

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Selena Matavosian (SBN 348044)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs and the Class

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

ALICIA ORTEGA, BRYAN SHEPPARD,
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; SHANTEANNA
BROWN, RAYVEYONE BROWN,
individually, and on behalf of other
members of the general public similarly
situated;

Plaintiffs,

vs.

SMARTGUARD, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 34-2020-00278712-CU-OE-GDS

Honorable Lauri A. Damrell
Department 28

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and Enhancement
Payments; Declarations of Class
Representatives (Alicia Ortega, Bryan
Sheppard, Shanteanna Brown, and Rayveyone
Brown); Declaration of Settlement
Administrator (Nathalie Hernandez); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: February 2, 2024
Time: 9:00 a.m.
Department: 28

Complaint Filed: May 15, 2020
FAC Filed: October 19, 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 Plaintiffs Alicia Ortega, Bryan Sheppard, Shanteanna Brown, and Rayveyone Brown (together, “Plaintiffs”) and the Class in the above-captioned matter. 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 May 5, 2023, in Department 28 of the above-entitled Court, the Honorable Lauri A. Damrell preliminarily approved the Class Action and Private Attorneys General Act Settlement Agreement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant Smartguard, Inc., (“Defendant”) (together with Plaintiffs, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Alicia Ortega, Bryan Sheppard, Shanteanna Brown, and Rayveyone Brown as the representatives of the Class (collectively, “Class Representatives”). 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 ILYM Group, Inc. (“ILYM” 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 Enhancement Payments (“Motion for Final Approval”), no Class Members have objected to the Class Settlement or the request for Attorneys’ Fees and Costs, Enhancement Payments, Settlement Administration Costs, or allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

WORK PERFORMED BY CLASS COUNSEL

4. 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 May 15, 2020.

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

6. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiffs and other Class Members and reviewed and analyzed a large volume of information, documents, and data obtained from Plaintiffs, Defendant, and other sources. Class Counsel propounded multiple sets of written discovery requests on Defendant (including, but not limited to: Form Interrogatories – General (Set One), Special Interrogatories (Sets One, Two, and Three), and Requests for Production of Documents (Sets One and Two)), and prepared and served numerous deposition notices. Class Counsel also prepared for and took the deposition of Defendant's Person Most Knowledgeable. The information, documents, and data reviewed and analyzed by Class Counsel included, and

were not limited to, Plaintiffs' employment records, a sampling of Class Members' time and pay data, job descriptions, and Defendant's operations and employment practices, policies, and procedures documents, among other information and documents. Class Counsel developed liability, damages, and penalties valuation models in the course of litigation and in connection with mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery, and the production of information, documents, and data in the course of litigation as well as mediation and settlement negotiations. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings, the mediation brief, and settlement documents; and preparing for and attending court proceedings and mediation and settlement negotiations, among other tasks.

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

8. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the case. These efforts included participating in a formal, full-day mediation conducted by the Hon. Steven M. Vartabedian (Ret.), a well-regarded mediator experienced in mediating complex labor and employment matters. During all settlement discussions, the Parties

1 conducted their negotiations at arm's length in an adversarial position. In the course of mediation
2 and settlement negotiations, the Parties exchanged information, documents, and data, and
3 discussed all aspects of the case, including and not limited to, the risks and delays of further
4 litigation, the risks to the Parties of proceeding with class certification and trial, the law relating
5 to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims,
6 and wage-and-hour law and enforcement, as well as the evidence produced and analyzed, and the
7 possibility of appeals, among other things. Arriving at a settlement that was acceptable to the
8 Parties was not easy. Defendant contended that individualized questions of fact predominate over
9 any common issues, and these issues would pose challenges to class certification and
10 representative adjudication, while Plaintiffs and Class Counsel believed that they would be able
11 to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the
12 Parties ultimately agreed that the case was well-suited for settlement given the legal issues
13 relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that would
14 attend further litigation. These risks of further litigation include, and are not limited to, a
15 determination that the claims are unsuitable for class treatment and/or representative adjudication,
16 class de-certification after certification of a class, allowing a jury to decide the claims asserted in
17 the case, and the real possibility of no monetary recovery after years of litigation.

18 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
19 attorneys' fees in the amount of \$490,000.00, which is thirty-five percent (35%) of the Gross
20 Settlement Amount of \$1,400,000.00, as set forth in the Settlement Agreement and the Class
21 Notice. Pursuant to the contingency-fee agreement entered into by and between each of the
22 Plaintiffs and Class Counsel, Plaintiffs have each agreed to contingency fees of at least thirty-
23 five percent (35%) of the recovery.

