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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

VALENCIA KING, individually, and on
behalf of other members of the general public
similarly situated; VICTORIA PERKINS,
individually, and on behalf of other members
of the general public similarly situated,

Plaintiff,

vs.

LEISURE CARE, LLC, a Washington limited
liability company; FRESN, LLC, a
Washington limited liability company;
LIVERMORE SENIOR LIVING, an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: RG21099267 (Lead) (*Consolidated
with* Case No. RG21112925)

Honorable Michael Markman
Department 23

CLASS ACTION

**DECLARATION OF SELENA
MATAVOSIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, CLASS COUNSEL
FEES PAYMENT AND LITIGATION
EXPENSES PAYMENT, AND SERVICE
PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action and PAGA
Settlement, Class Counsel Fees Payment and
Litigation Expenses Payment, and Service
Payments; Declaration of Class
Representatives (Valencia King and Victoria
Perkins); Declaration of Settlement
Administrator (Kevin Lee); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: December 12, 2024
Time: 10:00 a.m.
Department: 23

Complaint Filed: May 14, 2021
FAC Complaint Filed: March 4, 2024
Trial Date: None Set

DECLARATION OF SELENA MATAVOSIAN

I, Selena Matavosian, 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 Valencia King and Victoria Perkins (together, “Plaintiffs”) and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On September 5, 2024, in Department 23 of the above-entitled Court, the Honorable Michael Markman preliminarily approved the Class Action and PAGA Settlement Agreement and Amendment No. 1 to Class Action and PAGA Settlement Agreement (together, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendants Leisure Care, LLC, Fresno, LLC, Livermore Senior Living, Heritage Estates, and Dan B. Madsen (collectively, “Defendants”) (collectively with Plaintiffs, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Valencia King and Victoria Perkins 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”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“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 and PAGA Settlement, Class Counsel Fees Payment and Litigation Expenses Payment, and Service Payments (“Motion for Final Approval”), no Class Members have objected to the Class Settlement or the request for Class Counsel Fees Payment, Litigation Expenses Payment, Service Payments, Settlement Administration Expenses, or allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

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 prior to the commencement of Plaintiffs' putative class action that filed on May 14, 2021, *Valenica King v. Leisure Care, LLC, et al.*, Alameda County Superior Court, Case No. RG21099267 ("*King Class Action*"), and Plaintiff Valencia King's ("Plaintiff King") representative PAGA action that was filed on September 16, 2021, *Valenica King v. Leisure Care, LLC, et al.*, Alameda County Superior Court, Case No. RG21112925 ("*King PAGA Action*"). On April 28, 2022, Plaintiff Victoria Perkins ("Plaintiff Perkins") filed a Class Action Complaint for Damages against Defendants, *Victoria Perkins v. Leisure Care, LLC, et al.*, Fresno Superior Court, Case No 22CECG01299 ("*Perkins Action*"). On March 4, Plaintiff King filed a First Amended Complaint adding Plaintiff Perkins to the *King Class Action* (collectively, the *King Class Action*, *King PAGA Action*, and *Perkins Action* are referred to as the "Actions"). On February 25, 2022, the *King Class Action* and *King PAGA Action* were consolidated and the *King Class Action* was deemed the lead case.

5. Before initiating the Actions, 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 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, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour law and enforcement and penalties, 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 hourly-paid or 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.

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6. Class Counsel conducted significant investigation and informal discovery into the facts of the cases, to assess the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial prior to reaching the Settlement. Class Counsel reviewed and analyzed a large volume of information, data, and documents obtained from Plaintiffs, Defendants, and other sources, in the course of litigation and in connection with mediation and settlement negotiations. The information, documents, and data reviewed and analyzed by Class Counsel included, and were not limited to, Plaintiffs' employment records, a sampling of Class Members' time and pay data, and documents regarding Defendant's operations and employment practices, policies, and procedures, among other information and documents. Class Counsel developed liability, damages, and penalties valuation models in the course of litigation and in connection with 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, discovery and production of information, documents, and data, and claims evaluation and analysis. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings, motion-related papers, the mediation brief, and settlement documents; and preparing for and attending court proceedings and mediation and settlement negotiations, among other tasks.

