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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

YASMINE RAMIREZ BARAHONA,
individually, and on behalf of other members
of the general public similarly situated;

Plaintiff,

vs.

CARL’S JR. 800 INC., a California
corporation; BJ MART, LLC, an unknown
business entity; BR MART, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 21STCV20100
Related to Case No. 21STCV33550

Honorable Elihu M. Berle
Department SSC6

CLASS ACTION

**DECLARATION OF JOANNA GHOSH
IN SUPPORT OF PLAINTIFF’S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT,
ATTORNEYS’ FEES, COSTS, AND
ENHANCEMENT AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys’ Fees, Costs, and Enhancement
Award; Declaration of Class Representative
(Yasmine Ramirez Barahona); Declaration of
Settlement Administrator (Jennifer Beliveau);
and [Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: August 28, 2024
Time: 9:00 a.m.
Department: SSC6

Complaint Filed: May 27, 2021
Trial Date: None Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, 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 Plaintiff Yasmine Ramirez Barahona a/k/a Jasmine Ramirez (“Plaintiff”) 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 thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On December 11, 2023, in Department SSC6 of the above-entitled Court, the Honorable Elihu M. Berle preliminarily approved the Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendants Carl’s Jr. 800 Inc., Carl’s Jr. 7140 Inc., BJ Mart, LLC, BR Mart, Inc., Jasper Rodd, and Behnam Rodd (collectively, “Defendants”) (together, “Plaintiff” and “Defendants” are referred to as the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Yasmine Ramirez Barahona a/k/a Jasmine Ramirez as the representative of the Class (“Class Representative”). 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 Simpluris, Inc. (“Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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

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WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers for Justice, PC have been actively performing work in this matter since prior to the commencement of Plaintiff’s putative class action (i.e., the above-captioned action) (“*Barahona* Class Action”) on May 27, 2021 in the Los Angeles County Superior Court, and Plaintiff’s representative Private Attorneys General Act (“PAGA”) action that was filed on September 10, 2021, entitled *Jasmine Ramirez v. Carl’s Jr. 800 Inc., et al.*, Los Angeles County Superior Court Case No. 21STCV33550 (“*Ramirez* PAGA Action”) (together, “Actions”).

5. Before initiating the cases, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff, 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, Plaintiff’s claims and allegations, and potential defenses. After conducting an initial investigation, our firm determined that the claims of the Plaintiff 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.

6. Class Counsel investigated the veracity, strength, and scope of the claims and were preparing the cases for class certification and trial, prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff and percipient witnesses, and reviewed and analyzed a volume of information, documents, and data obtained from Plaintiff, Defendants, and other sources. Class Counsel propounded multiple sets of written discovery requests on Defendants (including, but not limited to Form Interrogatories – General (Set One),

1 Special Interrogatories (Sets One and Two), Requests for Production of Documents (Set One)),
2 noticed several depositions of Defendants' person(s) most knowledgeable, and reviewed
3 Defendants' objections to deposition notices and accompanying requests for production of
4 documents. The volume of information, documents, and data that Class Counsel reviewed and
5 analyzed included and was not limited to: employment records of Plaintiff, sampling of class
6 list and class time and pay records, company policy acknowledgements, internal memoranda,
7 and operations and employment policies, practices, and procedures documents (including, but
8 not limited to, Employee Declaration of Paid Wages and Well Being and Cashier Policy and
9 Procedures), among other information and documents. Class Counsel also developed liability,
10 damages, violation, and penalties valuation models in the course of litigation and in connection
11 with the mediation and settlement negotiations, and met and conferred with Defendants' counsel
12 on numerous occasions, e.g., to discuss issues relating to the pleadings, case management,
13 discovery and production of various information, documents, and data in the course of litigation
14 and in connection with the mediation and settlement negotiations, and the settlement. Other
15 work performed by Class Counsel included, and was not limited to, case strategy and analysis;
16 drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation brief,
17 and settlement documents; preparing for and attending court proceedings, mediation, and
18 settlement negotiations; and conducting review, analysis, and assessment of Defendants'
19 financial circumstances, among other tasks.

