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

LES ARRIOLA, ARMANDO ZUNIGA
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;

Plaintiffs,

vs.

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

Defendants.

ARMANDO ZUNIGA, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff,

vs.

MULTI MECHANICAL, INC., a California
Corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: RIC2003696
(Consolidated with Case No. CVRI2104327)

Honorable Harold Hopp
Department 1

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and Enhancement
Award; Declaration of Class Representative
(Les Arriola); Declaration of Settlement
Administrator (Jarrod Salinas); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: July 24, 2023
Time: 8:30 a.m.
Department: 1

Arriola Action Filed: September 16, 2020
Zuniga Action Filed: September 22, 2021
Arriola FAC Filed: April 5, 2021
Arriola SAC Filed: December 16, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Les Arriola (“Plaintiff Arriola”) and Armando Zuniga (“Plaintiff Zuniga”) (together, “Plaintiffs”) 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 March 22, 2023, in Department 1 of the above-entitled Court, the Honorable Craig C. Riemer preliminarily approved the First Amended Class Action and PAGA Settlement and Release of Claims (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Multi Mechanical, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Les Arriola and Armando Zuniga as the representatives of the Class (“Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), Exclusion Form, and Objection Form (together, “Notice Packet”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Award (“Motion for Final Approval”), no Class Member’s have objected to or requested exclusion from the Settlement or the contemplated request for Attorneys’ Fees and Costs, the PAGA Amount, Enhancement Award, or Settlement Administration Costs.

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WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating this matter since the inception of the above-captioned action, entitled *Les Arriola v. Multi Mechanical Inc.*, Riverside Superior Court, Case No. RIC2003696 (“*Arriola Action*”), which was filed on September 16, 2020, and the consolidated action entitled *Armando Zuniga v. Multi Mechanical, Inc.*, Riverside Superior Court, Case No. CVRI2104327 (“*Zuniga Action*”), which was filed September 22, 2021.

5. Before initiating the *Arriola Action*, 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 Arriola, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, on-premises rest breaks, regular rate of pay, business expense reimbursement, mileage expenses, wage-and-hour enforcement, Plaintiff Arriola’s claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiff Arriola 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 non-exempt employees who were employed by Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses.

6. Similarly, before initiating the *Zuniga Action*, 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 Zuniga, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to representative actions, off-the-clock theory, meal and rest periods, on-premises rest breaks, regular rate of pay, business expense reimbursement, mileage expenses, wage-and-hour enforcement, Plaintiff Zuniga’s claims and allegations, and potential defenses. After conducting initial investigation, our firm determined

1 that the claims of Plaintiff Zuniga were well-suited for representative adjudication owing to what
2 appeared to be a common course of conduct affecting a similarly situated group of current and
3 former non-exempt employees who worked for Defendant in California, who were not properly
4 compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and
5 unreimbursed business expenses.

6 7. Class Counsel investigated the veracity, strength, and scope of the claims, and
7 were preparing the matters for class certification and trial, prior to reaching the Settlement. The
8 parties conducted significant investigation and extensive informal discovery and exchange of a
9 large volume of information, documents, and data in the course of litigation and in connection
10 with mediation and settlement negotiations. Class Counsel also interviewed and obtained
11 information from Plaintiffs and/or other Class Members, and reviewed and analyzed information,
12 documents, and data obtained from Plaintiffs, Defendant, and other sources. The information,
13 documents, and data reviewed and analyzed by Class Counsel included, and were not limited to,
14 Plaintiffs' employment records, a detailed sampling of Class Members' time and pay data,
15 Defendant's Employee Handbook, acknowledgements (including, but not limited to, Employee
16 Handbook Acknowledgement, Receipt and Consent Form, Employee Safety Compliance), and
17 employment practices, forms, procedures, and policies (including, but not limited to,
18 Timekeeping Requirements, Reporting Time Pay, Meal Periods and Rest Breaks, and Expense
19 Reimbursement policies), among other information and documents. Class Counsel developed
20 liability and damages valuation models in preparation for mediation and settlement negotiations,
21 and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues
22 relating to the pleadings, case management, discovery, and production of various information,
23 documents, and data in the course of litigation and in connection with mediation and settlement
24 negotiations. Other work performed by Class Counsel included, and was not limited to, case
25 strategy and analysis; drafting, reviewing, and revising pleadings, the mediation brief, and
26 settlement approval motion papers; preparing and appearing for court proceedings; and preparing
27 for and engaging in mediation and settlement negotiations, among other tasks.

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1 8. As outlined herein, the parties have conducted significant informal discovery and
2 investigation during the course of litigating the case and mediation and settlement negotiations.
3 Class Counsel analyzed a large volume of information, documents, and data obtained from
4 Plaintiffs, Defendant, and other sources. These documents and data provided a critical
5 understanding of the nature of the work performed by the Class Members, as well as Defendant's
6 operations and employment policies, practices, and procedures, and were used in analyzing
7 liability and damages valuation issues in connection with all phases of the litigation, and
8 ultimately in connection with the mediation and settlement negotiation process. Class Counsel
9 also performed significant research into the applicable law, which is evolving as it relates to
10 certification, off-the-clock theory, meal and rest periods, Private Attorney General Act
11 ("PAGA") representative claims, on-premises rest breaks, regular rate of pay, business expense
12 reimbursement, mileage expenses, wage-and-hour enforcement, Plaintiffs' claims and damages,
13 and Defendant's defenses.

