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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

HENRY PEREZ, HENRY JOHNNY PEREZ
III, individually, and on behalf of other
members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiffs,

vs.

MONRO, INC., an unknown business entity;
MONRO HOLDINGS, LLC, an unknown
business entity; MNRO HOLDINGS, LLC, a
Delaware limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV09582

Honorable Elihu M. Berle
Department SSC-6

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Date: March 4, 2024
Hearing Time: 9:00 a.m.
Dept: SSC-6

Complaint Filed: March 11, 2021
FAC Filed: November 22, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers for Justice, PC, attorneys of record for Plaintiffs Henry Perez Jr. and Henry Johnny Perez III (together, "Plaintiffs") and the Class in the above-captioned action. 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 thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On September 19, 2023, in Department SSC-6 of the above-entitled Court, the Honorable Elihu M. Berle preliminarily approved the Class Action and PAGA Settlement Agreement ("Original Settlement Agreement") entered into between Plaintiffs and Defendants Monro, Inc. and MNRO Holdings, LLC (together, "Defendants"), and conditionally certified the Class for settlement purposes. The Court also preliminarily appointed Plaintiffs Henry Perez Jr. and Henry Johnny Perez III to represent the Class (together, "Class Representatives") and preliminarily appointed and designated Lawyers for Justice, PC and Protection Law Group, LLP as counsel for the Class (together, "Class Counsel"). The Court approved and ordered the mailing of the Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval ("Class Notice"), approved the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed ILYM Group, Inc. ("Settlement Administrator") to serve as the third-party administrator and handle the notice and settlement administration process. On October 24, 2023, pursuant to the stipulation of the Plaintiffs and Defendant (together, the "Parties"), the Court entered the Amended Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement, which, *inter alia*, confirmed that, pursuant to the escalator clause in Paragraph 8.1 of the Original Settlement Agreement, the Gross Settlement Amount had increased from \$1,750,000.00 to \$1,861,752.98. Together, the Original Settlement Agreement and the Amended Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement are referred to herein as "Settlement," "Agreement," or "Settlement Agreement."

WORK PERFORMED BY CLASS COUNSEL

3. Several other attorneys and staff members at Lawyers *for* Justice, PC and I have been actively engaged in the litigation of this matter from the inception of the above-captioned putative class action, which was commenced on March 11, 2021, and the separate representative action under the Private Attorneys General Act (“PAGA”) entitled *Henry Johnny Perez III, et al. v. MNRO Holdings, LLC, et al.*, Los Angeles Superior Court Case No. 21LBCV00478 (the “PAGA Action”), which was commenced on September 13, 2021 and dismissed without prejudice on November 29, 2022, and throughout the pendency of the cases. Lawyers *for* Justice, PC actively participated in the litigation of the matter, including and not limited to, preparing the pleadings, case strategy, undertaking investigation and formal and informal discovery, performing legal research, conducting claims evaluation and analysis, and engaging in settlement negotiations. Since joining forces with and associating in Protection Law Group, LLP as co-counsel for Plaintiffs and the Class in the above-captioned case, we have worked cooperatively with them to strategize and prosecute the above-captioned case, and our work with them has been a coordinated and combined effort. Ultimately, Class Counsel’s efforts and the efforts of Plaintiffs have been successful in reaching the Settlement.

4. Before initiating the lawsuits on behalf of Plaintiffs, Lawyers *for* Justice, PC conducted extensive investigation and research into 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, representative PAGA claims, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, arbitration agreements, Plaintiffs’ claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that Plaintiffs’ claims were well-suited for class action and representative action treatment owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid, non-exempt employees of Defendants in the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and

unreimbursed business expenses.

5. Collectively, Class Counsel investigated the veracity, strength, and scope of the claims, and worked on preparing the cases for class certification and trial, prior to reaching the Settlement. This matter has involved extensive and ongoing investigations and research into legal and factual issues, formal discovery, and court proceedings. Class Counsel reviewed and analyzed a volume of information, documents, and data obtained from Plaintiffs, Defendants, and other sources, researched applicable law, and undertook analyses and calculations of the value of claims, damages, and penalties exposure. Class Counsel also met and conferred with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, court proceedings, discovery and production of various documents and data in the course of litigation and the mediation sessions and settlement negotiations, the mediation sessions and settlement negotiations. Other work that Class Counsel performed included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings and motion-related papers; case management; claims assessment and evaluation; and preparing for and attending the mediation sessions and settlement negotiations.

