

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Vartan Madoyan (SBN 279015)
Helene Mayer (SBN 332975)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs and the Class

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

RENE REYES, individually, and on behalf
of other members of the general public
similarly situated and on behalf of all other
aggrieved employees pursuant to the
California Private Attorney General Act;
ANGIE MEDINA, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiffs,

vs.

INLAND PSYCHIATRIC MEDICAL
GROUP, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: CIVSB2123455

Honorable Christian Towns
Department S26

CLASS ACTION

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

Date: November 17, 2025
Time: 8:30 a.m.
Department: S26

Complaint Filed: August 9, 2021
FAC Filed: November 21, 2024
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 Plaintiffs Rene Reyes and Angie Medina (together, “Plaintiffs”) and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On June 12, 2025, in Department S26 of the above-entitled Court, the Honorable Christian Towns preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiffs and Defendant Inland Psychiatric Medical Group (“Defendant,”) (together with Plaintiffs, referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiffs Rene Reyes and Angie Medina as the representatives of the Class (“Class Representatives”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”).

3. 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”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Litigation Costs, and Enhancement Payments (“Motion for Final Approval”), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Attorneys’ Fees and Litigation Costs, Enhancement Payments, and Administration Costs, or the allocation for the PAGA Penalties.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above captioned action entitled *Reyes v. Inland Psychiatric Medical Group*, San

1 Bernardino County Superior Court, Case No. CIVSB2123455 which was filed on August 9,
2 2021, and *Reyes v, Inland Psychiatric Medical Group*, San Bernardino County Superior Court,
3 Case No. CIVSB2127286, which was filed on September 23, 2021 (together, the “Actions”).

4 6. Before initiating the cases, Lawyers for Justice, PC investigated and researched
5 the facts and circumstances underlying the pertinent factual and legal issues and applicable law.
6 This required thorough discussions and interviews between attorneys at Lawyers for Justice, PC
7 and Plaintiffs and research into the various legal issues involved in the cases, namely, the current
8 state of the law as it applied to class certification, representative adjudication, and trial; the law
9 relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense
10 reimbursements, recordkeeping and wage statement requirements, representative Private
11 Attorneys General Act (“PAGA”) claims and penalties, and wage-and-hour law and
12 enforcement, Plaintiff’s claims and allegations, and potential defenses. After conducting an
13 initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiffs were well-
14 suited for class-wide and representative adjudication, owing to what appeared to be a common
15 course of conduct affecting a similarly situated group of current and former hourly-paid or non-
16 exempt employees of Defendant in California, who were not properly compensated for, *inter*
17 *alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

18 7. Collectively, Class Counsel conducted significant formal and informal discovery
19 and investigation into the facts of the cases, to assess the veracity, strength, and scope of the
20 claims, and were preparing the cases for class certification and trial, prior to reaching the
21 Settlement. The Parties exchanged a large volume of information, documents, and data
22 throughout the course of the litigation and in connection with the mediation and settlement
23 negotiations. The volume of records and documents that Class Counsel reviewed and analyzed
24 included, and were not limited to: a sampling of Class Members’ time and payroll data,
25 Plaintiffs’ personnel records, Defendant’s Handbook, earning statements, company policy
26 acknowledgements, job descriptions, internal memorandum, Defendant’s operations and
27 employment practice, policies, and procedures, among other information and documents. Class
28 Counsel had the opportunity to interview and obtain information from Plaintiffs and percipient

witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiffs, Defendant, and other sources. Class Counsel developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, motion practice, formal and informal 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, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation briefing and supporting materials, and settlement documents; drafting and propounding multiple sets of formal written discovery requests on Defendant and notices of depositions of Defendant's persons most knowledgeable designees; reviewing Defendant's responses and objections to written discovery requests and deposition notices; and preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

8. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating this matter, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiffs, Defendant, and other sources that provided a critical understanding of the nature of the work performed by the Class Members and PAGA Group Members, as well as Defendant's organizational structure and their operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing liability, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiations process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest periods, representative PAGA claims and penalties, wage-and-hour enforcement, arbitration agreements, regular rate, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

