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Attorneys for Plaintiffs and the Class

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

GILBERT CHAVEZ, JESSE CHAVEZ,
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; EVODIO VALLES,
individually, and on behalf of other members
of the general public similarly situated;

Plaintiffs,

vs.

KSC & SON CORPORATION, an unknown
business entity; CHANDI GROUP USA, an
unknown business entity; NACHHATTAR S.
CHANDI, an individual; and DOES 1
through 100, inclusive,

Defendants.

Case No.: CIVSB2124237 (Lead Case)
Consolidated Case No.: CIVSB2126976

CLASS ACTION

Honorable Christian Towns
Department S26

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

Date: December 3, 2025
Time: 8:30 a.m.
Department: S26

Complaint Filed: August 20, 2021
FAC Filed: September 12, 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 Gilbert Chavez, Jesse Chavez, and Evodio Valles (collectively, the “Plaintiffs”) and the Class in the above-captioned matters. 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 Defendants KSC & Son Corporation, Chandi Group, USA Inc., and Nachhattar S. Chandi, (collectively, the “Defendants,”) (together with Plaintiffs referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiffs Gilbert Chavez, Jesse Chavez, and Evodio Valles as the representatives of the Class (collectively, the “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 ILYM Group, Inc. (“ILYM Group”) 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 Litigation Costs, and Incentive Awards (“Motion for Final Approval”), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Attorneys’ Fees and Litigation Costs, Incentive Awards, and Administration Fees, or the allocation for the PAGA Allocation.

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WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers for Justice, PC have been actively performing work in *Gilbert Chavez and Jesse Chavez v. KSC & Son Corporation and Chandi Group USA*, filed in San Bernardino County Superior Court, Case No. CIVSB2124237 (“Action”), which was filed on August 20, 2021, and the representative Private Attorneys General Act (“PAGA”) *Gilbert Chavez and Jesse Chavez v. KSC & Son Corporation, Chandi Group USA, and Nachhattar S. Chandi*, filed in San Bernardino County Superior Court, Case No. CIVSB2126976 (“PAGA Action”), which was filed on September 22, 2021 (together, “Actions”). On September 21, 2024, the Action and PAGA Action (together, the “Actions”) were consolidated and the Action was designated the lead action.

6. Before initiating the cases, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers for Justice, PC and Plaintiffs and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement, Plaintiffs’ claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiffs 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 of Defendants in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Collectively, Class Counsel conducted significant formal and informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and were preparing the cases for class certification and trial, prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. The volume of records and documents that Class Counsel reviewed and analyzed included, and were not limited to: Plaintiffs’ employment records,

a detailed sampling of Plaintiffs' and other Class Members' time data and pay records, job descriptions, new hire checklists, Defendants' Employee Handbooks, daily activity records, internal memorandum, company policy acknowledgements (including but not limited to, ARCO Am-Pm Handbook, Go-Go Express Wash Handbook, Del Taco Employee Handbook, Meal Breaks and Rest Periods Acknowledgment, Meal & Rest Period Acknowledgment), forms (including but not limited to Meal Period Waiver Agreement), procedures, and policies (Prohibited Conduct, Procedures During a Robbery, General Manager Responsibilities and Job Duties Requirements, and Loss Prevention), among other information and documents. Class 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, Defendants, 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 Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, 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, the mediation briefing and supporting materials, and settlement documents; drafting and propounding multiple sets of formal written discovery requests on Defendants and notices of depositions of multiple individuals regarding their employment with Defendants and job duties, along with accompanying requests for production of documents; reviewing Defendants' responses and objections to written discovery requests and deposition notices; responding to multiple sets of formal written discovery requests propounded by Defendants; preparing for and taking the depositions of multiple employees of Defendants; preparing for and defending the depositions of Plaintiffs Jesse Chavez and Gilbert Chavez; 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

1 Plaintiffs, Defendants, and other sources that provided a critical understanding of the nature of the work
2 performed by the Class Members and PAGA Group Members, as well as Defendants' organizational
3 structure and their operations and employment policies, practices, and procedures. The information,
4 documents, and data were used in analyzing liability, damages, penalties, and other valuation issues in
5 connection with all phases of the litigation, and ultimately, in connection with the mediation and
6 settlement negotiations process. Class Counsel also performed significant research into the applicable
7 law, which is evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest
8 periods, representative PAGA claims and penalties, wage-and-hour enforcement, Plaintiffs' claims and
9 allegations, and Defendants' defenses thereto, as well as facts discovered.