6. As outlined herein, the Parties have conducted significant investigations, litigation, and discovery in this matter. The volume of information, documents, and data obtained from Plaintiffs, Defendants, and other sources provided a critical understanding of the nature of the work performed by putative class members and aggrieved employees, as well as Defendants' operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing liability, damages, and penalties 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 significant research into the applicable law, which is evolving as it relates to class certification, manageability, PAGA representative claims, off-the-clock theory, meal and rest periods, regular rate, wage-and-hour enforcement, and arbitration agreements. Accordingly, sufficient investigation and review of information has taken place in order for the Parties to be adequately informed of the nature and extent of the claims, and to enable the Parties to fully evaluate the Settlement for its fairness,

adequacy, and reasonableness.

7. By way of the accompanying motion for final approval of the Settlement, Class Counsel seek attorneys' fees in the amount of \$651,613.54, which is thirty-five percent (35%) of the escalated Gross Settlement Amount of \$1,861,752.98. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs and Lawyers *for* Justice, PC, Plaintiffs have each agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

8. The attorneys' fees that are 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 have shown; (4) the results that Class Counsel have achieved throughout the litigation of the cases; (5) the value of the settlement that Class Counsel have achieved; and (6) the other cases that Class Counsel have turned down in order to devote their time and efforts to the cases.

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

10. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel have incurred many hours of work in connection with prosecuting the cases, 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 **326.30 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart for Lawyers *for* Justice, PC that sets forth in detail the nature of the legal services provided by attorneys at the firm, and the time incurred in performing those services. The hours attributable to Lawyers *for* Justice, PC include work done by me and several other attorneys at the firm. Additionally, separate from the hours of work referenced herein and in the attached chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

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11. The work performed in this matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate 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.

ADEQUACY OF LAWYERS for JUSTICE, PC

EDUCATION

12. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have 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, I have previously served as a *pro bono* mediator for the Los Angeles County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

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JUDICIAL EXTERNSHIPS

13. From approximately September 2002 to approximately December 2002, I 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, I served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal for the Second Appellate District*.

LITIGATION AND CLASS ACTION AND REPRESENTATIVE ACTION EXPERIENCE

14. In December of 2004, I obtained a license to practice law from the California State Bar.

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

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

16. 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.

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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
10 County 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.

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

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

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

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

20 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
21 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
22 the employer’s motion to compel arbitration, which resulted in a published opinion by the
23 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
24 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
25 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
26 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
27 5046.

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

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

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

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

21 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
22 representative action against a food company on behalf of non-exempt employees. On June 30,
23 2017, the court granted final approval of the class and PAGA representative action settlement.
24 The Sacramento County Superior Court Case Number is 34-2015-00175871.

25 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
26 representative action against a chocolate company on behalf of non-exempt employees. On July
27 19, 2017, the court granted final approval of the class and PAGA representative action
28 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

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

1 The Tulare County Superior Court Case Number is VCU264528.

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

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

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

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

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

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

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

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

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

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

1 approval of the class action settlement. The San Diego County Superior Court Case Number is
2 37-2015-00025968-CU-OE-CTL.

3 mm) LFJ represents the plaintiff in a wage-and-hour class action against a
4 nutritional products manufacturer on behalf of non-exempt production line employees. On
5 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
6 certified a class. The Solano County Superior Court Case Number is FCS051001.

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

12 **LITIGATION COSTS AND EXPENSES INCURRED BY**

13 **LAWYERS *for* JUSTICE, PC**

14 17. To date, Class Counsel have borne all of the risks and costs of litigation and will
15 not receive any compensation until a recovery is obtained in this matter. Lawyers *for* Justice, PC
16 seeks reimbursement of **\$4,451.93** in litigation costs and expenses incurred in this matter, as
17 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in
18 the prosecution of the cases and to obtain the Settlement.

