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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

SALVADOR VENEGAS and SERGIO
LAINEZ, on behalf of themselves and on
behalf of all persons similarly situated, and
on behalf of the State of California, as private
attorney generals;

Plaintiffs,

vs.

WWF OPERATING COMPANY, LLC, a
Limited Liability Company; DANONE
NORTH AMERICA PUBLIC BENEFIT
CORPORATION, a Corporation; DANONE
US, LLC, a Limited Liability Company; and
DOES 1 through 50, inclusive;

Defendants.

Case No.: 21STCV20991

Honorable Maren E. Nelson
Department SSC-17

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

Hearing Date: October 30, 2023
Hearing Time: 9:00 a.m.
Dept: SSC-17

Complaint Filed: June 4, 2021
FAC Filed: November 29, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, 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 Salvador Venegas and Sergio Lainez (together, “Plaintiffs”) in the above-captioned action. The facts set forth in this declaration are within my personal knowledge, and, if called as a witness, I could and would competently testify as thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On June 29, 2023, in Department SSC-17 of the above-entitled Court, the Honorable Maren E. Nelson preliminarily approved the Class Action and PAGA Settlement Agreement and Stipulation Regarding Cy Pres Beneficiary for Settlement (together, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendants WWF Operating Company, LLC, Danone North America Public Benefit Corporation, and Danone US, LLC (collectively, “Defendants”), and conditionally certified the Class for settlement purposes. The Court also preliminarily appointed Plaintiffs Salvador Venegas and Sergio Lainez to represent the Class (together, “Class Representatives”) and preliminarily appointed and designated Lawyers *for* Justice, PC and Blumenthal Nordrehaug Bhowmik De Blouw LLP as counsel for the Class (together, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Proposed Settlement of Class Action and Hearing Date for Final Court Approval (“Class Notice”), and adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed ILYM Group (“Administrator”) to serve as the third-party administrator and handle the notice and settlement administration process.

WORK PERFORMED BY CLASS COUNSEL

3. Myself and several other attorneys and staff members at Lawyers *for* Justice, PC have been actively engaged in the litigation of this matter since the inception of Plaintiff Sergio Lainez’s representative action under the California Private Attorneys General Act against Defendants, entitled *Sergio Lainez v. WWF Operating Company, LLC, et al.*, Los Angeles

County Superior Court Case No. 21PSCV01017, initiated on or around December 3, 2021 (“Lainez PAGA Action”). Lawyers for Justice, PC actively participated in the litigation of the matter, including and not limited to, preparing the pleadings, litigation and case strategy, investigation and research, and claims evaluation and analysis. Lawyer for Justice, PC joined forces with other plaintiff’s counsel Blumenthal Nordrehaug Bhowmik De Blouw LLP, who were pursuing the putative class action entitled *Salvador Venegas, et al. v. WWF Operating Company, LLC, et al.*, Los Angeles County Superior Court Case No. 21STCV20991, initiated on or around June 4, 2021 (“Venegas Class Action”) and the representative action under PAGA entitled *Salvador Venegas v. WWF Operating Company, LLC, et al.*, Los Angeles County Superior Court Case No. 21PSCV00643 that was initiated on or around August 9, 2021 (“Venegas PAGA Action”). Our work with that firm has been a coordinated and combined effort. Ultimately, Class Counsel’s efforts and the efforts of Plaintiffs have been successful in reaching the settlement.

4. Before initiating the *Lainez* PAGA Action, Lawyers for Justice, PC conducted extensive investigation and research into 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 Sergio Lainez “Plaintiff Lainez”), and research into the various legal issues involved in the case, namely, the current state of the law as it applied to off-the-clock theory, meal and rest periods, Private Attorney General Act (“PAGA”) claims, wage-and-hour enforcement, Plaintiff Lainez’s claims and damages, and potential defenses. After conducting initial investigation, our firm determined that Plaintiff Lainez’s claims were well-suited for representative adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of individuals who are or were previously employed by Defendants in California who were classified as hourly, non-exempt employees, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses.