7. As outlined herein, the Parties have conducted significant investigation and informal discovery during the course of litigating the cases, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiffs, Defendants, and other sources, both prior to and after the mediation. The information, documents, and data that were considered, provided a critical understanding of the nature of the work performed by the Class Members and PAGA Group Members, as well as Defendants' operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and valuation issues in connection with all phases of the litigation, and ultimately in connection with the mediation and settlement negotiation process. Class Counsel also performed research regarding applicable law, which is evolving as it relates to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims

1 and penalties, wage-and-hour law and enforcement, Plaintiffs' claims and allegations, and
2 Defendants' defenses thereto, as well as facts discovered.

3 8. After conducting significant investigation of the facts and law during the
4 prosecution of the cases, counsel for the Parties engaged in extensive settlement negotiations to
5 try to resolve the cases. These efforts included participating in a formal full-day mediation
6 conducted on April 10, 2023 by Jeffrey Krivis, Esq., a well-regarded mediator experienced in
7 mediating complex labor and employment matters, as well as extensive additional review and
8 analysis of data, claim evaluation, and settlement negotiations, before the mediator's proposal
9 was issued and accepted in April 11, 2023. During all settlement discussions, the Parties
10 conducted their negotiations at arm's length in an adversarial position. In the course of mediation
11 and settlement negotiations, the Parties exchanged information, documents, and data, and
12 discussed all aspects of the cases, including and not limited to, the risks and delays of further
13 litigation, the risks to the Parties of proceeding with class certification and trial, the law relating
14 to class certification, manageability, off-the-clock theory, rounding, meal and rest periods, on-
15 premises breaks, representative PAGA claims, wage-and-hour law and enforcement, as well as
16 the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving
17 at a settlement that was acceptable to the Parties was not easy. Defendants contended that
18 individualized questions of fact predominate over any common issues, and these issues would
19 pose challenges to class certification and representative adjudication. Defendants and its counsel
20 felt strongly about Defendants' ability to avoid class certification and representative adjudication
21 and prevail on the merits, while Plaintiffs and Class Counsel believed that they would be able to
22 obtain relief in court, obtain class certification and prevail at trial. With the aid of the mediator's
23 evaluation, the Parties ultimately agreed that the cases were well-suited for settlement given the
24 legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that
25 would attend further litigation. These risks of further litigation include, and are not limited to, a
26 determination that the claims are unsuitable for class treatment and/or representative adjudication,
27 class de-certification after certification of a class, allowing a jury to decide the claims asserted in
28 the cases, and the real possibility of no monetary recovery after years of litigation.

1 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
2 attorneys' fees in the amount of \$840,000.00, which is 35% of the Gross Settlement Amount of
3 \$2,400,000.00. Pursuant to the contingency-fee agreements entered into by and between Plaintiffs
4 and Class Counsel, Plaintiff King and Plaintiff Perkins have each agreed to a contingency fee of
5 45% of the recovery.

6 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
7 took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to
8 the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
9 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
10 has achieved in the cases; and (6) the other cases that Class Counsel has turned down in order to
11 devote Class Counsel's time and efforts to the cases. The nature of the work performed, skill
12 exercised, and the outcome in this matter support the percentage fee sought and the application
13 of a lodestar multiplier. An outstanding monetary recovery has been obtained in this matter,
14 involving a ***Gross Settlement Amount of \$2,400,000.00*** (with a Net Settlement Amount of ***at***
15 ***least approximately \$1,214,003.95 to be paid to Participating Class Members*** with an average
16 payment of at least approximately \$516.97 per Participating Class Member, a ***payment of***
17 ***\$68,000.00 to PAGA Group Members*** with an average payment of \$44.16 per PAGA Group
18 Member, and ***payment of 204,000.00 to the State of California***).