10 9. After conducting significant investigation of the facts and law during the prosecution of
11 this matter, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases.
12 These efforts included participating in a mediation session conducted by Deborah C. Saxe, Esq., a well-
13 regarded mediator experienced in handling complex labor and employment matters. During all
14 settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position.
15 In the course of the mediation and settlement negotiations, the Parties exchanged documents and data,
16 and discussed various aspects of the cases, including and not limited to, the risks and delays of further
17 litigation, the risks and expenses to the Parties of proceeding with class certification, representative
18 adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, meal and
19 rest periods expense reimbursements, recordkeeping and wage statement requirements, representative
20 PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiffs' claims and allegations,
21 and Defendants' defenses thereto, as well as the evidence produced and analyzed; and the possibility of
22 appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy.
23 Defendants contended that individualized questions of fact predominate over any common issues, and
24 these issues would pose challenges to class certification and representative adjudication. Defendants and
25 their counsel felt strongly about Defendants' ability to avoid class certification prevail on the merits and,
26 while Plaintiffs and Class Counsel believed that they would be able to obtain class certification and
27 prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that this matter
28 was well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, 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, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in this matter, 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 \$292,250.00, which is thirty-five percent (35%) of the Gross Settlement Amount of \$835,000.00. Pursuant to the contingency-fee agreements entered into by and between Plaintiffs and Class Counsel, Plaintiffs have agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (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 this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to these cases. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Gross Settlement Amount of \$835,000.00 (with a Net Settlement Amount of approximately at least \$446,381.17 to be paid to Settlement Class Members (with gross Individual Settlement Payments averaging approximately more than \$334.12), payment of \$6,250.00 to PAGA Group Members (with Individual PAGA Payments averaging approximately \$5.46) and payment of \$18,750.00 to the State of California)—support the percentage fee sought.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter 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 **489.90 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT 1**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for*

Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

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 wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a 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.

15. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000 class action or representative action cases.

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

17. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable

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

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

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

19. 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. The Settlement provides for reimbursement of litigation costs and expenses of up to \$35,000.00. Lawyers *for* Justice, PC seeks reimbursement of **\$33,918.83** in litigation costs and expenses incurred in the matter, as reflected in “**EXHIBIT 2**” attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. The cost savings of \$1,081.17 will be part of the Net Settlement Amount, which will be distributed to the Settlement Class Members in accordance with the Settlement.

INCENTIVE AWARDS TO PLAINTIFFS

20. In recognition of their efforts and work spearheading the prosecution of this matter and serving as the Class Representatives, as well as their broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Section VII.C. of the Settlement Agreement), the Settlement provides for Incentive Awards in the amount of up to \$7,500.00 each (\$22,500.00 total) to Plaintiffs. Plaintiffs spent a substantial amount of time and effort discussing their employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would help obtain a recovery in this matter. For example, Plaintiffs Jesse Chavez and Gilbert Chavez spent time preparing responses to Defendants’ formal discovery requests, producing responsive documents, attending their depositions, and reviewing their deposition transcripts. Accordingly, it is appropriate for Plaintiffs to receive \$7,500.00 each, as a reasonable Incentive Awards for their broader waiver and release of claims and services performed in this matter, in addition to their individual settlement payment(s).

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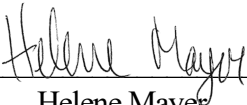
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21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiffs, the Class, and the State of California.

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

Executed this 6th day of November 2025, at Mooresville, North Carolina.



Helene Mayer

EXHIBIT 1

GILBERT CHAVEZ, ET AL. V. KSC & SON CORPORATION, ET AL.
San Bernardino County Superior Court Case No. CIVSB2124237 (“Class Action”)

JESSE CHAVEZ, ET AL. V. KSC & SON CORPORATION, ET AL.
San Bernardino County Superior Court Case No. CIVSB2126976 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Gilbert Chavez (“Plaintiff Gilbert Chavez”)	28.50
Meet and Communicate with Plaintiff Jesse Chavez (“Plaintiff Jesse Chavez”)	26.50
Meet and Communicate with Plaintiff Evodio Valles (“Plaintiff Valles”)	19.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	16.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez’s Class Action Claims, Conduct Legal Research and Analysis Regarding Class Action Claims, and Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez’s Class Action Complaint for Damages (filed August 20, 2021) (Class Action)	7.50
Investigate the Merits of Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez’s PAGA Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on September 22, 2021) (PAGA Action)	7.10