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1 5. On or about August 2, 2022, the *Lainez* PAGA Action was consolidated for all
2 purposes with the *Venegas* PAGA Action. On or about December 9, 2022, the *Venegas* PAGA
3 Action was consolidated with the *Venegas* Class Action (i.e., the above-captioned action, which
4 was deemed the lead case).

5 6. Collectively, Class Counsel investigated the veracity, strength, and scope of the
6 claims, and worked on preparing the cases for class certification and trial, prior to reaching the
7 Settlement. This matter has involved extensive and ongoing investigations and research into
8 legal and factual issues, formal and informal discovery (including written discovery, deposition
9 of Plaintiff Venegas, and deposition of Defendants' Persons Most Knowledgeable), motion
10 practice, and court proceedings. Class Counsel obtained information, documents, and data from
11 Plaintiffs, putative class members, aggrieved employees, and percipient witnesses, reviewed and
12 analyzed a volume of information, documents, and data obtained from Plaintiffs, Defendants,
13 and other sources, researched applicable law, and undertook analyses and calculations of the
14 value of claims, damages, and penalties exposure. Class Counsel also met and conferred with
15 Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case
16 management, court proceedings, discovery and production of various documents and data in the
17 course of litigation and mediation and settlement negotiations, and mediation and settlement
18 negotiations. Other work that Class Counsel performed included, and was not limited to, case
19 strategy and analysis; drafting, reviewing, and revising the pleadings and motion-related papers;
20 case management; claims assessment and evaluation; and preparing for and attending mediation
21 and settlement negotiations.

22 7. As outlined herein, the parties have conducted significant investigations and
23 discovery during the course of this litigation. Class Counsel analyzed a volume of information,
24 documents, and data obtained from Plaintiffs, Defendants, and other sources, which provided a
25 critical understanding of the nature of the work performed by putative class members and
26 aggrieved employees, as well as Defendants' operations and employment policies, practices, and
27 procedures. The information, documents, and data were used in analyzing liability, damages,
28 and penalties valuation issues in connection with all phases of the litigation, and ultimately, in

1 connection with the mediation and settlement negotiation process. Accordingly, sufficient
2 investigation and review of information has taken place in order for the parties to be adequately
3 informed of the nature and extent of the claims, and to enable all parties to fully evaluate the
4 Settlement for its fairness, adequacy, and reasonableness.

5 8. By way of the accompanying Motion for Final Approval of Class Settlement,
6 Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class
7 Representative Service Payments, Class Counsel seek attorneys' fees in the amount of \$416,666,
8 which is one-third (1/3) of the Gross Settlement Amount of \$1,250,000. Pursuant to the
9 contingency-fee agreement entered into by and between Plaintiff Sergio Lainez and Lawyers *for*
10 Justice, PC, Plaintiff Sergio Lainez has agreed to a contingency fee of at least one-third (1/3) of
11 the recovery.

12 9. The attorneys' fees that are sought are commensurate with: (1) the risk that Class
13 Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel
14 dedicated to the cases; (3) the skill and determination that Class Counsel have shown; (4) the
15 results that Class Counsel have achieved throughout the litigation of the cases; (5) the value of
16 the settlement that Class Counsel have achieved; and (6) the other cases that Class Counsel have
17 turned down in order to devote their time and efforts to the cases.

18 10. I am aware that common and acceptable rates for contingency representation in
19 wage and hour class and representative action litigation are normally in the range from 33.3% to
20 50%.

21 11. While not necessarily required to be demonstrated because the percentage fee is
22 proper for this settlement, Class Counsel have incurred many hours of work in connection with
23 prosecuting the cases, such that the award of attorneys' fees is also justified under a lodestar
24 analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **266.30 hours** performing
25 tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney
26 Task and Time Chart for Lawyers *for* Justice, PC that sets forth in detail the nature of the legal
27 services provided by attorneys at the firm, and the time incurred in performing those services.
28 The hours attributable to Lawyers *for* Justice, PC include work done by me and several other

attorneys at the firm. Additionally, separate from the hours of work referenced herein and in the attached chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate of at least \$650 per hour 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 \$650 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and/or representative action 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 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 compensation at the rate of \$766.05 per hour; 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 compensation at the rate of \$764.82 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,

1 and the award of attorneys' fees involved compensation at the rate of \$831.38 per hour; final
2 approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v.*
3 *Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15,
4 2018, and the award of attorney's fees involved compensation at the rate of \$780.77 per hour;
5 and final approval of the class and representative action settlement in *Demetrius Camarillo v.*
6 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
7 granted on June 30, 2017, and the award of attorneys' fees involved compensation at the rate of
8 \$845.64 per hour.