1 9. After conducting significant investigation of the facts and law during the
2 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to
3 try to resolve the cases. These efforts included participating in a mediation session conducted by
4 Monique Ngo-Bonnici, Esq., a well-regarded mediator experienced in handling complex labor
5 and employment matters. During all settlement discussions, the Parties conducted their
6 negotiations at arm's length in an adversarial position. In the course of the mediation and
7 settlement negotiations, the Parties exchanged documents and data, and discussed various
8 aspects of the cases, including and not limited to, the risks and delays of further litigation, the
9 risks and expenses to the Parties of proceeding with class certification, representative
10 adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory,
11 meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements,
12 representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiffs'
13 claims and allegations, and Defendant's defenses thereto, as well as the evidence produced and
14 analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was
15 acceptable to the Parties was not easy. Defendant contended that individualized questions of fact
16 predominate over any common issues, and these issues would pose challenges to class
17 certification and representative adjudication. Defendant and its counsel felt strongly about
18 Defendant's ability to avoid class certification prevail on the merits and, while Plaintiffs and
19 Class Counsel believed that they would be able to obtain class certification and prevail at trial.
20 With the aid of the mediator's evaluation, the Parties ultimately agreed that this matter was well-
21 suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the
22 costs and risks to the Parties that would attend further litigation. These risks of further litigation
23 include, and are not limited to, a determination that the claims are unsuitable for class treatment
24 and/or representative adjudication, class de-certification after certification of a class, allowing a
25 jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery
26 after years of litigation.

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1 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks
2 attorneys' fees in the amount of \$560,000.00, which is thirty-five percent (35%) of the Gross
3 Settlement Amount of \$1,600,000.00. Pursuant to the contingency-fee agreement entered into by
4 and between Plaintiff and Class Counsel, Plaintiffs have agreed to a contingency fee of at least
5 thirty-five percent (35%) of the recovery.

6 11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
7 took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to
8 the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
9 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
10 has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order
11 to devote their time and efforts to these cases. The nature of the work performed, skill exercised,
12 and the outcome in this matter which involves an outstanding monetary recovery involving an
13 Gross Settlement Amount of \$1,600,000.00 (with a Net Settlement Amount of approximately at
14 least \$735,000.00 to be paid to Settlement Class Members (with gross Individual Settlement
15 Payments averaging approximately more than \$2,217.70), payment of \$62,500.00 to PAGA
16 Group Members (with Individual PAGA Payment averaging approximately \$227.27) and
17 payment of \$187,500.00 to the State of California)—support the percentage fee sought.

18 12. While not necessarily required to be demonstrated because a percentage fee is
19 proper for this settlement, it should be noted that Class Counsel has incurred many hours of work
20 in connection with prosecuting this matter such that the award of attorneys' fees is also justified
21 under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **425.10**
22 **hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT 1**"
23 is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services
24 provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing
25 those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC.
26 Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had
27 litigation support personnel actively engaged in assisting with the prosecution of this matter.

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13. 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 \$850 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; 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.

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

14. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC 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 premiums wages for same, timely payment of

1 wages, provision of compliant wage statements, reimbursement of business expenses, executive,
2 administrative, and other overtime exemptions to the State of California and federal overtime
3 compensation requirements, PAGA claims, and sister statutes under federal law. During a
4 relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered
5 millions of dollars on behalf of thousands of individuals in California.

6 15. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice,
7 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
8 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
9 extensive formal training in dispute resolution and negotiation from the Straus Institute for
10 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
11 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
12 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
13 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
14 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
15 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
16 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
17 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
18 Appellate District. In December of 2004, he obtained a license to practice law from the
19 California State Bar. Since in or around October of 2008, through his work at Lawyers *for*
20 Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment
21 class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
22 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
23 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.
24 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
25 has successfully litigated cases involving the executive, administrative, and other overtime
26 exemptions to the State of California and federal overtime compensation requirements. Under
27 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
28 contested motion practice in approximately sixteen (16) cases in the last decade, and litigated

1 over 1,000 class action or representative action cases.

