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*Attorneys for Plaintiffs Lorena Bellamy,
Orishia Blacksher, Harold Brissett, and the Class*

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

LORENA BELLAMY, individually, and on
behalf of other members of the general public
similarly situated; and ORISHIA
BLACKSHER and HAROLD BRISSETT,
individually, and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiffs,

vs.

LIFELONG MEDICAL CARE, a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: HG19024178 (Lead Case)
Consolidated Case Nos.: 21CV004212 &
22CV012004

Honorable Somnath Raj Chatterjee
Department 21

CLASS ACTION

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
CLASS COUNSEL FEES, AND CLASS
REPRESENTATIVE SERVICE
PAYMENTS**

Reservation ID: 126656572735
Date: March 24, 2025
Time: 1:30 p.m.
Department: 21

Complaint Filed: June 24, 2019
FAC Filed: January 12, 2022
Trial Date: None Set

DEANNA LYNETTE DAVIS, individually
and on behalf of all others similarly situated;

Plaintiff,

v.

LIFELONG MEDICAL CARE, a California
Corporation; and DOES 1-50, inclusive,

Defendants

DEANNA LYNETTE DAVIS, individually
and on behalf of other aggrieved employees
pursuant to the California Private Attorney's
General Act;

Plaintiff,

v.

LIFELONG MEDICAL CARE, a California
Corporation; and DOES 1-50, inclusive,

Defendants

DECLARATION OF VARTAN MADOYAN

I, Vartan Madoyan, 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 Lorena Bellamy, Orishia Blacksher, and Harold Brissett (collectively, the “Plaintiffs”) and the Class in the above-captioned matters. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On October 21, 2024, in Department 21 of the above-entitled Court, the Honorable Somnath Raj Chatterjee preliminarily approved the First Amended Class Action and Private Attorneys General Act Settlement Agreement (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiffs and Defendant Lifelong Medical Care, Inc., (“Defendant,”) (together with Plaintiffs referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiffs Lorena Bellamy, Orishia Blacksher, Harold Brissett, and Deanna Lynette Davis as the representatives of the Class (collectively, the “Class Representatives”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC and James Hawkins, APLC as counsel for the Class (together, the “Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Proposed Settlement of Class Action and Hearing Date for Final Court Approval (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed ILYM Group, Inc. (“ILYM Group, Inc.”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Class Counsel Fees and Class Counsel Litigation Expenses, and Class Representative Service Payments (“Motion for Final Approval”), no Participating Class Member has objected to the Class Settlement, the contemplated request for Class Counsel Fees

and Class Counsel Litigation Expenses, Class Representative Service Payments, and Settlement Administration Costs, or the allocation for the PAGA Payment.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above captioned action entitled *Bellamy vs. Lifelong Medical Care* Alameda County Superior Court, Case No. HG19024178 (“*Bellamy Action*”), which was filed on June 24, 2019; the action entitled *Blacksher vs. Lifelong Medical Care* Alameda County Superior Court, Case No. RG19033794 (“*Blacksher Action*”), which was filed on September 4, 2019; and the action entitled *Brissett vs. Lifelong Medical Care* Alameda County Superior Court, Case No. RG21113462 (“*Brissett Action*”), which was filed on September 13, 2021, since prior to their commencement. On January 1, 2022, Plaintiff Lorena Bellamy filed a First Amended Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (“*Bellamy First Amended Complaint*”) adding Plaintiff Orishia Blacksher and Plaintiff Harold Brissett as parties to the *Bellamy Action* and adding a cause of action under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. Lawyers *for* Justice, PC eventually joined forces with James Hawkins, APLC (together, Lawyers *for* Justice, PC and James Hawkins, APLC are referred to as “Class Counsel”). James Hawkins APLC, serves as counsel for Plaintiff Deanna Lynette Davis, who has been pursuing the putative class action entitled *Deanna Lynette Davis v. Lifelong Medical Care*, Alameda County Superior Court Case No. 21CV004212 (“*Davis Class Action*”) and the PAGA representative action entitled *Deanna Lynette Davis v. Lifelong Medical Care*, Alameda County Superior Court Case No. 22CV012004 (“*Davis PAGA Action*”). The above-captioned action, the *Davis Class Action*, and the *Davis PAGA Action* (collectively referred herein as, the “*Settled Actions*”) are being resolved by way of the settlement for which approval is being sought in the above-captioned action. On February 27, 2024, pursuant to the stipulation of the parties in the *Settled Actions*, for purposes of implementation of the settlement, the Court entered an order consolidating the *Settled Actions* and deeming the above-captioned action as the lead case.

1 Lawyers for Justice, PC has worked cooperatively with James Hawkins, APLC to strategize and
2 prosecute the cases, and ultimately, to reach a resolution of them

3 6. Before initiating the *Bellamy* Action, Lawyers for Justice, PC investigated and
4 researched the facts and circumstances underlying the pertinent factual and legal issues and
5 applicable law. This required thorough discussions and interviews between attorneys at
6 Lawyers for Justice, PC and Plaintiffs Lorena Bellamy, Orishia Blacksher, and Harold Brissett
7 and research into the various legal issues involved in the cases, namely, the current state of the
8 law as it applied to class certification, representative adjudication, and trial; the law relating to
9 class certification, manageability, off-the-clock theory, meal and rest periods, rounding, regular
10 rate of pay, expense reimbursements, recordkeeping and wage statement requirements,
11 representative Private Attorneys General Act (“PAGA”) claims and penalties, and wage-and-
12 hour law and enforcement, Plaintiffs Lorena Bellamy, Orishia Blacksher, and Harold Brissetts’
13 claims and allegations, and potential defenses. After conducting an initial investigation,
14 Lawyers for Justice, PC determined that Plaintiffs Lorena Bellamy, Orishia Blacksher, and
15 Harold Brissetts’ claims were well-suited for class-wide and representative adjudication, owing
16 to what appeared to be a common course of conduct affecting a similarly situated group of
17 current and former hourly-paid or non-exempt employees of Defendant in California, who were
18 not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods,
19 and business expenses.