19 **CLASS REPRESENTATIVE SERVICE PAYMENTS TO PLAINTIFFS**

20 18. In recognition of their efforts and work expended in the cases and serving as the
21 Class Representatives, the Settlement provides for service payments in the amount of \$7,500
22 each to Plaintiffs. The requested service payment is fair and appropriate. Plaintiffs spent a
23 substantial amount of time and effort in providing relevant documents, past employment records,
24 and the facts and evidence necessary to attempt to prove the allegations in the cases. For
25 example, Plaintiff Henry Perez Jr. worked with Class Counsel to provide responses to discovery
26 requests propounded on him by Defendants. Plaintiffs were available whenever their attorneys
27 needed them and actively tried to obtain and provide information that would facilitate the pursuit
28 of the class and PAGA claims. Plaintiffs spent numerous hours speaking with their attorneys

1 about their claims, describing their work experiences with Defendants, and gathering, providing,
2 and reviewing documents. Accordingly, it is appropriate and just for Plaintiffs to receive
3 \$7,500.00 each (combined \$15,000.00) as reasonable service payments for their services on
4 behalf of the Class, Aggrieved Employees, and the State of California, in addition to their
5 individual settlement payments.

6 19. I submit that the settlement is fair, reasonable, and adequate. In addition, the
7 settlement is in the best interests of Plaintiffs, the Class, Aggrieved Employees, and the State of
8 California.

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

11 Executed this 8th day of December 2023, at Glendale, California.

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13 Edwin Aiwanian
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EXHIBIT A

HENRY PEREZ, ET AL. V. MONRO INC., ET AL.
Los Angeles County Superior Court, Case No. 21STCV09582 (“Class Action”)

HENRY PEREZ, ET AL. V. MNRO HOLDINGS, LLC, ET AL.
Los Angeles County Superior Court, Case No. 21LBCV00478 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	PROTECTION LAW GROUP, LLP	LAWYERS FOR JUSTICE, P.C.
Investigation and Research / Due Diligence		
Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality	5.90	7.50
Investigation of the Merits of Plaintiffs Henry Perez Jr.’s and Henry Perez III’s (together, “Plaintiffs”) Claims and the Merits of the Claims of the Putative Class Members	6.20	5.10
Investigation of Potential Damages Exposure of Defendants Monro, Inc., MNRO Holdings, LLC, and MNRO Holdings, LLC (collectively “Defendants”) with Respect to the Damages Sustained by Plaintiffs and the Putative Class Members	3.40	6.30
Investigation of the Merits of Plaintiffs’ Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiffs and the Aggrieved Employees	2.90	6.50
Investigation of Potential Civil Penalties Exposure of Defendants with Respect to Alleged California Labor Code and IWC Wage Order Violations with Respect to Plaintiffs and the Aggrieved Employees Pursuant to PAGA	2.50	4.30
Legal Research and Analysis of Latest Decisions and Law Regarding Off-the-Clock, Meal and Rest Break, Wage Order, Exemption, Penalties, and Class Certification in California, Including All New and Relevant Enforcement Guidance and the Division of Labor Standard Enforcement (DLSE) Materials	4.80	5.80

Investigation of Defendants, Defendants' Owners, Defendants' Business Relationships, and the Industry in which Defendants Operate	2.80	3.40
Investigation of Defendants' Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	2.90	3.10
Investigation, Research, and Analysis Regarding Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity	2.40	2.90
Analysis of Competitors in Various Relevant Geographic Areas within which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendants' Competitors	0	3.80
Research and Investigation re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendants in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	0	5.80
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and/or Other Online Reviews and Postings Regarding Work with Defendants in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock and/or During Meal or Rest Breaks	0	8.50
Research and Investigation Re: Workforce, Staffing Models, Staffing Levels, and Layout at Locations at Which Putative Class Members and Aggrieved Employees Worked Throughout California	0	6.70