19 11. While not necessarily required to be demonstrated because the percentage fee is
20 proper for this settlement, Class Counsel have incurred many hours of work in connection with
21 prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar
22 analysis. Attorneys at Lawyers for Justice, PC have spent a total of **458.80 hours** performing
23 tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney
24 Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys
25 at Lawyers for Justice, PC and the time incurred in performing those services. The hours
26 attributable to Lawyers for Justice, PC include work done by several attorneys. Additionally,
27 separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation
28 support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this 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 actions and representative actions, 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/or representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour.

EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC

13. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is attorney of record in dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. 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. Lawyers *for* Justice, PC, sometimes in association with other law firms, has recovered millions of dollars on behalf of thousands of individuals in

1 California.

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

25 15. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
26 received his Bachelor of Arts degree from University of California, Los Angeles, and graduated
27 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
28 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 cases have resulted in settlements that have been granted court approval, including and not limited to, those listed in paragraph 18 herein. He has handled over 150 mediations and worked on over 250 class action or representative action cases which have resulted in settlement.

16. 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 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 argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration of PAGA claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439,

cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and has handled this process in over 500 cases. Under Edwin Aiwasian, Arby Aiwasian, and her supervision, Lawyers *for* Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. She is a member of the California Employment Lawyers Association, and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

17. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Science degree from California State University, Northridge in 2019 and earned a Juris Doctor degree from Southwestern Law School in 2022. I was admitted to practice law in California in 2022. I am admitted to practice before all courts of the State of California and all federal district courts in the State of California. I have worked on many wage-and-hour class action and PAGA representative cases, and her work on these cases has included researching and drafting pleadings and motions, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, claims evaluation and analysis, and making court appearances.

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

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

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

Number is BC400414.

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

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

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

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

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

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

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

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

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

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

27 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class action against a national retailer of apparel, accessories, and home products,

1 involving allegations of misclassification of the “Department Manager” position. On August 12,
2 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
3 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
4 County Superior Court Case Number is RG13680477.

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

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

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

18 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
19 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
20 the employer’s motion to compel arbitration, which resulted in a published opinion by the
21 California Court of Appeal in favor of employees. Roberto Betancourt v. Prudential Overall
22 Supply (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
23 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
24 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
25 5046.

26 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a consumer packaging company,
28 on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the

1 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
2 Number is BC590429.

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

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

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

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

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

26 w) LFJ firm represented the plaintiff in a PAGA representative action, against
27 the parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On
28 October 18, 2017, the court granted approval of the PAGA representative action settlement. The

Los Angeles County Superior Court Case Number is BC569664.

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

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

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

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

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

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, represented the plaintiff in a wage-and-hour class and PAGA representative action against a medical equipment supplier on behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion for class certification and certified a class. On November 2, 2023, the court granted final approval

1 of the class and PAGA representative action settlement. The San Bernardino County Superior
2 Court Case Number is CIVDS1505744.

3 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
4 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
5 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
6 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
7 ZB, N.A. v. Superior Court (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
8 approval of the PAGA representative action settlement. The San Diego County Superior Court
9 Case Number is 37-2016-00005578-CU-OE-CTL.

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

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

22 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
23 wage-and-hour class and PAGA representative action against a plastic packaging company on
24 behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs' motion
25 for class certification and certified a class. On November 8, 2021, the court granted approval of
26 the partial settlement of the action. On April 22, 2024, the court granted approval of the PAGA
27 settlement and entered an order dismissing the action. The San Bernardino County Superior
28 Court Case Number is CIVDS1507361.

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

nn) LFJ represented 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. On January 16, 2024, the court granted final approval of the class and PAGA representative action settlement. The Solano County Superior Court Case Number is FCS051001.

oo) LFJ represents the plaintiffs in a wage-and-hour class action against a manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The Los Angeles County Superior Court Case Number is BC707670.

pp) LFJ represents the plaintiffs in a wage-and-hour class action against a chain of restaurants on behalf of non-exempt employees. On July 22, 2024, the court granted in part the plaintiffs' motion for class certification and certified a class. The San Francisco Superior Court Case Number is CGC-20-582809.