24 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
25 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
26 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
27 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
28 has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to

devote its time and efforts to this matter.

11. I am aware that common and acceptable rates for contingency representation in wage and hour class action litigation are normally in the range of 33.3% to 50%.

12. 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 **634.50 hours** performing tasks and obtaining recovery in this matter. 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 Lawyers for Justice, PC. Additionally, separate from the hours referenced herein, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The work performed in this particular case, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class and representative actions, support a reasonable blended hourly rate of compensation of at least \$775 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 \$775 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour 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 compensation at the rate of \$936.47 per hour; 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 compensation at the rate of \$919.57 per hour; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and

the award of attorneys' fees involved compensation at the rate of \$855.96 per hour; 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 compensation at the rate of \$831.38 per hour; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved compensation at the rate of \$780.77 per hour; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved compensation at the rate of \$845.64 per hour.

ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

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

JUDICIAL EXTERNSHIPS

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

///

LITIGATION AND CLASS ACTION EXPERIENCE

16. In December of 2004, I obtained a license to practice law from the California State Bar.

17. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. In association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

///

///

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

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

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

16 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
17 wage-and-hour class and PAGA representative action against a national wholesale distributor of
18 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
19 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
20 representative action settlement. The Sacramento County Superior Court Case Number is 34-
21 2012-00136285.

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

27 ///

28 ///

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

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

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

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

22 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
23 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
24 involving allegations of misclassification of the “Department Manager” position. On August 12,
25 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
26 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
27 County Superior Court Case Number is RG13680477.

28 ///

1 m) LFJ represented the plaintiff in a PAGA representative action against a real
2 estate and property management company, on behalf of non-exempt employees. On November
3 4, 2016, the court granted approval of the PAGA representative action settlement. The Orange
4 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

14 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
15 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
16 the employer's motion to compel arbitration, which resulted in a published opinion by the
17 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
18 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
19 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
20 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
21 5046.

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

27 ///

28 ///

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

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

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

16 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
17 representative action against a food company on behalf of non-exempt employees. On June 30,
18 2017, the court granted final approval of the class and PAGA representative action settlement.
19 The Sacramento County Superior Court Case Number is 34-2015-00175871.

20 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
21 representative action against a chocolate company on behalf of non-exempt employees. On July
22 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
23 The Alameda County Superior Court Case Number is RG15764300.

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

28 ///

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

6 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
7 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
8 employees. On December 11, 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 BC569646.

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

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

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

26 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
27 representative action against a behavioral health service provider on behalf of non-exempt
28 employees. On November 13, 2018, the court granted final approval of the class and PAGA

1 representative action settlement. The Alameda County Superior Court Case Number is
2 RG16811450.

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

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

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

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

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

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

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

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

20 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
21 wage-and-hour class action against manufacturer and supplier of power products and services on
22 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
23 motion for class certification and certified a class. On August 27, 2021, the court granted final
24 approval of the class action settlement. The San Diego County Superior Court Case Number is
25 37-2015-00025968-CU-OE-CTL.

26 mm) LFJ represents the plaintiff in a wage-and-hour class action against a
27 nutritional products manufacturer on behalf of non-exempt production line employees. On
28 December 13, 2021, the court granted the plaintiff's motion for class certification in part and

certified a class. The Solano County Superior Court Case Number is FCS051001.

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

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this case. Lawyers *for* Justice, PC seeks reimbursement of \$9,878.63 in litigation costs and expenses incurred in this matter, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of the case and to obtain the Settlement.

ENHANCEMENT PAYMENTS TO PLAINTIFFS

20. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for Enhancement Payments in the amount of \$10,000.00 each to Plaintiffs Alicia Ortega, Bryan Sheppard, Shanteanna Brown, and Rayveyone Brown. The requested Enhancement Payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort to produce relevant documents and information, and they provided facts and evidence necessary to support the prosecution of the claims. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would facilitate the pursuit of the case. Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their work experiences with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs Alicia Ortega, Bryan Sheppard, Shanteanna Brown, and Rayveyone Brown to receive \$10,000.00 each as reasonable Enhancement Payments for their services in the case, in addition to their individual settlement payments.