Review Court's Initial Case Management Conference Order (filed on September 28, 2021) (Class Action)	0.20
Review Court's Initial Case Management Conference Order (filed on November 2, 2021) (PAGA Action)	0.20
Review Defendants KSC & Son Corporation, Chandi Group USA, and Nachhattar S. Chandi's (collectively, "Defendants") Notice of Appearance (served on December 10, 2021) (Class Action & PAGA Action)	0.10
Review Court's Minute Order Re: Complex Case Management Conference (filed on December 13, 2021) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Report for Initial Case Management Conference (filed on January 19, 2022) (PAGA Action)	1.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Report for Initial Case Management Conference (filed on January 21, 2022) (Class Action)	1.10
Review Court's Minute Order Re: Case Management Conference (filed on January 28, 2022) (Class Action)	0.10
Review and Analyze Answer of Defendants KSC & Son Corporation and Nachhattar S. Chandi to Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Class Action Complaint (served on February 7, 2022), and Research Affirmative Defenses in Defendants KSC & Son Corporation and Nachhattar S. Chandi Answer (Class Action)	1.30
Review and Analyze Answer of Defendants KSC & Son Corporation and Nachhattar S. Chandi to PAGA Complaint (served on February 7, 2022), and Research Affirmative Defenses in Defendants KSC & Son Corporation and Nachhattar S. Chandi's Answer (PAGA Action)	1.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Stipulated Protective Order – Confidential Designation Only (submitted on November 21, 2022) (Class Action & PAGA Action)	1.50
Review Court's Protective Order (filed on November 29, 2022) (Class Action & PAGA Action)	0.10

Draft, Review, and/or Revise Declaration of Charles T. Sweeny in Response to Order to Show Cause Re: Dismissal of W-Chandi Group USA (filed on November 29, 2022) (Class Action)	0.60
Review Court's Minute Order Re: Further Case Management Conference (filed on December 1, 2022) (Class Action & PAGA Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on December 7, 2022) (Class Action & PAGA Action)	0.10
Review Substitutions of Attorney (filed on April 3, 2023) (Class Action & PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Separate Statement for Case Management Conference (filed on May 23, 2023) (PAGA Action)	0.50
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Report for Case Management Conference (filed on May 23, 2023) (PAGA Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Report for Case Management Conference (filed on May 31, 2023) (Class Action)	0.90
Review Court's Minute Order Re: Further Case Management Conference (filed on June 1, 2023) (Class Action)	0.10
Review Defendants' Informal Discovery Conference Request (served on June 5, 2023) (Class Action & PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Letter Brief Re: Informal Discovery Conference (submitted on June 5, 2023) (Class Action & PAGA Action)	1.10
Draft Notice of Entry of Dismissal and Proof of Service (filed on June 5, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Informal Discovery Conference (filed on June 6, 2023) (Class Action & PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Informal Discovery Conference Statement (filed on August 2, 2023) (Class Action)	0.60

Review Defendants' Informal Discovery Conference Statement (served on August 2, 2023) (Class Action)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on September 25, 2023) (Class Action & PAGA Action)	0.80
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Withdraw Discovery Motions Without Prejudice Pending Resolution of Plaintiffs' Motion for Settlement; [Proposed] Order (submitted on October 11, 2023) (Class Action & PAGA Action)	0.80
Review Court's Order to Withdraw Discovery Motions Without Prejudice Pending Resolution of Plaintiffs' Motion for Settlement (filed on October 12, 2023) (Class Action & PAGA Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on October 16, 2023) (Class Action & PAGA Action)	0.10
Review Clerk's Notice of Continuance (filed on October 16, 2023) (Class Action & PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on February 23, 2024) (Class Action & PAGA Action)	0.60
Review Court's Minute Order Re: Further Case Management Conference (filed on March 5, 2024) (Class Action & PAGA Action)	0.10
Review Clerk's Notice of Continuance (filed on June 24, 2024) (Class Action & PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (filed on August 28, 2024) (Class Action)	0.90
Draft, Review, and/or Revise Declaration of Helene Mayer in Response to Order to Show Cause (filed on August 28, 2024) (Class Action)	0.60
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (filed on August 29, 2024) (PAGA Action)	0.70
Draft, Review, and/or Revise Declaration of Helene Mayer in Response to Order to Show Cause (filed on August 29, 2024) (PAGA Action)	0.40

