Interrogatories (Set Two) and Requests for Production of Documents (Set One) to Defendant Fresh Link Logistics, LLC (served on June 28, 2019)	2.50
Review Defendant Fresh Link Logistics, LLC's Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (July 11, 2019; Organizational Structure) (served on July 3, 2019)	1.90

Review Defendant Fresh Link Logistics, LLC's Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (July 16, 2019; Wage and Hour Practices) (served on July 3, 2019)	2.50
Draft Plaintiff's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (August 28, 2019; Organizational Structure) (served on July 12, 2019)	2.20
Draft Plaintiff's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (September 4, 2019; Wage and Hour Practices) (served on July 12, 2019)	2.40
Review Defendant Field Fresh Foods, Inc.'s Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Field Fresh Foods, Inc. and Requests for Production of Documents (July 24, 2019; Organizational Structure) (served on July 17, 2019)	1.90
Review Defendant Field Fresh Foods, Inc.'s Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Field Fresh Foods, Inc. and Requests for Production of Documents (August 1, 2019; Wage and Hour Practices) (served on July 17, 2019)	2.60
Review Defendant Fresh Link Logistics, LLC's Amended Notice of Deposition of Plaintiff Pedro German (served on August 14, 2019)	0.20
Draft Plaintiff's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (November 6, 2019; Wage and Hour Practices) (served on August 14, 2019)	2.30
Draft Plaintiff's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (November 6, 2019; Organizational Structure) (served on August 14, 2019)	2.10

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (November 6, 2019; Affirmative Defenses) (served on August 16, 2019)	3.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Field Fresh Foods, Inc. and Requests for Production of Documents (November 7, 2019; Affirmative Defenses) (served on August 16, 2019)	2.50
Review Defendant Field Fresh Foods, Inc.'s Responses to Plaintiff's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant Field Fresh Foods, Inc. (served on August 16, 2019)	3.90
Review Defendant Field Fresh Foods, Inc.'s Supplemental Responses to Plaintiff's Form Interrogatories (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set Two) to Defendant Field Fresh Foods, Inc. (served on August 21, 2019)	5.70
Review Defendant Field Fresh Foods, Inc.'s Responses to Plaintiff's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant Field Fresh Foods, Inc. (served on September 17, 2019)	6.50
Review Defendant Fresh Link Logistics, LLC's Responses to Plaintiff's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant (served on September 17, 2019)	6.20
Review Defendant Fresh Link Logistics, LLC's Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fresh Link Logistics, LLC and Requests for Production of Documents (November 6, 2019; Affirmative Defenses) (served on October 29, 2019)	2.80
Review Defendant Field Fresh Foods, Inc.'s Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Field Fresh Foods, Inc. and Requests for Production of Documents (November 7, 2019; Affirmative Defenses) (served on October 29, 2019)	3.10

Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Field Fresh Foods, Inc. and Requests for Production of Documents (November 7, 2019; Joint Employer and Alter Ego) (served on October 29, 2019)	3.90
Review and Analyze Documents Produced by Defendant Fresh Link Logistics, LLC (served on November 4, 2019)	5.50
Review and Analyze Documents Produced by Defendant Fresh Link Logistics, LLC. (served on November 8, 2019)	0.10
Prepare for and Take the Deposition of Person Most Knowledgeable Kelly Huffner (November 6, 2019; Glendale, California) and Review Deposition Transcript	5.50
Prepare for and Take the Deposition of Person Most Knowledgeable James Pedroso (November 6, 2019; Glendale, California) and Review Deposition Transcript	6.80
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Pedro German (November 12, 2019; Los Angeles, California) and Review Deposition Transcript	11.50
Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Pedro German for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on May 5, 2021)	4.50
Meet with, and Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	25.70

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Defendants and Other Sources Prior to Mandatory Settlement Conference and Mediation • Employee Handbooks and Policies, Practices, and Procedures Documents • Sampling of Employee Time Data • Sampling of Employee Pay Data	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 Violation, Damages, and Penalties Analysis/Calculations (submitted on February 12, 2021)	24.50
Research and Draft Plaintiff's Mandatory Settlement Conference Statement and Gather Exhibits (filed on July 28, 2020)	17.10
Review Defendants' Mandatory Settlement Conference Statement (served on July 30, 2020)	4.50
Remotely Attend Mediation Session (February 18, 2021; Zoom Video Conference)	8.50
Draft, Review, Revise, Negotiate, and Finalize Settlement Memorandum of Understanding (executed on April 14, 2021)	6.50
Draft, Review, Revise, Negotiate, and Finalize Stipulation of Settlement and Release (executed on October 21, 2021) and Exhibits Thereto	15.50
Draft, Review, Revise, Negotiate, and Finalize First Amended Stipulation of Settlement and Release (executed on June 4, 2022) and Exhibits Thereto	6.50
Review and Monitor Settlement Administration Process and Weekly Reports	5.70