9 13. Applying the blended rate of \$650 per hour to 266.30 hours would place a
10 reasonable value of \$173,095.00 based on lodestar, for the work performed by Lawyers for
11 Justice, PC.

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

13 ***EDUCATION***

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

22 ***JUDICIAL EXTERNSHIPS***

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

28 ***LITIGATION AND CLASS ACTION AND REPRESENTATIVE ACTION EXPERIENCE***

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

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

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

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

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

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

26 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class action against a national property management company involving
28 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court

1 granted final approval of the class action settlement. The Los Angeles County Superior Court
2 Case Number is BC430918.

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

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

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

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

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

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

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

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

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

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

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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.

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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
18 settlement. 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.

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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 the 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
2 Court 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
11 certification in part and certified a class. The Alameda County Superior Court Case Number is
12 RG15757606 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, represents the plaintiff in a
20 wage-and-hour class and PAGA representative action against a medical equipment supplier on
21 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
22 for class certification and certified a class. The San Bernardino County Superior Court Case
23 Number is CIVDS1505744.

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

1 approval of the PAGA representative action settlement. The San Diego County Superior Court
2 Case Number is 34-2015-00175330.

3 jj) LFJ, in association with co-counsel therein, represented 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. On October 28, 2022, the court
7 granted final approval of the class and PAGA representative action settlement. The San Diego
8 County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

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

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

25 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
26 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for
27 the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On
28 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
LAWYERS *for* JUSTICE, PC**

18. To date, Class Counsel have borne all of the risks and costs of litigation and will not receive any compensation until a recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$1,814.00** in litigation costs and expenses incurred in this matter, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the settlement.

CLASS REPRESENTATIVE SERVICE PAYMENTS TO PLAINTIFFS

19. In recognition of their efforts and work expended in the cases and serving as the Class Representatives, the settlement provides for service payments in the amount of \$10,000 each to Plaintiffs Salvador Venegas and Sergio Lainez. The requested service payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort in providing relevant documents, past employment records, and the facts and evidence necessary to attempt to prove the allegations in the cases. Plaintiffs were available whenever their attorneys needed them and actively tried to obtain and provide information that would facilitate the pursuit of the class and PAGA claims. Plaintiffs spent numerous hours speaking with their attorneys about their claims, describing their work experiences with Defendants, and gathering, providing, and reviewing documents. Accordingly, it is appropriate and just for Plaintiffs Salvador Venegas and Sergio Lainez to each receive \$10,000.00 as reasonable service payments for their services on behalf of the Class, Aggrieved Employees, and the State of California, in addition to their individual settlement payments.

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

Ummi Durrain

Edwin Aiwarzian

EXHIBIT A

SERGIO LAINEZ V. WWF OPERATING COMPANY LLC, ET AL.
(Los Angeles County Superior Court Case No. 21PSCV01017 (“LAINEZ ACTION”))

SALVADOR VENEGAS V. WWF OPERATING COMPANY, LLC, ET AL.
(Los Angeles County Superior Court, Case No. 21STCV20991 (“VENEGAS CLASS ACTION”))

SALVADOR VENEGAS V. WWF OPERATING COMPANY, LLC, ET AL.
(Los Angeles County Superior Court, Case No. 21PSCV00643 (“VENEGAS PAGA ACTION”))

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 the Merits of Plaintiff Sergio Lainez’s (“Plaintiff Lainez”) Private Attorneys General Act (“PAGA”) Claims on Behalf of the State of California with Respect to the Aggrieved Employees	8.50
Pre-Lawsuit Investigation of Potential Civil Penalties Exposure of Defendants WWF Operating Company, LLC, Danone North America Public Benefit Corporation, and Danone US, LLC (collectively, “Defendants”) with Respect to Plaintiff Lainez and the Aggrieved Employees	7.30
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA Action, Manageability, and Class Certification Decisions in California, Including all New and Relevant DLSE Materials	7.50
Investigation of Defendants, Defendants’ Business Relationships, and the Industry in which Defendants Operate	3.50