14 9. After conducting significant investigation of the facts and law during the
15 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
16 try to resolve the entire matter. These efforts included participating in a formal, full-day
17 mediation conducted by Lynn Frank, Esq., a well-regarded mediator experienced in mediating
18 complex labor and employment matters. During all settlement discussions, the parties conducted
19 their negotiations at arm's length in an adversarial position. In the course of mediation and
20 settlement negotiations, the parties exchanged information and data, and discussed all aspects of
21 the case, including the risks and delays of further litigation, the risks to the parties of proceeding
22 with class certification and trial, the law relating to certification, off-the-clock theory, meal and
23 rest periods, PAGA claims, wage-and-hour enforcement, the evidence produced and analyzed,
24 and the possibility of appeals, among other things. Arriving at a settlement that was acceptable
25 to the parties was not easy. Defendant contended that individualized questions of fact
26 predominate over any common issues, and these issues would pose challenges to class
27 certification. Defendant and their counsel felt very strongly about Defendant's ability to prevail
28 on the merits and to obtain a denial of class certification. Meanwhile, Plaintiffs and Class

Counsel disagreed with these contentions and believed that class certification would be obtained and that they would prevail at trial. With the aid of the mediator's evaluation and extensive settlement negotiations, the parties ultimately agreed that the matter was well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, factual circumstances, as well as the costs and risks to the parties that would attend further litigation. These risks of further litigation include, and are not limited to, that claims are unsuitable for class treatment, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the case, and the real possibility of no monetary recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$350,000.00, which is thirty-five percent (35%) of the Gross Settlement Amount of \$1,000,000.00, as set forth in the Settlement Agreement and the Class Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs and Class Counsel, Plaintiffs have each agreed to a contingency fee of at least thirty-five percent (35%) of the recovery. Lawyers *for* Justice, PC has no fee-splitting agreement with any other attorney or law firm regarding this case.

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

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

13. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **443.80 hours** performing tasks and obtaining recovery in the matter. Attached hereto as "**EXHIBIT A**" is an Attorney

Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred in performing those services. These hours include work done by myself and several other attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

14. The attorneys identified below have worked on this case, and they have performed their work in this matter exclusively on a contingency basis.

LAWYERS for JUSTICE, PC – Attorney Hours, Rates, and Lodestar						
Attorney	Title	CA Bar No.	Admit Year	Rate	Total Hours	Lodestar
Edwin Aiwarzian	Managing Attorney & Shareholder	232943	2004	\$850	87.5	\$74,375
Arby Aiwarzian	Shareholder	269827	2010	\$775	84	\$65,100
Joanna Ghosh	Senior Attorney	272479	2010	\$725	8.8	\$6,380
Elizabeth Parker-Fawley	Attorney	301592	2014	\$675	43.7	\$29,498
Arman Marukyan	Attorney	327150	2019	\$575	37	\$21,275
Melissa LeBlanc	Attorney	283080	2012	\$575	61.1	\$35,133
Brian J. St. John	Attorney	304112	2015	\$575	25.1	\$14,433
Meg Razi	Attorney	237184	2005	\$425	5.7	\$2,423
Giovani Pimentel	Attorney	345232	2022	\$425	87.5	\$74,375
Alexandra Rose	Attorney (formerly)	329407	2019	\$525	84	\$65,100
Margaux V. Roussel	Attorney (formerly)	323398	2018	\$475	8.8	\$6,380
Khachatur Chris Ourkhan	Attorney (formerly)	336653	2021	\$425	43.7	\$29,498
Total:					443.8	\$295,193.00

15. The billing rates for each of the attorneys listed above who worked on this matter, which range from \$425 to \$850 per hour, are reasonable and commensurate with the background, training, and experience of the attorneys that are listed above as well as our firm, in litigating complex wage-and-hour class and representative actions. The California Supreme Court has held that the reasonable hourly rate used for the lodestar calculation is the “prevailing [rate] in the community for similar work.” *PLCM Group v. Drexler* (2000) 22 Cal.4th 1084, 1095; see also *Ketchum v. Moses* (2001) 24 Cal.4th 1122, 1132 (stating that “the lodestar is the basic fee for

comparable legal services in the community”). Courts in California have approved comparable hourly rates for similar work performed by other attorneys in the community. See *Lopez v. Management and Training Corporation* (S.D. Cal. 2020) No. 17cv1624 JM(RBM), 2020 WL 1911471, at **8-9 (approving rates up to \$900 for a partner and a rate of \$500 for an associate as reasonable in a wage-and-hour class action filed in southern California); *Hartless v. Clorox Co.* (S.D. Cal. 2011) 273 F.R.D. 630, 643-44, aff’d in part, 473 Fed.Appx. 716 (9th Cir. 2012) (approving rates of \$675-\$795 for partners and up to \$410 for associates in complex litigation involving product misrepresentation filed in San Diego County); see, e.g., *Campbell v. Best Buy Stores, L.P.* (C.D. Cal. 2016) No. LA CV12-07794 JAK (JEMx), 2016 WL 6662719, at *9 (finding that hourly rates between \$375 and \$875 for attorneys were reasonable in a wageand-hour class action filed in Los Angeles County); see *Ibarra v. Wells Fargo, N.A.* (C.D. Cal. 2018) No. CV 17-4344 PA (ASX), 2018 WL 5276295, at *4 (approving an hourly rate of \$775 and \$725 for attorneys with experience in a wage-and-hour class action filed in Los Angeles County); see *Bradley Taylor, et al. v. TIC – The Indus. Co.* (C.D. Cal. 2018) No. EDCV16186VAPSPX, 2018 WL 6131198, at *10 (finding that hourly rates of \$695 to \$425 were reasonable in a wage-and-hour class action filed in San Bernardino County).

16. Lawyers for Justice, PC has been awarded attorneys’ fees, compensating the firm at the blended rate of at least \$665 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys’ fees involved an hourly rate of \$936.47; 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 an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys’ fees involved an hourly rate of \$766.05; final approval of the class and representative action

1 settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior
2 Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees
3 involved an hourly rate of \$764.82; final approval of the class and representative action
4 settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
5 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an
6 hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley*
7 *Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450)
8 was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of
9 \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler*
10 *Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was
11 granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77;
12 and final approval of the class and representative action settlement in *Demetrius Camarillo v.*
13 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
14 granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

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

16 **EDUCATION**

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

25 **JUDICIAL EXTERNSHIPS**

26 18. From approximately September 2002 to approximately December 2002, I served
27 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of*
28 *Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I

served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal for the Second Appellate District*.

LITIGATION AND CLASS ACTION EXPERIENCE

19. 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 a prominent plaintiff-side law firm.

