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

DOMINIQUE DAVIS, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiff,

v.

BARKER MANAGEMENT, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Lead Case No.: 21STCV04439
Consolidated Case No.: 21STCV33269

Honorable William F. Highberger
Department SSC10

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF JOINT
STIPULATION OF CLASS ACTION AND
PAGA SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND ENHANCEMENT
PAYMENT**

[Notice of Motion and Motion for Final
Approval of Joint Stipulation of Class Action
and PAGA Settlement, Attorneys' Fees and
Costs, and Enhancement Payment; Declaration
of Class Representative (Dominique Davis);
Declaration of Settlement Administrator (Yami
Burns); and [Proposed] Final Approval Order
and Judgment filed concurrently herein]

Date: August 30, 2023
Time: 11:00 a.m.
Department: SSC10

Complaint Filed: February 4, 2021
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Dominique Davis (“Plaintiff”) and the Class. 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 April 13, 2023, in Department SSC10 of the above-entitled Court, the Honorable William F. Highberger preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Amendment No. 1 to Joint Stipulation of Class Action and PAGA Settlement (together, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Barker Management, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Dominique Davis 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 Phoenix Class Action Administration Solutions (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Joint Stipulation of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Payment (“Motion for Final Approval”), no Class Members have objected to the Settlement or the contemplated request for Attorneys’ Fees and Costs, Enhancement Payment, Settlement Administration Costs, or allocation for the penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

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WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers *for* Justice, PC have actively engaged in litigating this matter since the inception of the above-captioned action (“Class Action”), which was filed on February 4, 2021 and the consolidated action entitled *Davis v. Barker Management, Inc.*, Case No. 21STCV33269, filed September 9, 2021 (the “PAGA Action”) (together with the Class Action, the “Actions”).

5. Before initiating the Actions, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff, and research into the various legal issues involved in the Actions, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, non-discretionary bonus/shift differential/incentive pay, regular rate of pay, wage-and-hour enforcement, business expense reimbursement, PAGA representative claims, Plaintiff’s claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that the claims of 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 who worked for Defendant 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 was preparing the Class Action for class certification and the Actions for trial, prior to reaching the Settlement. The parties conducted significant investigations and extensive informal discovery and exchange of over 100,000 pages of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations. Class Counsel also had the opportunity to interview and obtain information from Plaintiff and other putative Class Members, and reviewed and analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included, and were not limited to, employment records

of Plaintiff, Class Members' time and pay data, Barker Management Employee Handbook, company policy acknowledgements, internal memoranda, job descriptions, new hire orientation checklists, operations and employment practices, forms, procedures, and policies (including but not limited to, Meal & Rest Periods & Acknowledgement Form, Attendance and Punctuality policy, Attire and Grooming policy, Agreement for Employee Use of Apartment Unit, and "Off" the Clock Work & Hours of Work and Overtime policy), among other information, data, and documents. Class Counsel developed liability, damages, and penalties valuation models in preparation for 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, informal discovery, and production of various information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising pleadings, the mediation brief, and settlement approval motion papers; preparing and appearing for court proceedings; and preparing for and attending mediation and settlement negotiations, among other tasks.

7. As outlined herein, the parties have conducted significant informal discovery and investigation during the course of litigating the Actions and mediation and settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. The information, documents, and data provided a critical understanding of the nature of the work performed by the Class Members and PAGA Employees, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, and penalties valuation issues in connection with all phases of the litigation, and ultimately in connection with the mediation and settlement negotiation process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, off-the-clock theory, meal and rest periods, non-discretionary bonus/shift differential/incentive pay, regular rate of pay, wage-and-hour enforcement, business expense reimbursement PAGA representative actions, wage-and-hour enforcement, Plaintiff's claims and damages, and Defendant's defenses.

