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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

FABIAN RIVERA, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

METRO RF SERVICES, INC.; and DOES 1
through 100, inclusive,

Defendants.

Case No.: CIVSB2121607

Honorable Tony Raphael
Department S36

CLASS ACTION

**DECLARATION OF HELENE MAYER
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action and PAGA
Settlement, Attorneys' Fees and Costs, and
Enhancement Award; Declaration of Class
Representative (Fabian Rivera); Declaration
of Settlement Administrator (Simpluris, Inc.);
and [Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: August 4, 2025
Time: 8:30 a.m.
Department: S36

Complaint Filed: July 26, 2021
Trial Date: None Set

DECLARATION OF HELENE MAYER

I, Helene Mayer, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Fabian Rivera (“Plaintiff”) 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 December 24, 2024, in Department S36 of the above-entitled Court, the Honorable Tony Raphael preliminarily approved the Joint Stipulation for Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Metro R.F. Services, Inc. (“Defendant”) (together with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Fabian Rivera as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement, Attorneys’ Fees and Costs, and Enhancement Award (“Motion for Final Approval”), no Settlement Class Members have objected to the Class Settlement, the contemplated requests for Attorneys’ Fees and Costs, Enhancement Award, and Settlement Administration Costs, or the PAGA Allocation.

WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above-captioned case since prior to its commencement on July 26, 2021 (as well as in the

related action entitled *Fabian Rivera v. Metro R.F. Services, Inc.*, Superior Court of California for the County of San Bernardino, Case No. CIVSB2123539 (the “*Rivera* PAGA Action,” collectively with the *Rivera* Class Action, the “Actions”), which is part of the Parties’ global settlement).

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 Lawyers for Justice, PC and Plaintiff and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, representative PAGA claims, off-the-clock theory, meal and rest periods, wage-and-hour law and enforcement, Plaintiff’s claims and damages, and Defendant’s potential defenses. After conducting an initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiff were well-suited for class-wide 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 who worked for Defendant within the State of 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 litigation and discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and was preparing the cases for class certification and/or trial prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff and other Class Members, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. Class Counsel served multiple sets of formal written discovery requests. Specifically, in the *Rivera* Class Action, Class Counsel served Requests for Production of Documents (Set One); Requests for Admission (Set One); Special Interrogatories (Sets One and Two); and Form Interrogatories - General (Set One), on Defendant. The parties then agreed to exchange significant informal discovery for mediation purposes. The volume of data and

documents that Class Counsel reviewed and analyzed included and was not limited to: Plaintiff's employment records, a detailed set of Plaintiff's and other Class Members' time and pay data, Employee Handbook, forms, procedures and policies, among other information and documents. Class Counsel also developed damages/valuation calculations 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, discovery, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, drafting the Plaintiff's mediation brief and preparing for and engaging in court proceedings, mediation and settlement negotiations, and other tasks.

7. As outlined herein, the Parties have conducted significant investigation and discovery during the course of litigating the case, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature of the work performed by the Class Members and PAGA Members, as well as Defendant's operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing violations, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to certification, representative PAGA claims, off-the-clock theory, meal and rest periods, wage-and-hour law and enforcement, Plaintiff's claims and damages, 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 Hon. Patrick J. Walsh (Ret.), a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and

1 settlement discussions, the Parties exchanged information, documents, and data, and discussed
2 various aspects of the case, including, but not limited to, the risks and delays of further litigation;
3 the risks to the Parties of proceeding with class certification and/or representative adjudication;
4 the law relating to off-the-clock theory, meal and rest periods, PAGA representative claims, and
5 wage-and-hour law and enforcement; the evidence produced and analyzed; and the possibility of
6 appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not
7 easy. Defendant contended that individualized questions of fact predominate over any common
8 issues, and these issues would pose challenges to class certification and representative
9 adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class
10 certification and prevail on the merits, while Plaintiff and Class Counsel believed that they would
11 be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation,
12 the Parties ultimately agreed that the cases were well-suited for settlement given the legal issues
13 relating to Plaintiff's 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 ("Attorneys' Fees") in the amount of \$157,500.00, which is 35% of the Maximum
20 Settlement Amount of \$450,000.00. Pursuant to the contingency-fee agreement entered into by
21 and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least 35%
22 of the recovery.