20. At the prominent plaintiff-side law firm, 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 the prominent plaintiff-side law firm, I argued approximately 100 motions, took or defended approximately 150 depositions, and prepared dozens of expert witnesses for deposition or trial.

21. 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 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

22. 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

1 of misclassification of various “manager” positions. On September 20, 2010, the court granted
2 final approval of the class action settlement. The Los Angeles County Superior Court Case
3 Number is BC400414.

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

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

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

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

24 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
25 wage-and-hour class and PAGA representative action against a national wholesale distributor of
26 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
27 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
28

1 representative action settlement. The Sacramento County Superior Court Case Number is 34-
2 2012-00136285.

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

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

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

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

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

1 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
3 involving allegations of misclassification of the “Department Manager” position. On August 12,
4 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
5 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
6 County Superior Court Case Number is RG13680477.

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

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

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

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

27 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class and PAGA representative action against a consumer packaging company,

1 on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the
2 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
3 Number is BC590429.

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

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

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

19 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
20 representative action against a food company on behalf of non-exempt employees. On June 30,
21 2017, the court granted final approval of the class and PAGA representative action settlement.
22 The Sacramento County Superior Court Case Number is 34-2015-00175871.

23 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
24 representative action against a chocolate company on behalf of non-exempt employees. On July
25 19, 2017, the court granted final approval of the class and PAGA representative action
26 settlement. The Alameda County Superior Court Case Number is RG15764300.

27 w) LFJ represented the plaintiff in a PAGA representative action, against the
28 parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On

1 October 18, 2017, the court granted approval of the PAGA representative action settlement. The
2 Los Angeles County Superior Court Case Number is BC569664.

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

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

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

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

24 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
25 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
26 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.
27 The Tulare County Superior Court Case Number is VCU264528.
28

cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative action against a behavioral health service provider on behalf of non-exempt employees. On November 13, 2018, the court granted final approval of the class and PAGA representative action settlement. The Alameda County Superior Court Case Number is RG16811450.

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

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

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

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

hh) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class and PAGA representative action against a medical equipment supplier on

1 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
2 for class certification and certified a class. The San Bernardino County Superior Court Case
3 Number is CIVDS1505744.

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

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

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

23 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class action against manufacturer and supplier of power products and services on
25 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
26 motion for class certification and certified a class. On August 27, 2021, the court granted final
27 approval of the class action settlement. The San Diego County Superior Court Case Number is
28 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

23. 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 \$13,176.06 in litigation costs and expenses incurred in the matters, as reflected in "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in the prosecution of the case and to obtain the Settlement.

ENHANCEMENT AWARD TO PLAINTIFF ARRIOLA

24. In recognition of his efforts and work serving as the Class Representative, and his general release of claims against Defendant, the Settlement provides for an Enhancement Award in the amount of \$7,500.00 to Plaintiff Arriola. The requested Enhancement Award is fair and appropriate. Plaintiff Arriola spent a substantial amount of time and effort in producing relevant documents and information and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiff Arriola was available whenever Class Counsel needed him and actively tried to obtain and provide information that would facilitate the pursuit of the class and PAGA claims. Plaintiff Arriola spent numerous hours speaking with Class Counsel about his claims, describing his work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Arriola to receive \$7,500.00 as a reasonable Enhancement Award, in addition to his individual settlement payments under the Settlement.

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1 25. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
2 Settlement is in the best interests of Plaintiffs, the Class, the State of California, and Aggrieved
3 Employees.

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

6 Executed this 29th day of June 2023, at Glendale, California.

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9 Edwin Aiwanian
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EXHIBIT A

ARRIOLA V. MULTI-MECHANICAL, INC.
(RIVERSIDE COUNTY SUPERIOR COURT CASE NO. RIC2003696) (“ARRIOLA ACTION”)
ZUNIGA V. MULTI-MECHANICAL, INC.
(RIVERSIDE COUNTY SUPERIOR COURT CASE NO. CVRI2104327) (“ZUNGA 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 • Edwin Aiwarzian (June 2020 – September 2020) – 4.60 hours • Arby Aiwarzian (June 2020 – September 2020) – 2.90 hours • Elizabeth Parker-Fawley (September 2020) – 1.80 hours	9.30
Pre-Lawsuit Investigation of the Merits of Plaintiff Les Arriola’s (“Plaintiff Arriola”) Claims and the Merits of the Claims of the Putative Class Members • Edwin Aiwarzian (July 2020 – September 2020) – 3.10 hours • Elizabeth Parker-Fawley (August 2020 – September 2020) – 2.70 hours	5.80
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Multi- Mechanical, Inc. (“Defendant”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members • Edwin Aiwarzian (August 2020 – September 2020) – 4.50 hours • Arby Aiwarzian (August 2020 – September 2020) – 3.10 hours	7.60
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Certification Decisions in California, Including all New Relevant DLSE Materials • Edwin Aiwarzian (August 2020 – March 2021; September 2021) – 2.90 hours	5.60

Elizabeth Parker-Fawley (September 2020 - March 2021; September 2021) – 2.70 hours	
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates Arby Aiwazian (August 2020 – March 2022) – 2.50 hours	2.50
Investigation of Defendant’s Organizational and Corporate Structure, and Executive Reporting Structure as It Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees Arby Aiwazian (August 2020 – March 2022) – 2.80 hours	2.80
Investigation, Research, and Analysis Regarding Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity Arby Aiwazian (August 2020 – March 2022) – 2.90 hours	2.90
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 Arby Aiwazian (August 2020 – March 2022) – 3.0 hours	3.0
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced and/or Operated by Defendant in California During the Class Period, Including Differences Between the Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues - Edwin Aiwazian (August 2020 – September 2021) – 2.60 hours - Arby Aiwazian (August 2020 – March 2022) – 3.40 hours	6.0