Research and Investigation re: Defendants’ Written and Non-Written Policies, Practices, and Procedures Relating to Attendance, Timekeeping, Scheduling, Meal/Rest Breaks, Auto-Deduction, On-Premises Breaks, Break Room/Area, Cleaning, Maintenance, Pre-Shift and Post-Shift Tasks, Overtime Compensation, Cash Count and Deposit, Dress Code/Uniform, Footwear, Supplies, Equipment, PPE, Use of Personal Cell Phones, Use of Personal Vehicles, Reimbursement of Business-Related Expenses, and Arbitration Agreements	6.10	17.50
Research and Investigation re: Various Software Programs, Applications, Systems, and Other Technology Defendants Use to Conduct Their Everyday Business, Including Inventory, Resource Management, Customer Service Management, Communications, Timekeeping, and Surveillance Systems, with a Focus on What Records (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	0	4.30
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, Compliant Policies, and Arbitration Agreements	1.20	7.10
Research and Investigation re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	2.60	3.80
Prepare a Discovery Strategy and Plan of Action, including Topics of Inquiry Important to Certification, Liability, Damages, and Penalties	8.50	1.30
Research, Brief, and Preliminarily Outline Issues Important to Class Certification and Trial Manageability	10.40	12.50
Research and Investigation Regarding Impact of COVID-19 Pandemic on Defendants, Their Operations, Putative Class Members, and Aggrieved Employees	3.60	4.50
Meet and Communicate with Plaintiff Henry Perez Jr. (“Plaintiff Perez Jr.”) throughout the Pendency of the Actions	35.10	10.50
Meet and Communicate with Plaintiff Henry Perez III (“Plaintiff Perez III”) throughout the Pendency of the Action	6.30	12.50

Investigate, Meet, Communicate with, and/or Conduct Interviews of Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	5.90	16.50
Pleadings and Court Filings		
Draft, Review, and/or Revise Plaintiff Perez Jr.'s Class Action Complaint for Damages and Analysis of All Claims Involved (filed March 11, 2021) (Class Action)	0	7.80
Review Court's Initial Status Conference Order Re: Complex Litigation Program and Minute Order (filed March 23, 2021) (Class Action)	0	0.20
Draft, Review, and/or Revise Plaintiff Perez Jr.'s Unilateral Initial Status Conference Statement (filed May 12, 2021) (Class Action)	0	1.30
Draft, Review, and/or Revise Plaintiff Perez Jr.'s Notice of Association of Counsel (filed May 28, 2021) (Class Action)	0.10	0.10
Review and Analyze Defendant Monro, Inc.'s Answer to Plaintiff Perez Jr.'s Complaint (filed June 7, 2021) (Class Action)	3.40	0.80
Review and Analyze Defendant MNRO Holdings, LLC's Answer to Plaintiff Perez Jr.'s Complaint (filed June 29, 2021) (Class Action)	3.50	0.60
Research, Draft, Review, and/or Revise Plaintiff Perez Jr.'s Notice of Posting Jury Fees (filed July 9, 2021) (Class Action)	0.10	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Statement (filed July 12, 2021) (Class Action)	2.10	0.10
Review Court's Minute Order Re: Initial Status Conference (filed July 22, 2021) (Class Action)	0.10	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Proposed Order re: Parties Utilizing CaseAnywhere as E-Service Provider (filed July 29, 2021) (Class Action)	1.80	0.10

Draft, Review, and/or Revise Plaintiffs' Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, <i>Et Seq.</i> and Legal Research and Analysis of All Allegations Involved (filed September 13, 2021) (PAGA Action)	0	7.50
Review Court's Order re: Case Assignment and Case Management Conference (filed September 16, 2021) (PAGA Action)	0	0.10
Review Court's Order Re: Order to Show Cause for Failure to File Proofs of Service (filed September 16, 2021) (PAGA Action)	0	0.10
Review and Analyze Defendant Monro Inc.'s Answer to Plaintiffs' PAGA Complaint (filed October 29, 2021) (PAGA Action)	0	1.10
Review and Analyze Defendant MNRO Holdings, LLC's Answer to Plaintiffs' PAGA Complaint (filed October 29, 2021) (PAGA Action)	0	1.10
Review and Analyze Defendants' Responses to Court's Complex Civil Case Questionnaire (filed November 16, 2021) (PAGA Action)	0	0.90
Review Court's Order Re: Complex Civil Case Questionnaire (filed December 10, 2021) (PAGA Action)	0	0.10
Review Defendants' Notice of Related Case Relating Class Action (filed December 22, 2021) (PAGA Action)	0	0.10
Review Defendants' Notice of Related Case (filed December 22, 2021) (Class Action)	0.50	0.10
Review and Analyze Defendants' Counsel's Notice of Name Change (filed December 23, 2021) (Class Action)	0.20	0.10
Review Court's Minute Order re: January 20, 2022, Status Conference Setting Order to Show Cause (filed January 20, 2022) (Class Action)	0.40	0.10
Review and Analyze Defendants' Case Management Statement (filed January 28, 2022) (PAGA Action)	0	0.60