2 16. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He
3 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
4 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
5 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
6 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
7 From approximately August 2008 to approximately December 2008, he served as a Judicial
8 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the
9 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
10 before all courts of the State of California and all United States District Courts in the State of
11 California. He has worked on many wage-and-hour class action and representative action cases,
12 taking the lead in taking and defending depositions, arguing motions, and attending mediations.
13 He has played an integral role in preparing matters for class certification, including and not
14 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
15 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
16 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
17 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
18 representative action cases have resulted in settlements that have been granted court approval.
19 He has handled over one hundred and fifty (150) mediations and worked on over two hundred
20 and fifty (250) class action or representative action cases which have resulted in settlement.

21 17. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
22 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
23 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
24 Georgetown University Law Center in 2010. She is admitted to practice in California (since
25 2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District
26 Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the
27 U.S. Supreme Court. She has taken and defended dozens of depositions and successfully
28 handled motion practice in class action cases regarding discovery (including and not limited to,

1 regarding class contact information), class certification (both contested class certification and
2 stipulated class certification), arbitration agreements, coordination, and intervention. She has
3 successfully handled briefing and oral arguments on appeal and obtained notable decisions
4 regarding Private Attorneys General Act claims and employer efforts to compel arbitration of
5 such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017)
6 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB,*
7 *N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions,
8 including and not limited to working on cases to obtain class certification through contested
9 motion practice and working on cases in the post-certification stage (e.g., post-certification
10 discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with
11 co-counsel in a case involving a certified class consisting of approximately 2,600 individuals).
12 She has extensive experience with class action and/or representative action settlements, and has
13 handled this process in over five hundred (500) cases. Under her, Edwin Aiwarzian, and Arby
14 Aiwarzian's supervision, Lawyers *for* Justice, PC has handled the class certification and court
15 approval process for hundreds of class action and/or representative action matters that have
16 successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers
17 Association and, on several occasions, has been a speaker regarding topics in wage and hour law
18 at the organization's continuing legal education events.

19 18. I, Helene Mayer, am a Member of Lawyers *for* Justice, PC. I received my
20 Bachelor of Arts degree from University of San Diego in 2017, and I earned my Juris Doctor
21 degree from University of San Diego School of Law in 2020. I was admitted to practice law in
22 California in 2021. I am admitted to practice before all courts of the State of California and all
23 U.S. Federal District Courts in the State of California. I have worked on wage-and-hour class
24 action and PAGA representative cases, and my work has included, *inter alia*, researching and
25 drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing
26 stipulations and settlement agreements, and making court appearances. Prior to working at
27 Lawyers *for* Justice, PC, I worked at law firms focused primarily on family law matters,
28 including, *inter alia*, representing clients in divorce, parentage, child custody, and domestic

1 violence restraining order proceedings, researching, and drafting pleadings, negotiating and
2 finalizing marital settlement agreements, engaging in motion practice, and making court
3 appearances.

4 **LITIGATION COSTS AND EXPENSES INCURRED BY**
5 **LAWYERS *for* JUSTICE, PC**

6 19. To date, Class Counsel has borne all of the risks and costs of litigation and will
7 not receive any compensation until recovery is obtained in this matter. The Settlement provides
8 for reimbursement of litigation costs and expenses of up to \$30,000.00. Lawyers *for* Justice, PC
9 seeks reimbursement of **\$26,788.81** in litigation costs and expenses incurred in the matter, as
10 reflected in **“EXHIBIT 2”** attached hereto. These expenses were reasonable and necessary in
11 the prosecution of the matter and to obtain the Settlement. The cost savings of **\$3,211.19** will be
12 part of the Net Settlement Amount, which will be distributed to the Settlement Class Members in
13 accordance with the Settlement.