20 7. Collectively, Class Counsel conducted significant formal and informal discovery
21 and investigation into the facts of the cases, to assess the veracity, strength, and scope of the
22 claims, and were preparing the cases for class certification and trial, prior to reaching the
23 Settlement. Lawyers for Justice, PC served multiple sets of formal written discovery requests
24 on Defendant (specifically, Plaintiff Lorena Bellamy’s Requests for Production of Documents
25 (Set One), Special Interrogatories (Sets One, Two, and Three), and Form Interrogatories –
26 General (Set One); and Plaintiff Orishia Blacksher’s Requests for Production of Documents (Set
27 One), Special Interrogatories (Sets One and Two), and Form Interrogatories – General (Set
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One)), and noticed the depositions of Defendant's Person Most Knowledgeable designees, along with accompanying requests for production of documents. Lawyers for Justice, PC also prepared responses to Defendant's formal written discovery and defended the depositions of Plaintiff Bellamy and Plaintiff Blacksher. The Parties also engaged in the *Belaire-West* notice process, and through the extensive formal and informal discovery, exchanged tens of thousands of pages of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. The volume of data and documents that Class Counsel reviewed and analyzed included, and were not limited to: Plaintiffs' employment records, a detailed sampling of Plaintiffs' and other Class Members' time data and pay records, Defendant's Employee Handbook, internal memoranda, job descriptions, offer letters employment termination process checklists, company policy acknowledgments (including but not limited to Employee Confidentiality Acknowledgement), forms (including but not limited to Arbitration Agreements, Employee Performance Reviews, Meal Break Waiver Form, and Paid Sick Leave Form), procedures, and policies (including but not limited to Work Attendance Policies, Time Record Policies, Overtime Policies, Employee Conduct Policies, Work-Related Driving Policies), among other information and documents. Class Counsel had the opportunity to interview and obtain information from Plaintiffs, Class Members, and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiffs, Defendant, and other sources. Class Counsel developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, motion practice, formal and informal discovery and depositions, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement, especially in light of Defendant's financial condition. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-

1 related papers (in connection with, briefing on Plaintiff Lorena Bellamy's Demurrer and Motion
2 to Strike Defendant's Answer and *ex parte* applications), the mediation briefing and supporting
3 materials, and settlement documents; drafting and propounding multiple sets of formal written
4 discovery requests on Defendant and notices of depositions of Defendant's persons most
5 knowledgeable designees; reviewing Defendant's responses and objections to written discovery
6 requests and deposition notices; and preparing for and attending depositions, court proceedings,
7 mediation, and settlement negotiations, among other tasks.

8 8. As outlined herein, the Parties have conducted significant investigation and formal
9 and informal discovery during the course of litigating this matter, mediation, and extensive
10 settlement negotiations. Class Counsel analyzed a volume of information, documents, and data
11 obtained from Plaintiffs, Defendant, and other sources that provided a critical understanding of
12 the nature of the work performed by the Class Members and Aggrieved Employees, as well as
13 Defendant's organizational structure and their operations and employment policies, practices,
14 and procedures. The information, documents, and data were used in analyzing liability,
15 damages, penalties, and other valuation issues in connection with all phases of the litigation, and
16 ultimately, in connection with the mediation and settlement negotiations process. Class Counsel
17 also performed significant research into the applicable law, which is evolving as it relates to
18 class certification, manageability, off-the-clock theory, meal and rest periods, representative
19 PAGA claims and penalties, wage-and-hour enforcement, arbitration agreements, regular rate,
20 Plaintiffs' claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

21 9. After conducting significant investigation of the facts and law during the
22 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations
23 to try to resolve the cases. These efforts included participating in a formal, full-day mediation
24 conducted by Paul Grossman, a well-regarded mediator experienced in handling complex labor
25 and employment matters. During all settlement discussions, the Parties conducted their
26 negotiations at arm's length in an adversarial position. In the course of the mediation and
27 settlement negotiations, the Parties exchanged documents and data, and discussed various
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aspects of the cases, including and not limited to, the risks and delays of further litigation, the risks and expenses to the Parties of proceeding with class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, arbitration agreements, rounding, regular rates of pay, meal and rest periods (including *inter alia*, on premises breaks), expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiffs' claims and allegations, and Defendant's defenses thereto; Defendant's financial condition; as well as the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication, Defendant and its counsel felt strongly about Defendant's ability to avoid class certification prevail on the merits and, while Plaintiffs and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that would attend further litigation, and accepted the mediator's proposal. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation, especially in light of Defendant's financial condition. Plaintiffs have also agreed to an Agreement Regarding Division of Attorneys' Fees and Costs Joint Prosecution and Fee-Sharing Agreement, which includes an agreement to split fees 80/20 between Class Counsel, with 80% being allocated to Lawyers for Justice, PC and 20% being allocated to James Hawkins, APLC.

10. By way of the accompanying Motion for Final Approval, Class Counsel seek attorneys' fees in the amount of \$612,500.00, which is thirty-five percent (35%) of the Gross

Settlement Amount of \$1,750,000.00. Pursuant to the contingency-fee agreements entered into by and between Plaintiffs and Class Counsel, Plaintiffs have agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel have shown; (4) the results that Class Counsel have achieved throughout the litigation; (5) the value of the settlement that Class Counsel have achieved in this matter; and (6) the other cases that Class Counsel have turned down in order to devote their time and efforts to these cases. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery including a Gross Settlement Amount of \$1,750,000.00 (with a Net Settlement Amount of approximately at least \$836,553.96 to be paid to Participating Class Members, and gross Settlement Shares averaging approximately more than \$464.37)—support the percentage fee sought.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel have incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **559.70 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The work performed in this particular matter, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who

worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour.

**EXPERIENCE AND ADEQUACY OF
LAWYERS *for* JUSTICE, PC**

14. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive,

administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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

1 contested motion practice in approximately sixteen (16) cases in the last decade, and litigated
2 over 1,000 class action or representative action cases.

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

22 17. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
23 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
24 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
25 Georgetown University Law Center in 2010. She is admitted to practice in California (since
26 2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District
27 Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the
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U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

18. Matthew Soto is a Member of Lawyers for Justice, PC. He received his Bachelor of Science degree and Bachelor of Arts degree from California State University, Los Angeles in 2020, and earned his Juris Doctor degree from Pepperdine Caruso School of Law in 2023. He was admitted to practice law in California in 2023. He is admitted to practice before all courts of the State of California and all federal district courts in the State of California. He has worked on over fifty (50) wage-and-hour class action and PAGA representative cases, and his work on these cases has included drafting pleadings and motions, drafting, negotiating, and finalizing

1 stipulations and settlement agreements, claims evaluation and analysis, and making court
2 appearances.