Draft, Review, and/or Revise Plaintiffs' Case Management Statement (filed January 28, 2022) (PAGA Action)	0	1.10
Review and Analyze Defendants' Declaration of Seth Neulight re: Order to Show Cause (filed February 7, 2022) (Class Action)	0.30	0.20
Review and Analyze Defendants' Amended Declaration of Seth Neulight re: Order to Show Cause (filed February 7, 2022) (Class Action)	0.70	0.20
Draft, Review, and/or Revise Declaration of Amir Nayebdadash re: Order to Show Cause (filed February 7, 2022) (Class Action)	2.30	0.10
Review Court's Minute Order Setting Trial and Final Status Conference (filed February 14, 2022) (PAGA Action)	0	0.10
Review Court's Minute Order Re: Order to Show Cause, Discovery, and Further Status Conference Scheduling (filed February 17, 2022) (Class Action)	1.00	0.10
Draft, Review, and/or Revise Notice of Status Conference for June 13, 2022 (filed February 24, 2022) (Class Action)	0.80	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Protective Order – Confidential Designation Only (filed May 13, 2022) (Class Action)	7.30	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed June 6, 2022) (Class Action)	1.50	0.10
Review Court's Minute Order Re: Status Conference and Mediation (filed June 13, 2022) (Class Action)	0.80	0.10
Draft, Review, and/or Revise Notice of Posting Jury Fees (filed June 20, 2022) (PAGA Action)	0	0.20
Draft, Review, and/or Revise Notice of Continued Status Conference (filed June 22, 2022) (Class Action)	1.10	0.10

Review and Analyze Defendants' <i>Ex Parte</i> Application for an Order Continuing Trial Date and Related Deadlines; Declaration of Seth L. Neulight in Support Thereof; and [Proposed] Order Thereof (filed July 12, 2022) (PAGA Action)	0	1.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order to Continue Trial and All Related Dates for Good Cause (filed July 12, 2022) (PAGA Action)	0	1.80
Review Court's Order re: <i>Ex Parte</i> Application to Continue Trial and Related Deadlines (filed July 20, 2022) (PAGA Action)	0	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed July 21, 2022) (Class Action)	1.80	0.10
Review Court's Minute Order Re: Status Conference (filed July 29, 2022) (Class Action)	0.30	0.10
Draft, Review, and/or Revise Notice of Continued Status Conference (filed July 29, 2022) (Class Action)	0.90	0.10
Review Court's Order Denying Joint Stipulation and [Proposed] Order to Continue Trial and All Related Deadlines (filed August 9, 2022) (PAGA Action)	0	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed August 26, 2022) (Class Action)	1.50	0.10
Review Court's Minute Order Re: Status Conference and Mediation (filed September 2, 2022) (Class Action)	0.40	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation re: Discovery and Mediation; [Proposed] Order (filed September 6, 2022) (Class Action)	6.80	0.10
Draft, Review, and/or Revise Notice of Continued Status Conference (filed September 6, 2022) (Class Action)	0.80	0.10

Research, Draft, Review, and/or Revise Plaintiffs' First Amended Complaint & for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, <i>Et Seq</i> (filed November 22, 2022); Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation and Order for Leave to File First Amended Complaint (filed November 21, 2022) (Class Action)	3.70	2.50
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed November 23, 2022) (Class Action)	1.40	0.10
Draft Request for Dismissal Without Prejudice (filed November 29, 2022) (PAGA Action)	0	0.30
Review Court's Minute Order Re: Status Conference and Rescheduled Mediation Date (filed December 2, 2022) (Class Action)	0.70	0.10
Draft, Review, and/or Revise Notice of Ruling Re: Court's Minute Orders (filed December 7, 2022) (Class Action)	1.10	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Post-Mediation Status Conference Statement (filed January 13, 2023) (Class Action)	2.10	0.10
Review Court's Minute Order Re: Continued Post-Mediation Status Conference (filed January 23, 2023) (Class Action)	0.90	0.10
Draft, Review, and/or Revise Notice of Continued Post-Mediation Status Conference (filed January 26, 2023) (Class Action)	1.20	0.10
Draft, Review, and/or Revise Notice of Settlement (filed March 2, 2023) (Class Action)	3.40	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed March 17, 2023) (Class Action)	0.80	0.10
Review Court's Minute Order re: Post-Mediation Status Conference (filed March 24, 2023) (Class Action)	0.10	0.10
Draft, Review, and/or Revise Notice of Ruling (filed March 29, 2023) (Class Action)	0.60	0.10

