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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

GREGORY J. KNOP, individually, and on behalf of other members of the general public similarly situated;

Plaintiff,

vs.

PEAK TECHNOLOGY ENTERPRISES, INC., a California corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. 21CV376019
Consolidated for Settlement Approval Purposes with Case No. 21CV386575

Honorable Beth McGowen
Department 22

CLASS ACTION

DECLARATION OF RYAN SLINGER IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND ENHANCEMENT PAYMENT

Date:	October 29, 2026
Time:	1:30 p.m.
Department:	22
Complaint Filed:	February 9, 2021
FAC Filed:	March 16, 2021
Trial Date:	None Set

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DECLARATION OF RYAN SLINGER

I, Ryan Slinger, 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 Gregory Knop ("Plaintiff") and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On April 30, 2026, in Department 22 of the above-entitled Court, the Honorable Beth McGowen preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release ("Settlement," "Agreement," or "Settlement Agreement") entered into between Plaintiff and Defendant Peak Technology Enterprises, Inc. ("Defendant") (together with Plaintiff, the "Parties") and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Gregory Knop as the representative of the Class ("Class Representative"). The Court also provisionally appointed and designated Lawyers *for* Justice, PC and Sweeny Law, PC as counsel for the Class (together, "Class Counsel").

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement ("Notice"), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed ILYM Group, Inc. ("ILYM") 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 and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Payment ("Motion for Final Approval"), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Attorneys' Fees and Costs, Enhancement Payment, and Settlement Administration Costs, or the allocation for the PAGA Amount.

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WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above-captioned action since before it was commenced on February 9, 2021.

6. Before initiating the cases, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiff and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative Private Attorneys General Act ("PAGA") claims and penalties, and wage-and-hour law and enforcement, Plaintiff's claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC 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 non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and were preparing the cases for class certification and trial, prior to reaching the Settlement. The Parties exchanged a volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. Class Counsel propounded multiple sets of written discovery requests on Defendant (including, but not limited to, Form Interrogatories—General (Set One), Special Interrogatories (Sets One & Two), and Requests for Production of Documents (Set One)), and reviewed Defendant's responses thereto. Additionally, Class Counsel noticed the deposition of Defendant's Person Most Knowledgeable regarding Organizational Structure and Job Descriptions. The volume of documents and data that Class Counsel reviewed and analyzed included and was not limited to: Plaintiff's

employment records, Class Members' time and payroll data, Defendant's Employee Handbook, Company policy acknowledgements, internal memoranda, and Defendant's operations and employment practice, policies, and procedures, among other information and documents. Class Counsel had the opportunity to interview and obtain information from Plaintiff, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, 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, informal discovery, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. 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-related papers, the mediation briefing and supporting materials, and settlement documents; and preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

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

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9. After conducting significant investigation of the facts and law during the prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in a mediation session conducted by Jeffrey A. Ross, a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of thirty-five percent (35%) of the Gross Settlement Amount of $300,000.00, which is currently estimated to be $105,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least 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 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 this matter; and (6) the other cases that Class Counsel has 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 these matters, which involves an outstanding monetary recovery involving a Gross Settlement Amount of $300,000.00 supports 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 has 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 **238.20 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. Lawyers *for* Justice, PC has successfully litigated cases

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involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. 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 the Chief Executive Officer 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, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. 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 many 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 contested motion practice in approximately sixteen (16) cases in the last decade, and litigated

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over 1,000 class action or representative action cases.

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

17. Joanna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010), in New York (since 2013), and in Washington (since 2026), and she is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, U.S. District Court for the Western District of Washington, and the U.S.

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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. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice before all courts of the State of California. I have worked on many wage-and-hour class action and PAGA representative cases, and my work on these cases has included preparing pleadings and motions, making court appearances, and drafting and finalizing settlement agreements.

LITIGATION COSTS AND EXPENSES INCURRED BY

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19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of actual costs. Lawyers *for* Justice, PC seeks reimbursement of **$13,128.30** 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.