Law and Motion	
Review and Analyze Defendants' Notice of Motion and Motion to Strike Class and Joint Employer Allegations in Plaintiff's First Amended Complaint; Memorandum of Points and Authorities, Request for Judicial Notice in Support Thereof, and [Proposed] Order Thereon (served on February 15, 2019)	3.50
Review and Analyze Defendants' Notice of Demurrer and Demurrer to Plaintiff's First Amended Complaint; Memorandum of Points and Authorities, Request for Judicial Notice in Support Thereof, and [Proposed] Order Thereon (served on February 15, 2019)	3.80
Draft Plaintiff's Opposition to Defendants' Motion to Strike and Demurrer to Plaintiff's First Amended Complaint (filed on May 6, 2019)	10.40
Review and Analyze Defendants' Reply to Plaintiff's Opposition to Defendants' Motion to Strike (served on May 10, 2019)	1.10
Review and Analyze Defendants' Reply to Demurrer to Plaintiff's First Amended Complaint (served on May 10, 2019)	1.30
Review Court's Order Overruling Defendants' Demurrer to the First Amended Complaint and Denying Defendants' Motion to Strike (filed on May 17, 2019)	1.50
Review Court's Minute Order Re: Hearing on Demurrer with Motion to Strike (filed on May 17, 2019)	0.10
Review Defendants' Notice of Motion and Motion for Summary Judgment or, in the Alternative, Summary Adjudication; Memorandum of Points and Authorities; Defendants' Request for Sanctions, Separate Statement of Undisputed Material Facts in Support Thereof, and Evidence in Support Thereof (served on February 21, 2020)	4.20
Draft Plaintiff's Memorandum in Opposition to Defendants' Motion for Summary Judgment and Declaration of Shahin Mehvary in Support Thereof (filed on April 20, 2020)	16.10

Draft Plaintiff's Separate Statement in Opposition to Defendants' Motion for Summary Judgment (filed on April 29, 2020)	5.80
Review Defendants' Reply Memorandum in Support of Its Motion for Summary Judgment or, in the Alternative, Summary Adjudication, Response to Plaintiff's Separate Statement of Additional Material Facts and Supporting Evidence in Opposition Thereof, Objections to Evidence in Support of Opposition to Motion, [Proposed] Order Sustaining Defendants' Objections, and [Proposed] Order Granting Defendants' Motion for Summary Judgment (served on May 8, 2020)	2.50
Review Court's Order Denying Defendants' Motion for Summary Judgment or, in the Alternative, Summary Adjudication (filed on July 14, 2020)	1.50
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Pedro German in Support Thereof, and [Proposed] Order Thereon (filed on November 29, 2021)	16.50
Review Court's Order Re: Motion for Preliminary Approval Checklist (filed on March 15, 2022)	0.90
Review Court's Minute Order Re: Motion for Preliminary Approval Checklist (filed on March 15, 2022)	0.10
Draft Plaintiff's Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement, Declaration of Brian St. John in Support Thereof, Supplemental Declaration of Pedro German in Support Thereof, Declaration of Eric Springer on Behalf of Simpluris, Inc. in Support Thereof, Declaration of Marjorie C. Soto in Support Thereof, and [Revised Proposed] Order Thereon (filed on June 3, 2022)	14.50
Review Declaration of Marjorie C. Soto in Support of Plaintiff's Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement (filed on June 3, 2022)	0.80

Review Court's [Tentative] Order Granting Motion for Preliminary Approval of Class Action Settlement (filed on June 15, 2022)	1.50
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on June 16, 2022)	0.10
Review Court's Order Granting Motion for Preliminary Approval of Class Action Settlement (filed on June 16, 2022)	0.80
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Service Award, and Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on December 2, 2022) (Anticipated)	18.50
Total Hours:	695.80