Appearances		
Prepare for and Appear at Initial Status Conference (May 19, 2021) (Class Action)	0	1.10
Prepare for and Appear at Continued Initial Status Conference (July 22, 2021) (Class Action)	1.30	0
Prepare for and Appear at Order to Show Cause Re: Failure to Appear at January 20, 2022 Status Conference (February 17, 2022) (Class Action)	1.20	0
Prepare for and Appear at Status Conference (December 2, 2022) (Class Action)	1.10	0
Prepare for and Appear at Initial Case Management Conference (February 14, 2022) (PAGA Action)	0	1.20
Prepare for and Appear at <i>Ex Parte</i> Application for an Order Continuing Trial and Related Deadlines (July 20, 2022) (PAGA Action)	0	1.70
Prepare for and Appear at Post-Mediation Status Conference (March 24, 2023) (Class Action)	1.30	1.30
Prepare for and Attend Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement (September 14, 2023) (Class Action)	1.50	1.10
Prepare for and Attend Hearing on Motion for Final Approval of Class Action and PAGA Settlement (March 4, 2024) (Anticipated)	2.00	1.50
Discovery and Deposition		
Draft Letter to Defendants Re: Requests for Personnel File, Pay Stubs, and Time Records for Plaintiff Henry Perez Jr. (served January 26, 2021)	0	1.90
Draft Letter to Defendants Re: Requests for Personnel File, Pay Stubs, and Time Records for Plaintiff Henry Perez III (served March 18, 2021)	0	1.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Henry Perez Jr. (served on March 5, 2021)	0	3.90

Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Henry Perez III (served on April 21, 2021)	0	2.50
Review Defendant MNRO Holdings, LLC's Form Interrogatories – Employment (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) to Plaintiff Perez Jr. (served December 9, 2021) (Class Action)	3.60	0.50
Draft, Review, and/or Revise Plaintiff Perez Jr.'s Responses to Defendant MNRO Holdings, LLC's Form Interrogatories – Employment (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) (served January 17, 2022) (Class Action)	12.30	0.80
Gather and/or Review Plaintiff Perez Jr.'s Document Production in Response to Defendant MNRO Holdings, LLC's Requests for Production of Documents, Set One (Bates PEREZ000001 – PEREZ000120) (served January 17, 2022) (Class Action)	3.40	1.10
Draft, Review, and/or Revise Plaintiffs' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Monro, Inc. (served February 22, 2022) (PAGA Action)	0	6.50
Draft, Review, and/or Revise Plaintiffs' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant MNRO Holdings, LLC (served February 22, 2022) (PAGA Action)	0	5.50
Draft, Review, and/or Revise Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Monro, Inc. and Requests for Production of Documents (noticed for April 13, 2022; Organizational Structure) (served on February 22, 2022) (PAGA Action)	0	3.10
Draft, Review, and/or Revise Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Monro, Inc. and Requests for Production of Documents (noticed for April 14, 2022; Wage and Hour Practices) (served on February 22, 2022)	0	3.40