8. After conducting significant investigation of the facts and law during the prosecution of the Actions, counsel for the parties engaged in extensive settlement negotiations to try to resolve the entire matter. These efforts included participating in a formal, full-day mediation conducted by Paul Grossman, Esq., a well-regarded mediator experienced in mediating complex labor and employment matters. During all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position. In the course of litigation, mediation, and settlement negotiations, the parties exchanged information and data, and discussed all aspects of the Actions, including the risks and delays of further litigation, the risks to the parties of proceeding with class certification and trial, the law relating to class certification, off-the-clock theory, meal and rest periods, non-discretionary bonus/shift differential/incentive pay, regular rate of pay, reporting time pay, wage-and-hour enforcement, business expense reimbursement, representative PAGA claims, and wage-and-hour enforcement, 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 prevail on the merits and obtain a denial of class certification, while, Plaintiff and Class Counsel disagreed with these contentions and 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 the matters were well-suited for settlement given the legal issues relating to Plaintiff's principal claims, factual circumstances, as well as the costs and risks to the parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the Actions, and the real possibility of no monetary recovery after years of litigation.

9. Pursuant to Section 39 of the Settlement Agreement, the Gross Settlement Amount is subject to increase if the Workweeks during the period from February 4, 2017 to

December 15, 2021 exceed 74,742. The Settlement Administrator has confirmed that the total number of Workweeks during the period from February 4, 2017 to December 15, 2021 is 75,724, and the Total Settlement Amount is therefore increased from \$2,900,000.00 to \$2,938,101.74.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$969,573.57, which is thirty-three percent (33%) of the escalated Total Settlement Amount of \$2,938,101.74, as set forth in the Settlement Agreement, the Class Notice, and the Court's April 13, 2023 Order Granting Preliminary Approval of Class Action Settlement. 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 thirty-three percent (33%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the Actions; (2) the time, effort, and expense that Class Counsel dedicated to the Actions; (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 Actions; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter.

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

12. 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 Actions such that the award of attorneys' fees is also justified under a lodestar analysis with a multiplier of 2.07. Attorneys at Lawyers for Justice, PC have spent a total of **605.20 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 in performing those services. These hours include work done by myself and several other attorneys at Lawyers for Justice, PC. Additionally, separate from the hours referenced herein, 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 our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this case, in litigating complex wage-and-hour actions, and in particular, employment class and representative actions, support a reasonable blended hourly rate of compensation at the rate of \$775 for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the blended rate of at least \$775 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour 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 an hourly rate of \$936.47; 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 an hourly rate of \$919.57; 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 an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

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ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

14. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

JUDICIAL EXTERNSHIPS

15. From approximately September 2002 to approximately December 2002, I served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal for the Second Appellate District*.

LITIGATION AND CLASS ACTION EXPERIENCE

16. In December of 2004, I obtained a license to practice law from the California State Bar. From approximately December 2004 to approximately August 2008, I was employed by a prominent plaintiff-side law firm.

17. At the prominent plaintiff-side law firm, my practice focused on class actions and other complex cases involving toxic torts and products liability. In addition, I gained substantial experience on cases involving insurance bad faith, premises liability, and medical negligence. While employed by the prominent plaintiff-side law firm, I argued approximately 100 motions, took or defended approximately 150 depositions, and prepared dozens of expert witnesses for deposition or trial.

18. Since its inception, in or around October of 2008, *Lawyers for Justice, PC* has almost exclusively focused on the prosecution of consumer and employment class actions,

1 involving wage-and-hour claims, race discrimination, unfair business practices or consumer
2 fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen
3 employment-related putative class actions in both state and federal courts in the State of
4 California. Lawyers *for* Justice, PC has successfully litigated cases involving the executive,
5 administrative, and other overtime exemptions to the State of California and federal overtime
6 compensation requirements. During this relatively short time, in association with other law
7 firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of
8 individuals in California.

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

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

13 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a
14 wage-and-hour class action against a major property management company involving allegations
15 of misclassification of various “manager” positions. On September 20, 2010, the court granted
16 final approval of the class action settlement. The Los Angeles County Superior Court Case
17 Number is BC400414.

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

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

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

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

11 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
12 wage-and-hour class and PAGA representative action against a national wholesale distributor of
13 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
14 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
15 representative action settlement. The Sacramento County Superior Court Case Number is 34-
16 2012-00136285.

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

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

27 i) LFJ, in association with co-counsel therein, represented the plaintiff in a
28 wage-and-hour class and PAGA representative action involving allegations of misclassification

1 of the salaried residential “Property Manager” position. On September 17, 2015, the court
2 granted plaintiff’s motion for class certification. On October 20, 2017, the court granted final
3 approval of the class and PAGA representative action settlement. The Los Angeles County
4 Superior Court Case Number is BC474784.