Review Declaration of Matthew C. Bradford in Response to Order to Show Cause (served on August 29, 2024) (Class Action)	0.10
Review Declaration of Matthew C. Bradford in Response to Order to Show Cause (served on August 29, 2024) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff Jesse Chavez, Plaintiff Gilbert Chavez, and Plaintiff Evodio Valles's (collectively, "Plaintiffs") Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed September 12, 2024), Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation Granting Plaintiffs Leave to File Consolidated Complaint; [Proposed] Order Thereon (submitted on August 29, 2024) (Class Action)	4.50
Review Court's Order Granting Plaintiffs Leave to File Consolidated Complaint (filed on September 3, 2024) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on September 11, 2024) (Class Action)	0.10
Review and Analyze Defendants' Answer to Plaintiffs' Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (served on October 2, 2024) (Class Action)	0.50
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on November 22, 2024) (Class Action)	0.70
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on February 10, 2025) (Class Action)	0.70
Review Court's Minute Order Re: Other Predisposition Hearing (filed on February 18, 2025) (Class Action & PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on May 15, 2025) (Class Action)	0.50

Appearances	
Prepare for and Remotely Attend Complex Case Management Conference (December 13, 2021) (Class Action)	0.90
Prepare for and Remotely Attend Complex Case Management Conference (January 28, 2022) (Class Action & PAGA Action)	1.30
Prepare for and Remotely Attend Further Case Management Conference (May 31, 2022) (Class Action & PAGA Action)	1.30
Prepare for and Remotely Attend Further Case Management Conference and Order to Show Cause Re: Dismissal of Defendant W-Chandi Group USA (December 1, 2022) (Class Action & PAGA Action)	1.70
Prepare for and Remotely Attend Further Case Management Conference (June 1, 2023) (Class Action & PAGA Action)	1.30
Prepare for and Remotely Attend Informal Discovery Conference (June 6, 2023) (Class Action & PAGA Action)	0.40
Prepare for and Remotely Attend Informal Discovery Conference (August 2, 2023) (Class Action)	0.90
Prepare for and Remotely Attend Order to Show Cause (September 13, 2024) (Class Action & PAGA Action)	0.90
Prepare for and Remotely Attend Hearing Re: Status of Filing Motion for Preliminary Approval (December 9, 2024) (Class Action & PAGA Action)	0.50
Prepare for and Remotely Attend Motion for Preliminary Approval (June 12, 2025) (Class Action)	1.30
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Gilbert Chavez (served on March 17, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jesse Chavez (served on April 21, 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 Gilbert Chavez (served on April 23, 2021)	2.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jesse Chavez (served on May 17, 2021)	2.80
Draft, Review, and/or Revise Plaintiff Gilbert Chavez's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Requests for Production of Documents (Set One) to Defendant Chandi Group USA (served on February 28, 2022) (Class Action)	3.10
Draft, Review, and/or Revise Plaintiff Gilbert Chavez's Form Interrogatories—General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Requests for Production of Documents (Set One) to Defendant KSC & Son Corporation (served on February 28, 2022) (Class Action)	2.80
Draft, Review, and/or Revise Plaintiff Gilbert Chavez's Form Interrogatories—General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Requests for Production of Documents (Set One) to Defendant W-Chandi Group USA (served on February 28, 2022) (Class Action)	2.50
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Nachhattar S. Chandi (noticed for June 9, 2022) (served on April 14, 2022) (PAGA Action)	0.50
Draft, Review, and/or Revise Plaintiff Jesse Chavez's Form Interrogatories – General (Set One), Special Interrogatories (Set One) Special Interrogatories (Set Two), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Defendant KSC & Son Corporation (served on April 14, 2022) (PAGA Action)	3.80
Review and Analyze Defendant KSC & Son Corporation's Responses to Plaintiff Gilbert Chavez's Form Interrogatories—General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Requests for Production of Documents (Set One) (served on May 20, 2022) (Class Action)	3.10

