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

MAYRA CORTEZ, individually, and on
behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

v.

BARKSDALE, INC., an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV29193

Honorable Carolyn B. Kuhl
Department 12

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement, Class
Counsel Fees Payment, Class Counsel
Litigation Expenses Payment, and Class
Representative Service Payment; Declaration
of Class Representative (Mayra Cortez);
Declaration of Settlement Administrator (Jarrod
Salinas); and [Proposed] Final Approval Order
and Judgment filed concurrently herein]

Date: May 25, 2023
Time: 10:30 a.m.
Department: 12

Complaint Filed: August 9, 2021
FAC Filed: December 23, 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 Plaintiff Mayra Cortez (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On December 15, 2022, in Department 12 of the above-entitled Court, the Honorable Carolyn B. Kuhl preliminarily approved the Class Action and PAGA Settlement Agreement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Barksdale, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Mayra Cortez to represent the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix” or “Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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

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WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers for Justice, PC have actively engaged in litigating the above-captioned putative class action (the “Class Action”) since prior to its commencement on August 9, 2021, as well as Plaintiff’s separate representative action under the Private Attorneys General Act (“PAGA”), entitled *Mayra Cortez v. Barksdale, Inc.*, Los Angeles County Superior Court, Case No. 21STCV35127 (the “PAGA Action”) since prior to its commencement on September 23, 2021 (collectively, the “Litigation”). On December 23, 2022, to implement the settlement, the claims asserted in both cases were effectively consolidated into the operative complaint in the Action, by the filing of the First Amended Consolidated Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq.

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

6. Class Counsel investigated the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial, prior to reaching the Settlement. The parties conducted informal discovery and investigation into the facts of the cases, and also informally exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with mediation and settlement negotiations. The volume of

1 information, data, and documents that Class Counsel reviewed and analyzed included and was
2 not limited to: employment records of Plaintiff and other Class Members, a detailed sampling of
3 Class Members' time and pay data, new hire checklists and materials, company policy
4 acknowledgments, internal memoranda (e.g., regarding Holiday Gift Cards, Employee Request
5 for Excuse from Emergency Overtime, and Safety Shoes/Boots Voucher), job descriptions,
6 Defendant's Employee Handbooks and operations and employment practices, policies, and
7 procedures documents (including but not limited to, training materials, meal period waivers and
8 related agreements and acknowledgments, Agreement Wage Schedule with Labor Grades, Job
9 Classifications and Straight Time Hourly Rate Ranges, and Standard Operating Procedures
10 (including, and not limited to, regarding Non-Exempt Hourly and Union Employee Time Clock
11 Policy, Bargaining Employees Attendance Policy, Protective Eye Wear Policy, and Employees
12 Dress Code Policy)), collective bargaining agreements, MOU/document re: settlement between
13 Union and Defendant, and exemplar signed release agreements, among other information and
14 documents. Class Counsel interviewed Plaintiff and other Class Members to gather facts and to
15 identify potential witnesses. Class Counsel researched applicable law, developed liability,
16 damages, and penalties valuation models in connection with mediation and settlement
17 negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to
18 discuss issues relating to the pleadings, case management, and informal discovery and
19 production of information, documents, and data in the course of litigation and in connection with
20 mediation and settlement negotiations. Other work performed by Class Counsel included, and
21 was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings and
22 the mediation brief; and preparing for and attended court proceedings and mediation and
23 settlement negotiations, among other tasks.

24 7. As outlined herein, the parties have conducted informal discovery and
25 investigation during the course of litigating the cases and mediation and settlement negotiations.
26 Class Counsel analyzed a large volume of information, documents, and data obtained from
27 Plaintiff, Defendant, and other sources. The information, documents, and data provided a critical
28 understanding of the nature of the work performed by the Class Members and Aggrieved

1 Employees, as well as Defendant's operations and employment policies, practices, and
2 procedures, and were used in analyzing liability, damages, penalties, and valuation issues in
3 connection with all phases of the litigation, and ultimately in connection with the mediation and
4 settlement negotiation process. Class Counsel also performed significant research into the
5 applicable law, which is evolving as it relates to class certification, off-the-clock theory, meal
6 and rest periods, PAGA representative claims, wage-and-hour enforcement, collective bargaining
7 agreements, pre-emption, and exemptions, Plaintiff's claims and allegations, and Defendant's
8 defenses thereto, as well as facts discovered.