20 7. As outlined herein, the Parties have conducted significant investigation and formal
21 and informal discovery during the course of litigating the cases, mediation, and extensive
22 settlement negotiations. Class Counsel analyzed a large volume of information, documents, and
23 data obtained from Plaintiff, Defendants, and other sources. The information, documents, and
24 data provided a critical understanding of the nature of the work performed by the Class Members
25 and Aggrieved Employees, as well as Defendants' operations and employment policies,
26 practices, and procedures, and were used in analyzing liability, damages, penalties, and other
27 valuation issues in connection with all phases of the litigation, and ultimately, in connection
28 with the mediation and settlement negotiation process. Class Counsel also performed significant

1 research into the applicable law, which is evolving as it relates to class certification,
2 manageability, off-the-clock theory, regular rate, meal and rest periods, representative PAGA
3 claims and penalties, wage-and-hour law and enforcement, Plaintiff's claims and allegations,
4 and Defendants' defenses thereto, as well as facts discovered.

5 8. After conducting significant investigation of the facts and law during the
6 prosecution of the cases, counsel for the Parties engaged in extensive settlement negotiations to
7 try to resolve the cases. These efforts included participating in a formal, private mediation
8 conducted on June 22, 2022 by Donna D. Melby, Esq. ("Mediator"), a well-regarded mediator
9 experienced in handling complex labor and employment matters, as well as several additional
10 follow-up discussions with the Mediator in 2023. During all settlement discussions, the Parties
11 conducted their negotiations at arm's length in an adversarial position. In the course of
12 mediation and settlement discussions, the Parties exchanged information, documents, and data,
13 and discussed various aspects of the cases, including and not limited to, the risks and delays of
14 further litigation, the risks and expenses to the Parties of proceeding with class certification and
15 trial, the law relating to class certification, manageability, off-the-clock theory, regular rate,
16 meal and rest periods, representative PAGA claims, and wage-and-hour law and enforcement,
17 as well as the evidence produced and analyzed, and the possibility of appeals, among other
18 things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendants
19 contended that individualized questions of fact predominate over any common issues, and these
20 issues would pose challenges to class certification and representative adjudication. Defendants
21 and their counsel felt strongly about Defendants' ability to avoid class certification and prevail
22 on the merits, while Plaintiff and Class Counsel believed that they would be able to obtain class
23 certification and prevail at trial. With the aid of the Mediator's evaluation, the Parties ultimately
24 agreed that the cases were well-suited for settlement given the legal issues relating to Plaintiff's
25 principal claims, as well as the costs and risks to the Parties that would attend further litigation.
26 These risks of further litigation include, and are not limited to, a determination that the claims
27 are unsuitable for class treatment and/or representative adjudication, class de-certification after
28 certification of a class, allowing a jury to decide the claims asserted in the cases, and the real

possibility of no monetary recovery after years of litigation, especially in light of Defendants' financial circumstances.

9. By way of the accompanying Motion for Final Approval, Plaintiff seeks attorneys' fees to Class Counsel in the amount of \$144,166.67 which is one-third (1/3) of the Total Settlement Amount of \$432,500.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least one-third (1/3) of the recovery.

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

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the 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 **362.90 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC, and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this particular matter, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$850 per hour for work performed by Lawyers for Justice, PC.

Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; 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. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers for Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

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

25 15. Arby Aiwarzian 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

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

17 16. Yasmin Hosseini is a Member of Lawyers for Justice, PC. She received her
18 Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned her
19 Juris Doctor degree from Pepperdine University School of Law in 2017. She was admitted to
20 practice law in California in 2019. She is admitted to practice before all courts of the State of
21 California and all federal district courts in the State of California. She has worked on many
22 wage and hour class action and PAGA representative matters, and her work has included, *inter*
23 *alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating,
24 and finalizing stipulations and settlement agreements, engaging in motion practice, claims
25 evaluation and analysis, and making court appearances. Prior to working at Lawyers for Justice,
26 PC, she represented filmmakers and talent, negotiating and structuring various types of
27 agreements on their behalf. She is a member of the California Employment Lawyers
28 Association, Beverly Hills Bar Association, and Iranian American Bar Association.