Comparative Analysis and Cross-Checking of All Available Job Postings by 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 Edwin Aiwazian (August 2020 – September 2021) – 2.40 hours	2.40
Research and Investigation Re: Staffing Models and Staffing Levels at Defendant’s Locations at Which Putative Class Members Worked Throughout California - Edwin Aiwazian (August 2020 – September 2021) – 1.50 hours - Arby Aiwazian (August 2020 – March 2022) – 1.90 hours	3.40
Research and Investigation Re: Defendant’s Policies, Practices, and Procedures Relating to Bonus/Commission/Incentive/Shift Differential Pay, Regular Rate Calculations, Timekeeping, Scheduling, Attendance, Mandatory Meetings, Inspections, Meal/Rest Breaks, On-Premises Breaks, Overtime Compensation, Use of Personal Cell Phones, Use of Personal Vehicles, Mileage Reimbursement, Dress Code, PPE, Equipment, and Reimbursement of Business-Related Expenses - Edwin Aiwazian (August 2020 – September 2021) – 6.80 hours - Arby Aiwazian (August 2020 – March 2022) – 9.30 hours - Elizabeth Parker-Fawley (August 2020 – September 2021) – 5.10 hours - Melissa Leblanc (March 2022) – 8.90 hours	30.10
Research and Investigation Re: Various Software Programs Defendant Uses to Conduct Its Everyday Business, Including Payroll Software, 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 - Edwin Aiwazian (August 2020 – September 2021) – 1.20 hours - Arby Aiwazian (August 2020 – March 2022) – 1.40 hours	2.60
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Hand Tools Exemption, Waiver, and Compliant Policies	7.10

• Edwin Aiwanian (August 2020 – September 2021) – 1.90 hours • Arby Aiwanian (August 2020 – March 2022) – 1.80 hours • Elizabeth Parker-Fawley (August 2020 – September 2021) – 1.50 hours • Melissa LeBlanc (March 2022) – 1.80 hours	
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 • Edwin Aiwanian (December 2018 – October 2020) – 2.60 hours	2.60
Meet and Communicate with Plaintiff Arriola Throughout the Pendency of the Case • Edwin Aiwanian (June 2020 – September 2021) – 8.10 hours • Arby Aiwanian (June 2020 – March 2022) – 9.60 hours • Elizabeth Parker-Fawley (September 2020 – September 2021) – 5.40 hours • Arman Marukyan (November 2020 - January 2022) - - 4.90 hours • Melissa Leblanc (February 2022 – April 2022) – 6.90 hours • Alexandra Rose (April 2022 – June 2023) – 6.10 hours • Brian J. St. John (June 2023) – 1.20 hours	42.20
Meet and Communicate with Plaintiff Armondo Zuniga (“Plaintiff Zuniga”) (together with Plaintiff Arriola, “Plaintiffs”) Throughout the Pendency of the Case • Edwin Aiwanian (September 2020 – September 2021) – 7.70 hours • Arby Aiwanian (September 2020 – March 2022) – 9.20 hours • Elizabeth Parker-Fawley (September 2020 – September 2021) – 4.90 hours • Arman Marukyan (November 2020 - January 2022) - 4.30 hours • Melissa Leblanc (February 2022 – April 2022) -7.10 hours • Alexandra Rose (April 2022 – June 2023) – 6.80 hours • Brian J. St. John (June 2023) – 0.90 hour	40.90
Investigate and Meet and Communicate with Putative Class Members and Percipient Witnesses • Edwin Aiwanian (August 2020 – September 2021) – 5.40 hours	10.30

Arby Aiwazian (March 2021 – March 2022) – 4.90 hours	
Pleadings and Court Filings	
Research and Draft Plaintiff Arriola’s Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on September 16, 2020) (<i>Arriola</i> Action) - Edwin Aiwazian (September 14, 2020 – September 16, 2020) – 3.30 hours - Elizabeth Parker-Fawley (September 14, 2020 – September 16, 2020) – 4.10 hours	7.40
Review Court’s Notice of Case Assignment and Notice of Case Management Conference (filed on September 16, 2020) (<i>Arriola</i> Action) Edwin Aiwazian (September 18, 2020) – 0.10 hour	0.10
Draft Plaintiff Arriola’s Notice of Posting Jury Fees (filed on November 2, 2020) (<i>Arriola</i> Action) Edwin Aiwazian (November 2, 2020) – 0.20 hour	0.20
Draft Plaintiff Arriola’s Case Management Conference Statement (filed on November 3, 2020) (<i>Arriola</i> Action) Arman Marukyan (November 3, 2020) – 1.40 hours	1.40
Review Court’s Minute Order Re: Case Management Conference and Notice of Order to Show Cause Hearing (filed on November 13, 2020) (<i>Arriola</i> Action) Edwin Aiwazian (November 17, 2020) – 0.20 hour	0.20
Review and Analyze Defendant’s Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant’s Answer (served on December 2, 2020) (<i>Arriola</i> Action) Edwin Aiwazian (December 4, 2020) – 1.90 hours	1.90

Review Court's Notice of Case Reassignment for All Purposes (filed on December 24, 2020) (<i>Arriola</i> Action) Edwin Aiwazian (December 30, 2020) – 0.10 hour	0.10
Review Court's Class Action Case Management Order #1 (filed on December 28, 2020) (<i>Arriola</i> Action) Edwin Aiwazian (January 4, 2021) – 0.50 hour	0.50
Review Defendant's Notice of Posting Complex Fees (served on January 5, 2021) (<i>Arriola</i> Action) Edwin Aiwazian (January 11, 2021) – 0.10 hour	0.10
Review Court's Notice of Telephonic Appearance (filed on February 22, 2021) (<i>Arriola</i> Action) Arman Marukyan (February 26, 2020) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (submitted on March 10, 2021)(<i>Arriola</i> Action) Arman Marukyan (March 9, 2021- March 10, 2021) – 1.80 hours	1.80
Draft Plaintiff <i>Arriola</i> 's Declaration of Arman Marukyan Regarding the Court's Order to Show Cause (filed on March 10, 2021) (<i>Arriola</i> Action) Arman Marukyan (March 9, 2021- March 10, 2021) – 1.20 hours	1.20
Review Court's Minute Order Re: Status Conference (filed on March 15, 2021) (<i>Arriola</i> Action) Arman Marukyan (March 16, 2021) – 0.10 hour	0.10
Research and Draft Plaintiff <i>Arriola</i> 's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on April 5, 2021); Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order Granting Plaintiff Leave to File	5.20