9 8. After conducting significant investigation of the facts and law during the
10 prosecution of the cases, counsel for the parties engaged in extensive settlement negotiations to
11 try to resolve the cases. These efforts included participating in a formal, full-day mediation
12 conducted by Mark S. Rudy, Esq., a well-regarded mediator experienced in mediating complex
13 labor and employment matters. During all settlement discussions, the parties conducted their
14 negotiations at arm's length in an adversarial position. In the course of mediation and settlement
15 negotiations, the parties exchanged information and data, and discussed all aspects of the cases,
16 including the risks and delays of further litigation, the risks to the parties of proceeding with
17 class certification and trial, the law relating to class certification, off-the-clock theory, meal and
18 rest periods, representative PAGA claims, wage-and-hour enforcement, collective bargaining
19 agreements, pre-emption, and exemptions, the evidence produced and analyzed, and the
20 possibility of appeals, among other things. Arriving at a settlement that was acceptable to the
21 parties was not easy. Defendant contended that individualized questions of fact predominate
22 over any common issues, and these issues would pose challenges to certification and
23 representative adjudication. Defendant and its counsel felt strongly about Defendant's ability to
24 prevail on the merits and obtain a denial of class certification, while Plaintiff and Class Counsel
25 believed that they would be able to obtain class certification and prevail at trial. With the aid of
26 the mediator's evaluation, the parties ultimately agreed that the cases were well-suited for
27 settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs and
28 risks to the parties that would attend further litigation. These risks of further litigation include,

1 and are not limited to, a determination that the claims are unsuitable for class treatment and/or
2 representative adjudication, class de-certification after certification of a class, allowing a jury to
3 decide the claims asserted in the cases, and the real possibility of no recovery after years of
4 litigation.

5 9. Pursuant to the escalator clause in Paragraph 8 of the Settlement Agreement, the
6 Settlement Administrator confirmed that the total number of Workweeks during the period from
7 August 9, 2017 through February 12, 2022 was thirty-three thousand two hundred forty-one
8 (33,241) and the total number of PAGA Pay Periods for the time period from July 20, 2020 to
9 February 12, 2022 was five thousand nine hundred thirty-three (5,933), therefore the workweeks
10 threshold was not exceeded and the Gross Settlement Amount remains \$1,200,000.00.

11 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks
12 attorneys' fees in the amount of \$420,000.00, which is thirty-five percent (35%) of the Gross
13 Settlement Amount of \$1,200,000.00, as set forth in the Settlement Agreement and the Class
14 Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and
15 Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of
16 the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
17 took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to
18 the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
19 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
20 has achieved in the cases; and (6) the other cases that Class Counsel has turned down in order to
21 devote its time and efforts to this matter.

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

24 12. While not necessarily required to be demonstrated because the percentage fee is
25 proper for this settlement, Class Counsel has incurred many hours of work in connection with
26 prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar
27 analysis with a multiplier of 1.20. Attorneys at Lawyers for Justice, PC have spent a total of
28 **485.50 hours** performing tasks and obtaining recovery in this matter. Attached hereto as

1 “EXHIBIT A” is an Attorney Task and Time Chart that sets forth in detail the nature of the
2 legal services provided by attorneys at Lawyers for Justice, PC and the time incurred in
3 performing those services. These hours include work done by myself and several other attorneys
4 at Lawyers for Justice, PC. Additionally, separate from the hours referenced herein, Lawyers for
5 Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of
6 this matter.

7 13. The work performed in this particular matter, the background of our firm, as well
8 as the individual backgrounds, training, and experience of the attorneys who worked on this
9 matter, in litigating complex wage-and-hour actions, and in particular, employment and
10 representative class actions, support a reasonable blended hourly rate of compensation of at least
11 \$725 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been
12 awarded attorneys’ fees, compensating the firm at the rate of at least \$725 per hour for legal
13 services performed, by courts granting approval of wage-and-hour settlements in other cases:
14 final approval of the class and representative action settlement in *David Dugan v. TEC*
15 *Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on
16 July 8, 2021, and the award of attorneys’ fees involved an hourly rate of \$936.47; final approval
17 of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan*
18 (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award
19 of attorneys’ fees involved an hourly rate of \$919.57; final approval of the class action settlement
20 in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court
21 Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of
22 attorneys’ fees involved an hourly rate of \$766.05; final approval of the class and representative
23 action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County
24 Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of
25 attorneys’ fees involved an hourly rate of \$764.82; final approval of the class and representative
26 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
27 SCV258764) was granted on February 6, 2019, and the award of attorneys’ fees involved an
28 hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley*

1 *Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450)
2 was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of
3 \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler*
4 *Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was
5 granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77;
6 and final approval of the class and representative action settlement in *Demetrius Camarillo v.*
7 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
8 granted on June 30, 2017, and the award of attorneys' fees involved a higher hourly rate of
9 \$845.64.