1 17. I am a Managing Member of Lawyers *for* Justice, PC. I received a Bachelor of
2 Arts degree from California State University, Los Angeles in 2006, a Master of Science degree
3 from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown
4 University Law Center in 2010. I am admitted to practice in California (since 2010) and in New
5 York (since 2013) and I am also admitted to practice in all U.S. District Courts in California,
6 the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. I
7 have taken and defended dozens of depositions and successfully handled motion practice in class
8 action cases regarding discovery (including and not limited to, regarding class contact
9 information), class certification (both contested class certification and stipulated class
10 certification), arbitration agreements, coordination, and intervention. I have successfully
11 handled briefing and oral argument on appeal and obtained notable decisions regarding the
12 Private Attorneys General Act claims and employer efforts to compel arbitration of such claims,
13 e.g., *Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439,
14 cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior*
15 *Court*, 8 Cal.5th175 (2019). I have significant experience with class actions, including and not
16 limited to working on cases to obtain class certification through contested motion practice and
17 working on cases in the post-certification stage (e.g., post-certification discovery, appeal,
18 statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a
19 case involving a certified class consisting of approximately 2,600 individuals). I also have
20 extensive experience with class action and/or representative action settlements, and have
21 handled this process in over three hundred (300) cases. Under Edwin Aiwazian, Arby Aiwazian,
22 and my supervision, Lawyers *for* Justice, PC has handled the class certification and court
23 approval process for hundreds of class action and/or representative action matters that have
24 successfully resolved. I am a member of the California Employment Lawyers Association and,
25 on several occasions, have been a speaker regarding topics in wage and hour law at the
26 organization's continuing legal education events.

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**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.

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

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

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

j. 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 upscale hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial

Council Coordination Proceeding Number is 4794.

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

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

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

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

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

p. LFJ, on behalf of the plaintiff and respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer’s motion to compel arbitration, which resulted in a published opinion by the California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*

1 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
2 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
3 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
4 5046.

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

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

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

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

25 u. LFJ represented the plaintiff in a wage-and-hour class and PAGA
26 representative action against a food company on behalf of non-exempt employees. On June 30,
27 2017, the court granted final approval of the class and PAGA representative action settlement.
28 The Sacramento County Superior Court Case Number is 34-2015-00175871.

1 v. LFJ represented the plaintiffs in a wage-and-hour class and PAGA
2 representative action against a chocolate company on behalf of non-exempt employees. On July
3 19, 2017, the court granted final approval of the class and PAGA representative action
4 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

1 BC498401.

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

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

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

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

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

26 gg. LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a national retailer of apparel and
28 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted

1 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the
2 court granted final approval of the class and PAGA representative action settlement. The
3 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

4 hh. LFJ, in association with co-counsel therein, represented the plaintiff in a
5 wage-and-hour class and PAGA representative action against a medical equipment supplier on
6 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
7 for class certification and certified a class. On November 2, 2023, the court granted final
8 approval of the class and PAGA representative action settlement. The San Bernardino County
9 Superior Court Case Number is CIVDS1505744.

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

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

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

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

8 mm. LFJ, in association with co-counsel therein, represented the plaintiffs in a
9 wage-and-hour class action against manufacturer and supplier of power products and services
10 on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
11 motion for class certification and certified a class. On August 27, 2021, the court granted final
12 approval of the class action settlement. The San Diego County Superior Court Case Number is
13 37-2015-00025968-CU-OE-CTL.

14 nn. LFJ represented the plaintiff in a wage-and-hour class action against a
15 nutritional products manufacturer on behalf of non-exempt production line employees. On
16 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
17 certified a class. On January 16, 2024, the court granted final approval of the class and PAGA
18 representative action settlement. The Solano County Superior Court Case Number is
19 FCS051001.

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

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

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers for Justice, PC seeks reimbursement of **\$18,999.37** in litigation costs and expenses incurred in the cases, as reflected in **“EXHIBIT B”** attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

CLASS REPRESENTATIVE ENHANCEMENT AWARD TO PLAINTIFF

20. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Award in the amount of \$9,000.00 to Plaintiff. The requested enhancement award is fair and appropriate. Plaintiff spent a considerable amount of time and effort to produce relevant documents and information and to provide the facts and evidence necessary to attempt to prove the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would facilitate the pursuit of the cases. Accordingly, it is appropriate for Plaintiff to receive \$9,000.00 as a reasonable enhancement award, for her efforts in this matter, in addition to her individual settlement payment.