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

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. Class Counsel seeks reimbursement of **\$24,996.05** in litigation costs and expenses incurred in the Actions, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

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SERVICE PAYMENTS TO PLAINTIFFS

20. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for Service Payments in the amount of \$14,500.00 each to Plaintiffs (for a total of \$29,000.00). The requested Service Payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort to produce relevant documents and information, and provided 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 facilitate the pursuit of the cases. Accordingly, it is appropriate for Plaintiffs Valencia King and Victoria Perkins to receive \$14,500.00 each as reasonable Service Payments for their services in the cases, in addition to their individual settlement payments.

21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiffs, Class Members, PAGA Group Members, 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 3rd day of December 2024, at Glendale, California.



Selena Matavosian

EXHIBIT A

VALENCIA KING V. LEISURE CARE, LLC, ET AL.
Alameda County Superior Court, Case No. RG21099267 (“King Class Action”)

VALENCIA KING V. LESIURE CARE, LLC, ET AL.
Alameda County Superior Court, Case No. RG21112925 (“King PAGA Action”)

VICTORIA PERKINS V. LEISURE CARE, LLC, ET AL.
Fresno County Superior Court, Case No. 22CECG01299 (“Perkins Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Valencia King (“Plaintiff King”) during the Case	49.20
Meet and Communicate with Plaintiff Victoria Perkins (“Plaintiff Perkins”) (together with Plaintiff King, “Plaintiffs”) during the Case	46.30
Investigate, Communicate with, and/or Interview Class Members, Aggrieved Employees and Percipient Witnesses	16.70
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft Plaintiff King’s Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on May 14, 2021) (King Class Action)	8.50
Review Court’s Notice of Hearing (filed on May 19, 2021) (King Class Action)	0.10

Review Court's Tentative Ruling Re: Complex Determination Hearing (issued on June 21, 2021) (King Class Action)	0.10
Review Court's Minutes (filed on June 22, 2021) (King Class Action)	0.10
Review Court's Order Re: Complaint – Other Employment (filed on June 22, 2021) (King Class Action)	0.10
Review and Analyze Defendants Leisure Care, LLC's and Livermore Senior Living's Answer to Plaintiff's Class Action Complaint and Research Affirmative Defenses in Defendants' Answer (filed on July 7, 2021) (King Class Action)	1.50
Review Court's Notice of Hearing (Amended) (filed on July 8, 2021) (King Class Action)	0.10
Review Court's Notice of Assignment of Judge for All Purposes (filed on July 27, 2021) (King Class Action)	0.10
Review Court's Minutes (filed on July 27, 2021) (King Class Action)	0.10
Review Court's Order Re: Complaint – Other Employment (filed on July 27, 2021) (King Class Action)	0.10
Meet and Confer with Defendants Leisure Care, LLC's and Livermore Senior Living's Counsel, and Draft Joint Case Management Conference Statement (filed on August 2, 2021) (King Class Action)	1.10
Review Court's Initial Case Management Order (filed on August 3, 2021) (King Class Action)	0.20
Review Court's Tentative Case Management Order (filed on August 9, 2021) (King Class Action)	0.10
Review Court's Case Management Order (filed on August 10, 2021) (King Class Action)	0.10
Review Court's Minutes (filed on August 10, 2021) (King Class Action)	0.10

Investigate the Merits of Plaintiff's Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft Plaintiff King's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on September 16, 2021) (King PAGA Action)	8.50
Review Court's Notice of Assignment of Judge for All Purposes (filed on September 17, 2021) (King PAGA Action)	0.10
Review Court's Notice of Case Management Conference and Order (filed on September 20, 2021) (King PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Conference Statement (filed on October 12, 2021) (King Class Action)	1.10
Review Court's Tentative Ruling Re: Order Re: Case Management (issued on October 15, 2021) (King Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on October 19, 2021)	0.10
Review Court's Notice of Case Rescheduling or Relocation (filed on November 9, 2021) (King PAGA Action)	0.10
Review and Analyze Defendants Leisure Care, LLC, Heritage Estates, Livermore Senior Living dba Heritage Estates, and Dan B. Madsen's Answer to Plaintiff Valencia King's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Research Affirmative Defenses in Defendants' Answer (filed on November 12, 2021) (King PAGA Action)	1.40
Meet and Confer with Defendants Leisure Care, LLC's and Livermore Senior Living's Counsel, and Draft Joint Case Management Conference Statement (filed on December 8, 2021) (King Class Action)	1.10
Draft Plaintiff King's Notice of Related Case (filed on December 8, 2021) (King Class Action)	0.20