3 19. I, Vartan Madoyan, am a Member of Lawyers for Justice, PC. I received my
4 Bachelor of Arts degree in Economics from the University of California, San Diego in 2007,
5 and a Juris Doctor degree from Loyola Law School in 2011, graduating with Cum Laude and
6 Order of the Coif honors. I am admitted to practice before all courts in the State of California
7 and all U.S. District Courts in California. I externed for the Honorable Victoria S. Kaufman of
8 the United States Bankruptcy Court, Central District of California, from June 2009 to August
9 2009. I externed for the Honorable Gary A. Feess of the United States District Court, Central
10 District of California, from January 2010 to May 2010. From 2011 through and including the
11 present, I have practiced almost exclusively on complex wage and hour class action and PAGA
12 action matters in California. From October 2011 to June 2013, I was an Associate at Littler
13 Mendelson's Century City, California office, working for one of the largest employer-side labor
14 and employment law firms in the United States. From July 2013 to March 2014, I was an
15 Associate at Sheppard, Mullin, Richter & Hampton's Century City, California office. From
16 March 2014 to July 2023, I worked as an Associate and then as Counsel at Baker Hostetler
17 LLP's Los Angeles office. From August 2023 to the present, I have been a Member of Lawyers
18 for Justice, PC. I have taken and defended dozens of depositions and successfully handled
19 motion practice in class action and PAGA cases regarding discovery (including and not limited
20 to motions regarding class contact information), class certification (both contested class
21 certification and stipulated class certification), dispositive motions, arbitration agreements,
22 coordination, and intervention. I have successfully handled a complex wage and hour class
23 action and PAGA case through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*,
24 Orange County Superior Court, Case No. 30-2013-00692890. I have also successfully handled
25 briefing on appeal regarding employer efforts to compel arbitration. *TitleMax of Cal. v. Pena*,
26 California Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28,
27 2023) (unpublished decision). Further, I have extensive experience with settlements of class
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actions and PAGA actions and have handled and supervised this process in over one hundred (100) cases.

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS FOR JUSTICE, PC

20. To date, Class Counsel have borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to \$40,000.00. Lawyers for Justice, PC seeks reimbursement of **\$18,862.26** in litigation costs and expenses incurred in the matter, as reflected in **“EXHIBIT 2”** attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. Any cost savings of will be part of the Net Settlement Amount, which will be distributed to the Participating Class Members in accordance with the Settlement.

CLASS REPRESENTATIVE SERVICE PAYMENTS TO PLAINTIFFS

21. In recognition of their efforts and work spearheading the prosecution of this matter and serving as the Class Representatives, as well as their broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph III.56.d. of the Settlement Agreement), the Settlement provides for Class Representative Service Payments in the amount of up to \$10,000.00 each to Plaintiffs. Plaintiffs Lorena Bellamy, Orishia Blacksher, and Harold Brissett spent a substantial amount of time and effort discussing their employment with Class Counsel, gathering and providing relevant documents and information, providing facts and evidence to support the prosecution of the claims, and/or providing discovery responses and appearing for depositions. Plaintiffs Lorena Bellamy, Orishia Blacksher, and Harold Brissett were available whenever Class Counsel needed them and actively tried to obtain and provide information that help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiffs Lorena Bellamy, Orishia Blacksher, and Harold Brissett to receive \$10,000.00 each, as reasonable Class Representative Service Payments for

1 their broader waiver and release of claims and services performed in this matter, in addition to
2 their individual settlement payments.

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

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

7 Executed this 28th day of February 2025, at Glendale, California.

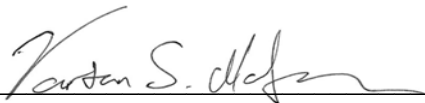
8 
9 Vartan Madoyan

EXHIBIT 1

LORENA BELLAMY V. LIFELONG MEDICAL CARE, ET AL.
Alameda County Superior Court, Case No. HG19024178 (“Bellamy Action”)

ORISHIA BLACKSHER V. LIFELONG MEDICAL CARE, ET AL.
Alameda County Superior Court, Case No. RG19033794 (“Blacksher Action”)

HAROLD BRISSETT V. LIFELONG MEDICAL CARE, ET AL.
Alameda County Superior Court, Case No. RG21113462 (“Brissett Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Lorena Bellamy (“Plaintiff Bellamy”)	43.50
Meet and Communicate with Plaintiff Orishia Blacksher (“Plaintiff Blacksher”)	45.50
Meet and Communicate with Plaintiff Harold Brissett (“Plaintiff Brissett”)	53.50
Review and Analyze Court Filings in <i>Deanna Lynette Davis v. Lifelong Medical Care</i> , Alameda County Superior Court Case No. 21CV004212 and <i>Deanna Lynette Davis v. Lifelong Medical Care</i> , Alameda County Superior Court Case No. 22CV012004	3.10
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Bellamy’s Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft Plaintiff Bellamy’s Class Action Complaint for Damages (filed on June 24, 2019) (Bellamy Action)	7.80