14 **ENHANCEMENT PAYMENTS TO PLAINTIFFS**

15 20. In recognition of their efforts and work spearheading the prosecution of this
16 matter and serving as the Class Representatives, as well as their broader individual waivers and
17 release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph VII.C.
18 of the Settlement Agreement), the Settlement provides for Enhancement Payments, in the
19 amount of up to \$7,500.00 to each Plaintiff. Plaintiffs spent a substantial amount of time and
20 effort discussing their employment with Class Counsel, gathering and providing relevant
21 documents and information, and providing facts and evidence to support the prosecution of the
22 claims. Plaintiffs were available whenever Class Counsel needed them and actively tried to
23 obtain and provide information that would help obtain a recovery in this matter. For example,
24 Plaintiff Reyes expended effort to review and provide responses to multiple sets of discovery
25 requests that were propounded by Defendant. Accordingly, it is appropriate for each Plaintiff to
26 receive \$7,500.00 as reasonable Enhancement Payments for their broader waiver and release of
27 claims and services performed in this matter, in addition to their individual settlement
28 payment(s).

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



Helene Mayer

EXHIBIT 1

RENE REYES, ET AL. V. INLAND PSYCHIATRIC MEDICAL GROUP
San Bernardino County Superior Court Case No. CIVSB2123455 (“Class Action”)
San Bernardino County Superior Court Case No. CIVSB2127286 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Rene Reyes (“Plaintiff Reyes”)	24.50
Meet and Communicate with Plaintiff Angie Medina (“Plaintiff Medina”)	19.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	42.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Reyes’ Class Action Claims, Conduct Legal Research and Analysis Regarding Class Action Claims, and Draft, Review, and/or Revise Plaintiff Reyes’ Class Action Complaint for Damages (filed on August 9, 2021) (Class Action)	8.50
Review Court’s Initial Case Management Conference Order (filed on September 10, 2021) (Class Action)	0.20
Investigate the Merits of Plaintiff Reyes’ PAGA Claim, Conduct Legal Research and Analysis Regarding PAGA Claim, and Draft, Review, and/or Revise Plaintiff Reyes’ Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on September 23, 2021) (PAGA Action)	7.50
Draft Plaintiff Reyes’ Notice of Posting Jury Fees (filed on October 7, 2021) (Class Action)	0.10

Review Court's Initial Case Management Conference Order and Guidelines for the Complex Litigation Program (filed on November 8, 2021) (PAGA Action)	0.30
Review Defendant Inland Psychiatric Medical Group, Inc.'s ("Defendant") Case Management Conference Statement (filed on November 23, 2021) (Class Action)	0.30
Review Court's Minute Order Re: Complex Case Management Conference (filed on November 23, 2021) (Class Action)	0.10
Review and Analyze Declaration of Pamela Tahim Thakur Re: Defendant Inland Psychiatric Medical Group's 30-Day Automatic Extension Pursuant to Cal. Code of Civ. Pro. §430.41 (served on January 13, 2022) (PAGA Action)	0.20
Review Court's Minute Order Re: Further Case Management Conference (filed on February 1, 2022) (Class Action)	0.10
Draft Plaintiff Reyes' Notice Regarding February 4, 2022 Case Management Conference (filed on February 10, 2022) (PAGA Action)	0.20
Review and Analyze Defendant's Answer to Plaintiff Reyes' Complaint (filed on February 15, 2022), and Research Affirmative Defenses in Defendant's Answer (PAGA Action)	1.30
Review and Analyze Defendant's Answer to Plaintiff Reyes' Class Action Complaint (filed on February 19, 2022), and Research Affirmative Defenses in Defendant's Answer (Class Action)	1.50
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Initial Case Status Conference Report (filed on May 6, 2022) (PAGA Action)	1.50
Draft, Review, and/or Revise Plaintiff Reyes' Case Management Conference Statement (filed on June 10, 2022) (Class Action)	0.40
Review Defendant's Case Management Statement (served on June 24, 2022) (Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulated Protective Order – Confidential Designation Only (submitted on August 30, 2022) (Class Action)	1.40