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

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **286.00 hours** performing tasks and obtaining recovery in these matters. 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 by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of these matters.

12. The work performed in this particular matter, 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 action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$850 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 \$800 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and 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; and 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.

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

13. 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 attorney of record in dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premium wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has 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, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second

Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice, PC, he has argued over 100 motions, taken or defended over 150 depositions, prepared dozens of expert witnesses for deposition or trial, and attended over 175 mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately 15 cases in the last decade and litigated over 1,000 class action or representative action cases.

15. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including, and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative cases have resulted in settlements that have been granted court approval. He has

1 handled over 150 mediations and worked on over 250 class action or representative action cases
2 which have resulted in settlement.

3 16. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
4 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
5 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
6 Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010)
7 and in New York (since 2013) and is also admitted to practice in all U.S. District Courts in
8 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
9 Court. She has taken and defended dozens of depositions and successfully handled motion
10 practice in class action cases regarding discovery (including, and not limited to, class contact
11 information), class certification (both contested class certification and stipulated class
12 certification), arbitration agreements, coordination, and intervention. She has successfully
13 handled briefing and oral argument on appeal and obtained notable decisions regarding Private
14 Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g.,
15 *Betancourt v. Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert.
16 denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*,
17 8 Cal.5th175 (2019). She has significant experience with class actions, including, and not limited
18 to working on cases to obtain class certification through contested motion practice and working
19 on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical
20 sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving
21 a certified class consisting of approximately 2,600 individuals). She also has extensive experience
22 with class action and/or representative action settlements, and has handled this process in over
23 300 cases. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, Lawyers *for* Justice,
24 PC has handled the class certification and court approval process for hundreds of class action
25 and/or representative action matters that have successfully resolved. She is a member of the
26 California Employment Lawyers Association and, on several occasions, has been a speaker
27 regarding topics in wage and hour law at the organization's continuing legal education events.

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1 17. Vartan Madoyan is a Member of Lawyers *for* Justice, PC. He received his Bachelor
2 of Arts degree in Economics from the University of California, San Diego in 2007, and a Juris
3 Doctor degree from Loyola Law School in 2011, graduating with Cum Laude and Order of the
4 Coif honors. He is admitted to practice before all courts in the State of California and all U.S.
5 District Courts in California. He externed for the Honorable Victoria S. Kaufman of the United
6 States Bankruptcy Court, Central District of California, from June 2009 to August 2009. He
7 externed for the Honorable Gary A. Feess of the United States District Court, Central District of
8 California, from January 2010 to May 2010. From 2011 through and including the present, he
9 has practiced almost exclusively on complex wage and hour class action and PAGA action
10 matters in California. From October 2011 to June 2013, he was an Associate at Littler
11 Mendelson's Century City, California office, working for one of the largest employer-side labor
12 and employment law firms in the United States. From July 2013 to March 2014, he was an
13 Associate at Sheppard, Mullin, Richter & Hampton's Century City, California office. From
14 March 2014 to July 2023, he worked as an Associate and then as Counsel at Baker Hostetler
15 LLP's Los Angeles office. From August 2023 to the present, he has been a Member of Lawyers
16 *for* Justice, PC. He has taken and defended dozens of depositions and successfully handled
17 motion practice in class action and PAGA cases regarding discovery (including, and not limited
18 to, motions regarding class contact information), class certification (both contested class
19 certification and stipulated class certification), dispositive motions, arbitration agreements,
20 coordination, and intervention. He has successfully handled a complex wage and hour class
21 action and PAGA through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange
22 County Superior Court, Case No. 30-2013-00692890. He has also successfully handled briefing
23 on appeal regarding employer efforts to compel arbitration. *TitleMax of Cal. v. Pena*, California
24 Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28, 2023)
25 (unpublished decision). Further, he has extensive experience with settlements of class actions
26 and PAGA actions and has handled and supervised this process in over one hundred (100) cases.