(PAGA Action)		
Draft, Review, and/or Revise Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant MNRO Holdings, LLC and Requests for Production of Documents (noticed for April 6, 2022; Organizational Structure) (served on February 22, 2022) (PAGA Action)	0	3.10
Draft, Review, and/or Revise Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant MNRO Holdings, LLC and Requests for Production of Documents (noticed for April 7, 2022; Wage and Hour Practices) (served on February 22, 2022) (PAGA Action)	0	3.40
Draft, Review, and/or Revise Plaintiff Perez Jr.'s Form Interrogatories – General (Set One), Special Interrogatories (Set One), Demand for Production of Documents (Set One), and Proposed <i>Belaire-West</i> Notice to Defendant Monro, Inc. (served February 24, 2022) (Class Action)	13.80	0.10
Draft, Review, and/or Revise Plaintiff Perez Jr.'s Notice of Deposition of Defendant Monro, Inc.'s Person Most Qualified (noticed for May 10, 2022 and May 11, 2022) (served February 24, 2022) (Class Action)	7.20	0.10
Draft, Review, and/or Revise Plaintiff Perez Jr.'s Form Interrogatories – General (Set One), Special Interrogatories (Set One), Demand for Production of Documents (Set One), and Proposed <i>Belaire-West</i> Notice to Defendant MNRO Holdings, LLC (served February 24, 2022) (Class Action)	13.80	0.10
Draft, Review, and/or Revise Plaintiff Perez Jr.'s Notice of Deposition of Defendant MNRO Holdings, LLC's Person Most Qualified (noticed for May 12, 2022 and May 13, 2022) (served February 24, 2022) (Class Action)	7.20	0.10
Review and Analyze Defendant MNRO Holdings, LLC's Objections to Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant MNRO Holdings, LLC and Requests for Production of Documents (noticed for April 6, 2022; Organizational Structure) (served on March 30, 2022) (PAGA Action)	0	0.50

Review and Analyze Defendant MNRO Holdings, LLC's Objections to Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant MNRO Holdings, LLC and Requests for Production of Documents (noticed for April 7, 2022; Wage and Hour Practices) (served on March 30, 2022) (PAGA Action)	0	1.50
Review and Analyze Defendant Monroe, Inc.'s Objections to Plaintiffs' Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (noticed for April 13, 2022; Organizational Structure) (served on March 30, 2022) (PAGA Action)	0	0.50
Review and Analyze Defendant Monroe, Inc.'s Objections to Plaintiff Perez Jr.'s Notice of Deposition of Person Most Qualified at Defendant Monroe, Inc. (noticed for May 10, 2022 and May 11, 2022) (served on May 2, 2022) (Class Action)	2.80	1.50
Review and Analyze Defendant MNRO Holdings, LLC's Objections to Plaintiff Perez Jr.'s Notice of Deposition of Person Most Qualified at Defendant MNRO, LLC (noticed for May 12, 2022 and May 13, 2022) (served on May 2, 2022) (Class Action)	2.80	1.50
Review and Analyze Defendant Monroe, Inc.'s Objections to Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Monroe, Inc. and Requests for Production of Documents (noticed for April 14, 2022; Wage and Hour Practices) (served on March 30, 2022) (PAGA Action)	0	1.50
Draft, Review, and/or Revise Plaintiff Perez Jr.'s Supplemental Responses to Defendant MNRO Holdings, LLC's Form Interrogatories – Employment (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One)(served April 4, 2022) (Class Action)	17.20	0.50
Review and Analyze Defendant Monroe, Inc.'s Responses to Plaintiffs' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served May 3, 2022) (PAGA Action)	0	3.90

Review and Analyze Defendant MNRO Holdings, LLC's Responses to Plaintiffs' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served May 3, 2022) (PAGA Action)	0	3.50
Review and Analyze Defendant Monro, Inc.'s Responses to Plaintiff Perez Jr.'s Form Interrogatories – General (Set One), Special Interrogatories (Set One), and Demand for Production of Documents (Set One), (served May 3, 2022) (Class Action)	5.70	0.60
Review and Analyze Defendant MNRO Holdings, LLC's Responses to Plaintiff Perez Jr.'s Form Interrogatories – General (Set One), Special Interrogatories (Set One), and Demand for Production of Documents (Set One) (served May 3, 2022) (Class Action)	5.90	0.50
Review and Analyze Documents Produced Pursuant to Protective Order by Defendant MNRO Holdings, LLC (Bates MNROH_CLASS000001 – MNROH_CLASS000085) (served May 5, 2022) (Class Action)	3.40	1.10
Review and Analyze Verifications Regarding Discovery Responses of Monro, Inc. (served on May 10, 2023) (Class Action)	0.30	0.30
Letters and Correspondence		
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Perez Jr. for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on July 8, 2021) (PAGA Action)	0	4.50
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Perez III for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on July 8, 2021) (PAGA Action)	0	4.50
Draft Meet and Confer Correspondence to, Meet and Confer Telephonically with, and Review and Respond to Correspondence from Defendants' Counsel	48.50	18.50

