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

MARGARET TAYLOR, individually, and
on behalf of other members of the general
public similarly situated and other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiff,

vs.

BARBIER SECURITY GROUP, a
California corporation; and DOES 1 through
100, inclusive;

Defendants.

Case No.: 2000399

Honorable Stephen Freccero
Department A

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Payment; Declaration of Class Representative
(Margaret Macedo); Declaration of Settlement
Administrator (Taylor Mitzner); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: January 24, 2023
Time: 1:30 p.m.
Department: A

Complaint Filed: January 31, 2020
FAC Filed: June 23, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Margaret Macedo (formerly Margaret Taylor) (“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 September 13, 2022, in Department A of the above-entitled Court, the Honorable Stephen Freccero preliminarily approved the Joint Stipulation of Class Action Settlement and Release of Claims (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Barbier Security Group (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Margaret Macedo 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 Settlement Administrators (“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 Class Action Settlement, Attorneys’ Fees, Costs, and Enhancement Payment (“Motion for Final Approval”), no Settlement Class Members have objected to the Settlement or the contemplated request for Attorneys’ Fees and Litigation Costs, Enhancement Payment, 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 been actively engaged in litigating this matter since prior to the commencement of the above-captioned action on January 31, 2020.

5. Before initiating the action, 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 case, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement and penalties, 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 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, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel investigated the veracity, strength, and scope of the claims, and were preparing the matter for class certification and trial, prior to reaching the Settlement. The parties conducted significant investigation and formal and informal discovery and exchange of a large volume of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations. Class Counsel served multiple sets of written discovery requests in various forms; reviewed Defendant's responses thereto; worked with Plaintiff to provide responses to discovery requests that were propounded by Defendant; and prepared and served numerous notices of deposition of person(s) most knowledgeable along with requests for production of documents. Class Counsel also interviewed and obtained information from Plaintiff and other Class Members, and reviewed and analyzed documents and data obtained from Plaintiff, Defendants, and other sources. The documents and data reviewed and analyzed by Class Counsel included, and were not limited to, employment records of Plaintiff and other Class Members, a detailed sampling of Class Members' time and pay data, multiple

iterations of the Barbier Security Group Handbook, company policy acknowledgements, internal memoranda, job descriptions, new hire orientation checklists, training materials, operations and employment practices, policies, and procedures documents (e.g., Mutual Voluntary Agreement For Individual Arbitration agreement, Off Duty Meal Period Waiver and Second Meal Waiver forms, Authorization Form For Payment Of Missed Meal Period Or Rest Break forms, Paycheck Deduction Agreement), and extensive documents regarding Defendant's financial condition (e.g., Balance Sheets, Profit and Loss Statements, Revenue Graph, and Tax Returns), among other information and documents. The parties engaged in motion and *ex parte* practice (including, e.g., Plaintiff's Consolidated Motion to Compel Defendant to Provide Responses to Plaintiff's Special Interrogatories (Set One, Two, and Three), Form Interrogatories (General, Set One), and Requests for Production of Documents (Sets One and Two), and for Monetary Sanctions and Defendant's Motion for Terminating and Monetary Sanctions Against Plaintiff Margaret Macedo and Her Attorneys). Class Counsel developed damages and penalties valuation models in preparation for mediation, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, motion practice, 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 formal and informal discovery and investigation during the course of litigating the case. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. These documents and data provided a critical understanding of the nature of the work performed by the Class Members, 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

1 mediation and settlement negotiation process. Class Counsel also performed significant research
2 into the applicable law, which is constantly evolving as it relates to certification, off-the-clock
3 theory, meal and rest periods, waivers, arbitration agreements, PAGA claims, wage-and-hour
4 enforcement, Plaintiff's claims and damages, and Defendant's defenses.

5 8. After conducting significant investigation of the facts and law during the
6 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
7 try to resolve the entire matter. These efforts included participating in a formal, full-day
8 mediation conducted by Cary G. Palmer, Esq., a well-regarded mediator experienced in
9 mediating complex labor and employment matters. During all settlement discussions, the parties
10 conducted their negotiations at arm's length in an adversarial position. In the course of
11 mediation and settlement negotiations, the parties exchanged information and data, and discussed
12 all aspects of the case, including the risks and delays of further litigation, the risks to the parties
13 of proceeding with class certification and trial, the law relating to off-the-clock theory, meal and
14 rest periods, waivers, arbitration agreements, PAGA claims, and wage-and-hour enforcement,
15 Defendant's financial condition, the evidence produced and analyzed, and the possibility of
16 appeals, among other things. Arriving at a settlement that was acceptable to the parties was not
17 easy. Defendant contended that individualized questions of fact predominate over any common
18 issues, and these issues would pose challenges to class certification and representative
19 adjudication. Defendant and its counsel felt very strongly about Defendant's ability to prevail on
20 the merits and to obtain a denial of class certification. In fact, Defendant gathered a large
21 number of declarations from putative class members, that Defendant contended demonstrated
22 that Plaintiff would not be able to certify a class, would not be able to present a manageable trial
23 plan (for either class or PAGA claims), and would not be able to prove the merit of the claims.
24 Meanwhile, Plaintiff and Class Counsel disagreed with these contentions and believed that class
25 certification would be obtained and that they would prevail at trial. With the aid of the
26 mediator's evaluation, the parties ultimately agreed that the matter was well-suited for settlement
27 given the legal issues relating to Plaintiff's principal claims, factual circumstances, as well as the
28 costs and risks to the parties that would attend further litigation. These risks of further litigation

1 include, and are not limited to, a determination that the claims are unsuitable for class treatment
2 and/or representative adjudication, class de-certification after certification of a class, allowing a
3 jury to decide the claims asserted in the case, and the real possibility of no monetary recovery
4 after years of litigation, especially in light of Defendant's financial condition.