ENHANCEMENT PAYMENT TO PLAINTIFF

20. In recognition of his efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as his broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 34 of the Settlement Agreement), the Settlement provides for an Enhancement Payment, in the amount of up to $7,500.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing his employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive $7,500.00 as a reasonable Enhancement Payment for his broader waiver and release of claims and services performed in this matter, in addition to his individual settlement payments.

21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, the Class, PAGA Employees, and the State of California.

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

Executed this 7th day of October 2026, at Glendale, California.

Ryan Slinger

Ryan Slinger

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EXHIBIT 1

GREGORY J. KNOP V. PEAK TECHNOLOGY ENTERPRISES, INC.
Santa Clara County Superior Court Case No. 21CV376019 ("Class Action")

GREGORY J. KNOP V. PEAK TECHNOLOGY ENTERPRISES, INC.
Santa Clara County Superior Court Case No. 21CV386575 ("PAGA Action")

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS *for* JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Gregory Knop ("Plaintiff")	11.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	6.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff's Class Action Claims, Conduct Legal Research and Analysis Regarding Class Claims, and Draft, Review, and/or Revise Plaintiff's Class Action Complaint for Damages (filed on February 9, 2021) (Class Action)	7.50
Review Court's Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadline (filed on February 11, 2021) (Class Action)	0.10
Draft, Review, and/or Revise Plaintiff's First Amended Class Action Complaint for Damages and Demand for Jury Trial (filed on March 16, 2021) (Class Action)	0.50
Draft, Review, and/or Revise Plaintiff's Initial Case Management Conference Statement (filed on May 19, 2021) (Class Action)	0.90
Draft, Review, and/or Revise Plaintiff's Notice of Posting Jury Fees (filed on May 19, 2021) (Class Action)	0.20

Review Defendant Peak Technology Enterprises, Inc.'s ("Defendant") Notice of Appearance (served on May 21, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on June 3, 2021) (Class Action)	0.10
Review Court's Notice of Further Case Management Conference (filed on June 8, 2021) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on July 21, 2021) (Class Action)	1.20
Review Court's Notice of Rescheduled Case Management Conference (filed on July 26, 2021) (Class Action)	0.20
Investigate the Merits of Plaintiff's Private Attorneys General Act ("PAGA") Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on September 9, 2021) (PAGA Action)	6.50
Review Court's Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadline (filed on September 9, 2021) (PAGA Action)	0.30
Review Court's Notice of Rescheduled Case Management Conference (filed on September 30, 2021) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 10, 2021) (Class Action)	1.10
Review Court's Notice of Rescheduled Case Management Conference (filed on November 12, 2021) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 23, 2021) (PAGA Action)	1.10
Review Court's Minute Order Re: Case Management Conference (filed on December 2, 2021) (PAGA Action)	0.20

Review Court's Notice of Further Case Management Conference (filed on December 7, 2021) (Class Action)	0.20
Review Court's Notice of Further Case Management Conference (filed on December 7, 2021) (PAGA Action)	0.20
Review Defendant's Substitution of Attorney–Civil (served on April 22, 2022) (Class Action)	0.20
Review Defendant's Substitution of Attorney–Civil (served on April 22, 2022) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on August 18, 2022) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on August 18, 2022) (PAGA Action)	0.80
Review Court's Order to Continue Case Management Conference and Notice of Rescheduled Case Management Conference (filed on August 19, 2022) (Class Action)	0.20
Review Court's Order to Continue Case Management Conference and Notice of Rescheduled Case Management Conference (filed on August 19, 2022) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Continue Case Management Conference (filed on August 19, 2022) (PAGA Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Continue Case Management Conference (filed on August 26, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on October 20, 2022) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on October 20, 2022) (PAGA Action)	0.70

Review Court's Order to Continue Case Management Conference and Notice of Rescheduled Case Management Conference (filed on October 21, 2022) (Class Action)	0.20
Review Court's Order to Continue Case Management Conference and Notice of Rescheduled Case Management Conference (filed on October 21, 2022) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Continue Case Management Conference (filed on October 21, 2022) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Continue Case Management Conference (filed on October 21, 2022) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on January 4, 2023) (Class Action)	0.90
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on January 4, 2023) (PAGA Action)	0.70
Review Court's Order to Continue Case Management Conference (filed on January 4, 2023) (Class Action)	0.20
Review Court's Order to Continue Case Management Conference and Notice of Rescheduled Case Management Conference (filed on January 4, 2023) (PAGA Action)	0.20
Review Court's Notice of Rescheduled Case Management Conference (filed on January 5, 2023) (Class Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Continue Case Management Conference (filed on January 10, 2023) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Continue Case Management Conference (filed on January 10, 2023) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on March 10, 2023) (Class Action)	0.90