21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, Class Members, Aggrieved Employees, 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 24th day of June 2024, at Glendale, California.



Joanna Ghosh

EXHIBIT A

YASMINE RAMIREZ BARAHONA V. CARLS JR. 800, INC., ET AL.
Los Angeles County Superior Court Case No. 21STCV20100 (“Class Action”)
JASMINE RAMIREZ V. CARLS JR. 800, INC., ET AL.
Los Angeles County Superior Court Case No. 21STCV33550 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality, and Manageability	8.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Yasmine Ramirez Barahona a/k/a Jasmine Ramirez’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	7.50
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendants Carl’s Jr. 800 Inc., Carl’s Jr. 7140 Inc., BJ Mart, LLC, BR Mart, Inc., Jasper Rodd, and Behnam Rodd (collectively “Defendants”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members	7.10
Pre-Notice Investigation of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiff and the Aggrieved Employees	6.50
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendants with Respect to Plaintiff and the Aggrieved Employees	5.80
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, IWC Wage Orders, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials	7.50
Investigation of Defendants, Their Business Relationships, and the Industry in Which They Operate	2.10

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	3.30
Investigation of Defendants' (including, <i>inter alia</i> , Executives, Officers, and Leadership) Litigation History with a Focus on Involvement in Wage-and-Hour Issues and Other Related Employment Issues to Evaluate Willfulness and Uniformity	3.50
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	3.60
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, or Operated by Defendants in California During the Class Period, Including Differences (If Any) Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	3.10
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked in California	3.50
Research and Investigation Re: Defendants' Written and Non-Written Policies, Practices, and Procedures Relating to Opening and Closing Tasks, Store Hours and Operations, Customer Service, Health and Food Safety, Timekeeping, On-Call, Meal/Rest Breaks, On-Premises Breaks, Meal/Rest Premiums, Overtime Compensation, Non-Discretionary Bonus/Incentive/Shift Differential Pay, Use of Personal Cell Phones, Uniform/Dress Code, PPE/Equipment/Supplies, and Reimbursement of Business-Related Expenses	12.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendants Use to Conduct Everyday Business, Including Timekeeping, Sales, Inventory, Logistics, Communications, Security, and Surveillance with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal and Rest Breaks	2.60
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	7.50
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, Including Research Regarding Which Experts to Retain and For What Purpose	5.40

Research and Investigation Re: Impact of COVID-19 Pandemic on Defendants, Their Operations, and Putative Class Members' Work, and Defendants' Financial Circumstances	8.50
Meet and Communicate with Plaintiff During the Case	41.50
Investigate, Meet, Communicate with, and/or Conduct Interviews of Putative Class Members and/or Percipient Witnesses	9.50
Pleadings and Court Filings	
Research and Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on May 27, 2021) (Class Action)	7.10
Review Court's Notice of Case Assignment (filed on May 27, 2021) (Class Action)	0.10
Review Court's Initial Status Conference Order (Complex Litigation Program) and Minute Order Re: Court Order Re: Initial Status Conference (filed on June 14, 2021) (Class Action)	0.10
Review Defendants' Notice of Appearance (served on July 22, 2021) (Class Action)	0.10
Draft Plaintiff's Initial Status Conference Report (filed on July 23, 2021) (Class Action)	0.80
Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on August 12, 2021) (Class Action)	1.30
Research and Draft Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on September 10, 2021) (PAGA Action)	5.20
Review Court's Notice of Case Assignment (filed on September 10, 2021) (PAGA Action)	0.10
Review Court's Notice of Case Management Conference and Order to Show Cause Hearing (filed on September 13, 2021) (PAGA Action)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on October 7, 2021) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Report (submitted on October 25, 2021) (Class Action)	0.80