27 18. I, Helene Mayer, am a Member of Lawyers *for* Justice, PC. I received my Bachelor
28 of Arts degree from the University of San Diego in 2017, and I earned my Juris Doctor degree

1 from the University of San Diego School of Law in 2020. I was admitted to practice law in
2 California in 2021. I am admitted to practice before all courts of the State of California and all
3 U.S. Federal District Courts in the State of California. I have worked on wage-and-hour class
4 action and PAGA representative cases, and my work has included, *inter alia*, researching and
5 drafting pleadings and motion-related papers; conducting claims evaluation; administrative
6 notice exhaustion; drafting, negotiating, and finalizing stipulations and settlement agreements;
7 and making court appearances. Prior to working at Lawyers *for* Justice, PC, I worked at law firms
8 focused primarily on family law matters, including, *inter alia*, representing clients in divorce,
9 parentage, child custody, and domestic violence restraining order proceedings; researching and
10 drafting pleadings; negotiating and finalizing marital settlement agreements; engaging in motion
11 practice; and making court appearances.

12 **COSTS AND EXPENSES INCURRED**

13 **BY LAWYERS *FOR* JUSTICE, PC**

14 19. To date, Class Counsel has borne all of the risks and costs of litigation and will not
15 receive any compensation until recovery is obtained in these matters. Lawyers *for* Justice, PC
16 seeks reimbursement of **\$13,765.31** in litigation costs and expenses incurred in the case, as
17 reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the
18 prosecution of the cases and to obtain the Settlement.

19 **ENHANCEMENT AWARD TO PLAINTIFF**

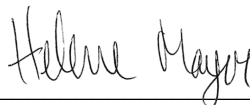
20 20. In recognition of his efforts and work serving as the Class Representative, the
21 Settlement provides for an Enhancement Award in the amount of \$5,000.00 to Plaintiff Fabian
22 Rivera. The requested Enhancement Award is fair and appropriate. Plaintiff spent a substantial
23 amount of time and effort to produce relevant documents and information and provided facts and
24 evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel
25 needed him and actively tried to obtain and provide information that would facilitate the pursuit
26 of the case. Plaintiff spent numerous hours speaking with Class Counsel about his claims,
27 describing his work experiences with Defendant, and gathering and reviewing documents.
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1 Accordingly, it is appropriate for Plaintiff to receive \$5,000.00 as a reasonable Enhancement
2 Award for his services in the case, in addition to his individual settlement payments.

3 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
4 interests of Plaintiff, Class Members, PAGA Members, and the State of California.

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

7 Executed this 11th day of July 2025, at Mooresville, North Carolina.

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11 Helene Mayer
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EXHIBIT A

FABIAN RIVERA V. METRO RF SERVICES, INC.
San Bernardino County Superior Court, Case No. CIVSB2121607 (“*Rivera* Class Action”)

FABIAN RIVERA V. METRO RF SERVICES, INC.
San Bernardino County Superior Court, Case No. CIVSB2123539 (“*Rivera* PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>FOR</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Fabian Rivera (“Plaintiff”) During the Case	19.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Action Claims, Conduct Legal Research and Analysis of Class Action Claims, and Draft, Review, and/or Revise Plaintiff Fabian Rivera’s Class Action Complaint for Damages (filed on July 26, 2021) (<i>Rivera</i> Class Action)	8.50
Investigate the Merits of Plaintiff’s PAGA Claim, Conduct Legal Research and Analysis of PAGA Claim, and Draft, Review, and/or Revise Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code 2698, Et Seq. (filed on August 10, 2021) (<i>Rivera</i> PAGA Action)	7.50
Review Court’s Initial Case Management Conference Order (filed on August 20, 2021) (<i>Rivera</i> Class Action)	0.10
Review Court’s Initial Case Management Conference Order (filed on September 15, 2021) (<i>Rivera</i> PAGA Action)	0.10
Review and Analyze Defendant’s Notice of Appearance (filed on October 14, 2021) (<i>Rivera</i> Class Action)	0.10
Review Clerk’s Notice of Continuance (filed on October 15, 2021) (<i>Rivera</i> PAGA Action)	0.10
Review Defendant’s Notice of Appearance (filed on October 22, 2021) (<i>Rivera</i> PAGA Action)	0.10
Meet and Confer with Defendant’s Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Report (filed on October 26, 2021) (<i>Rivera</i> Class Action)	1.30