Review Court's Tentative Ruling Re: Order Re: Case Management (issued on December 14, 2021) (King Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on December 17, 2021) (King Class Action)	0.10
Review Court's Case Management Conference Order (issued on December 17, 2021) (King Class Action)	0.10
Review Court's Notice of Case Rescheduling or Relocation (filed on January 25, 2022) (King PAGA Action)	0.10
Meet and Confer with Defendants Leisure Care, LLC's and Livermore Senior Living's Counsel, and Draft Joint Case Management Conference Statement (filed on February 8, 2022) (King Class Action)	1.10
Review Court's Tentative Ruling Re: Order: Re: Case Management (issued on February 14, 2022) (King Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on February 15, 2022) (King Class Action)	0.10
Review Court's Case Management Conference Order (issued on February 15, 2022) (King Class Action)	0.10
Meet and Confer with Defendants Leisure Care, LLC's and Livermore Senior Living's Counsel, and Draft Stipulation and [Proposed] Order to Consolidate Actions (filed on February 23, 2022) (King Class Action)	1.10
Review Court's Order Granting Stipulation and Order to Consolidate Actions (filed on February 25, 2022) (King Class Action)	0.10
Draft Plaintiff King's Notice of Posting Jury Fees (filed on April 14, 2022) (King Class Action)	0.20

Investigate the Merits of Plaintiff's Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft Plaintiff Perkins' Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on April 28, 2022) (Perkins Action)	8.50
Review Court's Notice of Case Management Conference and Assignment of Judge for All Purposes (filed on May 2, 2022) (Perkins Action)	0.10
Review and Analyze Defendants Leisure Care, LLC's and Fresn, LLC's Answer to Plaintiff's Class Action Complaint and Research Affirmative Defenses in Defendants' Answer (filed on July 19, 2022) (Perkins Action)	1.30
Meet and Confer with Defendants Leisure Care, LLC's and Fresn, LLC's Counsel and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on August 17, 2022) (Perkins Action)	1.10
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (filed on August 19, 2022) (Perkins Action)	0.10
Draft Plaintiff Perkins' Notice of Entry of Judgment or Order (filed on August 26, 2022) (Perkins Action)	0.20
Meet and Confer with Defendants Leisure Care, LLC's and Livermore Senior Living's Counsel, and Draft Joint Case Management Conference Statement (filed on October 11, 2022) (King Class Action)	1.10
Review Court's Tentative Ruling Re: Order: Case Management (issued on October 17, 2022) (King Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on October 18, 2022) (King Class Action)	0.10
Review Court's Case Management Conference Order (issued on October 18, 2022) (King Class Action)	0.10

Review Court's Notice of Assignment of Judge for All Purposes (filed on January 19, 2023) (Perkins Action)	0.10
Meet and Confer with Defendants Leisure Care, LLC's and Livermore Senior Living's Counsel, and Draft Joint Notice of Settlement (filed on May 1, 2023) (King Class Action)	1.10
Meet and Confer with Defendants Leisure Care, LLC's and Livermore Senior Living's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on May 1, 2023) (King Class Action)	1.10
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (filed on May 1, 2023) (King Class Action)	0.10
Meet and Confer with Defendants Leisure Care, LLC's and Fresn, LLC's Counsel and Draft Joint Notice of Settlement (filed on May 1, 2023) (Perkins Action)	1.10
Draft Plaintiff King's Notice of Entry of Judgement or Order (filed on May 9, 2023) (King Class Action)	0.20
Review Court's Law and Motion Minute Order (filed on June 5, 2023) (Perkins Action)	0.10
Meet and Confer with Defendants Leisure Care, LLC's and Livermore Senior Living's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on September 5, 2023) (King Class Action)	1.10
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (filed on September 6, 2023) (King Class Action)	0.10
Meet and Confer with Defendants Leisure Care, LLC's and Fresn, LLC's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on September 29, 2023) (Perkins Action)	1.10

Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (filed on October 2, 2023) (Perkins Action)	0.10
Meet and Confer with Defendants Leisure Care, LLC's and Livermore Senior Living's Counsel, and Draft Joint Case Management Conference Statement (filed on December 5, 2023) (King Class Action)	1.10
Review Court's Tentative Ruling Re: Order Re: Case Management (issued on December 6, 2023) (King Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on December 12, 2023) (King Class Action)	0.10
Review Court's Order Re: Case Management Conference (issued on December 12, 2023) (King Class Action)	0.10
Meet and Confer with Defendants Leisure Care, LLC's and Fresn, LLC's Counsel and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on December 22, 2023) (Perkins Action)	1.10
Draft Plaintiff Perkins' Notice of Remote Appearance and Order Regarding Remote Appearance (filed on December 22, 2023) (Perkins Action)	0.30
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (filed on December 22, 2023) (Perkins Action)	0.10
Draft Plaintiff Perkins' Notice of Entry of Judgment or Order (filed on January 3, 2024) (Perkins Action)	0.20
Meet and Confer with Defendants Leisure Care, LLC's and Livermore Senior Living's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order Thereon (filed on January 11, 2024) (King Class Action)	2.10

Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed on February 8, 2024) (King Class Action)	0.10
Review Court's Notice of Case Reassignment (filed on February 8, 2024) (King Class Action)	0.10
Review Court's Notice of Case Rescheduling or Relocation (filed on February 8, 2024) (King Class Action)	0.10
Research and Draft Plaintiffs' First Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on March 4, 2024) (King Class Action)	2.50
Review and Analyze Defendants Leisure Care, LLC's, Fresn, LLC's, and Livermore Senior Living's Answer to First Amended Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (filed on March 6, 2024) (King Class Action)	1.30
Meet and Confer with Defendants Leisure Care, LLC's and Fresn, LLC's Counsel and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on March 12, 2024) (Perkins Action)	1.10
Draft Plaintiff Perkins' Notice of Remote Appearance and [Proposed] Order Regarding Remote Appearance (filed on March 12, 2024) (Perkins Action)	0.30
Review Defendants Leisure Care, LLC's and Fresn, LLC's Counsel's Notice of Remote Appearance and [Proposed] Order Regarding Remote Appearance (filed on March 12, 2024) (Perkins Action)	0.10
Review Court's Order Regarding Remote Appearance (Re: Selena Matavosian) (filed on March 18, 2024) (Perkins Action)	0.10
Review Court's Order Regarding Remote Appearance (Re: Maria Arakelian) (filed on March 18, 2024) (Perkins Action)	0.10
Review Court's Law and Motion Minute Order (filed on March 21, 2024) (Perkins Action)	0.10

Review Court's Notice of Case Reassignment (filed on March 27, 2024) (King Class Action)	0.10
Review Court's Notice of Case Rescheduling or Relocation (filed on April 9, 2024) (King Class Action)	0.10
Meet and Confer with Defendants Leisure Care, LLC's, Fresn, LLC's, and Livermore Senior Living's Counsel, and Draft Joint Stipulation to Continue the Hearing and Deadline to File Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (filed on April 11, 2024) (King Class Action)	1.10
Review Court's Order Granting Joint Stipulation to Continue the Hearing and Deadline to File Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on April 12, 2024) (King Class Action)	0.10
Meet and Confer with Defendants Leisure Care, LLC's, Fresn, LLC's, and Livermore Senior Living's Counsel, and Draft Joint Stipulation to Continue the Hearing and Deadline to File Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (filed on May 2, 2024) (King Class Action)	1.10
Review Court's Order Granting Joint Stipulation to Continue the Hearing and Deadline to File Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on May 3, 2024) (King Class Action)	0.10
Draft Plaintiffs' Notice of Entry of Judgement or Order (filed on May 7, 2024) (King Class Action)	0.20
Meet and Confer with Defendants Leisure Care, LLC's, Fresn, LLC's, and Livermore Senior Living's Counsel, and Draft Joint Case Management Conference Statement (filed on June 20, 2024) (King Class Action)	1.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on June 26, 2024) (King Class Action)	0.10
Review Court's Minute Re: Case Management Conference (filed on June 27, 2024) (King Class Action)	0.10
Review Court's Order Re: Case Management Conference (filed on June 27, 2024) (King Class Action)	0.10