///

///

Edwin Aiwarzian

EXHIBIT A

ALICIA ORTEGA, ET AL. V. SMARTGUARD, INC.
Sacramento County Superior Court Case No. 34-2020-00278712-CU-OE-GDS

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality, and Manageability	11.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Alicia Ortega’s (“Plaintiff Ortega”) Claims and the Merits of the Claims of the Putative Class Members	10.50
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Smartguard, Inc. (“Defendant”) with Respect to Plaintiff Ortega and the Putative Class Members	8.30
Pre-Lawsuit Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiff Ortega and the Aggrieved Employees	7.50
Pre-Lawsuit Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiff Ortega and the Aggrieved Employees	7.80
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, Wage Orders, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials	7.50
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in Which Defendant Operates	3.50

Investigation of Defendant's Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	3.20
Investigation, Research, and Analysis Regarding Defendant's Executives, Officers, and Leadership With a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity	4.50
Analysis of Competitors in Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	3.90
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Layout, Configuration, and Differences Between Them (if applicable) to Assess Whether Individual Issues Predominate Over Common Issues	4.70
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	2.30
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California	3.20
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Scheduling and Attendance, Timekeeping, Meal/Rest Breaks, On-Premises Breaks, On-Duty Meal Agreements, Daily Activity Reports, Pre-Post Calls, Equipment Check and Logging, Non-Discretionary Bonus/Incentive/Performance/Shift Differential Pay, Overtime Compensation, Dress Code/Uniform, Footwear, PPE, Equipment/Supplies, Use of Personal Cell Phones, Company Provided Devices, and Reimbursement of Business-Related Expenses	14.50

Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Communications, Information and Technology, Customer Relations Management, GPS, Surveillance, and Security Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	4.60
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	8.10
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, Including Research Regarding Which Experts to Retain and For What Purpose	5.30
Review and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Class Members' and Aggrieved Employees' Work	6.90
Meet and Communicate with Plaintiff Alicia Ortega Throughout the Pendency of the Case	56.50
Meet and Communicate with Plaintiff Bryan Sheppard ("Plaintiff Sheppard") Throughout the Pendency of the Case	55.50
Meet and Communicate with Plaintiff Shanteanna Brown ("Plaintiff S. Brown") Throughout the Pendency of the Case	56.50
Meet and Communicate with Plaintiff Rayveyone Brown ("Plaintiff R. Brown") (together, Plaintiff Ortega, Plaintiff Sheppard, Plaintiff S. Brown, and Plaintiff R. Brown are referred to as "Plaintiffs") Throughout the Pendency of the Case	55.50
Investigate, Meet, Communicate with, and/or Conduct Interviews of Putative Class Members and Percipient Witnesses	11.50

Pleadings and Court Filings	
Draft Plaintiff Ortega's Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on May 15, 2020)	7.50
Review and Analyze Defendant's Answer to Complaint and Legal Research and Analysis of Affirmative Defenses in Defendant's Answer (served on July 13, 2020)	1.20
Review Court's Notice and Order of Complex Case Determination (filed on July 30, 2020)	0.10
Draft Plaintiff Ortega's Notice of Posting Jury Fees (filed on October 22, 2020)	0.10
Review Court's Notice of Case Management Conference and Complex Case Management Procedures (filed on December 28, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Initial Case Management Conference (filed on February 22, 2021)	01.10
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on March 9, 2021)	0.10
Draft Plaintiff Ortega's Notice of Ruling (filed on March 11, 2021)	0.10
Review Court's Minute Order Re: Case Management Conference – Complex (filed on March 12, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement Regarding Settlement (filed on May 21, 2021)	0.80
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on June 3, 2021)	0.10
Review Court's Minute Order Re: Case Management Conference – Complex (filed on June 4, 2021)	0.10

Review Court's Minute Order Re: Order and Notice Reassigning Case (filed on July 30, 2021)	0.10
Draft First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et. Seq. and Legal Research and Analysis of All Claims Involved (filed on October 19, 2021); and Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Ortega Leave to File First Amended Complaint; [Proposed] Order Thereon (submitted on October 5, 2021)	3.80
Review Defendant's Case Management Statement (served on October 6, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on October 8, 2021)	0.80
Review Court's Order Granting Plaintiff Ortega Leave to File First Amended Complaint (filed on October 12, 2021)	0.10
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on October 20, 2021)	0.10
Review Court's Minute Order Re: Case Management Conference – Complex (filed on October 22, 2021)	0.10
Review and Analyze Defendant's Answer to Plaintiffs' First Amended Complaint and Research Affirmative Defenses in Defendant's Answer (served on December 10, 2021)	1.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on January 14, 2022)	0.80
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on January 27, 2022)	0.10
Review Court's Minute Order Re: Order and Notice Reassigning Case and Minute Order Re: Complex Case Management (filed on January 28, 2022)	0.10