Review Court's Minute Order Re: Complex Case Management Conference (filed on November 5, 2021) (<i>Rivera</i> Class Action)	0.10
Review Defendant's Notice of Deposit of Jury Fees (November 8, 2021) (<i>Rivera</i> PAGA Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint and Demand for Jury Trial (filed on November 12, 2021) and Research Affirmative Defenses in Defendant's Answer (<i>Rivera</i> Class Action)	1.30
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Report (filed on November 15, 2021) (<i>Rivera</i> PAGA Action)	1.10
Review Court's Order Re: Discovery Conference and Requirements for Trial and Minute Order Re: Complex Case Management Conference (filed on November 18, 2021) (<i>Rivera</i> PAGA Action)	0.20
Review and Analyze Defendant Metro RF Services, Inc.'s Notice of Deposit of Jury Fees (filed on December 21, 2021) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order to Continue Trial Setting Conference (filed on March 23, 2022) (<i>Rivera</i> PAGA Action)	1.00
Review Court's Order to Continue Trial Setting Conference (filed on March 28, 2022) (<i>Rivera</i> PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed Order] to Continue Case Management Conference (filed on April 20, 2022) (<i>Rivera</i> Class Action)	0.80
Review Court's Order to Continue Case Management Conference (filed on April 26, 2022) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed Order] to Continue Further Case Management Conference (filed on June 3, 2022) (<i>Rivera</i> Class Action)	0.80
Review Court's Order to Continue Further Case Management Conference (filed on June 9, 2022) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Trial Setting Conference [Proposed] Order (filed on July 6, 2022) (<i>Rivera</i> PAGA Action)	0.60
Review Court's Order to Continue Trial Setting Conference (filed on July 8, 2022) (<i>Rivera</i> PAGA Action)	0.10

Draft Notice of Entry of Judgment or Order (filed on July 15, 2022) (<i>Rivera</i> PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order to Continue Trial Setting Conference (filed on August 8, 2022) (<i>Rivera</i> PAGA Action)	0.80
Review Court's Order to Continue Trial Setting Conference (filed on August 11, 2022) (<i>Rivera</i> PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Report and Notice of Settlement (filed on September 1, 2022) (<i>Rivera</i> PAGA Action)	0.60
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement and Stipulation to Continue Case Management Conference (filed on September 2, 2022) (<i>Rivera</i> Class Action)	0.60
Draft Notice of Entry of Judgment or Order (filed on September 15, 2022) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order to Vacate Trial Setting Conference (filed on November 4, 2022) (<i>Rivera</i> PAGA Action)	0.60
Review Court's Order to Vacate Trial Setting Conference (filed on November 17, 2022) (<i>Rivera</i> PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference (filed on January 10, 2023) (<i>Rivera</i> Class Action)	0.60
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference (filed on January 10, 2023) (<i>Rivera</i> PAGA Action)	0.60
Draft Notice of Entry of Judgment or Order (filed on January 23, 2023) (<i>Rivera</i> PAGA Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on January 23, 2023) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on May 8, 2023) (<i>Rivera</i> Class Action)	0.60
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on May 8, 2023) (<i>Rivera</i> PAGA Action)	0.60
Review Court's Important Correspondence - Notice of Hearing (served on May 17, 2023) (<i>Rivera</i> PAGA Action)	0.10