Review Notice of Case Management Conference and Notice of Assignment of Judge for All Purposes (filed on June 25, 2019) (Bellamy Action)	0.10
Analyze Defendant's Answer to Plaintiff Bellamy's Class Action Complaint (served on July 29, 2019), and Research Affirmative Defenses in Defendant's Answer (Bellamy Action)	1.20
Draft Plaintiff's Notice of Posting Jury Fees (filed on August 26, 2019) (Bellamy Action)	0.10
Investigate the Merits of Plaintiff Blacksher's PAGA Claim, Conduct Legal Research and Analysis of PAGA Claim, and Draft Plaintiff Blacksher's Complaint for Enforcement Under the Private Attorneys General Act (filed on September 4, 2019) (Blacksher Action)	6.70
Review Notice of Case Management Conference and Notice of Assignment of Judge for All Purposes (filed on September 5, 2019) (Blacksher Action)	0.10
Review Defendant's Notice of Substitution of Attorney (filed on September 26, 2019) (Bellamy Action)	0.10
Draft Plaintiff Bellamy's Case Management Statement (filed on October 25, 2019) (Bellamy Action)	0.50
Review Defendant's Case Management Statement (filed on October 28, 2019) (Bellamy Action)	0.20
Review Order Re: Case Management (filed on September 8, 2019) (Bellamy Action)	0.10
Review Declaration of Hannibal P. Odisho in Support of Defendants' Good Faith Attempt to Meet and Confer Regarding Motion to Strike Portions of Plaintiff Blacksher's Complaint (filed on October 22, 2019) (Blacksher Action)	0.20
Draft Plaintiff Blacksher's Notice of Posting Jury Fees (filed on December 5, 2019) (Blacksher Action)	0.10
Meet and Confer with Defendant's Counsel, Draft Stipulation to Strike Portions of the Complaint for Enforcement Under the Private Attorneys General Act, Draft [Proposed] Order Thereon, and Analyze Related Issues (filed on December 20, 2019) (Blacksher Action)	1.80

Review and Analyze Defendant's Answer to Plaintiff Blacksher's Complaint (served on December 30, 2019), and Research Affirmative Defenses in Defendant's Answer (Blacksher Action)	1.20
Review Defendant's Case Management Statement (filed on January 6, 2020) (Bellamy Action)	0.20
Review Defendant's Case Management Statement (filed on January 6, 2020) (Blacksher Action)	0.10
Draft Plaintiff Bellamy's Case Management Statement (filed on January 7, 2020) (Bellamy Action)	0.30
Draft Plaintiff Blacksher's Case Management Statement (filed on January 7, 2020) (Blacksher Action)	0.30
Review Court's Order on Joint Stipulation to Strike Portions of the Complaint for Enforcement Under the Private Attorneys General Act (filed on January 16, 2020) (Blacksher Action)	0.10
Review Defendant's First Amended Answer to Plaintiff Blacksher's Complaint (served on January 21, 2020) (Blacksher Action)	0.70
Review Court Order Re: Case Management (filed on January 21, 2020) (Bellamy Action)	0.10
Review Substitution of Attorney (filed on March 2, 2020) (Bellamy Action)	0.10
Review Substitution of Attorney (filed on March 2, 2020) (Blacksher Action)	0.10
Review and Analyze Defendant's First Amended Answer to Plaintiff Bellamy's Class Action Complaint (served on March 5, 2020), and Research Affirmative Defenses in Defendant's Answer (Bellamy Action)	1.10
Review and Analyze Defendant's Second Amended Answer to Plaintiff Bellamy's Class Action Complaint (served on March 16, 2020), and Research Affirmative Defenses in Defendant's Answer (Bellamy Action)	0.90
Review Defendant's Case Management Statement (filed on April 30, 2020) (Bellamy Action)	0.20
Review Defendant's Case Management Statement (filed on May 4, 2020) (Bellamy Action)	0.20

Review Court Order Re: Case Management (filed on May 5, 2020) (Bellamy Action)	0.10
Review Court Order Re: Case Management (filed on June 11, 2020) (Brissett Action)	0.10
Review Defendant's Substitution of Attorney (filed on July 8, 2020) (Blacksher Action)	0.10
Review Defendant's Substitution of Attorney (filed on July 9, 2020) (Bellamy Action)	0.10
Review Defendant's Notice of Deposit of Jury Fees (filed on July 10, 2020) (Blacksher Action)	0.10
Review Defendant's Case Management Statement (filed on July 14, 2020) (Bellamy Action)	0.20
Draft Notice of Association of Counsel (filed on August 6, 2020) (Bellamy Action)	0.10
Draft Notice of Association of Counsel (filed on August 6, 2020) (Blacksher Action)	0.10
Review Case Management Order (filed on August 10, 2020) (Bellamy Action)	0.10
Review Defendant's Case Management Statement (filed on October 13, 2020) (Blacksher Action)	0.20
Review Case Management Order (filed on October 29, 2020) (Blacksher Action)	0.10
Review Defendant's Case Management Statement (filed on December 1, 2020) (Bellamy Action)	0.20
Review Defendant's Case Management Statement (filed on February 2, 2021) (Blacksher Action)	0.20
Draft Plaintiff Blacksher's Case Management Statement (filed on February 2, 2021) (Blacksher Action)	0.30
Review Case Management Order (filed on February 16, 2020) (Blacksher Action)	0.10
Review Defendant's Case Management Statement (filed on June 15, 2021) (Blacksher Action)	0.20
Draft Plaintiff Blacksher's Case Management Statement (filed on June 16, 2021) (Blacksher Action)	0.30

Review Case Management Order (filed on July 1, 2021) (Blacksher Action)	0.10
Investigate the Merits of Plaintiff Brissett's PAGA Claim, Conduct Legal Research and Analysis of PAGA Claim, and Draft Plaintiff Brissett's Complaint for Enforcement Under the Private Attorneys General Act (filed on September 13, 2021) (Brissett Action)	6.20
Review Notice of Case Management Conference and Notice of Assignment of Judge for All Purposes (filed on September 24, 2021) (Brissett Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Trial Date and [Proposed] Order (filed on October 13, 2021) (Bellamy Action)	0.90
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Trial Date and [Proposed] Order (filed on October 13, 2021) (Blacksher Action)	0.20
Review Court's Order on Joint Stipulation to Continue Trial Date (filed on October 20, 2021) (Bellamy Action)	0.10
Draft Notice of Related Cases (filed on November 10, 2021) (Brissett Action)	0.10
Review Court's Order on Joint Stipulation to Continue Trial Date (filed on November 15, 2021) (Blacksher Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Amend Complaint and [Proposed] Order (filed on December 17, 2021) (Bellamy Action)	0.90
Review Court's Order on Joint Stipulation to Amend Complaint and [Proposed] Order (filed on December 23, 2021) (Bellamy Action)	0.10
Review Defendant's Case Management Statement (filed on December 28, 2021) (Blacksher Action)	0.20
Draft Plaintiff Blacksher's Case Management Statement (filed on January 3, 2022) (Blacksher Action)	0.30