Review and Analyze Defendant's Answer to Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Research Affirmative Defenses in Defendant's Answer (served on November 19, 2021) (PAGA Action)	1.20
Draft Plaintiff's Notice of Court's Minute Order (filed on December 8, 2021) (Class Action)	0.10
Draft [Proposed] Order Authorizing Electronic Service (Case Anywhere) and Review Court's Order Authorizing Electronic Service (Case Anywhere) (filed on December 14, 2021) (Class Action)	0.20
Review Defendant's Notice of Related Case (served on January 5, 2022) (Class Action)	0.10
Review Defendant's Notice of Related Case (served on January 5, 2022) (PAGA Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Order Authorizing Electronic Service (filed on February 25, 2022) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Notice of Settlement and Post-Medication Status Report (submitted on July 27, 2022) (Class Action)	0.70
Meet and Confer with Defendants' Counsel, and Draft Joint Notice of Settlement and Initial Status Conference Report (submitted on July 27, 2022) (PAGA Action)	0.50
Draft Plaintiff's Notice Re: Post-Mediation Status Conference (filed on August 16, 2022) (Class Action)	0.40
Draft Plaintiff's Notice Re: Initial Status Conference (filed on August 16, 2022) (PAGA Action)	0.60
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order (submitted on December 7, 2022) (Class Action)	1.10
Review Court's Order Granting Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (filed on December 9, 2022) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order (submitted on December 21, 2022) (Class Action)	0.80

Review Court's Order Granting Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (filed on December 28, 2022) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order (submitted on January 25, 2023) (Class Action)	0.80
Review Court's Order Granting Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (filed on January 30, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order (submitted on March 23, 2023) (Class Action)	0.80
Review Court's Order Granting Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (filed on March 27, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order (submitted on April 24, 2023) (Class Action)	0.80
Review Court's Order Granting Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (filed on May 2, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order (submitted on June 27, 2023) (Class Action)	0.80
Draft Plaintiff's Notice Regarding August 2, 2023 Hearing (filed on August 2, 2023) (Class Action)	0.40
Draft Plaintiff's Amendment to Complaint (Fictitious/Incorrect Name) (filed on August 10, 2023) (Class Action)	0.10
Draft Plaintiff's Notice Regarding September 26, 2023 Hearing (filed on September 28, 2023) (Class Action)	0.20
Review Supplemental Declaration of Defendants (served on October 26, 2023) (Class Action)	0.50

Draft Plaintiff's Notice Regarding December 4, 2023 Hearing (filed on December 12, 2023) (Class Action)	0.20
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Final Approval; [Proposed] Order (submitted on January 30, 2024) (Class Action)	1.20
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Final Approval; [Proposed] Order (submitted on February 9, 2024) (Class Action)	0.80
Review Court's Order Granting Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Final Approval (filed on February 14, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Final Approval; [Proposed] Order (submitted on May 10, 2024) (Class Action)	0.80
Review Court's Order Granting Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Final Approval (filed on May 14, 2023) (Class Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Final Approval (filed on May 15, 2023) (Class Action)	0.10
Appearances	
Prepare for and Telephonically/Remotely Attend Initial Status Conference (July 28, 2021) (Class Action)	0.90
Prepare for and Telephonically/Remotely Attend Status Conference (December 6, 2021) (Class Action)	0.60
Prepare for and Telephonically/Remotely Attend Post-Mediation Status Conference (August 12, 2022) (Class Action) (PAGA Action)	0.50
Prepare for and Telephonically/Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (September 26, 2023) (Class Action)	0.90
Prepare for and Telephonically/Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (December 4, 2023) (Class Action)	0.90

Discovery and Deposition	
Draft Letter to Defendant Carl's Jr. 800, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on December 29, 2020)	1.90
Draft Follow-Up Letter to Defendant Carl's Jr. 800, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on January 22, 2021)	0.80
Draft Follow-Up Letter to Defendant Carl's Jr. 800, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on February 16, 2021)	0.80
Review and Analyze Documents Produced by Defendant Carl's Jr. 800, Inc. in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on March 31, 2021)	3.10
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Carl's Jr. 800, Inc. (served on October 21, 2021)	3.50
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant BJ Mart, LLC (served on October 21, 2021)	2.10
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant BR Mart, Inc. (served on October 21, 2021)	2.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Carl's Jr. 800, Inc. and Requests for Production of Documents (November 22, 2021; Organizational Structure and Document Retention) (served on October 21, 2021)	1.80
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Carl's Jr. 800, Inc. and Requests for Production of Documents (November 23, 2021; Wage and Hour Practices) (served on October 21, 2021)	2.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BJ Mart, LLC and Requests for Production of Documents (November 29, 2021; Organizational Structure and Document Retention) (served on October 21, 2021)	1.10