Review Court's Order Re: Stipulated Protective Order – Confidential Designation Only (filed on September 1, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on December 9, 2022) (Class Action)	0.90
Review Clerk's Notice of Continuance (filed on December 12, 2022) (Class Action)	0.10
Review Court's Order to Continue Case Management Conference (filed on December 13, 2022) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on December 28, 2022) (Class Action)	0.10
Review Defendant's Notice of Unavailability of Counsel (served on July 27, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Further Case Management Conference; [Proposed] Order (submitted on September 18, 2023) (Class Action)	0.80
Review Court's Order to Continue Further Case Management Conference (filed on September 19, 2023) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on September 26, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement and Joint Stipulation to Continue Further Case Management Conference; [Proposed] Order (filed on October 27, 2023) (Class Action)	0.80
Review Court's Order to Continue Further Case Management Conference (filed on November 2, 2023) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on November 13, 2023) (Class Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Hearing on Plaintiff Reyes' Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on January 9, 2024) (Class Action)	0.80
Review Court's Order to Continue Hearing on Plaintiff Reyes' Motion for Preliminary Approval (filed on January 24, 2024) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on January 29, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Hearing on Plaintiff Reyes' Motion for Preliminary Approval; [Proposed] Order (submitted on April 25, 2024) (Class Action)	0.80
Review Defendant's Notice of Unavailability of Counsel (served on April 25, 2024) (Class Action)	0.10
Review Court's Order to Continue Hearing on Plaintiff Reyes' Motion for Preliminary Approval (filed on April 29, 2024) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on May 3, 2024) (Class Action)	0.10
Review Defendant's Notice of Unavailability of Counsel (served on June 20, 2024) (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 21, 2024) (Class Action)	0.30
Review Defendant's Notice of Unavailability of Counsel (served on October 4, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, Draft, Review, and/or Revise Plaintiffs' First Amended Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on November 21, 2024), and Draft, Review, and/or Revise Joint Stipulation Re: Leave to File First Amended Consolidated Complaint; [Proposed] Order Thereon (submitted on October 31, 2024) (Class Action)	3.70

Review Court's Order Re: Leave to File First Amended Consolidated Complaint (filed on November 4, 2024) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on November 8, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 26, 2024) (Class Action)	0.40
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on April 8, 2025) (Class Action)	0.40
Draft Notice of Entry of Judgment or Order (filed on July 15, 2025) (Class Action)	0.10
Appearances	
Prepare for and Remotely Attend Complex Case Management Conference (November 23, 2021) (Class Action)	1.10
Prepare for and Remotely Attend Further Case Management Conference and Demurrer & Motion to Strike (February 1, 2022) (Class Action)	2.20
Prepare for and Remotely Attend Complex Case Management Conference (February 4, 2022) (PAGA Action)	1.10
Prepare for and Telephonically Attend Further Case Management Conference (April 13, 2022) (Class Action)	1.10
Prepare for and Remotely Attend Further Case Management Conference (June 24, 2022) (Class Action)	1.70
Prepare for and Remotely Attend Further Case Management Conference (August 27, 2024) (Class Action)	1.10
Prepare for and Remotely Attend Further Case Management Conference (December 6, 2024) (Class Action)	0.40
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (June 12, 2025) (Class Action)	0.80

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rene Reyes (served on March 10, 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 Rene Reyes (served on March 29, 2021)	3.60
Draft, Review, and/or Revise Plaintiff Reyes' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Production of Documents (Set One), and Requests for Admissions (Set One) (served on May 20, 2022) (PAGA Action)	4.80
Draft, Review, and/or Revise Plaintiff Reyes' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Production of Documents (Set One), and Requests for Admission (Set One) (served on May 20, 2022) (Class Action)	3.50
Review and Analyze Defendant's Responses to Plaintiff Reyes' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Production of Documents (Set One), and Requests for Admissions (Set One) (served on July 13, 2022) (PAGA Action)	5.50
Review and Analyze Defendant's Responses to Plaintiff Reyes' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Production of Documents (Set One), and Requests for Admissions (Set One) (served on July 13, 2022) (Class Action)	4.50
Review and Analyze Documents Produced by Defendant (served on July 13, 2022)	3.90