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

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

15 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
16 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
17 involving allegations of misclassification of the “Department Manager” position. On August 12,
18 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
19 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
20 County Superior Court Case Number is RG13680477.

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

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

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

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

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

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

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

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

6 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
7 representative action against a food company on behalf of non-exempt employees. On June 30,
8 2017, the court granted final approval of the class and PAGA representative action settlement.
9 The Sacramento County Superior Court Case Number is 34-2015-00175871.

10 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
11 representative action against a chocolate company on behalf of non-exempt employees. On July
12 19, 2017, the court granted final approval of the class and PAGA representative action
13 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

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

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

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

26 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class action against a parking company on behalf of non-exempt employees. On
28 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a

1 class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial
2 Council Coordination Proceeding Number is 4886.

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

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

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

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

26 jj) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 wage-and-hour class and PAGA representative action against a large national drug testing
28 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the

plaintiff's motion for class certification and certified a class. On October 28, 2022, the court granted final approval of the class and PAGA representative action settlement. The San Diego County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

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

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

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

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

20. To date, Class Counsel has borne all 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 \$20,240.47 in litigation costs and expenses incurred in this matter, as

1 reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in
2 the prosecution of the Actions and to obtain the Settlement.

3 **ENHANCEMENT PAYMENT TO PLAINTIFF**

4 21. In recognition of her efforts and work serving as the Class Representative and for
5 her general release of individual claims, the Settlement provides for an Enhancement Payment in
6 the amount of \$12,500.00 to Plaintiff. The requested Enhancement Payment is fair and
7 appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant
8 documents and information and provided the facts and evidence necessary to attempt to prove
9 the allegations. Plaintiff was available whenever Class Counsel needed her and actively tried to
10 obtain information that would facilitate the pursuit of the class and PAGA claims. Plaintiff spent
11 numerous hours speaking with Class Counsel about her claims, describing her work experience
12 with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for
13 Plaintiff to receive \$12,500.00 as a reasonable Enhancement Payment in addition to her
14 Individual Settlement Share under the Settlement.

15 22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
16 Settlement is in the best interests of Plaintiff, Class Members, the State of California, and PAGA
17 Employees.

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

20 Executed 8th day of August 2023, at Glendale, California.

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23 Edwin Aiwazian
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EXHIBIT A

DOMINIQUE DAVIS V. BARKER MANAGEMENT INC.
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. 21STCV04439) (CLASS ACTION) (LEAD CASE)
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. 21STCV33269) (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, and Commonality	14.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Dominique Davis’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	12.40
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Barker Management, Inc. (“Defendant”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members	11.90
Pre-Notice Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiff and the Aggrieved Employees	8.60
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiff and the Aggrieved Employees	9.70
Legal Research and Analysis of Latest Decisions and Law Regarding Off-the-Clock, Meal and Rest Break, Wage Order, Representative PAGA Actions, Regular Rate of Pay, and Class Certification in California, Including all New and Relevant Enforcement Guidance and DLSE Materials	7.50
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	6.40

Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	6.50
Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity, and Research and Analysis of Defendant's Past and Recent Litigation History and Agency Proceedings History Involving Labor, Wage-and-Hour, and Other Related Employment Issues	5.40
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	5.90
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period and Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	19.40
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Consumer Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock and/or During Meal or Rest Breaks	9.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Properties at Which Putative Class Members and Aggrieved Employees Worked Throughout California	7.30
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Pre-Shift and Post-Shift Tasks, Attendance, Training, Meetings, Emergency Responses, Timekeeping, Rounding, Scheduling, Meal/Rest Breaks, On-Premises Breaks, Non-Discretionary Bonus/Shift Differential/Incentive Pay, Regular Rate, Overtime Compensation, Reporting Time Pay, Use	40.50

of Personal Cell Phones, Use of Personal Vehicle/Gas/Mileage/Travel, and Reimbursement of Business-Related Expenses	
Research and Investigation Re: Various Software Programs, Applications, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Document and Information Management, Communications, Timekeeping, Inventory, Resource Management, Phone/Call Distribution, Scheduling, Surveillance, Controlled Access, and Security Systems with a Focus on What Records (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	8.40
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	12.10
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	6.30
Research and Investigation Regarding Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members and Aggrieved Employees' Work	12.80
Meet and Communicate with Plaintiff Dominique Davis Throughout the Pendency of the Case	37.10
Investigate, Meet, and Communicate with, and/or Conduct Interviews of Putative Class Members, Aggrieved Employees, and Percipient Witnesses	28.50
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 February 4, 2021) (Class Action)	7.50
Review Court's Notice of Case Assignment (filed on February 4, 2021) (Class Action)	0.10