[Proposed] First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (submitted on March 24, 2021) (<i>Arriola</i> Action) • Edwin Aiwazian (March 23, 2021- March 24, 2021; April 5, 2021) – 0.90 hour • Elizabeth Parker-Fawley (March 15, 2021- March 24, 2021) – 2.80 hours • Arman Marukyan (March 23, 2021- March 24, 2021) – 1.50 hours	
Review Court’s Order Granting Plaintiff Leave to File [Proposed] First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Minute Order Re: First Amended Complaint (filed on April 5, 2021) (<i>Arriola</i> Action) • Arman Marukyan (April 5, 2021) – 0.10 hour	0.10
Review Court’s Notice of Telephonic Appearance (filed on April 21, 2021) (<i>Arriola</i> Action) • Arman Marukyan (April 22, 2021) – 0.10 hour	0.10
Meet and Confer with Defendant’s Counsel, and Draft Joint Case Management Statement (submitted on May 6, 2021) (<i>Arriola</i> Action) • Elizabeth Parker-Fawley (May 5, 2021- May 6, 2021) – 1.40 hours	1.40
Review Court’s Minute Order Re: Status Conference and Order to Show Cause Re: Sanctions (filed on May 12, 2021) (<i>Arriola</i> Action) • Arman Marukyan (May 13, 2021) – 0.20 hour	0.20
Review Court’s Amended Minute Order Re: Status Conference (filed on May 13, 2021) (<i>Arriola</i> Action) • Arman Marukyan (May 13, 2021) – 0.10 hour	0.10
Review and Analyze Defendant’s Answer to First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Research Affirmative Defenses in Defendant’s Answer (served on May 26, 2021) (<i>Arriola</i> Action)	4.0

• Edwin Aiwazian (May 28, 2021) – 0.90 hours • Arman Marukyan (May 28, 2021 – June 3, 2021) - 3.10	
Review Court’s Notice of Telephonic Appearance (filed on June 7, 2021) (<i>Arriola</i> Action) • Arman Marukyan (June 9, 2021) – 0.10 hour	0.10
Draft Plaintiff Arriola’s Declaration of Demurring or Moving Party in Support of Automatic Extension (filed on June 7, 2021) (<i>Arriola</i> Action) • Arman Marukyan (June 7, 2021) – 1.0 hour	1.0
Draft Declaration of Arman Marukyan Regarding the Court’s Order to Show Cause (filed on June 16, 2021) (<i>Arriola</i> Action) • Arman Marukyan (June 15, 2021 – June 16, 2021) – 1.10 hour	1.10
Meet and Confer with Defendant’s Counsel, and Draft Joint Case Management Statement (submitted on June 16, 2021) (<i>Arriola</i> Action) • Arman Marukyan (June 15, 2021 – June 16, 2021) – 1.50 hour	1.50
Review Court’s Minute Order Re: Status Conference (filed on June 23, 2021) (<i>Arriola</i> Action) • Arman Marukyan (June 15, 2021 – June 16, 2021) – 1.10 hour	0.10
Review Court’s Minute Order Re: Order to Show Cause (filed on June 23, 2021) (<i>Arriola</i> Action) • Arman Marukyan (June 23, 2021) – 0.10 hour	0.10
Review Court’s Notice of Telephonic Appearance (filed on August 25, 2021) (<i>Arriola</i> Action) • Arman Marukyan (June 23, 2021) – 0.10 hour	0.10

Meet and Confer with Defendant’s Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on August 26, 2021) (<i>Arriola</i> Action) Arman Marukyan (August 24, 2021 – August 26, 2021) – 1.40 hour	1.40
Review Court’s Order to Continue Case Management Conference (filed on August 26, 2021) (<i>Arriola</i> Action) Arman Marukyan (August 27, 2021) – 0.10 hour	0.10
Review Court’s Minute Order Re: Status Conference (filed on August 31, 2021) (<i>Arriola</i> Action) Arman Marukyan (August 31, 2021) – 0.10 hour	0.10
Research and Draft Plaintiff Zuniga’s Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on September 22, 2021) (<i>Zuniga</i> Action) - Edwin Aiwazian (September 14, 2020 – September 16, 2020) – 2.70 hours - Elizabeth Parker-Fawley (September 14, 2020 – September 16, 2020) – 3.0 hours - Khachatur Chris Ourkhan (September 14, 2020) – 2.50 hours	8.20
Review Court’s Notice of Case Management Conference and Notice of Department Assignment (filed on September 23, 2021) (<i>Zuniga</i> Action) Edwin Aiwazian (September 28, 2021) – 0.10 hour	0.10
Review Court’s Notice of Return Document (filed on November 17, 2021) (<i>Zuniga</i> Action) Edwin Aiwazian (November 22, 2021) – 0.10 hour	0.10
Review Defendant’s Notice of Related Case (served on December 1, 2021) (<i>Arriola</i> Action) Edwin Aiwazian (December 1, 2021) – 0.10 hour	0.10