Review Court's Notice of Reassignment (filed on January 4, 2022) (Blacksher Action)	0.10
Draft Plaintiffs' First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act. California Labor Code § 2698, Et Seq. (filed on January 12, 2022) (Bellamy Action)	3.20
Draft Notice of Entry of Judgment or Order (filed on January 12, 2022) (Bellamy Action)	0.10
Review Court's Minute Order and Case Management Order (filed on January 13, 2022) (Blacksher Action)	0.10
Draft Request for Dismissal (filed on January 24, 2022) (Brissett Action)	0.10
Draft Notice of Disassociation of Counsel (filed on February 1, 2022) (Bellamy Action)	0.10
Draft Notice of Disassociation of Counsel (filed on February 1, 2022) (Blacksher Action)	0.10
Draft Notice of Entry of Dismissal (filed on February 2, 2022) (Blacksher Action)	0.10
Review Court's Order on Request for Dismissal (filed on February 2, 2022) (Blacksher Action)	0.10
Review Court's Order on Request for Dismissal (filed on February 4, 2022) (Brissett Action)	0.10
Draft Notice of Entry of Dismissal (filed on February 10, 2022) (Brissett Action)	0.10
Review and Analyze Defendant's Answer to Plaintiffs' First Amended Complaint (served on February 16, 2022), and Research Affirmative Defenses in Defendant's Answer (Bellamy Action)	0.80
Review Court's Notice of Hearing (filed on April 7, 2022) (Bellamy Action)	0.10
Review Defendant's Case Management Statement (filed on May 31, 2022) (Bellamy Action)	0.20

Meet and Confer with Defendant's Counsel, and Draft Stipulation and [Proposed] Order Consolidating the Bellamy and Davis Class Action Cases (filed on June 1, 2022) (Bellamy Action)	1.10
Draft Notice of Related Cases (filed on June 14, 2022) (Bellamy Action)	0.10
Review Defendant's Case Management Statement (filed on July 28, 2022) (Bellamy Action)	0.20
Draft Plaintiffs' Case Management Statement (filed on July 28, 2022) (Bellamy Action)	0.30
Review Court's Order Re: Case Management (filed on August 15, 2022) (Bellamy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on November 16, 2022) (Bellamy Action)	0.60
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on November 16, 2022) (Bellamy Action)	0.10
Review Defendant's Case Management Statement (filed on November 21, 2022) (Bellamy Action)	0.20
Draft Plaintiffs' Case Management Statement (filed on November 23, 2022) (Bellamy Action)	0.30
Draft Notice of Related Cases (filed on December 1, 2022) (Bellamy Action)	0.10
Review Court's Case Management Order (filed on December 12, 2022) (Bellamy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement and Notice of Settlement (filed on December 22, 2022) (Bellamy Action)	0.40
Review Defendant's Case Management Statement (filed on February 14, 2023) (Bellamy Action)	0.20
Draft Plaintiffs' Case Management Statement (filed on February 17, 2023) (Bellamy Action)	0.30

Review Court's Case Management Order (filed on February 27, 2023) (Bellamy Action)	0.10
Review Court's Notice of Case Reassignment and Minute Order (filed on May 3, 2023) (Bellamy Action)	0.10
Review Defendant's Case Management Statement (filed on May 5, 2023) (Bellamy Action)	0.20
Draft Plaintiffs' Case Management Statement (filed on May 8, 2023) (Bellamy Action)	0.30
Review Court's Case Management Order (filed on May 15, 2023) (Bellamy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on June 2, 2023) (Bellamy Action)	0.50
Review Court's Case Management Order (filed on June 9, 2023) (Bellamy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on August 25, 2023) (Bellamy Action)	0.50
Review Court's Case Management Order (filed on September 8, 2023) (Bellamy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on November 14, 2023) (Bellamy Action)	0.50
Review Court's Case Management Order (filed on November 17, 2023) (Bellamy Action)	0.10
Review Notice of Case Reassignment (filed on December 14, 2023) (Bellamy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on February 8, 2024) (Bellamy Action)	0.50
Review Court's Case Management Order (filed on February 14, 2023) (Bellamy Action)	0.10

Review Court Order Re: Compliance Hearing (filed on February 21, 2024) (Bellamy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Consolidate Case Numbers HG19024178 and 22CV012004; [Proposed] Order Thereon (filed on February 27, 2024) (Bellamy Action)	1.50
Review Court's Order Granting Joint Stipulation to Consolidate Case Numbers HG19024178 and 22CV012004 (filed on February 27, 2024) (Bellamy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement Regarding Compliance Hearing Re: Settlement/Dismissal (filed on May 24, 2024) (Bellamy Action)	0.50
Review Court Order Re: Compliance Hearing (filed on June 3, 2024) (Bellamy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on August 13, 2024) (Bellamy Action)	0.50
Review Court's Case Management Order (filed on February 14, 2023) (Bellamy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Deadline for Defendant to Provide Class Data, The Settlement Administrator to Mail Class Notices, Plaintiffs' Motion for Final Approval and Related Deadlines (filed on November 26, 2024) (Bellamy Action)	1.90
Review Court's Order Granting Joint Stipulation to Continue Deadline for Defendant to Provide Class Data, The Settlement Administrator to Mail Class Notices, Plaintiffs' motion for Final Approval and Related Deadlines (filed on December 2, 2024) (Bellamy Action)	0.10
Review Court's Notice of Case Reassignment (filed on December 17, 2024) (Bellamy Action)	0.10
Draft Notice of Change of Address (filed on January 24, 2025) (Bellamy Action)	0.10
Appearances	

Prepare for and Telephonically Attend Case Management Conference (November 8, 2019) (Bellamy Action)	0.40
Prepare for and Telephonically Attend Case Management Conference (July 1, 2021) (Blacksher Action)	0.50
Prepare for and Telephonically Attend Status Conference (June 3, 2024) (Bellamy Action)	0.90
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Blacksher (served on January 30, 2019) (Bellamy Action)	1.20
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Blacksher (served on February 21, 2019) (Blacksher Action)	2.80
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Bellamy (served on March 1, 2019) (Brissett Action)	1.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Bellamy (served on March 25, 2019) (Bellamy Action)	4.60
Review Defendant's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Requests for Production of Documents (Set One), Requests for Admissions (Set One), and Requests for Production of Documents (Set One) to Plaintiff Bellamy (Served on August 20, 2019) (Bellamy Action)	1.10
Draft Plaintiff Bellamy's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant (served on September 5, 2019) (Bellamy Action)	4.60