Meet and Confer with Defendants Leisure Care, LLC's, Fresn, LLC's, and Livermore Senior Living's Counsel, and Draft Joint Case Management Conference Statement (filed on July 25, 2024) (King Class Action)	1.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on July 30, 2024) (King Class Action)	0.10
Review Defendants' Notice of Change of Address or Other Contact Information (filed on November 22, 2024) (King Class Action)	0.10
Appearances	
Prepare for and Remotely Attend Hearing on Case Management Conference (March 21, 2024) (Perkins Action)	1.10
Discovery and Deposition	
Draft Letter to Defendant Leisure Care, LLC Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff King (served on January 14, 2021)	1.80
Review and Analyze Documents Produced by Defendant Leisure Care, LLC in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff King (served on February 5, 2021)	3.60
Draft Letter to Defendant Leisure Care, LLC Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Perkins (served on July 23, 2021)	1.70
Review and Analyze Documents Produced by Defendant Leisure Care, LLC in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Perkins (served on August 20, 2021)	2.20
Letters and Correspondence	

Draft Notice of California Labor and Workforce Development Agency Re: Claims of Plaintiff King for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (“PAGA”) (served on July 12, 2021)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants’ Counsel	25.80
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources Prior to Mediation	91.50
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 and Penalties Analysis/Calculations (submitted on April 3, 2023)	42.70
Attend Mediation Session (April 10, 2023; Zoom Video Conference)	12.50
Review and Analyze Mediator’s Proposal	2.30
Draft, Review, Revise, Negotiate, and/or Finalize Class Action and PAGA Settlement Agreement (executed on May 7, 2024), and Notice of Class Action Settlement	25.60
Draft, Review, Revise, Negotiate, and/or Finalize Amendment No. 1 to Class Action and PAGA Settlement Agreement (executed on August 12, 2024), and Revised Notice of Class Action Settlement	3.70
Coordinate Settlement Administration with Settlement Administrator, Review Weekly Reports, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	4.10
Law and Motion	

Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Selena Matavosian in Support Thereof, Declaration of Valencia King in Support Thereof, Declaration of Victoria Perkins in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement, and Review Declaration of Giancarlo Urey in Support Thereof (filed on June 3, 2024) (King Class Action)	23.20
Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval (issued on June 26, 2024) (King Class Action)	0.20
Review Court's Order Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on June 27, 2024) (King Class Action)	0.10
Review Court's Minutes Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on June 27, 2024) (King Class Action)	0.10
Review Court's Amended Order Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on June 27, 2024) (King Class Action)	0.10
Review Court's Amended Minutes Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on June 27, 2024) (King Class Action)	0.10
Research and Draft Plaintiffs' Supplemental Declaration of Selena Matavosian in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; and [Revised Proposed] Order Thereon (filed on July 25, 2024) (King Class Action)	5.60
Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval (issued on July 30, 2024) (King Class Action)	0.10
Review Court's Minutes Re: Hearing on Motion – Other Motion for Preliminary Approval and Case Management Conference (filed on August 1, 2024) (King Class Action)	0.20

Review Court's Order Re: Hearing on Motion – Other Motion for Preliminary Approval and Case Management Conference (filed on August 1, 2024) (King Class Action)	0.20
Research and Draft Plaintiffs' Further Supplemental Declaration of Selena Matavosian in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on August 12, 2024) (King Class Action)	2.80
Review Court's Order Preliminary Approval of Class Action Settlement (filed on September 5, 2024) (King Class Action)	0.30
Review and Analyze Declaration of Settlement Administrator; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement, Class Counsel Fees Payment and Litigation Expenses Payment, and Service Payments, Declaration of Selena Matavosian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on December 3, 2024) (King Class Action)	26.60
Total Hours:	458.80