Investigation of Defendants' Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	3.10
Investigation, Research, and Analysis Regarding Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity; and Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	3.30
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	3.90
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendants in California During the Class Period, Including Differences Between the Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	4.50
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other 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	3.80
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California	3.40
Research and Investigation Re: Defendants' Written and Non-Written Policies, Practices, and Procedures Regarding Timekeeping, COVID-19 Screenings and Temperature Checks, Reporting Time Pay, Overtime Pay, Non-Discretionary Bonus/Shift Differential/Performance/Incentive Pay, Meal/Rest Breaks, Meal Waiver Forms, On-Premises Rest Breaks, Scheduling and Shifts, Donning and Doffing, Uniforms, Use of	16.50

Personal Cell Phones, Reimbursement of Business-Related Expenses, and Collective Bargaining Agreements	
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendants Use to Conduct Their Everyday Business, Including Timekeeping, Project Management, Customer Relations Management, Document Sharing, and Communications Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	3.70
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, Compliant Policies, Collective Bargaining Agreements, Exemptions, and LMRA Pre-Emption	7.50
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	4.80
Research and Investigation of Impact of COVID-19 Pandemic on Defendants, Their Operations, and Putative Class Members and Aggrieved Employees' Work	6.30
Review Register of Actions and Filings in <i>Salvador Venegas v. WWF Operating Company, LLC, et al.</i> , Los Angeles County Superior Court, Case No. 21PSCV00643	1.30
Review Register of Actions and Filings in <i>Salvador Venegas v. WWF Operating Company, LLC, et al.</i> , Los Angeles County Superior Court, Case No. 21STCV20991	1.10
Review Register of Actions and Filings in <i>Freddy Bautista v. WWF Operating Company, LLC, et al.</i> , Los Angeles County Superior Court, Case No. 23STCV02410. ("Bautista Action")	1.10
Meet and Communicate with Plaintiff Sergio Lainez Throughout the Pendency of the Case	57.50
Investigate, Meet, Communicate with, and/or Conduct Interviews of Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	12.50

Pleadings and Court Filings	
Draft Plaintiff Lainez's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on December 3, 2021) (Lainez Action)	7.10
Review Court's Notice of Case Assignment (filed on December 3, 2021) (Lainez Action)	0.10
Review Court's Notice of Case Management Conference (filed on December 6, 2021) (Lainez Action)	0.10
Review Court's Order to Show Cause Hearing (filed on December 6, 2021) (Lainez Action)	0.10
Review Defendants' Notice of Related Cases (served on January 12, 2022) (Lainez Action)	0.10
Review and Analyze Defendants' Answer to Complaint for Penalties Pursuant to California Private Attorneys General Act, Cal. Labor Code § 2698 Et Seq. and Research Affirmative Defenses in Defendants' Answer (served on January 12, 2022) (Lainez Action)	1.60
Draft Declaration of Arman Marukyan Regarding the Court's Order to Show Cause (filed on April 7, 2022) (Lainez Action)	0.20
Draft Plaintiff Lainez's Case Management Statement (filed on April 7, 2022) (Lainez Action)	0.80
Review Defendants' Case Management Statement (served on April 13, 2022) (Lainez Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on April 28, 2022) (Lainez Action)	0.10
Draft Plaintiff Lainez's Notice of Posting Jury Fees (filed on April 29, 2022) (Lainez Action)	0.10
Review Court's Notice Re: Continuance of Hearing and Order •	0.10