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BJ Mart, LLC and Requests for Production of Documents (November 30, 2021; Wage and Hour Practices) (served on October 21, 2021)	1.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BR Mart, Inc. and Requests for Production of Documents (December 1, 2021; Organizational Structure and Document Retention) (served on October 21, 2021)	1.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BR Mart, Inc. and Requests for Production of Documents (December 2, 2021; Wage and Hour Practices) (served on October 21, 2021)	1.30
Review and Analyze Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Carl's Jr. 800, Inc. and Requests for Production of Documents (November 22; Organizational Structure and Document Retention) (served on November 16, 2021)	0.20
Review and Analyze Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Carl's Jr. 800, Inc. and Requests for Production of Documents (November 23; Wage and Hour Practices) (served on November 16, 2021)	0.80
Review and Analyze Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BJ Mart, LLC. and Requests for Production of Documents (November 29, 2021; Organizational Structure and Document Retention) (served on November 16, 2021)	0.20
Review and Analyze Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BJ Mart, LLC. and Requests for Production of Documents (November 30, 2021; Wage and Hour Practices) (served on November 16, 2021)	0.80
Review and Analyze Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BR Mart, Inc. and Requests for Production of Documents (December 1, 2021; Organizational Structure and Document Retention) (served on November 16, 2021)	0.20
Review and Analyze Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BR Mart, Inc. and Requests for Production of Documents (December 2, 2021; Wage and Hour Practices) (served on November 16, 2021)	0.80

Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on July 7, 2021)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	15.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants (approximately 7,566 pages), and Other Sources Prior to Mediation	39.50
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 and Calculations (submitted on June 8, 2022)	25.50
Telephonically/Remotely Attend Mediation Session (June 22, 2022; Zoom Video Conference)	12.50
Meet and Confer with Mediator and Engage in Additional Settlement-Related Discussions (January 10, 2023)	1.50
Meet and Confer with Mediator and Engage in Additional Settlement-Related Discussions (April 20, 2023)	1.50
Draft, Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement (executed August 10, 2023) and Notice of Class Action Settlement	15.50
Review Weekly Reports from Settlement Administrator and Monitor Settlement Notice Administration Process	2.50
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Yasmine Ramirez Barahona in Support Thereof, and [Proposed] Order Thereon (filed on August 10, 2023) (Class Action)	15.50
Draft Supplemental Declaration of Yasmine Ramirez Barahona in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on October 25, 2023) (Class Action)	0.80

Prepare [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on December 6, 2023)	0.20
Review Court's Revised Order Granting Preliminary Approval of Class Action Settlement (filed on December 11, 2023) (Class Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Revised Order Granting Preliminary Approval of Class Action Settlement (filed on December 13, 2023) (Class Action)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Award, and Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on June 24, 2024)	18.50
Total Hours:	362.90