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

11 ***EDUCATION***

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

20 ***JUDICIAL EXTERNSHIPS***

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

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LITIGATION AND CLASS ACTION EXPERIENCE

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

17. At *Girardi & Keese*, my practice focused on class actions and other complex cases involving toxic torts and products liability. In addition, I gained substantial experience on cases involving insurance bad faith, premises liability, and medical negligence. While employed by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150 depositions, and prepared dozens of expert witnesses for deposition or trial.

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

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

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

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

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

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

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

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

21 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
22 wage-and-hour class and PAGA representative action against a national wholesale distributor of
23 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
24 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
25 representative action settlement. The Sacramento County Superior Court Case Number is 34-
26 2012-00136285.

27 g) LFJ, in association with co-counsel therein, represented the plaintiff in a
28 wage-and-hour class action against a multinational corporation that provides global workplace

1 solutions, involving allegations of misclassification of the “Operations Manager” position. On
2 September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles
3 County Superior Court Case Number is BC478769.

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

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

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

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

25 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
27 involving allegations of misclassification of the “Department Manager” position. On August 12,
28 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.

On August 6, 2019, the court granted final approval of the class action settlement. The Alameda County Superior Court Case Number is RG13680477.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

20. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$15,116.82** in litigation costs and expenses incurred in the Litigation, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

CLASS REPRESENTATIVE SERVICE PAYMENT TO PLAINTIFF

21. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for a Class Representative Service Payment in the amount of \$10,000.00 to Plaintiff Mayra Cortez. The requested Class Representative Service Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant documents and past employment records and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain information that would facilitate the pursuit of the class and PAGA claims. Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing her work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Mayra Cortez to receive \$10,000.00 as a reasonable Class Representative Service Payment, for her services on behalf of the Class Members, State of California, and Aggrieved Employees, in addition to her individual settlement payment.

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

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

Executed this 3rd day of May 2023, at Glendale, California.



Edwin Aiwarzian

EXHIBIT A

MAYRA CORTEZ V. BARKSDALE, INC.
Los Angeles County Superior Court Case No. 21STCV29193 (“CLASS ACTION”)
MAYRA CORTEZ V. BARKSDALE, INC.
Los Angeles County Superior Court Case No. 21STCV35127 (“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 Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality	11.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Mayra Cortez’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	9.20
Pre-Lawsuit Investigation of Potential Damages of Defendant Barksdale, Inc. (“Defendant”) with Respect to Plaintiff and the Putative Class Members	10.30
Pre-Lawsuit Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California With Respect to Plaintiff and the Aggrieved Employees	8.90
Pre-Lawsuit Investigation of Potential Civil Penalties Exposure of Defendant with Respect to the Aggrieved Employees	7.50
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Breaks, PAGA, Collective Bargaining Agreements, Pre-Emption, Exemptions, and Class Certification in California, Including all New and Relevant DLSE Materials	8.50

Investigation of Defendant, Defendant's Business Relationships, and the Industry in which Defendant Operates	3.50
Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members	3.10
Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity; and Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	3.70
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	4.90
Research and Investigation Re: Location(s), Department(s), and/or Division(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between 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/or Consumer Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	6.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	5.20
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Timekeeping, Rounding, Timekeeping Attestations, Scheduling, Bell System, Meal/Rest Breaks, On-Premises Breaks, Meal Period Waivers, Meal/Rest Premiums, Overtime Compensation,	23.50

Bonuses/Incentive/Shift Differential Pay, Purchasing N-95 Masks and Sanitizers, PPE, Supplies, Equipment, Reimbursement of Business-Related Expenses, and Collective Bargaining Agreements	
Research and Investigation Re: Software Programs and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Production and Resource Management, Project Management, Logistics, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	4.50
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, Release, and Compliant Policies	8.50
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.70
Prepare a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, Damages, and Civil Penalties	5.20
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' and Aggrieved Employees' Work	6.90
Research and Preliminarily Outline Issues Important to Class Certification and Trial Manageability	12.50
Meet and Communicate with Plaintiff Mayra Cortez Throughout the Pendency of the Case	51.50
Investigate, Meet and Communicate with, and/or Conduct Interviews of Putative Class Members and Percipient Witnesses	17.50

Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on August 9, 2021) (Class Action)	7.20
Review Court's Notice of Case Assignment Unlimited Civil Case (filed on August 9, 2021) (Class Action)	0.10
Review Court's Initial Status Conference Order (filed on August 17, 2021) (Class Action)	0.20
Review Court's Order Re: Newly Assigned Case (filed on August 17, 2021) (Class Action)	0.10
Draft Plaintiff's Peremptory Challenge to Judicial Officer (Code Civ. Proc., 170.6) (filed on August 26, 2021) (Class Action)	0.20
Review Court's Minute Order Re: Peremptory Challenge to Judicial Officer (Code Civ. Proc., 170.6) (filed on August 27, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Case Reassignment (filed on September 16, 2021) (Class Action)	0.10
Draft Plaintiff'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 September 23, 2021) (PAGA Action)	7.10
Review Court's Notice of Case Assignment Unlimited Civil Case (filed on September 23, 2021) (PAGA Action)	0.10
Review Court's Minute Order Regarding Newly Filed Class Action (filed on September 30, 2021) (Class Action)	0.20
Review Court's Notice of Case Management Conference (filed on October 6, 2021) (PAGA Action)	0.10

Meet and Confer with Defendant's Counsel and Draft Notice and Acknowledgement of Receipt (filed on October 7, 2021) (Class Action)	0.20
Review Defendant Barksdale, Inc.'s Notice of Appearance (served on October 7, 2021) (Class Action)	0.10
Draft Plaintiff's [Proposed] Order Authorizing Electronic Service (Case Anywhere) (filed on October 27, 2021) (Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Response Statement (submitted on November 3, 2021) (Class Action)	2.10
Review Court's Order Authorizing Electronic Service (Case Anywhere) (filed on November 10, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on November 10, 2021) (Class Action)	0.10
Review and Analyze Defendant's Answer to Complaint for Penalties Pursuant to California Private Attorneys General Act, Cal. Labor Code §2698 Et Seq. (served on December 7, 2021) (PAGA Action)	1.90
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on March 8, 2021) (PAGA Action)	1.10
Review Court's Order Re: Joint Stipulation to Continue Case Management Conference (filed on March 14, 2022) (PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on March 15, 2022) (PAGA Action)	0.10
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on April 29, 2022) (PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on May 20, 2022) (PAGA Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Case Management Conference Statement (submitted on June 1, 2022) (PAGA Action)	0.80
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Post-Mediation Status Report (submitted on June 1, 2022) (Class Action)	0.60
Review Court's Minute Order Re: Joint Notice of Settlement (filed on June 1, 2022) (PAGA Action)	0.10
Review Court's Order Re: Non-Appearance Case Review Re: Filing of the Motion for Preliminary Approval (Case Anywhere Posting) (filed on June 13, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on September 27, 2022) (PAGA Action)	0.80
Review Court's Minute Order Re: Case Management Conference (filed on October 4, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on December 22, 2022) (PAGA Action)	1.10
Draft Plaintiff's First Amended Consolidated Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on December 23, 2022) (Class Action)	4.50
Review Court's Minute Order Re: Case Management Conference (filed on January 3, 2023) (PAGA Action)	0.10
Review and Analyze Defendants' Answer to First Amended Consolidated Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code §2698 Et Seq (served on January 19, 2023) (Class Action)	1.30

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Mail Additional Class Notices (filed on January 23, 2023) (Class Action)	1.20
Review Court's Order Re: Joint Stipulation to Mail Additional Class Notices (filed on January 23, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Mail Three (3) Additional Class Notices (filed on January 30, 2023) (Class Action)	0.90
Review Court's Order Re: Joint Stipulation to Mail Three (3) Additional Class Notices (filed on January 31, 2023) (Class Action)	0.10
Appearances	
Prepare for and Telephonically Attend Initial Status Conference (November 10, 2021) (Class Action)	1.50
Prepare for and Telephonically Attend Case Management Conference (October 4, 2022) (PAGA Action)	1.30
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (December 15, 2022) (Class Action)	1.30
Prepare for and Telephonically Attend Case Management Conference (January 3, 2023) (PAGA Action)	0.90
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment (May 25, 2023) (Anticipated)	1.50

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Mayra Cortez (served on May 26, 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 Mayra Cortez (served on July 2, 2021)	4.10
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 15, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on January 27, 2022)	5.40
Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Mayra Cortez for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on July 20, 2021)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	23.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Defendant (in excess of 4,700 pages), Plaintiff, and Other Sources • Employee Handbooks, Training Materials, and Employment and Operations Policies, Practices, and Procedures Documents • Sampling of Employee Time Data • Sampling of Employee Pay Data • Exemplar Meal Period Waiver Agreements • Collective Bargaining Agreements and Related Memorandums	68.50