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
King vs. Leisure Care, LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/14/2021	U.S. Postmaster	Postage	\$7.50
5/17/2021	Legal Document Server, Inc.	Attorney Service	\$200.23
5/17/2021	Alameda Superior Court	Complex Filing Fee	\$1,000.00
5/17/2021	Alameda Superior Court	Complaint Filing Fee	\$435.00
6/4/2021	ProLegal	Attorney Service	\$502.50
6/24/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
7/26/2021	Legal Document Server, Inc.	Attorney Service	\$18.90
8/2/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
8/14/2021	One Legal	Attorney Service	\$20.54
8/31/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
12/9/2021	Legal Document Server, Inc.	Attorney Service	\$18.95
2/8/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
4/14/2022	Legal Document Server, Inc.	Attorney Service	\$28.07
4/14/2022	Alameda Superior Court	Jury Fee	\$150.00
8/3/2022	First Mediation Corporation	Mediation Fee	\$10,000.00
10/12/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
3/31/2023	Desmond, Marcello & Amster LLC	Analysis of Sampling of Time Records	\$7,928.75
4/6/2023	Los Angeles Superior Court	Document Download Fee	\$140.60
4/7/2023	Los Angeles Superior Court	Document Download Fee	\$20.60
5/1/2023	Legal Document Server, Inc.	Attorney Service	\$20.29
5/1/2023	Alameda Superior Court	Stipulation & Order Fee	\$20.00
5/11/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
6/6/2023	Desmond, Marcello & Amster LLC	Analysis of Sampling of Time Records	\$442.50
12/5/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
1/12/2024	Legal Document Server, Inc.	Attorney Service	\$20.29
3/4/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
3/6/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
3/13/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
4/12/2024	Legal Document Server, Inc.	Attorney Service	\$20.29
5/2/2024	Legal Document Server, Inc.	Attorney Service	\$49.13
5/8/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
6/4/2024	Legal Document Server, Inc.	Attorney Service	\$23.07
6/4/2024	Alameda Superior Court	Motion Fee	\$60.00
7/26/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
8/13/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
8/13/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
Total:			\$21,717.01

LAWYERS for JUSTICE PC CASE COST DETAIL
King vs. Leisure Care, LLC, et al. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/12/2021	U.S. Postmaster	Postage	\$30.00
7/12/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
9/16/2021	Legal Document Server, Inc.	Attorney Service	\$168.49
9/16/2021	Legal Document Server, Inc.	Complex Filing Fee	\$435.00
10/1/2021	ProLegal	Attorney Service	\$792.00
11/17/2021	Legal Document Server, Inc.	Attorney Service	\$18.95
Total:			<u>\$1,519.44</u>

LAWYERS for JUSTICE PC CASE COST DETAIL
Perkins vs. Leisure Care, LLC, et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/23/2021	U.S. Postmaster	Postage	\$7.00
5/2/2022	Legal Document Server, Inc.	Attorney Service	\$111.61
5/2/2022	Fresno Superior Court	Complex Filing Fee	\$435.00
5/2/2022	Fresno Superior Court	Complex Filing Fee	\$1,000.00
6/7/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
8/18/2022	Legal Document Server, Inc.	Attorney Service	\$16.85
8/18/2022	Fresno Superior Court	Stipulation & Order Fee	\$20.00
8/29/2022	Legal Document Server, Inc.	Attorney Service	\$15.50
5/8/2023	Legal Document Server, Inc.	Attorney Service	\$15.70
9/29/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
12/22/2023	Legal Document Server, Inc.	Attorney Service	\$17.09
12/22/2023	Legal Document Server, Inc.	Attorney Service	\$11.95
12/22/2023	Fresno Superior Court	Stipulation & Order Fee	\$20.00
12/26/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
1/4/2024	Legal Document Server, Inc.	Attorney Service	\$15.55
3/13/2024	Legal Document Server, Inc.	Attorney Service	\$15.55
3/14/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
Total:			<u>\$1,759.60</u>