Review and Analyze Defendant's Answer Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Research Affirmative Defenses in Defendant's Answer (served on December 1, 2021) (<i>Zuniga</i> Action) Edwin Aiwarzian (December 3, 2021) – 1.90 hours	1.90
Review Court's Notice of Order to Show Cause Hearing (filed on December 3, 2021) (<i>Zuniga</i> Action) Arman Marukyan (December 3, 2021) – 0.10 hour	0.10
Review Court's Minute Order Re: Court's Own Motion (filed on December 3, 2021) (<i>Arriola</i> Action) Arman Marukyan (December 3, 2021) – 0.10 hour	0.10
Draft Plaintiff Zuniga's Declaration of Arman Marukyan Re: Consolidation (filed on December 23, 2021) (<i>Zuniga</i> Action) Arman Marukyan (December 23, 2021) – 0.40 hour	0.40
Review Court's Minute Order Re: Order to Show Cause Re: Why Cases Should Not Be Consolidated for All Purposes (filed on December 30, 2021) (<i>Arriola</i> Action) Arman Marukyan (December 31, 2021) – 0.10 hour	0.10
Review Court's Minute Order Re: Order to Show Cause Re: Why Cases Should Not Be Consolidated for All Purposes (filed on December 30, 2021) (<i>Zuniga</i> Action) Arman Marukyan (December 31, 2021) – 0.10 hour	0.10
Draft Plaintiff Arriola's Notice of Posting Jury Fees (filed on January 25, 2022) (<i>Arriola</i> Action) Edwin Aiwarzian (January 25, 2022) – 0.10 hour	0.10
Review Court's Minute Order Re: Hearing Off Calendar (filed on March 22, 2022) (<i>Zuniga</i> Action)	0.10

• Melissa LeBlanc (March 25, 2022) - 0.10 hour	
Review Court's Amended Notice of Hearing (filed on March 28, 2022) (<i>Arriola</i> Action) • Melissa LeBlanc (April 1, 2022) - 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Statement and Notice of Settlement (submitted on April 5, 2022) (<i>Arriola</i> Action) • Melissa LeBlanc (April 4, 2022 – April 5, 2022) – 1.20 hours	1.20
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement (submitted on April 5, 2022) (<i>Zuniga</i> Action) • Melissa LeBlanc (April 5, 2022) – 0.80 hour	0.80
Review Court's Minute Order Re: Status Conference (filed on April 11, 2022) (<i>Arriola</i> Action) • Alexandra Rose (April 12, 2022) – 0.10 hour	0.10
Draft Plaintiffs' Status Conference Statement (filed on August 4, 2022) (Consolidated Action) • Alexandra Rose (August 4, 2022) – 0.60 hour	0.60
Review Court's Minute Order Re: Status Conference (filed on August 9, 2021) (Consolidated Action) • Alexandra Rose (August 10, 2022) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (submitted on September 8, 2022) (Consolidated Action) • Alexandra Rose (September 7, 2022 – September 8, 2022) – 1.20 hours	1.20
Review Court's Minute Order Re: Status Conference (filed on September 14, 2022) (Consolidated Action) • Alexandra Rose (September 15, 2022) – 0.10 hour	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (submitted on November 15, 2022) (Consolidated Action) Alexandra Rose (November 14, 2022 – November 15, 2022) – 0.90 hour	0.90
Review Court's Minute Order Re: Status Conference (filed on November 17, 2022) (Consolidated Action) Alexandra Rose (November 21, 2022) – 0.10 hour	0.10
Research and Draft Plaintiffs' Second Amended Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on December 16, 2022); Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiffs Leave to File Second Amended Consolidated Complaint; and [Proposed] Order Thereon (submitted on December 12, 2022) (Consolidated Action) - Alexandra Rose (December 7, 2022 – December 16, 2022) – 2.80 hours - Brian J. St. John (December 7, 2022) – 0.90 hour - Giovani Pimentel (December 6, 2022) – 0.50 hour	4.20
Review Court's Order Granting Plaintiffs Leave to File Second Amended Consolidated Complaint (filed on December 14, 2022) (Consolidated Action) Alexandra Rose (December 16, 2022) – 0.10 hour	0.10
Review and Analyze Defendant's Answer to Second Amended Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Research Affirmative Defenses in Defendant's Answer (served on January 18, 2023) (Consolidated Action) Alexandra Rose (January 18, 2023) – 1.0 hour	1.0

Review Court's Notice of Department Reassignment for All Purposes (filed on May 16, 2023) (Consolidated Action)	0.10
Alexandra Rose (May 22, 2023) – 0.10 hour	
Appearances	
Prepare for and Telephonically Attend Status Conference (March 15, 2021) (<i>Arriola</i> Action)	1.0
Arman Marukyan (March 15, 2021) – 1.00 hour	
Prepare for and Telephonically Attend Status Conference and Hearing on Order to Show Cause as to Why Sanctions Not to Exceed \$1,500.00 or Dismissal Should Not Be Imposed for Failure to Timely Request Entry of Default of All Defendants Who Have Been Served But Have Not Filed a Response as to Lawyers for Justice PC, Les Arriola (June 23, 2021) (<i>Arriola</i> Action)	1.40
Arman Marukyan (June 23, 2021) – 1.40 hours	
Prepare for and Telephonically Attend Order to Show Cause Re: Consolidation (December 30, 2021) (<i>Arriola</i> Action)	0.80
Arman Marukyan (December 30, 2021) – 0.80 hour	
Prepare for and Telephonically Attend Status Conference (August 9, 2022) (Consolidated Action)	0.80
Alexandra Rose (August 9, 2022) – 0.80 hour	
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (November 14, 2022) (Consolidated Action)	3.0
Alexandra Rose (November 13, 2022 – November 14, 2022) – 3.00 hours	
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (January 26, 2023) (Consolidated Action)	1.80

Alexandra Rose (January 26, 2023) – 1.80 hour	
Prepare for, Travel to/from, and Attend Hearing on Plaintiffs’ Motion for Final Approval of Class Action Settlement, Attorneys’ Fees, Costs, and Service Award (July 24, 2023) (Anticipated) Brian J. St. John (July 24, 2023) – 1.50 hours	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Arriola (served on June 30, 2020) Edwin Aiwazian (June 30, 2020) – 1.80 hours	1.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Arriola (served on July 23, 2020) - Edwin Aiwazian (July 24, 2020) – 3.20 hours - Elizabeth Parker-Fawley (September 2020) – 2.40 hours	5.60
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Zuniga (served on September 30, 2020) Edwin Aiwazian (September 30, 2020) – 1.70 hours	1.70
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Zuniga (served on October 26, 2020) - Edwin Aiwazian (November 11, 2020) – 3.50 hours - Elizabeth Parker-Fawley (September 2021) – 2.20 hours - Khachatur Chris Ourkhan (September 2021) – 1.90 hours	7.60
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Zuniga (served on November 4, 2020)	5.90