Review and Analyze Defendant's Supplemental Responses to Plaintiff Reyes' Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Admissions (Set One), and Requests for Production of Documents (Set One) (served on September 16, 2022) (Class Action)	3.10
Review and Analyze Documents Produced by Defendant (served on September 16, 2022)	1.10
Review and Analyze Defendant's Second Supplemental Responses to Plaintiff Reyes' Form Interrogatories – General (Set One) and Requests for Production of Documents (served on November 4, 2022) (Class Action)	1.30
Review and Analyze Documents Produced by Defendant (served on November 4, 2022)	1.80
Review and Analyze Defendant's Second Supplemental Responses to Plaintiff Reyes' Special Interrogatories (Set One) and Special Interrogatories (Set Two) (served on November 9, 2022) (Class Action)	1.20
Draft, Review, and/or Revise <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (mailed on October 28, 2022), Meet and Confer with Third-Party Administrator and Review and Monitor <i>Belaire-West</i> Administration Process, and Review Non-Opt Out Contact List (received on November 29, 2022)	7.50
Review and Analyze Defendant's Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), Requests for Admissions (Set One), and Requests for Production of Documents (Set One) to Plaintiff Reyes (served on December 6, 2022) (Class Action)	0.80
Draft, Review, and/or Revise Plaintiff Reyes' Responses to Defendant's Form Interrogatories – Employment Law (Set One), Requests for Admissions (Set One), and Requests for Production of Documents (Set One) (served on March 8, 2023) (Class Action)	11.50
Review and Analyze Documents Produced by Defendant (served on March 15, 2023)	2.50

Review and Analyze Documents Produced by Defendant (served on March 30, 2023)	5.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Rene Reyes for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (served on July 19, 2021)	4.50
Draft Correspondence to, Meet and Confer with, and/or Respond to Correspondence from Defendant's Counsel	26.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to Mediation	59.50
Prepare for Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Exhibits in Support of the Mediation Brief, and Performing Damages and Penalties Analyses and Calculations (submitted on October 9, 2023)	38.50
Attend Mediation Session (October 16, 2023; Zoom Video Conference)	15.40
Review and Analyze Mediator's Proposal (accepted on October 16, 2023)	2.10
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement (executed on February 26, 2025), and Draft Notice of Class Action Settlement	14.70
Coordinate Settlement Administration with Settlement Administrator, Review Weekly Reports, and Ongoing Monitoring of Settlement Administration	7.50

Law and Motion	
Review and Analyze Defendant's Notice of Demurrer and Demurrer to Plaintiff Reyes' Class Action Complaint; Memorandum of Points and Authorities in Support Thereof, Notice of Motion and Motion to Strike Portions of Plaintiff Reyes' Class Action Complaint; Memorandum of Points and Authorities in Support Thereof, and Declaration of Pamela Tahim Thakur in Support Thereof (served on November 24, 2021) (Class Action)	2.10
Research, Draft, Review, and/or Revise Plaintiff Reyes' Omnibus Opposition to Defendant's Demurrer and Motion to Strike (filed on January 20, 2022) (Class Action)	13.60
Review and Analyze Defendant's Reply to Plaintiff Reyes' Opposition to Defendant's Demurrer and Motion to Strike (served on January 26, 2022) (Class Action)	1.80
Review Court's Minute Order Re: Demurrer and Motion to Strike (filed on February 1, 2022) (Class Action)	0.20
Draft Plaintiff Reyes' Notice of Ruling on Overruling Defendant's Demurrer and Denial of Motion to Strike to Plaintiff Reyes' Complaint (filed on February 8, 2022) (Class Action)	0.20
Research, Draft, Review, and/or Revise Plaintiffs' 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 Plaintiff Reyes in Support Thereof, Declaration of Plaintiff Medina in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on February 27, 2025) (Class Action)	21.30
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on June 12, 2025) (Class Action)	0.10

Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Litigation Costs, and Enhancement Payments; Memorandum of Points and Authorities in Support Thereof, Declaration of Helene Mayer in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on October 21, 2025)	22.50
Total Hours:	425.10