Review and Analyze Defendant Chandi USA Inc. Responses to Plaintiff Gilbert Chavez's Form Interrogatories—General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Requests for Production of Documents (Set One) (served on May 20, 2022) (Class Action)	2.90
Review and Analyze Defendant KSC & Son Corporation's Responses to Plaintiff Jesse Chavez's Form Interrogatories – General (Set One); Special Interrogatories (Set One); Special Interrogatories (Set Two); Request for Admission (Set One), and Requests for Production of Documents (Set One) (served on June 7, 2022) (PAGA Action)	3.60
Review and Analyze Documents Produced by Defendants (served on June 27, 2022)	7.10
Review Defendant KSC & Son Corporation's Special Interrogatories (Set One) and Declaration of Rudy Ginez, Jr. Regarding Additional Special Interrogatories to Plaintiff Jesse Chavez (served on January 18, 2023) (Class Action)	0.50
Review Defendant KSC & Son Corporation's Special Interrogatories (Set One) and Declaration of Rudy Ginez, Jr. Regarding Additional Special Interrogatories to Plaintiff Gilbert Chavez (served on January 19, 2023) (Class Action)	0.50
Review Defendant KSC & Son Corporation's Special Interrogatories (Set One) and Declaration of Rudy Ginez, Jr. Regarding Additional Special Interrogatories to Plaintiff Gilbert Chavez (served on January 19, 2023) (PAGA Action)	0.50
Review Defendant KSC & Son Corporation's Special Interrogatories (Set One) and Declaration of Rudy Ginez, Jr. Regarding Additional Special Interrogatories to Plaintiff Gilbert Chavez (served on January 19, 2023) (PAGA Action)	0.50
Review Defendant KSC & Son Corporation's Form Interrogatories – General (Set One) and Form Interrogatories – Employment Law to Plaintiff Gilbert Chavez (served on January 20, 2023) (Class Action)	0.50
Review Defendant KSC & Son Corporation's Form Interrogatories – General (Set One) and Form Interrogatories – Employment Law to Plaintiff Jesse Chavez (served on January 20, 2023) (Class Action)	0.50

Review Defendant KSC & Son Corporation's Form Interrogatories – General (Set One) and Form Interrogatories – Employment Law to Plaintiff Gilbert Chavez (served on January 20, 2023) (PAGA Action)	0.50
Review Defendant KSC & Son Corporation's Form Interrogatories – General (Set One) and Form Interrogatories – Employment Law to Plaintiff Jesse Chavez (served on January 20, 2023) (PAGA Action)	0.50
Draft, Review, and/or Revise Plaintiff Gilbert Chavez's Responses to Defendant KSC & Son Corporation's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), and Special Interrogatories (Set One) (served on April 28, 2023) (Class Action)	8.50
Draft, Review, and/or Revise Plaintiff Jesse Chavez's Responses to Defendant KSC & Son Corporation's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), and Special Interrogatories (Set One) (served on April 28, 2023) (Class Action)	8.10
Draft, Review, and/or Revise Plaintiff Jesse Chavez's Responses to Defendant KSC & Son Corporation's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One) and Special Interrogatories (Set One) (served on April 28, 2023) (PAGA Action)	9.30
Draft, Review, and/or Revise Plaintiff Gilbert Chavez's Responses to Defendant KSC & Son Corporation's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One) and Special Interrogatories (Set One) (served on April 28, 2023) (PAGA Action)	8.30
Draft, Review, and/or Revise <i>Belaire-West</i> Notice and Opt-Out Postcard, Obtain Bids from Third-Party Administrator, Meet and Confer with Defendants' Counsel and Third-Party Administrator, Review and Analyze Weekly Reports from Third-Party Administrator, and Analyze Final Report and Putative Class Contact List (Class Action)	6.50
Review Defendants' Notice of Deposition of Gilbert Chavez (served on June 2, 2023) (Class Action)	0.20
Review Defendants' Notice of Deposition of Jesse Chavez (served on June 2, 2023) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Jesse Chavez's Special Interrogatories (Set Four) and Requests for Production of Documents (Set Two) to Defendant Chandi Group USA (served on June 5, 2023) (Class Action)	2.20

Draft, Review, and/or Revise Plaintiff Jesse Chavez's Special Interrogatories (Set Four) and Requests for Production of Documents (Set Two) to Defendant KSC & Son Corporation (served on June 5, 2023) (Class Action)	1.90
Draft, Review, and/or Revise Plaintiff Gilbert Chavez's Objections to Defendants' KSC Son Corporation and Chandi Group USA Notice of Deposition of Plaintiff Gilbert Chavez and Request for Production of Documents (July 10, 2023) (served on June 30, 2023) (Class Action)	2.50
Draft, Review, and/or Revise Plaintiff Jesse Chavez's Objections to Defendants' KSC Son Corporation and Chandi Group USA Notice of Deposition of Plaintiff Gilbert Chavez and Request for Production of Documents (July 11, 2023) (served on June 30, 2023) (Class Action)	2.20
Review Defendants' Amended Notice of Deposition of Jesse Chavez (served on July 14, 2023) (Class Action)	0.20
Review Defendants' Amended Notice of Deposition of Gilbert Chavez (served on July 14, 2023) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Lucia Alvarez (noticed for July 26, 2023) (served on July 14, 2023) (Class Action)	0.50
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Abril Cruz (noticed for July 31, 2023) (served on July 14, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Adam Robertson (noticed for August 1, 2023) (served on July 14, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Adrian Santoyo (noticed for August 2, 2023) (served on July 14, 2023) (Class Action)	0.40

Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Cristian Hernandez (noticed for August 3, 2023) (served on July 14, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Elizabeth Chavez (noticed for August 4, 2023) (served on July 14, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Everardo Rosas (noticed for August 7, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Gabriella Marie (noticed for August 8, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Giovanni Ramirez (noticed for August 9, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Jose Cabrera (noticed for August 10, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Karla Aguirre (noticed for August 11, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Maria Louisa (noticed for August 14, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Martin Luna (noticed for August 15, 2023) (served on July 17, 2023) (Class Action)	0.40

Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Pablo Lopez (noticed for August 16, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Paola Angulo (noticed for August 17, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Pedro Tinoco (noticed for August 18, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Rogelio Hernandez (noticed for August 21, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Ruby Romero (noticed for August 22, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Shawn Lageman (noticed for August 23, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Yamilez Quintero (noticed for August 24, 2023) (served on July 17, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Yasmine Vasquez (noticed for August 25, 2023) (served on July 17, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Abril Cruz (served on July 20, 2023) (Class Action)	0.50

Review Defendants' Objection to Notice of Putative Class Member of Adam Robertson (served on July 20, 2023) (Class Action)	0.50
Review Defendants' Objection to Notice of Putative Class Member of Adrian Santoyo (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Cristian Hernandez (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Elizabeth Chavez (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Everardo Rosas (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Gabriella Marie (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Giovani Ramirez (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Jose Cabrera (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Karla Aguirre (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Lucia Alvarez (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Maria Louisa (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Martin Luna (served on July 20, 2023) (Class Action)	0.40

Review Defendants' Objection to Notice of Putative Class Member of Pablo Lopez (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Paola Angulo (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Pedro Tinoco (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Rogelio Hernandez (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Ruby Romero (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Shawn Lageman (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Yamilez Quintero (served on July 20, 2023) (Class Action)	0.40
Review Defendants' Objection to Notice of Putative Class Member of Yasmin Vasquez (served on July 20, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Evodio Valles (served on August 2, 2023)	1.90
Draft, Review, and/or Revise Plaintiff Gilbert Chavez's Objections to Amended Notice of Deposition of Gilbert Chavez (served on August 9, 2023) (Class Action)	2.20
Review Defendants' Second Amended Notice of Deposition of Gilbert Chavez (served on August 9, 2023) (Class Action)	0.20
Review Defendants' Second Amended Notice of Deposition of Jesse Chavez (served on August 9, 2023) (Class Action)	0.20

Draft, Review, and/or Revise Plaintiff Jesse Chavez's Objections to Amended Notice of Deposition of Jess Chavez (served on August 11, 2023) (Class Action)	2.10
Draft, Review, and/or Revise Plaintiff Gilbert Chavez's Objections to Second Amended Notice of Deposition of Gilbert Chavez (served on August 11, 2023) (Class Action)	1.80
Draft, Review, and/or Revise Plaintiff Jesse Chavez's Objections to Second Amended Notice of Deposition of Jesse Chavez (served on August 11, 2023) (Class Action)	0.50
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Lucia Alvarez (noticed for August 21, 2023) (served on August 11, 2023) (Class Action)	0.50
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Everardo Rosas (noticed for August 22, 2023) (served on August 11, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff Jesse Chavez and Plaintiff Gilbert Chavez's Notice of Deposition of Putative Class Member Yamilex Quintero (noticed for August 22, 2023) (served on August 11, 2023) (Class Action)	0.30
Review Defendants' Third Amended Notice of Deposition of Jesse Chavez (served on August 11, 2023) (Class Action)	0.20
Review Defendants' Third Amended Notice of Deposition of Gilbert Chavez (served on August 11, 2023) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Gilbert Chavez's Objections to Third Amended Notice of Deposition of Gilbert Chavez (served on August 17, 2023) (Class Action)	1.90
Draft, Review, and/or Revise Plaintiff Jesse Chavez's Objections to Third Amended Notice of Deposition of Jesse Chavez (served on August 17, 2023) (Class Action)	1.80
Review Defendants' Objection to Deposition Notice with Request for Production of Documents of Yamilex Quintero (served on August 17, 2023) (Class Action)	0.50