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on March 10, 2023) (PAGA Action)	0.70
Review Court's Order to Continue Case Management Conference (filed on March 10, 2023) (Class Action)	0.20
Review Court's Order to Continue Case Management Conference (filed on March 10, 2023) (PAGA Action)	0.20
Review Court's Notice of Rescheduled Case Management Conference (filed on March 13, 2023) (Class Action)	0.10
Review Court's Notice of Rescheduled Case Management Conference (filed on March 13, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on May 12, 2023) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on May 12, 2023) (PAGA Action)	0.70
Review Court's Minute Order Re: Case Management Conference (filed on May 18, 2023) (Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on May 18, 2023) (PAGA Action)	0.20
Review Court's Notice of Further Case Management Conferences (filed on May 30, 2023) (Class Action & PAGA Action)	0.20
Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint for Damages, and Research Affirmative Defenses in Defendant's Answer (served on July 18, 2023) (Class Action)	1.20
Review and Analyze Defendant's Answer to Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, and Research Affirmative Defenses in Defendant's Answer (served on July 18, 2023) (PAGA Action)	1.20

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on August 4, 2023) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on August 4, 2023) (PAGA Action)	0.60
Review Court's Minute Order Re: Case Management Conference (filed on August 10, 2023) (Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on August 10, 2023) (PAGA Action)	0.20
Review Court's Notice of Further Case Management Conference (filed on August 15, 2023) (Class Action)	0.20
Review Court's Notice of Further Case Management Conference (filed on August 15, 2023) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Complex Case Management Conference Statement (filed on October 25, 2023) (Class Action)	0.90
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Complex Case Management Conference Statement (filed on October 25, 2023) (PAGA Action)	0.70
Review Court's Minute Order Re: Case Management Conference (filed on November 9, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on November 9, 2023) (PAGA Action)	0.10
Review Court's Notice of Further Case Management Conferences and Order and Notice of Reassignment of Cases (filed on November 16, 2023) (Class Action & PAGA Action)	0.30
Review Court's Notice of Rescheduled Case Management Conferences (filed on January 17, 2024) (Class Action & PAGA Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on February 14, 2024) (Class Action)	0.80
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on February 14, 2024) (PAGA Action)	0.60
Review Court's Notice of Rescheduled Case Management Conferences (filed on March 8, 2024) (Class Action & PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Consolidate Case Numbers 21CV376019 and 21CV386575; [Proposed] Order Thereon (submitted on March 19, 2024) (Class Action & PAGA Action)	1.10
Review Court's Order to Consolidate Case Numbers 21CV376019 and 21CV386575 (filed on March 20, 2024) (Class Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Consolidate Case Numbers 21CV376019 and 21CV386575 (filed on March 20, 2024) (Class Action)	0.20
Review Court's Notice of Rescheduled Case Management Conference (filed on July 17, 2024) (Class Action)	0.10
Draft, Review, and/or Revise Notice of Association of Counsel (filed on August 16, 2024) (Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Complex Case Management Conference Statement (filed on November 1, 2024) (Class Action)	0.20
Review Court's Notice of Rescheduled Case Management Conference (filed on November 5, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 23, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 23, 2025) (PAGA Action)	0.20