Review Court's Minute Order Re: Further Case Management Conference (filed on May 22, 2023) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on August 8, 2023) (<i>Rivera</i> Class Action)	0.60
Review Court's Minute Order Re: Further Case Management Conference (filed on August 22, 2023) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (filed on September 6, 2023) (<i>Rivera</i> PAGA Action)	0.80
Review Court's Order to Show Cause Re: Dismissal (filed on September 14, 2023) (<i>Rivera</i> PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on October 5, 2023) (<i>Rivera</i> Class Action)	0.60
Review Court's Minute Order Re: Status Conference (filed on October 20, 2023) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (filed on November 28, 2023) (<i>Rivera</i> PAGA Action)	0.60
Review Court's Notice of Reassignment of Case for all Purposes (filed on November 29, 2023) (<i>Rivera</i> PAGA Action)	0.10
Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (filed on December 13, 2023) (<i>Rivera</i> PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (filed on January 10, 2024) (<i>Rivera</i> Class Action)	0.80
Review Court's Minute Order Re: OSC Re: Dismissal (Settled) (filed on January 22, 2024) (<i>Rivera</i> Class Action)	0.10
Draft, Review, and/or Revise Notice Regarding January 22, 2024 Order to Show Cause Regarding Dismissal Hearing (filed on January 24, 2024) (<i>Rivera</i> Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (filed on March 20, 2024) (<i>Rivera</i> PAGA Action)	0.60

Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (filed on March 27, 2024) (<i>Rivera</i> PAGA Action)	0.10
Review Court's Notice of Re-Assignment of Case for All Purposes (filed on May 18, 2024) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (filed on June 17, 2024) (<i>Rivera</i> Class Action)	0.60
Review Court's Minute Order Re: OSC re: Dismissal (Settled) (filed on June 25, 2024) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (filed on August 14, 2024) (<i>Rivera</i> Class Action)	0.60
Review Court's Minute Order Re: OSC re: Dismissal (Settled) (filed on August 29, 2024) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (filed on October 11, 2024) (<i>Rivera</i> PAGA Action)	0.60
Review Court's Minute Order Re: OSC re: Dismissal (Settled) (filed on October 18, 2024) (<i>Rivera</i> PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (filed on November 18, 2024) (<i>Rivera</i> Class Action)	0.60
Review Court's Notice of Reassignment of Case for All Purposes (filed on April 3, 2025) (<i>Rivera</i> PAGA Action)	0.10
Draft Notice of Change of Address or Other Contact Information (filed on April 11, 2025) (<i>Rivera</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (filed on April 11, 2025) (<i>Rivera</i> PAGA Action)	0.60
Draft Notice of Change of Address or Other Contact Information (filed on April 11, 2025) (<i>Rivera</i> PAGA Action)	0.10
Review Court's Minute Order Regarding OSC Re: Dismissal (Settled) (filed on April 18, 2025) (<i>Rivera</i> PAGA Action)	0.10