Review Defendants' Objection to Deposition Notice with Request for Production of Documents of Everardo Rosas (served on August 17, 2023) (Class Action)	0.40
Review Defendants' Objection to Deposition Notice with Request for Production of Documents of Lucia Alvarez (served on August 17, 2023) (Class Action)	0.40
Prepare for and Take the Deposition of Putative Class Member Everardo Rosas (August 22, 2023; Video Conference) and Review Deposition Transcript	3.10
Prepare for and Take the Deposition of Putative Class Member Yamilex Quintero (August 22, 2023; Video Conference) and Review Deposition Transcript	5.10
Prepare for and Defend the Deposition of Plaintiff Gilbert Chavez (August 23, 2023; Video Conference) and Review Deposition Transcript	10.80
Prepare for and Defend the Deposition of Plaintiff Jesse Chavez (August 24, 2023; Video Conference) and Review Deposition Transcript	9.70
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Evodio Valles (served on August 24, 2023)	1.80
Prepare for and Take the Deposition of Putative Class Member Lucia Islas (August 25, 2023; Video Conference) and Review Deposition Transcript	6.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Jesse Chavez for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (served on July 14, 2021)	4.50
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Gilbert Chavez for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (served on July 16, 2021)	4.10
Draft Correspondence to, Meet and Confer with, and/or Respond to Correspondence from Defendants' Counsel	28.50

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources Prior to Mediation	39.50
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 September 1, 2023)	28.50
Attend Mediation Session (September 8, 2023; Zoom Video Conference)	16.50
Review and Analyze Mediator's Proposal and Review, Revise, Negotiate, and Finalize Term Sheet (accepted on September 19, 2023)	2.20
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement (executed on October 15, 2024), and Draft Notice of Class Action Settlement	14.50
Law and Motion	
Review and Analyze Defendant KSC & Son Corporation's Notice of Motion and Motion to Compel Responses from Plaintiff Gilbert Chavez to Special Interrogatories and for Sanctions, Memorandum of Points and Authorities in Support Thereof, Declaration of Matthew C. Bradford in Support Thereof, and Statement of Interrogatories and Responses in Dispute (filed on August 25, 2023) (Class Action)	1.80
Review and Analyze Defendant KSC & Son Corporation's Notice of Motion and Motion to Compel Responses from Plaintiff Jesse Chavez to Special Interrogatories and for Sanctions, Memorandum of Points and Authorities in Support Thereof, Declaration of Matthew C. Bradford in Support Thereof, and Statement of Interrogatories and Responses in Dispute (filed on August 25, 2023) (Class Action)	1.60
Review and Analyze Defendant KSC & Son Corporation's Notice of Motion and Motion to Compel Responses from Plaintiff Gilbert Chavez to Special Interrogatories and for Sanctions, Memorandum of Points and Authorities in Support Thereof, Declaration of Matthew C. Bradford in Support Thereof, and Statement of Interrogatories and Responses in Dispute (filed on August 28, 2023) (PAGA Action)	1.70

Review and Analyze Defendant KSC & Son Corporation's Notice of Motion and Motion to Compel Responses from Plaintiff Jesse Chavez to Special Interrogatories and for Sanctions, Memorandum of Points and Authorities in Support Thereof, Declaration of Matthew C. Bradford in Support Thereof, and Statement of Interrogatories and Responses in Dispute (filed on August 28, 2023) (PAGA Action)	1.50
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, Declaration of Helene Mayer in Support Thereof, Declaration of Plaintiff Gilbert Chavez in Support Thereof, Declaration of Plaintiff Evodio Valles in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on February 28, 2025) (Class Action)	19.50
Draft, Review, and/or Revise Declaration of Jesse Chavez in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on March 3, 2025) (Class Action)	0.90
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 Incentive Awards; Memorandum of Points and Authorities in Support Thereof, Declaration of Helene Mayer in Support Thereof, and [Proposed] Final Approval Order and Judgment (Class Action)	20.50
Total Hours:	489.90