Review Defendants' Case Management Statement (served on May 26, 2022) (Lainez Action)	0.20
Review Court's Notice Re: Continuance of Hearing and Order (filed on June 2, 2022) (Lainez Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on June 14, 2022) (Lainez Action)	0.10
Meet and Confer with Defendants' Counsel and Co-Counsel and Draft, Review, and/or Revise Joint Stipulation to Consolidate Two Matters; [Proposed] Order (submitted on June 21, 2022) (Venegas PAGA Action)	0.20
Review Court's Minute Order and Order to Consolidate Two Matters (filed on August 2, 2022) (Venegas PAGA Action)	0.20
Review Defendant's Case Management Statement (served on September 21, 2022) (Venegas PAGA Action)	0.20
Draft Plaintiff Lainez's Case Management Statement (filed on September 21, 2022) (Venegas PAGA Action)	0.60
Review Plaintiff Venegas's Case Management Statement (served on September 21, 2022) (Venegas PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on October 6, 2022) (Venegas PAGA Action)	0.10
Review Court's Notice Re: Continuance of Hearing and Order (filed on October 14, 2022) (Venegas PAGA Action)	0.10
Meet and Confer with Defendants' Counsel and Co-Counsel and Draft, Review, and/or Revise Joint Stipulation to Consolidate Case Nos. 21STCV20991 and 21PSCV00643; [Proposed] Order (submitted on November 25, 2022) (Venegas Class Action)	0.20

Research and Draft, Revise, and/or Review Plaintiff Lainez and Plaintiff Venegas's (together, "Plaintiffs") First Amended Consolidated Class and Representative Action Complaint (filed on November 29, 2022) (Venegas Class Action)	0.30
Review Court's Minute Order Re: Non-Appearance Case Review re: Filing of Motion for Preliminary Approval of Class Action Settlement (filed on November 29, 2022) (Venegas Class Action)	0.10
Meet and Confer with Defendants' Counsel and Co-Counsel, and Draft, Review, and/or Revise Notice of Ruling (filed on November 30, 2022) (Venegas Class Action)	0.30
Review Court's Notice of Case Reassignment and Order for Plaintiffs to Give Notice (Dates Remain) (filed on December 8, 2022) (Venegas Class Action)	0.10
Review Court's Minute Re: Court Order re: Stipulation to Relate and Consolidate Cases (filed on December 9, 2022) (Venegas Class Action)	0.10
Meet and Confer with Defendants' Counsel and Co-Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on December 15, 2022) (Venegas Class Action)	0.10
Review and Analyze Defendants' Answer to First Amended Consolidated Class and Representative Action Complaint and Research Affirmative Defenses in Defendants' Answer (served on December 16, 2022) (Venegas Class Action)	0.80
Review Court's Minute Order Re: Non-Appearance Case Review re: Filing of Motion for Preliminary Approval of Class Action Settlement (filed on December 16, 2022) (Venegas Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review re: Filing of Motion for Preliminary Approval of Class Action Settlement (filed on January 20, 2023) (Venegas Class Action)	0.10
Review Defendants' Notice of Related Cases (served on March 17, 2023) (Venegas Class Action)	0.10
Review Court's Minute Order Re: Notice of Related Case (filed on April 5, 2023) (Venegas Class Action)	0.10

Appearances	
Prepare for and Telephonically Attend Case Management Conference (April 28, 2022) (Lainez Action)	1.70
Prepare for and Telephonically Attend Case Management Conference (June 14, 2022) (Lainez Action)	0.80
Prepare for and Telephonically Attend Case Management Conference (October 6, 2022) (Venegas PAGA Action)	1.10
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (May 10, 2023) (Venegas Class Action)	1.50
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (June 29, 2023) (Venegas Class Action)	1.30
Prepare for and Telephonically Attend Hearing on Plaintiff Bautista's Motion to Consolidate (July 18 2023) (Bautista Class Action)	1.20
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payments (October 30, 2023) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Danone North America Public Benefit Corporation Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sergio Lainez (served on September 20, 2021) (Lainez Action)	1.90
Draft Letter to Defendant Danone North America Public Benefit Corporation Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Seth Swan (served on November 5, 2021) (Lainez Action)	1.90

Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sergio Lainez (served December 2, 2021) (Lainez Action)	4.20
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sergio Lainez (served December 3, 2021) (Lainez Action)	0.90
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Sergio Lainez for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 29, 2021)	4.60
Meet with, Draft Correspondence to, and Respond to Correspondence from, Co-Counsel	13.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	12.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources, Perform Damages and Penalties Analysis and Calculations, and Evaluate Claims Prior to Reaching Settlement	14.50
Prepare for and/or Remotely Attend Mediation Session and Confer with Other Plaintiff's Counsel (March 9, 2022; Zoom Video Conference)	5.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (fully executed August 22, 2022)	2.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on January 3, 2023) and Notice of Proposed Settlement of Class Action and Hearing Date for Final Court Approval, [Proposed] Preliminary Approval Order, and [Proposed] Final Approval Order and Judgment	2.50