Review Defendant's Notice of Posting Complex Fees (served on January 31, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on March 17, 2022)	0.80
Draft Plaintiffs' Notice of Remote Appearance (filed on March 29, 2022)	0.10
Review Court's Minute Order Re: Complex Case Management (filed on March 29, 2022)	0.10
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on March 30, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference – Complex (filed on April 1, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on May 12, 2022)	0.60
Draft Plaintiffs' Notice of Remote Appearance (filed on May 24, 2022)	0.10
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on May 24, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference – Complex (filed on May 26, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on June 16, 2022)	0.50
Draft Plaintiffs' Notice of Remote Appearance (filed on June 28, 2022)	0.10
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on June 29, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference – Complex (filed on June 30, 2022)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on September 14, 2022)	0.50
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on September 27, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference – Complex (filed on September 29, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on November 16, 2022)	0.50
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on November 30, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference – Complex (filed on December 1, 2022)	0.10
Draft Plaintiffs' Notice of Remote Appearance (filed on February 1, 2023)	0.10
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on February 1, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference and Plaintiffs' Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement; [Proposed] Thereon (submitted on March 8, 2023)	0.90
Review Court's Order to Continue Case Management Conference and Plaintiffs' Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement (filed on March 13, 2023)	0.10
Draft Plaintiffs' Case Management Conference Statement (filed on April 26, 2023)	0.60

Review Court's Tentative Ruling Re: Case Management Conference (filed on May 4, 2023)	0.10
Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on May 26, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Final Approval Hearing and Deadline to File Motion for Final Approval; [Proposed] Order Thereon (submitted on August 9, 2023)	0.80
Review Court's Order to Continue Final Approval Hearing and Deadline to File Motion for Final Approval (filed on August 16, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Final Approval Hearing and Deadline to File Motion for Final Approval; [Proposed] Order Thereon (submitted on October 19, 2023)	0.80
Review Court's Order to Continue Final Approval Hearing and Deadline to File Motion for Final Approval (filed on October 23, 2023)	0.10
Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on October 24, 2023)	0.10
Appearances	
Prepare for and Telephonically Attend Case Management Conference (January 28, 2022)	0.50
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (May 5, 2023)	0.50
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payments (February 2, 2024)	1.50

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alicia Ortega (served on February 4, 2020)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alicia Ortega (served on February 25, 2020)	0.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alicia Ortega (served on March 5, 2020)	2.10
Review Defendant's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Request for Admissions (Set One), Request for Production of Documents (Set One), and the Declaration of Alexandra Asterlin, Esq., in Support of Additional Discovery to Plaintiff Ortega (served on June 18, 2020)	1.10
Draft Plaintiff Ortega's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant (served on September 4, 2020)	5.10
Draft Plaintiff Ortega's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for October 5, 2020; Organizational Structure) (served on September 4, 2020)	2.20
Draft Plaintiff Ortega's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for October 6, 2020; Wage and Hour Practices) (served on September 4, 2020)	3.10
Draft Plaintiff Ortega's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for October 7, 2020; Affirmative Defenses) (served on September 4, 2020)	3.50

Draft Plaintiff Ortega's Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for December 9, 2020; Organizational Structure) (served on October 20, 2020)	1.10
Draft Plaintiff Ortega's Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for December 9, 2020; Wage and Hour Practices) (served on October 20, 2020)	1.10
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rayveyone Brown (served on November 10, 2020)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Shanteanna Brown (served on November 12, 2020)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rayveyone Brown (served on December 1, 2020)	4.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Shanteanna Brown (served on December 3, 2020)	0.80
Prepare for and Take the Deposition of Person Most Knowledgeable from Defendant Byron Bayer (December 9, 2020; Zoom Video Conference) and Review Transcript	10.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Shanteanna Brown (served on December 29, 2020)	2.30
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Bryan Sheppard (served on February 18, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Bryan Sheppard (served on March 11, 2021)	3.90

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Bryan Sheppard (served on March 18, 2021)	0.90
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Alicia Ortega for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on March 3, 2020)	4.50
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Bryan Sheppard for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on June 3, 2021)	4.10
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	15.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant (in excess of approximately 5,939 pages), and Other Sources Prior to Mediation	63.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on March 30, 2021)	34.50
Attend Mediation Session (April 1, 2021; Zoom Video Conference)	11.50
Review and Analyze Mediator's Proposal (issued April 1, 2021 and accepted April 6, 2021)	0.90
Draft, Review, Revise, Negotiate, and Finalize Class Action and Private Attorneys General Act Settlement Agreement and Release (executed on August 11, 2022) and Draft Notice of Class Action Settlement	18.50