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Reyes vs. Inland Psychiatric Medical Group, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/10/2021	U.S. Postmaster	Postage	\$7.00
8/9/2021	Legal Document Server, Inc.	Attorney Service	\$200.23
8/9/2021	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
8/9/2021	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
9/27/2021	ProLegal	Attorney Service	\$156.30
10/19/2021	One Legal	Attorney Service	\$73.92
10/19/2021	San Bernardino Superior Court	Jury Fee	\$150.00
10/28/2021	Legal Document Server, Inc.	Attorney Service	\$120.00
11/24/2021	CourtCall, LLC	Attorney Service	\$94.00
1/19/2022	Legal Document Server, Inc.	Attorney Service	\$150.00
2/2/2022	CourtCall, LLC	Attorney Service	\$94.00
2/8/2022	Legal Document Server, Inc.	Attorney Service	\$130.00
4/14/2022	CourtCall, LLC	Attorney Service	\$94.00
6/10/2022	Legal Document Server, Inc.	Attorney Service	\$145.00
6/27/2022	CourtCall, LLC	Attorney Service	\$94.00
8/30/2022	Legal Document Server, Inc.	Attorney Service	\$151.35
8/30/2022	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
11/22/2022	First Mediation Corporation	Mediation Fee	\$10,000.00
12/9/2022	Legal Document Server, Inc.	Attorney Service	\$151.35
12/9/2022	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
12/28/2022	Legal Document Server, Inc.	Attorney Service	\$150.00
1/13/2023	General Logistics Systems US, Inc.	Courier Service	\$23.19
1/16/2023	CPT Group, Inc.	Notice Mailing	\$725.80
2/6/2023	General Logistics Systems US, Inc.	Courier Service	\$28.21
2/15/2023	General Logistics Systems US, Inc.	Courier Service	\$25.20
5/16/2023	General Logistics Systems US, Inc.	Courier Service	\$24.13
9/18/2023	Legal Document Server, Inc.	Attorney Service	\$151.39
9/18/2023	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
9/26/2023	Legal Document Server, Inc.	Attorney Service	\$130.00
10/13/2023	Signature Resolution LLC	Second Mediation Fee	\$7,950.00
10/16/2023	Aliza Grossman	Travel Reimbursement	\$34.73
10/18/2023	General Logistics Systems US, Inc.	Courier Service	\$19.78
10/31/2023	Legal Document Server, Inc.	Attorney Service	\$18.59
10/31/2023	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
11/10/2023	San Bernardino Superior Court	Document Download Fee	\$2.50
11/13/2023	Legal Document Server, Inc.	Attorney Service	\$17.09
1/19/2024	Legal Document Server, Inc.	Attorney Service	\$196.39
1/19/2024	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
1/30/2024	Legal Document Server, Inc.	Attorney Service	\$17.09

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Reyes vs. Inland Psychiatric Medical Group, Inc.

2/2/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
4/26/2024	Legal Document Server, Inc.	Attorney Service	\$161.39
4/26/2024	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
5/8/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
8/21/2024	Legal Document Server, Inc.	Attorney Service	\$180.00
10/31/2024	Legal Document Server, Inc.	Attorney Service	\$201.39
10/31/2024	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
11/26/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
12/2/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
12/20/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
2/27/2025	Legal Document Server, Inc.	Attorney Service	\$271.77
2/27/2025	San Bernardino Superior Court	Motion Fee	\$60.00
4/8/2025	Legal Document Server, Inc.	Attorney Service	\$155.00
7/9/2025	San Bernardino Superior Court	Document Download Fee	\$6.79
7/16/2025	Legal Document Server, Inc.	Attorney Service	\$18.89
10/7/2025	San Bernardino Superior Court	Document Download Fee	\$8.50
Total:			<u>\$24,044.72</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Reyes vs. Inland Psychiatric Medical Group, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/19/2021	U.S. Postmaster	Postage	\$7.50
7/19/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
9/22/2021	Legal Document Server, Inc.	Attorney Service	\$210.99
9/22/2021	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
9/22/2021	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
1/14/2022	ProLegal	Attorney Service	\$223.75
2/7/2022	CourtCall, LLC	Attorney Service	\$94.00
2/10/2022	Legal Document Server, Inc.	Attorney Service	\$130.00
2/25/2022	Legal Document Server, Inc.	Attorney Service	\$130.00
5/6/2022	Legal Document Server, Inc.	Attorney Service	\$145.00
5/9/2022	CourtCall, LLC	Attorney Service	\$94.00
4/19/2023	U.S. Postmaster	Postage	\$182.70
12/6/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
Total:			<u><u>\$2,744.09</u></u>