Draft Plaintiff Bellamy's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure) (Set for November 6, 2019) (served on September 5, 2019) (Bellamy Action)	1.10
Draft Plaintiff Bellamy's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices) (Set for November 7, 2019) (served on September 5, 2019) (Bellamy Action)	1.40
Draft Plaintiff Bellamy's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Affirmative Defenses) (Set for November 8, 2019) (served on September 5, 2019) (Bellamy Action)	2.10
Draft Plaintiff Bellamy's Responses to Defendant's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Requests for Production of Documents (Set One), Requests for Admissions (Set One), and Requests for Production of Documents (Set One) (Served on October 10, 2019) (Bellamy Action)	12.50
Draft Plaintiff Blacksher's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on October 22, 2019) (Blacksher Action)	3.40
Draft Plaintiff Blacksher's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure) (Set for January 10, 2020) (served on October 22, 2019) (Blacksher Action)	0.90
Draft Plaintiff Bellamy's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices) (Set for January 9, 2020) (served on October 22, 2019) (Bellamy Action)	1.20
Review Defendant's Responses to Plaintiff Bellamy's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests	7.10

for Production of Documents (Set One), and Requests for Production of Documents (Set Two) (served on November 21, 2019) (Bellamy Action)	
Review Defendant's Objections to Blacksher's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure) (Served on January 3, 2020) (Blacksher Action)	1.50
Review Defendant's Objections to Blacksher's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices) (Served on January 3, 2020) (Blacksher Action)	1.10
Meet and Confer with Defendant's Counsel, Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard, Review and Monitor <i>Belaire-West</i> Administration Process, and Review Non-Opt Out Contact List (Bellamy Action) (February 25, 2021 to April 2, 2021)	8.50
Review Defendant's Notice of Deposition of Plaintiff Blacksher (Set for March 15, 2021) (Served on February 17, 2021) (Blacksher Action)	0.20
Review Defendant's Notice of Deposition of Plaintiff Bellamy (Set for March 18, 2021) (Served on February 17, 2021) (Bellamy Action)	0.20
Draft Plaintiff Bellamy's Objections to Defendant's Notice of Taking Remote and Videotaped Deposition of Plaintiff (served on March 10, 2021) (Bellamy Action)	0.30
Draft Plaintiff Blacksher's Objections to Defendant's Notice of Taking Remote and Videotaped Deposition of Plaintiff (served on March 10, 2021) (Blacksher Action)	0.30
Review Defendant's Amended Notice of Deposition of Plaintiff Bellamy (Set for April 28, 2021) (Served on March 19, 2021) (Bellamy Action)	0.20

Draft Plaintiff Bellamy's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure) (Set for April 22, 2021) (served on March 30, 2021) (Bellamy Action)	0.90
Draft Plaintiff Bellamy's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices) (Set for April 23, 2021) (served on March 30, 2021) (Bellamy Action)	1.10
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Brissett (served on April 8, 2021) (Brissett Action)	1.10
Review Defendant's Objections to Plaintiff Bellamy's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices) (served on April 15, 2021) (Bellamy Action)	1.20
Review Defendant's Objections to Plaintiff Bellamy's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure) (served on April 21, 2021) (Bellamy Action)	0.80
Draft Plaintiff Bellamy's Objections to Defendant's Amended Notice of Taking Remote and Videotaped Deposition of Plaintiff (served on April 22, 2021) (Bellamy Action)	0.20
Prepare for and Defend Deposition of Plaintiff Lorena Bellamy (April 28, 2021) and Review Deposition Transcript (Bellamy Action)	9.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Brissett (served on May 7, 2021) (Brissett Action)	7.50
Review Defendant's Amended Notice of Deposition of Plaintiff Blacksher (Set for March 15, 2021) (Served on February 17, 2021) (Blacksher Action)	0.20

Prepare and Defend Deposition of Plaintiff Blacksher (January 12, 2022) and Review Deposition Transcript (Blacksher Action)	7.10
Review and Analyze Defendant's Demand for Exchange of Expert Witness Information and Demand for Production of Expert Reports and Writings (filed on May 25, 2022) (Bellamy Action)	0.80
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Blacksher Under the Private Attorneys General Act (served on July 1, 2019)	4.50
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Brissett under the Private Attorneys General Act (served on July 7, 2021)	4.10
Draft Correspondence to, Meet and Confer with, and Respond to Correspondence from, Defendant's Counsel	28.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant (approximately 21,000 pages), and Other Sources Prior to Mediation	69.50
Prepare for Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiffs' Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on November 21, 2022)	48.50
Attend Mediation Session (November 30, 2022; via Video Conference)	23.50
Review, Analyze, and Accept Mediator's Proposal	1.50
Review, Revise, Negotiate, and Finalize Class Action and Private Attorneys General Act Settlement Agreement (executed on February 13, 2024), and Draft Notice of Class Action Settlement	18.50

Review, Revise, Negotiate, and Finalize First Amended Class Action and Private Attorneys General Act Settlement Agreement (executed on September 30, 2024)	5.50
Law and Motion	
Draft Plaintiff Bellamy's Notice of Demurrer and Demurrer to Defendant Lifelong Medical Care's Answer; Declaration of Daniel J. Kramer in Support Thereof; and [Proposed] Order Thereon (filed on September 12, 2019) (Bellamy Action)	11.50
Draft Plaintiff Bellamy's Notice of Motion and Motion to Strike Portions of Defendant Lifelong Medical Care's Answer; Declaration of Daniel J. Kramer in Support Thereof; and [Proposed] Order Thereon (filed on September 12, 2019) (Bellamy Action)	10.50
Review Defendant's Opposition to Plaintiff Bellamy's Demurrer to Defendant's Answer (filed on November 19, 2019) (Bellamy Action)	1.10
Review Defendant's Opposition to Plaintiff Bellamy's Motion to Strike Portions of Defendant's Answer (filed on November 19, 2019) (Bellamy Action)	0.90
Draft Reply in Support of Plaintiff Bellamy's Motion to Strike Portions of Defendant Lifelong Medical Care's Answer (filed on November 25, 2019) (Bellamy Action)	5.30
Draft Reply in Support of Plaintiff Bellamy's Demurrer to Defendant Lifelong Medical Care's Answer (filed on November 25, 2019) (Bellamy Action)	3.20
Review Court's Order Re: Demurrer (filed on December 4, 2019) (Bellamy Action)	0.10
Review Court's Order Re: Motion to Strike (filed on December 4, 2019) (Bellamy Action)	0.10
Draft Supplemental Brief in Support of Plaintiff Bellamy's Demurrer to and Motion to Strike Portions of Defendant's Answer; and Declaration of Talar Derohannessian in Support Thereof (filed on February 6, 2020) (Bellamy Action)	2.10