Law and Motion	
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Annabel Blanchard in Support Thereof, Declaration of Alicia Ortega in Support Thereof, Declaration of Bryan Sheppard in Support Thereof, Declaration of Shanteanna Brown in Support Thereof, Declaration of Rayveyone Brown in Support Thereof, and [Proposed] Order Thereon (filed on January 18, 2023)	20.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement – Complex (filed on February 2, 2023)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement – Complex (filed on February 3, 2023)	0.10
Draft Supplemental Declaration of Annabel Blanchard in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on April 14, 2023)	4.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement and Tentative Ruling Re: Case Management Conference – Complex (filed May 4, 2023)	0.20
Review Court's Order Granting Preliminary Approval of Class Action Settlement and Minute Order Re: Case Management Conference – Complex and Motion for Preliminary Approval of Class Action Settlement (filed on May 5, 2023)	0.20
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payments, Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Final Approval Order and Judgment (January 10, 2024)	17.50
Total Hours:	634.50

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Ortega v. Smartguard, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/4/2020	U.S. Postmaster	Postage	6.85
5/15/2020	Legal Document Server, Inc.	Attorney Service	180.23
5/15/2020	Sacramento Superior Court	Complaint Filing Fee	435.00
5/15/2020	Sacramento Superior Court	Complex Filing Fee	1,000.00
6/3/2020	Legal Document Server, Inc.	Attorney Service	110.00
6/12/2020	Legal Document Server, Inc.	Attorney Service	130.00
7/20/2020	General Logistics Systems US, Inc.	Courier Service	17.55
7/31/2020	General Logistics Systems US, Inc.	Courier Service	31.37
9/4/2020	General Logistics Systems US, Inc.	Courier Service	27.48
10/20/2020	General Logistics Systems US, Inc.	Courier Service	36.48
10/22/2020	Legal Document Server, Inc.	Attorney Service	135.25
10/22/2020	Sacramento Superior Court	Jury Fee	150.00
11/10/2020	U.S. Postmaster	Postage	6.95
11/12/2020	U.S. Postmaster	Postage	6.95
12/9/2020	Esquire Deposition Solutions, LLC	Videography Service	842.50
12/9/2020	Esquire Deposition Solutions, LLC	Court Reporter	1,707.70
1/6/2021	Legal Document Server, Inc.	Attorney Service	130.00
2/18/2021	U.S. Postmaster	Postage	7.00
2/22/2021	Legal Document Server, Inc.	Attorney Service	110.70
2/22/2021	Sacramento Superior Court	Stipulation & Order Fee	20.00
3/11/2021	General Logistics Systems US, Inc.	Courier Service	32.03
3/12/2021	Dowling Aaron Inc.	Mediation Fee	2,000.00
3/22/2021	Legal Document Server, Inc.	Attorney Service	110.00
5/21/2021	Legal Document Server, Inc.	Attorney Service	110.00
10/5/2021	Legal Document Server, Inc.	Attorney Service	130.85
10/5/2021	Sacramento Superior Court	Stipulation & Order Fee	20.00
10/8/2021	Legal Document Server, Inc.	Attorney Service	110.00
10/19/2021	Legal Document Server, Inc.	Attorney Service	130.00
3/17/2022	Legal Document Server, Inc.	Attorney Service	120.00
3/29/2022	Legal Document Server, Inc.	Attorney Service	100.00
5/12/2022	Legal Document Server, Inc.	Attorney Service	100.00
5/24/2022	Legal Document Server, Inc.	Attorney Service	100.00
6/16/2022	Legal Document Server, Inc.	Attorney Service	100.00
6/28/2022	Legal Document Server, Inc.	Attorney Service	120.00
9/14/2022	Legal Document Server, Inc.	Attorney Service	105.00
11/10/2022	U.S. Postmaster	Postage	6.95
11/16/2022	Legal Document Server, Inc.	Attorney Service	105.00
1/18/2023	Legal Document Server, Inc.	Attorney Service	264.05
1/18/2023	Sacramento Superior Court	Motion Fee	60.00
2/2/2023	Legal Document Server, Inc.	Attorney Service	125.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Ortega v. Smartguard, Inc.

3/8/2023	Legal Document Server, Inc.	Attorney Service	126.35
3/8/2023	Sacramento Superior Court	Stipulation & Order Fee	20.00
3/16/2023	Sacramento Superior Court	Document Download Fee	5.00
4/14/2023	Legal Document Server, Inc.	Attorney Service	145.00
4/26/2023	Legal Document Server, Inc.	Attorney Service	125.00
5/30/2023	Legal Document Server, Inc.	Attorney Service	145.00
10/19/2023	Legal Document Server, Inc.	Attorney Service	126.39
10/19/2023	Sacramento Superior Court	Stipulation & Order Fee	20.00
10/24/2023	Legal Document Server, Inc.	Attorney Service	125.00
Total:			<u><u>9,878.63</u></u>