Appearances	
Prepare for and Remotely Attend Hearing on Complex Case Management Conference (November 5, 2021) (<i>Rivera Class Action</i>)	0.90
Prepare for and Remotely Attend Hearing on Complex Case Management Conference (November 18, 2021) (<i>Rivera PAGA Action</i>)	1.10
Prepare for and Remotely Attend Hearing on Further Case Management Conference (May 22, 2023) (<i>Rivera Class Action</i>)	0.50
Prepare for and Remotely Attend Hearing on Further Case Management Conference (August 22, 2023) (<i>Rivera Class Action</i>)	0.90
Prepare for and Remotely Attend Hearing on Order to Show Cause Re: Dismissal (September 14, 2023) (<i>Rivera PAGA Action</i>)	0.60
Prepare for and Remotely Attend Hearing on Order to Show Cause Re: Dismissal (December 13, 2023) (<i>Rivera PAGA Action</i>)	0.80
Prepare for and Remotely Attend Hearing on Order to Show Cause Re: Dismissal (Settled) (January 22, 2024) (<i>Rivera Class Action</i>)	0.90
Prepare for and Remotely Attend Hearing on Order to Show Cause Re: Dismissal (March 27, 2024) (<i>Rivera PAGA Action</i>)	1.30
Prepare for and Remotely Attend Hearing on Order to Show Cause Re: Dismissal (Settled) (June 25, 2024) (<i>Rivera Class Action</i>)	0.90
Prepare for and Remotely Attend Hearing on Order to Show Cause Re: Dismissal (October 18, 2024) (<i>Rivera PAGA Action</i>)	0.80
Prepare for and Remotely Attend Hearing on Status of Filing Motion for Preliminary Approval/ Order to Show Cause Re: Settlement (August 29, 2024) (<i>Rivera Class Action</i>)	0.90
Prepare for and Remotely Attend Hearing on Motion for Preliminary Approval of Class Action Settlement (December 24, 2024) (<i>Rivera Class Action</i>)	1.20

Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (served on June 2, 2021)	4.50
Draft Correspondence to, Meet and Confer with, and Respond to Correspondence from Defendant's Counsel	20.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (approximately 10,834 pages), and Other Sources Prior to First Mediation	61.50
Prepare for Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on June 9, 2022)	39.50
Attend Mediation Session (June 16, 2022; Video Conference)	8.50
Engage in Additional Settlement Negotiations After Mediation	8.10
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class and PAGA Settlement (fully executed on December 12, 2022)	4.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on July 30, 2024) and Draft, Review, and/or Revise Notice of Class Action Settlement	16.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Fabian Rivera (served on February 12, 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 Fabian Rivera (served on March 8, 2021)	2.80
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Requests for Admission (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Metro RF Services, Inc. (served on April 1, 2022)	4.50

Law and Motion	
Review and Analyze Defendant's Peremptory Challenge; Declaration of Timothy B. Nelson (filed on October 14, 2021) (<i>Rivera</i> Class Action)	0.10
Review Court's Minute Order Re: Motion - Affidavit of Prejudice - Post Disposition (served on October 21, 2021) (<i>Rivera</i> Class Action)	0.10
Review and Analyze Defendant's Peremptory Challenge; Declaration of Timothy B. Nelson (filed on October 22, 2021) (<i>Rivera</i> PAGA Action)	0.10
Review Court's Notice and Order Re: Affidavit of Prejudice Code of Civil Procedure 170.6 (filed on October 28, 2021) (<i>Rivera</i> PAGA Action)	0.10
Review Court's Minute Order Re: Motion Affidavit of Prejudice Predisposition (filed on October 28, 2021) (<i>Rivera</i> PAGA Action)	0.10
Review and Analyze Defendant Metro RF Services, Inc.'s Notice of Motion and Motion for Reconsideration Regarding Denial of its Peremptory Challenge, Memorandum of Points and Authorities in Support Thereof, Declaration of Timothy B. Nelson in Support Thereof, and [Proposed] Order Granting Defendant Metro RF Services, Inc.'s Motion for Reconsideration Regarding Denial of Its Peremptory Challenge (filed on November 4, 2021) (<i>Rivera</i> Class Action)	1.10
Draft, Review, and/or Revise Plaintiff's Response to Defendant Metro RF Services, Inc.'s Motion for Reconsideration Regarding Denial of its Peremptory Challenge (filed on December 17, 2021) (<i>Rivera</i> Class Action)	1.50
Review and Analyze Defendant Metro RF Services, Inc.'s Reply Brief in Support of Its Motion for Reconsideration Regarding Denial of Its Peremptory Challenge (filed on December 23, 2021) (<i>Rivera</i> Class Action)	0.50
Review Court's Tentative Ruling Re: Defendant's Motion for Reconsideration Regarding Denial of Its Peremptory Challenge (issued on January 14, 2022) (<i>Rivera</i> Class Action)	0.10
Review Court's Minute Order Re: Predisposition Motion (filed on January 18, 2022) (<i>Rivera</i> Class Action)	0.10
Review Defendant's Notice of Entry of Order (filed on January 20, 2022) (<i>Rivera</i> Class Action)	0.10