• Edwin Aiwarzian (October 27, 2020) – 2.50 hours • Elizabeth Parker-Fawley (September 2021) – 2.0 hours • Khachatur Chris Ourkhan (September 2021) – 1.40 hours	
Letters and Correspondence	
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Arriola for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on January 8, 2021) • Edwin Aiwarzian (January 7, 2021 – January 8, 2021) – 1.00hour • Arman Marukyan (January 7, 2021 – January 8, 2021) – 3.50 hours	4.50
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Zuniga for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on July 16, 2021) • Edwin Aiwarzian (July 16, 2021) – 0.70 hour • Khachatur Chris Ourkhan (July 16, 2021) – 3.30 hours	4.00
Meet with Defendant’s Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendant’s Counsel • Edwin Aiwarzian (June 2020 – September 2021) – 3.10 hours • Arby Aiwarzian (June 2020 – March 2022) – 2.80 hours • Elizabeth Parker-Fawley (September 2020 – September 2021) – 1.10 hours • Arman Marukyan (November 2020 - January 2022) -- 5.0 hours • Melissa Leblanc (February 2022 – March 2022) – 2.20 hours • Alexandra Rose (April 2022 – June 2023) – 2.30 hours • Brian J. St. John (June 2023) – 0.40 hour	16.90
Mediation/Settlement	
Review and Analyze Mediation Data and Documents (Employee Handbooks and Policies, Sampling of Employee Time Data, and Sampling of Employee Pay Data) Produced by Defendant (served on March 1, 2022 and March 4, 2022)	24.50

• Arby Aiwazian (March 2, 2022 – March 10, 2022) – 10.20 hours • Melissa LeBlanc (March 1, 2022 – March 10, 2022) – 14.30 hours	
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages Analysis/Calculations (submitted on March 3, 2022) • Arby Aiwazian (March 9, 2022) – 3.70 hours • Melissa LeBlanc (March 1, 2022 – March 3, 2022) – 7.80 hours	11.50
Remotely Attend Mediation Session (March 10, 2022; Zoom Video Conference) • Arby Aiwazian (March 10, 2022) – 8.50 hours • Melissa LeBlanc (March 10, 2022) – 8.50 hours	17.0
Draft, Review, Revise, Negotiate, and Finalize Confidential Memorandum of Understanding (executed March 14, 2022) • Melissa LeBlanc (March 10, 2022 – March 14, 2022) – 1.40 hours	1.40
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on September 8, 2022) and Draft Exhibits • Edwin Aiwazian (August 31, 2022) – 0.90 hour • Alexandra Rose (April 18, 2022 – April 27, 2022; June 10, 2022 – July 28, 2022; August 23 – September 8, 2022) - 15.80 hours • Margaux V. Roussel (April 26, 2022 – April 27, 2022) – 1.10 hours	17.80
Review Defendant’s Mediation Brief • Alexandra Rose (December 5, 2022; January 5, 2023) – 1.30 hours	1.30

Draft First Amended Class Action and PAGA Settlement Agreement (executed on January 18, 2023) and Draft Exhibits - Alexandra Rose (December 21, 2022 – January 18, 2023) - 2.60 hours - Joanna Ghosh (December 21, 2022 – January 18, 2022) – 1.20 hours	3.80
Law and Motion	
Review and Analyze Defendant’s Motion for Peremptory Disqualification (C. C. P. §170.6) by Defendant; Declaration of Brandon L. Sylvia in Support Thereof (served on December 24, 2020) (Arriola Action) Edwin Aiwazian – December 30, 2020 – 0.20 hour	0.20
Research, Review, and/or Draft Plaintiffs’ Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Alexandra Rose in Support Thereof, Plaintiffs’ Compliance Chart in Support Thereof, Declaration of Les Arriola in Support Thereof, Declaration of Armando Zuniga in Support Thereof, Declaration of Brandon L. Sylvia, Declaration of Michael Moore on Behalf of Proposed Settlement Administrator Phoenix Class Action Administration Solutions, Declaration of Jose Padilla on Behalf of Proposed Cy Pres Recipient California Rural Legal Assistance, Inc., and [Proposed] Order Thereon (filed on September 20, 2022) (Consolidated Action) - Alexandra Rose (September 13, 2022 – September 20, 2022) - 17.60 hours - Brian J. St. John (September 17, 2022 – September 18, 2022) – 4.10 hours	21.70
Review Court’s Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on November 14, 2022) (Consolidated Action) Alexandra Rose (September 14, 2022) – 0.10 hour	0.10
Review Court’s Order Re Motion for Preliminary Approval of Class Action Settlement (filed on November 29, 2022) (Consolidated Action) Alexandra Rose (November 29, 2022) – 0.30 hour	0.30

Review Court’s Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on December 20, 2022) (Consolidated Action) Alexandra Rose (December 20, 2022) – 0.10 hour	0.10
Meet and Confer with Defendant’s Counsel, and Draft Joint Stipulation to Continue Hearing on Motion for Preliminary Approval and Related Deadlines; [Proposed] Order Thereon (submitted on December 30, 2022) Alexandra Rose (December 29, 2022 – December 30, 2022) – 1.10 hours	1.10
Review Court’s Order Continuing Hearing on Motion for Preliminary Approval and Related Deadlines (filed on January 3, 2023) (Consolidated Action) Alexandra Rose (January 3, 2023) – 0.10 hour	0.10
Review Court’s Minute Order Re: Hearing (filed on January 11, 2023) (Consolidated Action) Alexandra Rose (January 13, 2023) – 0.10 hour	0.10
Meet and Confer with Defendant’s Counsel, and Draft Joint Supplemental Brief in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement, Declaration of Alexandra Rose in Support Thereof, Supplemental Declaration of Armando Zuniga in Support Thereof, and [Proposed] Order Thereon (filed on January 19, 2023) (Consolidated Action) - Alexandra Rose (January 5, 2023 – January 19, 2023) - 9.70 - Joanna Ghosh (January 17, 2023- January 19, 2023) – 6.10	15.8
Review Court’s Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on January 26, 2023) (Consolidated Action) Alexandra Rose (January 31, 2023) – 0.10 hour	0.10