Mediation/Settlement		
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources Prior to Mediation and Perform Evaluation of Claims and Damages and Penalties in Connection with Settlement Negotiations and Mediations	55.40	20.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting, Reviewing, and/or Revising the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Violation Analysis and Calculations of Damages and Penalties (submitted on December 12, 2022)	29.40	6.50
Prepare for and Remotely Attend Mediation Session with Hon. James Otero (Ret.) (December 16, 2022) (via Zoom)	10.0	0
Prepare for and Attend Second Mediation Session with Hon. James Otero (Ret.) (January 12, 2023) (via Zoom)	8.0	0
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed on February 9, 2023)	8.70	0.20
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on April 5, 2021) and Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	22.50	1.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, Review Workweeks Count and Escalator Clause, and/or Respond to Inquiries Regarding Notice Settlement Administration	8.80	1.50
Law and Motion		
Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Declaration of Heather Davis in Support Thereof; Declaration of Edwin Aiwasian in Support Thereof; Declaration of Plaintiff Henry Perez, Jr. in Support Thereof; Declaration of Plaintiff Henry Perez III in Support Thereof; Declaration of Settlement Administrator; and [Proposed] Order Thereof (filed May 24, 2023)	26.0	4.50

Review Court's Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on September 14, 2023)	0.20	0.10
Draft, Review, and/or Revise Notice of Ruling Granting Plaintiffs' Motion for Preliminary Approval of Settlement (filed September 18, 2023)	0.50	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation Re Amendment of Order Granting Plaintiffs' Motion for Preliminary Approval and Increasing Gross Settlement Amount; [Proposed] Amended Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement (filed October 19, 2023) (Class Action)	2.20	0.40
Review Court's Amended Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement (filed October 24, 2023) (Class Action)	0.50	0.10
Draft Notice of Entry of Order Re: Amended Order (filed October 27, 2023) (Class Action)	0.50	0
Review and Analyze Settlement Administrator's Preliminary Declaration Regarding Settlement Notice Administration; and Research and Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement; Declaration of Heather Davis in Support Thereof; Declaration of Edwin Aiwasian in Support Thereof; Declaration of Plaintiff Henry Perez, Jr. in Support Thereof; and Declaration of Plaintiff Henry Perez III in Support Thereof (filed on December 8, 2023) (Anticipated)	31.70	6.50
Review and Analyze Settlement Administrator's Final Declaration Regarding Settlement Notice Administration; and [Proposed] Final Approval Order and Judgment (filed on February 23, 2024) (Anticipated)	5.50	0
Total Hours:	536.20	326.30
Grand Total Hours:	862.50	

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Perez v. Monro, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/26/2021	U.S. Postmaster	Postage	\$7.00
3/11/2021	Legal Document Server, Inc.	Attorney Service	\$180.23
3/11/2021	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
3/11/2021	Los Angeles Superior Court	Complex Filing Fee	1,000.00
5/12/2021	Legal Document Server, Inc.	Attorney Service	110.00
5/13/2021	Legal Document Server, Inc.	Attorney Service	\$125.00
5/17/2021	ProLegal	Attorney Service	429.00
5/27/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
5/28/2021	Legal Document Server, Inc.	Attorney Service	\$175.00
7/9/2021	Legal Document Server, Inc.	Attorney Service	115.25
7/9/2021	Los Angeles Superior Court	Jury Fee	150.00
11/10/2021	Case Anywhere LLC	Attorney Service	\$115.20
2/3/2022	Case Anywhere LLC	Attorney Service	\$120.00
5/10/2022	Case Anywhere LLC	Attorney Service	\$120.00
8/6/2022	Case Anywhere LLC	Attorney Service	\$120.00
9/22/2022	Jams, Inc.	Mediation Fee	475.00
11/9/2022	Case Anywhere LLC	Attorney Service	\$120.00
11/18/2022	Legal Document Server, Inc.	Attorney Service	\$17.30
11/18/2022	Los Angeles Superior Court	Stipulation Fee	\$20.00
11/22/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
2/8/2023	Case Anywhere LLC	Attorney Service	\$132.00
5/9/2023	Case Anywhere LLC	Attorney Service	\$120.00
8/6/2023	Case Anywhere LLC	Attorney Service	\$120.00
11/4/2023	Case Anywhere LLC	Attorney Service	\$120.00
Total:			<u><u>4,451.93</u></u>