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
German v. Field Fresh Foods, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/18/2018	U.S. Postmaster	Postage	6.70
8/28/2018	Los Angeles Superior Court	Court Filing Fee	435.00
8/28/2018	Los Angeles Superior Court	Complex Court Filing Fee	1,000.00
8/28/2018	Los Angeles Superior Court	Jury Fee	150.00
8/28/2018	One Legal	Attorney Service	34.51
9/6/2018	ProLegal	Attorney Service	123.35
9/13/2018	Los Angeles Superior Court	Court Filing Fee	60.00
10/23/2018	ProLegal	Attorney Service	147.35
12/7/2018	Elizabeth Parker-Fawley	Travel Reimbursement	44.00
12/12/2018	Los Angeles Superior Court	Document Download Fee	4.00
12/14/2018	Jill Parker	Travel Reimbursement	21.00
12/20/2018	Golden State Overnight	Courier Service	19.67
1/31/2019	ProLegal	Attorney Service	15.00
1/31/2019	ProLegal	Attorney Service	99.27
3/22/2019	U.S. Postmaster	Postage	1.90
4/2/2019	Golden State Overnight	Courier Service	11.58
4/4/2019	FedEx Express	Courier Service	22.04
4/8/2019	Golden State Overnight	Courier Service	12.58
4/12/2019	Case Anywhere LLC	Attorney Service	124.80
4/15/2019	Golden State Overnight	Courier Service	11.58
4/18/2019	FedEx Express	Courier Service	56.70
5/17/2019	Cinela Aziz	Travel Reimbursement	38.64
6/17/2019	Golden State Overnight	Courier Service	17.62
7/10/2019	Case Anywhere LLC	Attorney Service	180.00
7/18/2019	U.S. Postmaster	Postage	2.05
8/20/2019	Los Angeles Superior Court	Document Download Fee	11.80
8/23/2019	Cinela Aziz	Travel Reimbursement	203.32
9/16/2019	CourtCall, LLC	Attorney Service	94.00
10/2/2019	Case Anywhere LLC	Attorney Service	222.00
10/28/2019	Shahin Mehvary	Travel Reimbursement	21.82
11/6/2019	Coalition Court Reporters	Court Reporter	1,464.40
11/12/2019	Shahin Mehvary	Travel Reimbursement	345.38
11/19/2019	Veritext, LLC	Court Reporter	1,010.90
11/25/2019	Coalition Court Reporters	Court Reporter	1,872.90
1/7/2020	Case Anywhere LLC	Attorney Service	132.00
2/5/2020	Shahin Mehvary	Travel Reimbursement	21.68
4/8/2020	Case Anywhere LLC	Attorney Service	120.00
6/12/2020	Jeffrey D. Klein	Travel Reimbursement	18.20
6/16/2020	Legal Document Server, Inc.	Attorney Service	150.00
7/7/2020	Case Anywhere LLC	Attorney Service	144.00

LAWYERS for JUSTICE PC CASE COST DETAIL

German v. Field Fresh Foods, Inc.

7/10/2020	Los Angeles Superior Court	Document Download Fee	15.00
7/17/2020	TSG Reporting, Inc.	Court Reporter	335.00
7/20/2020	Los Angeles Superior Court	Document Download Fee	15.00
7/27/2020	Los Angeles Superior Court	Document Download Fee	23.00
7/27/2020	TSG Reporting, Inc.	Court Reporter	30.00
7/31/2020	Los Angeles Superior Court	Document Download Fee	23.00
9/3/2020	Legal Document Server, Inc.	Attorney Service	110.70
9/3/2020	Legal Document Server, Inc.	Attorney Service	95.00
9/3/2020	Los Angeles Superior Court	Court Filing Fee	20.00
9/8/2020	Signature Resolution	Mediation Fee	7,450.00
10/6/2020	Case Anywhere LLC	Attorney Service	126.00
1/6/2021	Case Anywhere LLC	Attorney Service	120.00
2/16/2021	FedEx Express	Courier Service	38.79
2/18/2021	Signature Resolution	Supplemental Mediation Fee	3,150.00
4/2/2021	Case Anywhere LLC	Attorney Service	120.00
5/5/2021	Labor & Workforce Development Agency	Filing Fee	75.00
7/1/2021	Case Anywhere LLC	Attorney Service	120.00
8/18/2021	Legal Document Server, Inc.	Attorney Service	110.00
8/18/2021	Legal Document Server, Inc.	Attorney Service	65.00
8/31/2021	ASC Legal	Damages Consulting Expert	9,450.00
10/4/2021	Case Anywhere LLC	Attorney Service	126.00
10/6/2021	Numerical Company	Analysis of Sampling of Time Records	4,306.00
10/15/2021	Los Angeles Superior Court	Court Filing Fee	20.00
10/15/2021	One Legal	Attorney Service	17.27
10/21/2021	One Legal	Attorney Service	16.68
10/21/2021	One Legal	Attorney Service	16.68
10/21/2021	One Legal	Attorney Service	16.68
10/25/2021	Los Angeles Superior Court	Court Filing Fee	20.00
10/25/2021	One Legal	Attorney Service	17.27
11/30/2021	Legal Document Server, Inc.	Attorney Service	17.75
11/30/2021	Los Angeles Superior Court	Court Filing Fee	60.00
1/4/2022	Case Anywhere LLC	Attorney Service	180.00
4/8/2022	Case Anywhere LLC	Attorney Service	120.00
5/24/2022	Legal Document Server, Inc.	Attorney Service	16.55
5/24/2022	Los Angeles Superior Court	Court Filing Fee	20.00
5/26/2022	Los Angeles Superior Court	Document Download Fee	5.00
5/27/2022	Legal Document Server, Inc.	Attorney Service	15.20
6/6/2022	Legal Document Server, Inc.	Attorney Service	15.20
6/6/2022	Legal Document Server, Inc.	Attorney Service	185.75
6/17/2022	Legal Document Server, Inc.	Attorney Service	15.20
7/5/2022	Case Anywhere LLC	Attorney Service	180.00
7/12/2022	Legal Document Server, Inc.	Attorney Service	15.95

LAWYERS for JUSTICE PC CASE COST DETAIL
German v. Field Fresh Foods, Inc.

10/5/2022	Case Anywhere LLC	Attorney Service	126.00
		Total:	35,492.41