Review Court Order Re: Motion to Strike Answer (filed on February 21, 2020) (Bellamy Action)	0.30
Draft Notice of Entry of Judgment Regarding Court's Order Re: Motion to Strike Answer (filed on February 25, 2020) (Bellamy Action)	0.10
Draft Plaintiffs' Unopposed <i>Ex Parte</i> Application and Declaration of Jacob Karczewski, to Request the Court (1) Sign the Parties' Joint Stipulation Proposed Order, and (2) Continue the Trial Date and All Related Deadlines; and [Proposed] Order Thereon (filed on June 1, 2022) (Bellamy Action)	4.50
Review Court's Order Re: <i>Ex Parte</i> Hearing (filed on June 06, 2022) (Bellamy Action)	0.10
Draft Plaintiffs' Unopposed <i>Ex Parte</i> Application and Declaration of Jacob Karczewski, to Request the Court (1) Sign the Parties' Joint Stipulation Proposed Order, and (2) Continue the Trial Date and All Related Deadlines; Declaration of Jacob Karczewski in Support Thereof; and [Proposed] Order Thereon (filed on June 14, 2022) (Bellamy Action)	0.80
Review Court's Order Granting Plaintiff's Unopposed <i>Ex Parte</i> Application (filed on June 20, 2022) (Bellamy Action)	0.10
Review Declaration of Greg Mauro, Declaration of Plaintiff Deanna Lynette Davis, and Declaration of Ryan S. Hanlon, and Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities; Declaration of Elizabeth Parker-Fawley in Support Thereof; Declaration of Plaintiff Bellamy in Support Thereof; Declaration of Plaintiff Blacksher in Support Thereof; Declaration of Plaintiff Brissett in Support Thereof; and [Proposed] Order Granting Preliminary Approval of Class Action Settlement	9.20
Review Order Re: Motion for Preliminary Approval (filed on August 20, 2024) (Bellamy Action)	0.20
Review Supplemental Declaration of James Hawkins; and Draft Declaration of Joanna Ghosh in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed Order] (filed on October 8, 2024)	3.50

Review Order Re: Motion for Preliminary Approval (filed on October 15, 2024) (Bellamy Action)	0.20
Review Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on October 21 2024) (Bellamy Action)	0.20
Review Declaration of Settlement Administrator, Declaration of Plaintiff Deanna Lynette Davis, and Declaration of James Hawkins; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Awards; Declaration of Vartan Madoyan in Support Thereof; Declaration of Plaintiff Lorena Bellamy in Support Thereof; Declaration of Plaintiff Orishia Blacksher in Support Thereof; Declaration of Plaintiff Harold Brissett in Support Thereof; and [Proposed] Final Approval Order and Judgment	12.50
Total Hours:	559.70

EXHIBIT 2

LAWYERS *for* JUSTICE, P.C. CASE COST DETAIL
Bellamy v. Lifelong Medical Care

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/30/2019	U.S. Postmaster	Postage	\$6.85
3/1/2019	U.S. Postmaster	Postage	\$6.85
6/24/2019	Alameda Superior Court	Complaint Filing Fee	\$435.00
6/24/2019	Legal Document Server, Inc.	Attorney Service	\$145.22
6/28/2019	Legal Document Server, Inc.	Attorney Service	\$115.00
7/11/2019	Legal Document Server, Inc.	Attorney Service	\$130.00
7/30/2019	Legal Document Server, Inc.	Attorney Service	\$195.00
8/26/2019	Alameda Superior Court	Jury Fee	\$150.00
8/26/2019	Legal Document Server, Inc.	Attorney Service	\$135.25
9/5/2019	General Logistics Systems US, Inc.	Courier Service	\$14.68
9/5/2019	General Logistics Systems US, Inc.	Courier Service	\$25.15
9/12/2019	Alameda Superior Court	Motion Fee	\$120.00
9/12/2019	Legal Document Server, Inc.	Attorney Service	\$174.20
9/16/2019	General Logistics Systems US, Inc.	Courier Service	\$11.20
9/20/2019	Legal Document Server, Inc.	Attorney Service	\$65.00
10/10/2019	U.S. Postmaster	Postage	\$9.45
10/11/2019	FedEx Express	Courier Service	\$67.95
10/25/2019	Legal Document Server, Inc.	Attorney Service	\$195.00
10/29/2019	General Logistics Systems US, Inc.	Courier Service	\$17.33
11/11/2019	CourtCall, LLC	Attorney Service	\$94.00
11/12/2019	Legal Document Server, Inc.	Attorney Service	\$130.00
11/25/2019	Legal Document Server, Inc.	Attorney Service	\$130.00
12/4/2019	Esquire Deposition Solutions, LLC	Court Reporter Cancellation	\$490.00
12/5/2019	CourtCall, LLC	Attorney Service	\$94.00
12/16/2019	Legal Document Server, Inc.	Attorney Service	\$195.00
1/7/2020	Legal Document Server, Inc.	Attorney Service	\$130.00
1/22/2020	CourtCall, LLC	Attorney Service	\$94.00
2/5/2020	General Logistics Systems US, Inc.	Courier Service	\$19.39
2/6/2020	Legal Document Server, Inc.	Attorney Service	\$245.00
2/21/2020	CourtCall, LLC	Attorney Service	\$94.00
2/25/2020	Legal Document Server, Inc.	Attorney Service	\$130.00
7/16/2020	General Logistics Systems US, Inc.	Courier Service	\$24.46
8/13/2020	Legal Document Server, Inc.	Attorney Service	\$120.00
8/18/2020	General Logistics Systems US, Inc.	Courier Service	\$31.51
3/25/2021	General Logistics Systems US, Inc.	Courier Service	\$14.30
3/30/2021	General Logistics Systems US, Inc.	Courier Service	\$26.27
4/28/2021	Imagine Court Reporting	Court Reporter	\$807.85
10/14/2021	General Logistics Systems US, Inc.	Courier Service	\$19.49
10/15/2021	One Legal	Attorney Service	\$40.15