Draft, Review, and/or Revise Plaintiff's Complex Case Management Conference Statement (filed on February 24, 2025) (Class Action)	0.20
Review Court's Notice of Reset Hearing (filed on February 26, 2025) (Class Action)	0.20
Review Court's Notice of Reset Hearing (filed on June 3, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Complex Case Management Conference Statement (filed on July 11, 2025) (Class Action)	0.20
Review Court's Notice of Reset Hearing (filed on July 15, 2025) (Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Complex Case Management Conference Statement (filed on September 25, 2025) (Class Action)	0.20
Review Court's Notice of Reset Hearing (filed on September 30, 2025) (Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Complex Case Management Conference Statement (filed on December 15, 2025) (Class Action)	0.20
Review Court's Minute Order Re: Further Case Management Conference (filed on December 18, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Ruling from December 18, 2025 Case Management Conference (filed on January 2, 2026) (Class Action)	0.20
Review Court's Minute Order Re: Further Case Management Conference (filed on April 30, 2026) (Class Action)	0.10
Appearances	
Prepare for and Remotely Attend Case Management Conference (June 3, 2021) (Class Action)	1.50
Prepare for and Remotely Attend Case Management Conference (December 2, 2021) (PAGA Action)	1.10
Prepare for and Remotely Attend Case Management Conference (May 18, 2023) (Class Action & PAGA Action)	2.80

Prepare for and Remotely Attend Case Management Conference (August 10, 2023) (Class Action & PAGA Action)	1.80
Prepare for and Remotely Attend Case Management Conference (November 9, 2023) (Class Action & PAGA Action)	1.50
Prepare for and Remotely Attend Case Management Conference (December 18, 2025) (Class Action)	0.40
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Gregory J. Knop (served on December 10, 2020) (Class Action)	2.10
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Peak Technology Enterprises, Inc., and Requests for Production of Documents (Organizational Structure; noticed for August 23, 2023) (served on May 24, 2023) (Class Action)	1.20
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Peak Technology Enterprises, Inc., and Requests for Production of Documents (Wage and Hour Practices; noticed for August 24, 2023) (served on May 24, 2023) (Class Action)	1.40
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Peak Technology Enterprises, Inc., and Requests for Production of Documents (Organizational Structure; noticed for August 30, 2023) (served on May 24, 2023) (PAGA Action)	1.10
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Peak Technology Enterprises, Inc., and Requests for Production of Documents (Wage and Hour Practices; noticed for August 31, 2023) (served on May 24, 2023) (PAGA Action)	1.30
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on May 24, 2023) (Class Action)	4.50
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on May 24, 2023) (PAGA Action)	4.10

Review and Analyze Defendant's Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on July 11, 2023) (Class Action)	2.10
Review and Analyze Defendant's Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on July 11, 2023) (PAGA Action)	1.60
Review and Analyze Documents Produced by Defendant (served on July 11, 2023) (Class Action & PAGA Action)	2.10
Review and Analyze Documents Produced by Defendant (served on September 8, 2023) (Class Action & PAGA Action)	1.60
Review and Analyze Defendant's Amended Responses to Plaintiff'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 27, 2023) (Class Action)	1.70
Review and Analyze Documents Produced by Defendant (served on October 27, 2023) (Class Action & PAGA Action)	0.80
Letters and Correspondence	
Draft, Review, and/or Revise Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Gregory J. Knop (served on December 1, 2020) (Class Action)	1.90
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Gregory J. Knop under the Private Attorneys General Act (served on July 6, 2021) (PAGA Action)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendant's Counsel	13.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (approximately 7,805 pages), and Other Sources Prior to Mediation	51.50

Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations (submitted on July 11, 2022)	29.50
Attend Mediation Session (July 18, 2022; via Zoom Video Conference)	18.50
Engage in Additional Settlement-Related Discussions (July 2022 – January 2024)	6.50
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding Re: Class Action and PAGA Settlement (executed on August 30, 2024)	0.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on January 15, 2026), and Draft, Review, and/or Revise Court-Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	1.40
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	3.50
Law and Motion	
Review Declaration of Charles T. Sweeny and Declaration of Plaintiff Gregory J. Knop, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Vartan Madoyan in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on April 8, 2026) (Class Action)	3.20
Draft, Review, and/or Revise Supplemental Declaration of Charles T. Sweeny in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on April 9, 2026) (Class Action)	0.30
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on April 29, 2026) (Class Action)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on April 30, 2026) (Class Action)	0.20

Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on May 1, 2026) (Class Action)	0.20
Research, Draft, Review, and/or Revise Declaration of Brian J. St. John in Support of Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Class Representative Enhancement Payment (Class Action)	3.50
Total Hours:	238.20