Draft Plaintiff's Peremptory Challenge to Judicial Officer (Code Civ. Proc., § 170.6) (filed on February 10, 2021) (Class Action)	0.20
Review Court's Minute Order Re: Peremptory Challenge to Judicial Officer (Code Civ. Proc., § 170.6) (filed on February 18, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Complex Designation (filed on April 1, 2021) (Class Action)	0.20
Review Defendant Barker Management, Inc.'s Notice of Appearance of Counsel (filed on April 19, 2021) (Class Action)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on May 4, 2021) (Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Plaintiff's [Proposed] Order Authorizing Electronic Service (filed on May 7, 2021) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Class Action Response Statement (filed on May 14, 2021) (Class Action)	2.60
Review Court's Notice of Continuance of Initial Status Conference (filed on May 18, 2021) (Class Action)	0.10
Review Court's Order Authorizing Electronic Service (filed on May 19, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on May 28, 2021) (Class Action)	0.10
Draft Plaintiff's Amendment to Complaint (filed on June 3, 2021) (Class Action)	0.30
Meet and Confer with Defendant's Counsel, and Draft Joint Message Board Posting Re: Mediation (posted on July 19, 2021)	1.20
Review Court's Message Board Posting Re: Post-Mediation Status Conference (posted on July 19, 2021) (Class Action)	0.10

Research and Draft Plaintiff's Complaint for the Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et. Seq., and Legal Research and Analysis of All Claims Involved (filed on September 9, 2021) (PAGA Action)	6.70
Review Court's Notice of Case Assignment (filed on September 9, 2021) (PAGA Action)	0.10
Review Court's Notice of Case Management Conference (filed on September 13, 2021) (PAGA Action)	0.10
Draft Plaintiff's Case Management Conference Statement (filed on November 24, 2021) (PAGA Action)	0.90
Draft Plaintiff's Notice of Related Case (filed on November 24, 2021) (Class Action)	0.20
Draft Plaintiff's Notice of Related Case (filed on November 30, 2021) (PAGA Action)	0.20
Review Court's Minute Order Regarding Continuance of Hearing (filed on December 2, 2021) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Post-Mediation Status Conference; [Proposed] Order (filed on December 20, 2021) (Class Action)	1.50
Review Court's Minute Order Re: Notice of Related Case (filed on December 22, 2021) (PAGA Action)	0.20
Review Court's Minute Order Re: Notice of Related Case (filed on December 22, 2021) (Class Action)	0.10
Review Court's Order Granting Joint Stipulation to Continue Post-Mediation Status Conference (filed on January 4, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Entry of Order Granting Joint Stipulation to Continue Post-Mediation Status Conference (filed on January 4, 2022) (Class Action)	0.10
Review Court's Message Board Posting Re: Continuance Granted as to Both Cases (Posted January 5, 2022)	0.10

Review Court's Minute Order Re: Initial Status Conference (filed on January 6, 2022) (PAGA Action)	0.10
Review Defendant's Notice of Appearance (filed on January 11, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Post-Mediation Status Conference Statement and Notice of Settlement (filed on January 24, 2022) (Class Action)	1.40
Review Court's Message Board Posting re: Order Re: March 10, 2022 Post-Mediation Status Conference in 21STCV04439 and re 21STCV33269 (posted on January 28, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Message Board Reply to Order Re: March 10, 2022 Post-Mediation Status Conference in 21STCV04439 and re 21STCV33269 (posted on March 9, 2022)	0.50
Review Court's Minute Order (filed on March 10, 2022) (Class Action)	0.10
Review Court's Minute Order (filed on March 10, 2022) (PAGA Action)	0.10
Review Minute Order Re: Consolidation (filed on May 20, 2022) (Class Action)	0.10
Review Minute Order Re: Consolidation (filed on May 20, 2022) (PAGA Action)	0.10
Review Court's Message Board Posting Re: LASC Complex Settlement Agreement Forms (posted on July 12, 2022)(Consolidated Action)	0.20
Review Court's Message Board Posting Re: Status Inquiry (posted on August 19, 2022) (Consolidated Action)	0.10
Review Defendant's Message Board Posting Re: Motion for Preliminary Approval (posted on August 19, 2022) (Consolidated Action)	0.10
Draft Message Board Reply Re: Status of Motion for Preliminary Approval (posted on August 22, 2022) (Consolidated Action)	0.30

Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Motion for Preliminary Approval (filed on August 22, 2022) (Consolidated Action)	0.10
Review Court's Message Board Reply Re: Status Inquiry (posted on November 21, 2022) (Consolidated Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Message Board Reply Re: Status of Motion for Preliminary Approval (posted on November 22, 2022) (Consolidated Action)	0.30
Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Motion for Preliminary Approval (filed on November 23, 2022) (Consolidated Action)	0.10
Review Court's Minute Order Re: Nunc Pro Tunc Order (filed on December 5, 2022) (Consolidated Action)	0.10
Review Court's Message Board Posting Re: ETA for Motion for Preliminary Approval (posted on January 30, 2023) (Consolidated Action)	0.10
Review Court's Message Board Reply Re: ETA for Motion for Preliminary Approval (posted on February 1, 2023) (Consolidated Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Message Board Reply Re: ETA for Motion for Preliminary Approval (posted on February 1, 2023) (Consolidated Action)	0.80
Review Court's Message Board Reply Re: ETA for Motion for Preliminary Approval (posted on February 1, 2023) (Consolidated Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Motion for Preliminary Approval (filed on February 6, 2023) (Consolidated Action)	0.10

Draft Plaintiff's Response to Order to Show Cause Re: Why the Class Claims Should Not Be Stricken Due to Putative Class Counsel's Failure to Timely File the Motion for Preliminary Approval (filed on February 7, 2023) (Consolidated Action)	1.60
Review Court's Minute Order Re: Order to Show Cause Re: Why the Class Claims Should Not Be Stricken Due to Putative Class Counsel's Failure to Timely File the Motion for Preliminary Approval (filed on February 14, 2023) (Consolidated Action)	0.10
Review Defendant's Notice of Change of Address or Other Contact Information (filed on March 20, 2023) (Consolidated Action)	0.10
Review Court's Message Board Posting Re: All Cases Pending in LASC Dept. SSC-10 Spring Street – Judge Highberger – Courtroom Dark (posted on March 24, 2023)	0.10
Appearances	
Prepare for and Telephonically Attend Initial Status Conference (May 28, 2021) (Class Action)	0.80
Prepare for and Telephonically Attend Order to Show Cause Hearing Re: Why the Class Claims Should Not Be Stricken Due to Putative Class Counsel's Failure to Timely File the Motion for Preliminary Approval (February 14, 2023) (Class Action)	0.60
Prepare for and Telephonically Attend Hearing on Motion for Preliminary Approval of Class Action Settlement (March 15, 2023) (Class Action)	1.20
Prepare for and Telephonically Attend Hearing on Motion for Preliminary Approval of Class Action Settlement (April 13, 2023) (Class Action)	0.90
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Award (August 30, 2023) (Anticipated)	1.50
Discovery and Deposition	

Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Dominique Davis (served on October 15, 2020)	1.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Dominique Davis (served on November 20, 2020)	4.20
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on October 25, 2021)	1.20
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 24, 2021)	4.30
Letters and Correspondence	
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Dominique Davis for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on July 6, 2021)	3.90
Meet with Defendant's Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	32.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Defendant (served on November 29, 2021) and Other Sources • Employee Handbooks and Policies • Employee Time Records • Employee Pay Records • Plaintiff's Time & Pay Records	160.30

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 Analysis/Calculations (submitted on December 8, 2021)	40.50
Remotely Attend Mediation Session (December 15, 2021; Zoom Video Conference)	30.00
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement (executed on January 24, 2023) and Draft Exhibits	22.50
Draft, Review, Revise, Negotiate, and Finalize Amendment No. 1 to Joint Stipulation of Class Action and PAGA Settlement (executed on March 29, 2023)	3.10
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 Brian J. St. John in Support Thereof, Declaration of Dominique Davis in Support Thereof, and [Proposed] Order Thereon (filed on February 17, 2023)	21.50
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on March 15, 2023)	0.10
Research and Draft Plaintiff's Supplemental Declaration of Brian J. St. John in Support of Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed] Order Theron (filed on March 30, 2023)	6.70
Review Court's Message Board Posting Re: Still Need to Prove Submission of Settlement Agreement to LWDA (posted on April 12, 2023)	0.10
Draft Message Board Reply Re: Still Need to Prove Submission of Settlement Agreement to LWDA (posted on April 12, 2023)	0.20