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Barahona v. Carls Jr. 800, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/29/2020	U.S. Postmaster	Postage	6.95
1/22/2021	U.S. Postmaster	Postage	7.80
2/12/2021	U.S. Postmaster	Postage	7.20
5/27/2021	Legal Document Server, Inc.	Attorney Service	180.23
5/27/2021	Los Angeles Superior Court	Complaint Filing Fee	435.00
5/27/2021	Los Angeles Superior Court	Complex Filing Fee	1,000.00
6/23/2021	ProLegal	Attorney Service	298.13
7/20/2021	Legal Document Server, Inc.	Attorney Service	175.00
7/23/2021	Legal Document Server, Inc.	Attorney Service	175.00
8/2/2021	Los Angeles Superior Court	Remote Appearance Fee	15.00
9/27/2021	One Legal	Attorney Service	16.68
10/7/2021	Los Angeles Superior Court	Jury Fee	150.00
10/7/2021	One Legal	Attorney Service	21.10
10/19/2021	ProLegal	Attorney Service	376.08
10/22/2021	General Logistics Systems US, Inc.	Courier Service	20.43
10/25/2021	Legal Document Server, Inc.	Attorney Service	15.20
10/26/2021	Legal Document Server, Inc.	Attorney Service	95.00
12/8/2021	Legal Document Server, Inc.	Attorney Service	15.20
12/9/2021	Legal Document Server, Inc.	Attorney Service	15.20
1/14/2022	Paul Hastings LLP	Mediation Fee	10,000.00
2/24/2022	Los Angeles Superior Court	Document Download Fee	8.60
2/25/2022	Legal Document Server, Inc.	Attorney Service	15.20
5/19/2022	FedEx Express	Courier Service	35.85
6/17/2022	Los Angeles Superior Court	Document Download Fee	31.20
6/22/2022	Case Anywhere LLC	Attorney Service	135.00
7/27/2022	Legal Document Server, Inc.	Attorney Service	15.95
8/16/2022	Legal Document Server, Inc.	Attorney Service	15.95
8/24/2022	Paul Hastings LLP	Supplemental Mediation Fee	3,000.00
9/7/2022	Case Anywhere LLC	Attorney Service	147.00
12/8/2022	Legal Document Server, Inc.	Attorney Service	17.30
12/8/2022	Los Angeles Superior Court	Stipulation & Order Fee	20.00
12/22/2022	Legal Document Server, Inc.	Attorney Service	17.30
12/22/2022	Los Angeles Superior Court	Stipulation & Order Fee	20.00
1/26/2023	Legal Document Server, Inc.	Attorney Service	17.30
1/26/2023	Los Angeles Superior Court	Stipulation & Order Fee	20.00
3/1/2023	Case Anywhere LLC	Attorney Service	147.00
3/24/2023	Legal Document Server, Inc.	Attorney Service	17.30
3/24/2023	Los Angeles Superior Court	Stipulation & Order Fee	20.00
4/24/2023	Legal Document Server, Inc.	Attorney Service	17.54
4/24/2023	Los Angeles Superior Court	Stipulation & Order Fee	20.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Barahona v. Carls Jr. 800, Inc.

6/1/2023	Case Anywhere LLC	Attorney Service	147.00
6/27/2023	Legal Document Server, Inc.	Attorney Service	17.54
6/27/2023	Los Angeles Superior Court	Stipulation & Order Fee	20.00
8/3/2023	Legal Document Server, Inc.	Attorney Service	16.15
8/10/2023	Legal Document Server, Inc.	Attorney Service	16.15
8/11/2023	Legal Document Server, Inc.	Attorney Service	224.57
8/11/2023	Los Angeles Superior Court	Motion Fee	60.00
9/2/2023	Case Anywhere LLC	Attorney Service	183.00
9/29/2023	Legal Document Server, Inc.	Attorney Service	16.15
10/27/2023	Legal Document Server, Inc.	Attorney Service	32.30
12/5/2023	Case Anywhere LLC	Attorney Service	153.00
12/6/2023	Los Angeles Superior Court	Attorney Service	2.00
12/8/2023	Legal Document Server, Inc.	Attorney Service	16.15
12/12/2023	Legal Document Server, Inc.	Attorney Service	16.15
12/14/2023	Legal Document Server, Inc.	Attorney Service	161.15
1/31/2024	Legal Document Server, Inc.	Attorney Service	17.54
1/31/2024	Los Angeles Superior Court	Stipulation & Order Fee	20.00
2/9/2024	Legal Document Server, Inc.	Attorney Service	17.54
2/9/2024	Los Angeles Superior Court	Stipulation & Order Fee	20.00
3/4/2024	Case Anywhere LLC	Attorney Service	171.00
Total:			18,091.08

LAWYERS for JUSTICE PC CASE COST DETAIL
Barahona v. Carl's Jr. 800 Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/7/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
7/7/2021	U.S. Postmaster	Postage	45.00
9/13/2021	One Legal	Attorney Service	29.51
9/13/2021	Los Angeles Superior Court	Complaint Filing Fee	435.00
9/27/2021	One Legal	Attorney Service	16.68
12/27/2021	Legal Document Server, Inc.	Attorney Service	15.20
7/27/2022	Legal Document Server, Inc.	Attorney Service	140.95
8/16/2022	Legal Document Server, Inc.	Attorney Service	15.95
12/5/2022	Case Anywhere	Attorney Service	135.00
Total:			908.29