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Chavez, et al. vs. KSC Son Corporation, et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/17/2021	U.S. Postmaster	Postage	\$6.96
4/21/2021	U.S. Postmaster	Postage	\$7.00
8/20/2021	Legal Document Server, Inc.	Attorney Service	\$200.23
8/20/2021	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
8/20/2021	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
10/22/2021	ProLegal	Attorney Service	\$400.75
1/6/2022	Legal Document Server, Inc.	Attorney Service	\$130.00
1/21/2022	Legal Document Server, Inc.	Attorney Service	\$130.00
6/1/2022	CourtCall, LLC	Attorney Service	\$94.00
11/22/2022	Legal Document Server, Inc.	Attorney Service	\$151.35
11/22/2022	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
11/29/2022	Legal Document Server, Inc.	Attorney Service	\$150.00
12/2/2022	CourtCall, LLC	Attorney Service	\$94.00
12/7/2022	Legal Document Server, Inc.	Attorney Service	\$170.00
3/15/2023	General Logistics Systems US, Inc.	Courier Service	\$53.24
5/31/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
6/2/2023	CourtCall, LLC	Attorney Service	\$144.00
6/5/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
6/5/2023	General Logistics Systems US, Inc.	Courier Service	\$22.72
7/14/2023	ProLegal	Attorney Service	\$337.89
7/19/2023	Jams, Inc.	Mediation Fee	\$12,975.00
8/2/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
8/11/2023	ProLegal	Attorney Service	\$328.89
8/22/2023	Esquire Deposition Solutions, LLC	Court Reporter	\$941.00
8/22/2023	Esquire Deposition Solutions, LLC	Court Reporter	\$1,582.05
8/23/2023	Esquire Deposition Solutions, LLC	Court Reporter	\$2,486.31
8/23/2023	Charlie Sweeny	Travel Reimbursement	\$116.25
8/23/2023	Esquire Deposition Solutions, LLC	Videography Service	\$452.50
8/24/2023	Esquire Deposition Solutions, LLC	Court Reporter	\$1,561.90
8/25/2023	Esquire Deposition Solutions, LLC	Court Reporter	\$2,467.33
8/30/2023	ILYM Group, Inc.	Notice Mailing	\$918.47
9/8/2023	Samantha Costa	Travel Reimbursement	\$30.78
9/8/2023	Melissa LeBlanc	Travel Reimbursement	\$17.12
9/25/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
10/12/2023	Legal Document Server, Inc.	Attorney Service	\$151.39
10/12/2023	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
10/13/2023	San Bernardino Superior Court	Document Download Fee	\$5.00
10/16/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
3/28/2024	Legal Document Server, Inc.	Attorney Service	\$17.09

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Chavez, et al. vs. KSC Son Corporation, et al.

8/28/2024	Legal Document Server, Inc.	Attorney Service	\$200.00
8/29/2024	Legal Document Server, Inc.	Attorney Service	\$201.39
8/29/2024	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
9/11/2024	Legal Document Server, Inc.	Attorney Service	\$200.00
9/12/2024	Legal Document Server, Inc.	Attorney Service	\$200.00
9/13/2024	Legal Document Server, Inc.	Attorney Service	\$200.00
11/22/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
2/28/2025	Legal Document Server, Inc.	Attorney Service	\$244.87
3/3/2025	Legal Document Server, Inc.	Attorney Service	\$135.00
5/16/2025	Legal Document Server, Inc.	Attorney Service	\$18.89
7/14/2025	San Bernardino Superior Court	Document Download Fee	\$6.79
Total:			<u>\$29,812.36</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Chavez, et al. vs. KSC Son Corporation, et al. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/14/2021	U.S. Postmaster	Attorney Service	\$15.00
7/14/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
7/16/2021	U.S. Postmaster	Postage	\$22.50
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
11/1/2021	ProLegal	Attorney Service	\$220.50
11/24/2021	Legal Document Server, Inc.	Attorney Service	\$260.00
11/29/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
1/18/2022	Legal Document Server, Inc.	Attorney Service	\$130.00
6/1/2022	CourtCall, LLC	Attorney Service	\$94.00
11/22/2022	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
12/2/2022	CourtCall, LLC	Attorney Service	\$94.00
12/7/2022	Legal Document Server, Inc.	Attorney Service	\$170.00
5/23/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
6/2/2023	CourtCall, LLC	Attorney Service	\$144.00
9/25/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
10/12/2023	Legal Document Server, Inc.	Attorney Service	\$151.39
10/12/2023	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
10/13/2023	San Bernardino Superior Court	Document Download Fee	\$2.50
10/16/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
11/22/2023	Legal Document Server, Inc.	Attorney Service	\$151.35
3/28/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
7/16/2024	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
8/29/2024	Legal Document Server, Inc.	Attorney Service	\$200.00
2/13/2025	Legal Document Server, Inc.	Attorney Service	\$18.15
Total:			<u>\$4,106.47</u>