MOU/Document re: Settlement Between Union and Defendant and Exemplar Signed Release Agreements	
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, Performing Violation, Damages, and Penalties Analysis and Calculations, and Preparing PowerPoint Presentation (submitted on May 10, 2022)	29.50
Remotely Attend Mediation Session (May 17, 2022; Zoom Video Conference)	15.50
Review and Analyze Mediator's Proposal (issued May 17, 2022 and accepted May 23, 2022)	3.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on September 30, 2022) and Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	17.50
Review and Monitor Settlement Administration Process and Weekly Reports	6.50
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Mayra Cortez in Support Thereof, Declaration of Michael E. Moore in Support Thereof, Declaration of Robert S. Blumberg in Support Thereof, Declaration of Marie Dhaine in Support Thereof, and [Proposed] Order Thereon (filed on September 30, 2022)	18.50
Review Court's Case Anywhere Message Board Posting Re: Motion for Preliminary Approval of Settlement (filed on November 18, 2022) (Class Action)	0.10
Review Court's Case Anywhere Message Board Posting Re: Motion for Preliminary Approval of Settlement (filed on November 28, 2022) (Class Action)	0.10

Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on December 15, 2022) (Class Action)	0.80
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on December 15, 2022) (Class Action)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment, and Declaration of Edwin Aiwazian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on May 3, 2023) (Anticipated)	20.50
Total Hours:	485.50

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Cortez v. Barksdale, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/26/2021	U.S. Postmaster	Postage	7.00
8/9/2021	Legal Document Server, Inc.	Attorney Service	180.23
8/9/2021	Los Angeles Superior Court	Court Filing Fee	435.00
8/9/2021	Los Angeles Superior Court	Complex Filing Fee	1,000.00
8/26/2021	Legal Document Server, Inc.	Attorney Service	175.00
10/21/2021	One Legal	Attorney Service	16.68
10/26/2021	One Legal	Attorney Service	16.68
10/28/2021	One Legal	Attorney Service	33.36
11/3/2021	Legal Document Server, Inc.	Attorney Service	15.20
11/5/2021	Mark S. Rudy	Mediation Fee	11,000.00
2/1/2022	CaseAnywhere LLC	Attorney Service	106.80
5/5/2022	CaseAnywhere LLC	Attorney Service	120.00
5/12/2022	FedEx Express	Courier Service	92.11
6/2/2022	Legal Document Server, Inc.	Attorney Service	15.20
8/4/2022	CaseAnywhere LLC	Attorney Service	126.00
10/3/2022	Legal Document Server, Inc.	Attorney Service	360.95
10/3/2022	Los Angeles Superior Court	Motion Fee	60.00
11/8/2022	CaseAnywhere LLC	Attorney Service	174.00
12/19/2022	Los Angeles Superior Court	Attorney Service	23.80
12/27/2022	Legal Document Server, Inc.	Attorney Service	160.95
1/23/2023	Legal Document Server, Inc.	Attorney Service	17.30
1/23/2023	Los Angeles Superior Court	Stipulation Fee	20.00
1/31/2023	Legal Document Server, Inc.	Attorney Service	17.30
1/31/2023	Los Angeles Superior Court	Stipulation Fee	20.00
2/7/2023	CaseAnywhere LLC	Attorney Service	132.00
Total:			14,325.56

LAWYERS for JUSTICE PC CASE COST DETAIL
Cortez v. Barksdale, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/20/2021	U.S. Postmaster	Postage	7.50
7/21/2021	Labor & Workforce Development Agency	Filing Fee	75.00
9/24/2021	One Legal	Attorney Service	29.51
9/24/2021	Los Angeles Superior Court	Filing Fee	435.00
11/12/2021	Legal Document Server	Attorney Service	15.20
3/9/2022	Legal Document Server	Attorney Service	131.55
3/9/2022	Los Angeles Superior Court	Filing Fee	20.00
3/18/2022	Legal Document Server	Attorney Service	15.20
5/5/2022	Legal Document Server	Attorney Service	15.20
6/2/2022	Legal Document Server	Attorney Service	15.20
9/27/2022	Legal Document Server	Attorney Service	15.95
12/23/2022	Legal Document Server	Attorney Service	15.95
Total:			791.26