Draft, Review, and/or Revise Stipulation Regarding Cy Pres Beneficiary for Settlement; Order Thereon (Executed June 6, 2023)	0.30
Law and Motion	
Research and Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Unopposed Motion for Preliminary Approval of Class Settlement, Memorandum of Points and Authorities in Support Thereof, Declaration of Kyle Nordrehaug in Support Thereof, Declaration of Salvador Venegas in Support Thereof (filed on January 19, 2023) (Venegas Class Action)	0.50
Review Defendants' Declaration of David Voorhees in Support of Defendants' Memorandum of Points and Authorities in Support of Motion for Preliminary Approval (served on January 23, 2023) (Venegas Class Action)	0.30
Draft Declaration of Sergio Lainez in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement and Declaration of Joanna Ghosh in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement (filed on March 17, 2023) (Venegas Class Action)	4.80
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on May 10, 2023) (Venegas Class Action)	0.10
Review Court's Preliminary Approval Checklist (filed on May 25, 2023) (Venegas Class Action)	0.10
Draft, Review, and/or Revise Supplemental Declaration of Joanna Ghosh in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement, Supplemental Declaration of Kyle Nordrehaug in Support of Motion for Preliminary Approval of Class Settlement and Supplemental Declaration of Sergio Lainez in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement (filed on June 6, 2023) (Venegas Class Action)	5.50
Review Court's Order Regarding Cy Pre Beneficiary for Settlement (filed on June 9, 2023) (Venegas Class Action)	0.10

Draft, Review, and/or Revise Second Supplemental Declaration of Kyle Nordrehaug in Support of Motion for Preliminary Approval of Class Settlement (filed on June 22, 2023) (Venegas Class Action)	0.20
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on June 29, 2023) (Venegas Class Action)	0.10
Review Court's Order Granting Motion for Preliminary Approval of Class Action Settlement (filed on June 29, 2023) (Venegas Class Action)	0.20
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payments, and Declaration of Edwin Aiwezian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on October 6, 2023) (Anticipated)	4.50
Total Hours:	266.30

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Lainez v. WWF Operating Company, LLC (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/20/2021	U.S. Postmaster	Postage	7.38
9/29/2021	Labor & Workforce Development Agency	Filing Fee	75.00
9/29/2021	U.S. Postmaster	Postage	7.75
11/5/2021	U.S. Postmaster	Postage	7.38
12/8/2021	Legal Document Server, Inc.	Attorney Service	33.89
12/8/2021	Los Angeles Superior Court	Court Filing Fee	435.00
12/14/2021	ProLegal	Attorney Service	468.78
2/7/2022	Legal Document Server, Inc.	Attorney Service	15.20
4/8/2022	Legal Document Server, Inc.	Attorney Service	15.20
4/29/2022	Legal Document Server, Inc.	Attorney Service	25.32
4/29/2022	Los Angeles Superior Court	Jury Fee	150.00
6/2/2022	Los Angeles Superior Court	Document Download Fee	2.00
9/22/2022	Legal Document Server, Inc.	Attorney Service	15.95
3/13/2023	Los Angeles Superior Court	Document Download Fee	79.40
3/17/2023	Legal Document Server, Inc.	Attorney Service	15.95
3/17/2023	Legal Document Server, Inc.	Attorney Service	125.00
3/20/2023	Legal Document Server, Inc.	Attorney Service	15.95
3/20/2023	Legal Document Server, Inc.	Attorney Service	15.95
3/20/2023	Legal Document Server, Inc.	Attorney Service	105.00
4/16/2023	CaseAnywhere	Attorney Service	33.60
6/7/2023	Legal Document Server, Inc.	Attorney Service	16.15
6/7/2023	Legal Document Server, Inc.	Attorney Service	16.15
7/3/2023	CaseAnywhere	Attorney Service	132.00
Total:			1,814.00