Review Court's Amended Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on January 26, 2023) (Consolidated Action) Alexandra Rose (January 31, 2023) – 0.10 hour	0.10
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (filed on February 24, 2023) Alexandra Rose (February 24, 2023) – 0.20 hour	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on February 27, 2023) (Consolidated Action) Alexandra Rose (March 6, 2023) – 0.10 hour	0.10
Draft Further Supplemental Declaration of Alexandra Rose in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on March 15, 2023) (Consolidated Action) Alexandra Rose (March 13, 2023 – March 15, 2023) – 2.90	2.90
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (filed on March 21, 2023) Alexandra Rose (March 21, 2023) – 0.10 hour	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on March 22, 2023) (Consolidated Action) Alexandra Rose (March 22, 2023) – 0.10 hour	0.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on March 22, 2023) (Consolidated Action) Alexandra Rose (March 22, 2023) – 0.10 hour	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 Settlement, Attorneys’ Fees, Costs, and Service Award, and Declaration of Edwin Aiwarzian in Support Thereof, and Revise [Proposed] Final Approval Order and Judgment (filed on June 27, 2023) (Anticipated) • Edwin Aiwarzian (June 28, 2023) – 0.40 hour • Elizabeth Parker-Fawley (June 28, 2023) – 2.10 hours • Brian J. St. John (June 26, 2023 – June 29, 2023) – 16.10 hours • Meg Razi (June 27 – June 29, 2023) – 5.70 hours	24.30
Total Hours:	443.80

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Arriola v. Multi Mechanical, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/16/2020	Legal Document Server, Inc.	Attorney Service	180.75
9/16/2020	Riverside Superior Court	Complaint Filing Fee	450.00
9/16/2020	Riverside Superior Court	Complex Filing Fee	1,000.00
10/28/2020	Legal Document Server, Inc.	Attorney Service	110.00
10/28/2020	U.S. Postmaster	Postage	6.95
10/29/2020	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
11/2/2020	Legal Document Server, Inc.	Attorney Service	135.25
11/2/2020	Riverside Superior Court	Jury Fees	150.00
11/3/2020	Legal Document Server, Inc.	Attorney Service	130.00
12/9/2020	Legal Document Server, Inc.	Attorney Service	130.00
1/8/2021	U.S. Postmaster	Postage	15.00
1/8/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
1/20/2021	Riverside Superior Court	Filing Fee	11.50
2/17/2021	Legal Document Server, Inc.	Attorney Service	130.00
6/28/2021	Legal Document Server, Inc.	Attorney Service	150.00
8/26/2021	Legal Document Server, Inc.	Attorney Service	25.65
8/26/2021	Riverside Superior Court	Stipulation Fee	20.00
8/27/2021	Riverside Superior Court	Document Download Fee	9.00
8/30/2021	Legal Document Server, Inc.	Attorney Service	20.70
1/26/2022	Legal Document Server, Inc.	Attorney Service	21.92
1/26/2022	Riverside Superior Court	Jury Fee	150.00
2/15/2022	Lynn S. Frank	Mediation Fee	9,000.00
3/1/2022	FedEx Express	Courier Service	65.92
3/4/2022	FedEx Express	Courier Service	57.10
3/17/2022	Riverside Superior Court	Document Download Fee	11.00
8/5/2022	Legal Document Server, Inc.	Attorney Service	15.55
9/9/2022	Legal Document Server, Inc.	Attorney Service	15.55
9/27/2022	Legal Document Server, Inc.	Attorney Service	19.60
9/27/2022	Riverside Superior Court	Motion Fee	60.00
11/15/2022	Legal Document Server, Inc.	Attorney Service	15.55
11/17/2022	Riverside Superior Court	Document Download Fee	1.00
12/12/2022	Legal Document Server, Inc.	Attorney Service	16.90
12/12/2022	Riverside Superior Court	Stipulation Fee	20.00
12/14/2022	Legal Document Server, Inc.	Attorney Service	15.55
12/19/2022	OneLegal	Attorney Service	16.78
12/22/2022	Legal Document Server, Inc.	Attorney Service	15.55
12/30/2022	Legal Document Server, Inc.	Attorney Service	16.90
12/30/2022	Riverside Superior Court	Stipulation Fee	20.00
1/3/2023	Riverside Superior Court	Document Download Fee	1.00
1/4/2023	Legal Document Server, Inc.	Attorney Service	31.10

LAWYERS for JUSTICE PC CASE COST DETAIL
Arriola v. Multi Mechanical, Inc.

1/24/2023	Legal Document Server, Inc.	Attorney Service	15.55
1/25/2023	Legal Document Server, Inc.	Attorney Service	15.55
1/31/2023	Riverside Superior Court	Document Download Fee	2.00
2/16/2023	Legal Document Server, Inc.	Attorney Service	27.30
3/14/2023	Riverside Superior Court	Document Download Fee	1.00
3/22/2023	Legal Document Server, Inc.	Attorney Service	15.55
Total:			12,488.72

LAWYERS for JUSTICE PC CASE COST DETAIL
Zuniga v. Multi Mechanical, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/30/2020	U.S. Postmaster	Postage	6.95
7/17/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
7/16/2021	U.S. Postmaster	Postage	15.00
9/23/2021	One Legal	Attorney Service	28.67
9/23/2021	Riverside Superior Court	Complaint Filing Fee	450.00
11/17/2021	Legal Document Server, Inc.	Attorney Service	11.00
11/23/2021	Legal Document Server, Inc.	Attorney Service	13.95
12/23/2021	General Logistics Systems US, Inc.	Courier Service	18.27
12/27/2021	Legal Document Server, Inc.	Attorney Service	27.90
4/5/2022	Legal Document Server, Inc.	Attorney Service	25.80
4/6/2022	Legal Document Server, Inc.	Attorney Service	14.80
Total:			687.34