LAWYERS *for* JUSTICE, P.C. CASE COST DETAIL
Bellamy v. Lifelong Medical Care

10/20/2021	One Legal	Attorney Service	\$41.13
12/20/2021	Legal Document Server, Inc.	Attorney Service	\$165.00
12/21/2021	Alameda Superior Court	Stipulation Fee	\$20.00
12/21/2021	Legal Document Server, Inc.	Attorney Service	\$19.90
12/29/2021	Alameda Superior Court	Document Download Fee	\$1.00
1/13/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
1/14/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
2/1/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
6/2/2022	Alameda Superior Court	Ex Parte Fee	\$60.00
6/2/2022	Legal Document Server, Inc.	Attorney Service	\$199.95
6/14/2022	Alameda Superior Court	Ex Parte Fee	\$60.00
6/14/2022	Legal Document Server, Inc.	Attorney Service	\$39.95
6/28/2022	Alameda Superior Court	Document Download Fee	\$3.00
7/28/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
8/12/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
9/6/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
11/16/2022	Alameda Superior Court	Stipulation Fee	\$20.00
11/16/2022	Legal Document Server, Inc.	Attorney Service	\$20.05
11/18/2022	Paul Hastings LLP	Mediation Fee	\$7,500.00
11/23/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
12/2/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
12/23/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
2/21/2023	Legal Document Server, Inc.	Attorney Service	\$18.70
5/8/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
6/2/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
8/4/2023	Alameda Superior Court	Document Download Fee	\$4.00
8/25/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
11/14/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
2/8/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
2/15/2024	Alameda Superior Court	Document Download Fee	\$1.00
2/22/2024	Alameda Superior Court	Document Download Fee	\$6.00
2/27/2024	Alameda Superior Court	Stipulation Fee	\$20.00
2/27/2024	Legal Document Server, Inc.	Attorney Service	\$20.29
5/28/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
6/3/2024	Alameda Superior Court	Document Download Fee	\$1.00
7/17/2024	Alameda Superior Court	Motion Fee	\$60.00
7/17/2024	Legal Document Server, Inc.	Attorney Service	\$23.07
7/18/2024	Legal Document Server, Inc.	Attorney Service	\$206.50
8/13/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
9/9/2024	Alameda Superior Court	Document Download Fee	\$6.50

LAWYERS *for* JUSTICE, P.C. CASE COST DETAIL
Bellamy v. Lifelong Medical Care

10/11/2024	Legal Document Server, Inc.	Attorney Service	\$20.45
10/16/2024	Alameda Superior Court	Document Download Fee	\$10.00
10/21/2024	Alameda Superior Court	Document Download Fee	\$1.00
10/28/2024	Legal Document Server, Inc.	Attorney Service	\$20.45
12/2/2024	Legal Document Server, Inc.	Attorney Service	\$21.84
12/2/2024	Alameda Superior Court	Stipulation Fee	\$20.00
Total:			<u>\$13,857.68</u>

LAWYERS *for* JUSTICE, P.C. CASE COST DETAIL
Blacksher v. Lifelong Medical Care (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/1/2019	U.S. Postmaster	Postage	\$6.85
7/1/2019	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
9/4/2019	Alameda Superior Court	Complaint Filing Fee	\$435.00
9/4/2019	Legal Document Server, Inc.	Attorney Service	\$145.22
9/12/2019	Legal Document Server, Inc.	Attorney Service	\$150.00
10/3/2019	Alameda Superior Court	Document Download Fee	\$4.00
10/4/2019	Legal Document Server, Inc.	Attorney Service	\$195.00
10/22/2019	Golden State Overnight	Courier Service	\$25.91
12/5/2019	Alameda Superior Court	Jury Fee	\$150.00
12/5/2019	Legal Document Server, Inc.	Attorney Service	\$135.25
12/20/2019	Legal Document Server, Inc.	Attorney Service	\$65.00
12/23/2019	Legal Document Server, Inc.	Attorney Service	\$145.22
1/7/2020	Legal Document Server, Inc.	Attorney Service	\$130.00
1/15/2020	CourtCall, LLC	Attorney Service	\$94.00
8/10/2020	Legal Document Server, Inc.	Attorney Service	\$120.00
2/2/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
2/2/2021	Legal Document Server, Inc.	Attorney Service	\$65.00
2/28/2021	Simpluris, Inc.	Notice Mailing	\$337.50
3/10/2021	Legal Document Server, Inc.	Attorney Service	\$175.00
4/9/2021	General Logistics Systems US, Inc.	Courier Service	\$31.14
6/16/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
7/8/2021	General Logistics Systems US, Inc.	Courier Service	\$28.46
9/22/2021	General Logistics Systems US, Inc.	Courier Service	\$48.13
10/5/2021	General Logistics Systems US, Inc.	Courier Service	\$20.99
10/15/2021	One Legal	Attorney Service	\$40.15
10/20/2021	One Legal	Attorney Service	\$41.13
1/3/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
1/26/2022	Legal Document Server, Inc.	Attorney Service	\$11.00
1/31/2022	Blue Light, Inc.	Court Reporter	\$918.30
2/1/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
2/2/2022	Alameda Superior Court	Stipulation Fee	\$20.00
2/2/2022	Alameda Superior Court	Document Download Fee	\$3.00
2/2/2022	Legal Document Server, Inc.	Attorney Service	\$85.85
2/3/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
2/15/2022	General Logistics Systems US, Inc.	Courier Service	\$38.09
Total:			<u><u>4,054.04</u></u>

LAWYERS *for* JUSTICE, P.C. CASE COST DETAIL
Brisset v. Lifelong Medical Care (PAGA)

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