Review Court's Minute Order Re: Affidavit of Prejudice (filed on January 21, 2022) (<i>Rivera</i> Class Action)	0.10
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Helene Mayer in Support Thereof, Declaration of Fabian Rivera in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 31, 2024) (<i>Rivera</i> Class Action)	19.50
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement and Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on December 24, 2024) (<i>Rivera</i> Class Action)	0.10
Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Award; Memorandum of Points and Authorities, Declaration of Helene Mayer in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on July 11, 2025) (<i>Rivera</i> Class Action)	20.50
Total Hours:	286.00

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Rivera vs. Metro R.F Services, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/12/2021	U.S. Postmaster	Postage	\$6.96
7/26/2021	Legal Document Server, Inc.	Attorney Service	\$200.23
7/26/2021	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
7/26/2021	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
8/27/2021	ProLegal	Attorney Service	\$242.85
9/23/2021	ProLegal	Attorney Service	\$100.80
11/5/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
11/8/2021	CourtCall, LLC	Attorney Service	\$94.00
12/17/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
1/19/2022	CourtCall, LLC	Attorney Service	\$94.00
6/10/2022	FedEx Express	Courier Service	\$60.73
9/1/2022	Legal Document Server, Inc.	Attorney Service	\$196.35
9/1/2022	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
9/15/2022	Legal Document Server, Inc.	Attorney Service	\$150.00
5/8/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
5/19/2023	CourtCall, LLC	Attorney Service	\$72.00
8/8/2023	Legal Document Server, Inc.	Attorney Service	\$130.00
8/22/2023	CourtCall, LLC	Attorney Service	\$72.00
10/16/2023	CourtCall, LLC	Attorney Service	\$72.00
1/10/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
1/19/2024	CourtCall, LLC	Attorney Service	\$72.00
3/28/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
6/17/2024	CourtCall, LLC	Attorney Service	\$72.00
6/18/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
8/14/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
10/11/2024	Legal Document Server, Inc.	Attorney Service	\$372.17
10/31/2024	Legal Document Server, Inc.	Attorney Service	\$58.00
10/31/2024	San Bernardino Superior Court	Motion Fee	\$60.00
11/18/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
1/7/2025	San Bernardino Superior Court	Document Download Fee	\$7.32
4/24/2025	Legal Document Server, Inc.	Attorney Service	\$18.90
Total:			\$4,103.09

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Rivera vs. Metro R.F Services, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
6/2/2021	U.S. Postmaster	Postage	\$7.16
6/2/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
8/10/2021	Legal Document Server, Inc.	Attorney Service	\$200.23
8/10/2021	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
8/10/2021	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
9/23/2021	ProLegal	Attorney Service	\$100.80
10/28/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
5/16/2022	Signature Resolution LLC	Mediation Fee	\$6,450.00
7/6/2022	Legal Document Server, Inc.	Attorney Service	\$196.35
7/6/2022	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
7/14/2022	San Bernardino Superior Court	Document Download Fee	\$2.50
7/15/2022	Legal Document Server, Inc.	Attorney Service	\$150.00
9/1/2022	Legal Document Server, Inc.	Attorney Service	\$195.00
5/8/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
9/6/2023	Legal Document Server, Inc.	Attorney Service	\$130.00
12/12/2023	CourtCall, LLC	Attorney Service	\$72.00
3/25/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
10/22/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
4/11/2025	Legal Document Server, Inc.	Attorney Service	\$135.00
4/14/2025	Legal Document Server, Inc.	Attorney Service	\$160.00
4/23/2025	Legal Document Server, Inc.	Attorney Service	\$18.89
Total:			<u>\$9,662.22</u>