Review Court's Message Board Reply Re: Still Need to Prove Submission of Settlement Agreement to LWDA (posted on April 12, 2023)	0.10
Research and Draft Plaintiff's Further Supplemental Declaration of Brian J. St. John in Support of Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement (filed on April 12, 2023)	1.30
Review Court's Minute Order Granting Preliminary Approval of Class Action Settlement (filed on April 13, 2023)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on April 13, 2023)	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 Settlement, Attorneys' Fees, Costs, and Service Award, and Declaration of Edwin Aiwarzian in Support Thereof, and Revise [Proposed] Final Approval Order and Judgment (filed on August 8, 2023) (Anticipated)	24.50
Total Hours:	605.20

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Davis v. Barker Management, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/15/2020	U.S. Postmaster	Postage	6.95
2/4/2021	Legal Document Server, Inc.	Attorney Service	180.23
2/4/2021	Los Angeles Superior Court	Complaint Filing Fee	435.00
2/4/2021	Los Angeles Superior Court	Complex Filing Fee	1,000.00
2/11/2021	Legal Document Server, Inc.	Attorney Service	110.00
3/17/2021	Legal Document Server, Inc.	Attorney Service	110.00
5/4/2021	Legal Document Server, Inc.	Attorney Service	95.25
5/4/2021	Los Angeles Superior Court	Jury Fee	150.00
5/7/2021	Legal Document Server, Inc.	Attorney Service	175.00
5/17/2021	Legal Document Server, Inc.	Attorney Service	110.00
5/28/2021	Legal Document Server, Inc.	Attorney Service	175.00
6/2/2021	Los Angeles Superior Court	Remote Hearing Fee	15.00
7/16/2021	Los Angeles Superior Court	Document Download Fee	6.20
9/1/2021	ProLegal	Attorney Service	133.88
10/2/2021	Case Anywhere LLC	Attorney Service	96.00
11/15/2021	Legal Document Server, Inc.	Attorney Service	15.20
11/24/2021	Legal Document Server, Inc.	Attorney Service	15.20
12/7/2021	Paul Hastings LLP	Mediation Fee	15,000.00
12/20/2021	Legal Document Server, Inc.	Attorney Service	16.15
12/20/2021	Los Angeles Superior Court	Stipulation Fee	20.00
12/21/2021	Legal Document Server, Inc.	Attorney Service	95.00
1/4/2022	Case Anywhere LLC	Attorney Service	132.00
1/5/2022	Legal Document Server, Inc.	Attorney Service	15.20
1/24/2022	Legal Document Server, Inc.	Attorney Service	15.20
4/8/2022	Case Anywhere LLC	Attorney Service	132.00
5/5/2022	CourtCall	Attorney Service	94.00
7/5/2022	Case Anywhere LLC	Attorney Service	120.00
10/5/2022	Case Anywhere LLC	Attorney Service	120.00
1/3/2023	Legal Document Server, Inc.	Attorney Service	15.20
1/4/2023	Case Anywhere LLC	Attorney Service	120.00
2/8/2023	Legal Document Server, Inc.	Attorney Service	15.95
2/17/2023	Legal Document Server, Inc.	Attorney Service	40.00
2/17/2023	Los Angeles Superior Court	Motion Fee	120.00
2/21/2023	Legal Document Server, Inc.	Attorney Service	203.00
3/30/2023	Legal Document Server, Inc.	Attorney Service	27.70
4/12/2023	Legal Document Server, Inc.	Attorney Service	11.95
4/13/2023	Legal Document Server, Inc.	Attorney Service	16.15
4/15/2023	Case Anywhere LLC	Attorney Service	204.00
4/27/2023	Legal Document Server, Inc.	Attorney Service	16.15

LAWYERS for JUSTICE PC CASE COST DETAIL
Davis v. Barker Management, Inc.

7/2/2023	Case Anywhere LLC	Attorney Service	126.00
		Total:	19,504.56

LAWYERS for JUSTICE PC CASE COST DETAIL
Davis v. Barker Management, Inc. (PAGA)

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