5 9. As set forth more fully in the accompanying Motion for Final Approval, Class
6 Counsel seeks attorneys' fees in the amount of \$248,500.00, which is thirty-five percent (35%)
7 of the Maximum Settlement Amount of \$710,000.00, as set forth in the Settlement Agreement
8 and the Class Notice. Pursuant to the contingency-fee agreement entered into by and between
9 Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five
10 percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk
11 that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class
12 Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4)
13 the results that Class Counsel has achieved throughout the litigation; (5) the value of the
14 settlement that Class Counsel has achieved in the case; and (6) the other cases that Class Counsel
15 has turned down in order to devote their time and efforts to this matter.

16 10. I am aware that the common and acceptable rate for contingency representation in
17 wage and hour class action litigation is normally 40% before trial, with the range being from
18 33.3% up to 50%.

19 11. While not necessarily required to be demonstrated because the percentage fee is
20 proper for this settlement, Class Counsel has incurred many hours of work in connection with
21 prosecuting the case such that the award of attorneys' fees is also justified under a simple
22 lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **477.60 hours**
23 performing tasks and obtaining recovery in the matter. Attached hereto as "**EXHIBIT A**" is an
24 Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by
25 attorneys at Lawyers for Justice, PC and the time incurred in performing those services. These
26 hours include work done by myself and several other attorneys at the firm. Also, separate from
27 the hours referenced herein, Lawyers for Justice, PC had litigation support personnel actively
28 engaged in assisting with the prosecution of this matter.

12. 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 actions, support a reasonable blended hourly rate of compensation at the rate of \$650 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 \$650 per hour for legal services performed, by courts granting approval of wage and hour settlements in other 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 action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; 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.*

1 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
2 granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

3 **ADEQUACY OF LAWYERS *for* JUSTICE, PC**

4 ***EDUCATION***

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

13 ***JUDICIAL EXTERNSHIPS***

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

19 ***LITIGATION AND CLASS ACTION EXPERIENCE***

20 15. In December of 2004, I obtained a license to practice law from the California
21 State Bar. From approximately December 2004 to approximately August 2008, I was employed
22 by *Girardi & Keese*.

23 16. At *Girardi & Keese*, my practice focused on class actions and other complex
24 cases involving toxic torts and products liability. In addition, I gained substantial experience on
25 cases involving insurance bad faith, premises liability, and medical negligence. While employed
26 by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150
27 depositions, and prepared dozens of expert witnesses for deposition or trial.

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1 17. Since its inception, in or around October of 2008, Lawyers *for* Justice, PC has
2 almost exclusively focused on the prosecution of consumer and employment class actions,
3 involving wage-and-hour claims, race discrimination, unfair business practices or consumer
4 fraud. Currently, we are the attorneys of record in over a dozen employment-related putative
5 class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC
6 has successfully litigated cases involving the executive, administrative, and other overtime
7 exemptions to the State of California and federal overtime compensation requirements. During
8 this relatively short time, in association with other law firms, Lawyers *for* Justice, PC has
9 recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

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

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* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
12 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
13 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
14 5046.

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

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

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

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

8 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
9 representative action against a food company on behalf of non-exempt employees. On June 30,
10 2017, the court granted final approval of the class and PAGA representative action settlement.
11 The Sacramento County Superior Court Case Number is 34-2015-00175871.

12 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
13 representative action against a chocolate company on behalf of non-exempt employees. On July
14 19, 2017, the court granted final approval of the class and PAGA representative action
15 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

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

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

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

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

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

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

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

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

1 jj) LFJ, in association with co-counsel therein, represents the plaintiff in a
2 wage-and-hour class and PAGA representative action against a large national drug testing
3 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
4 plaintiff's motion for class certification and certified a class. The San Diego County Superior
5 Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

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

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

21 **LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL**

22 19. To date, Class Counsel has borne all the risks and costs of litigation and will not
23 receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC
24 seeks reimbursement of \$24,502.95 in litigation costs and expenses incurred in this matter, as
25 reflected in **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in
26 the prosecution of the cases and to obtain the Settlement.

27 ///

28 ///

ENHANCEMENT PAYMENT TO PLAINTIFF

20. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Payment in the amount of \$7,000.00 to Plaintiff. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant documents and information and provided the facts and evidence necessary to attempt to prove the allegations, including and not limited to, by way of working with Class Counsel to provide responses to discovery requests that were propounded on her by Defendant. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain information that would facilitate the pursuit of the class and PAGA claims. Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing her work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff to receive \$7,000.00 as a reasonable Enhancement Payment for her service in this matter, in addition to her individual settlement payment under the Settlement.

21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiff, the Class, PAGA Group Members, 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 6th day of January 2023, at Glendale, California.


Edwin Aiwasian

EXHIBIT A

MARGARET TAYLOR V. BARBIER SECURITY GROUP
(MARIN COUNTY SUPERIOR COURT CASE NO. CIV 2000399)

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	9.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Margaret Macedo’s (formerly Margaret Taylor) (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	8.30
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Barbier Security Group (“Defendant”) with Respect to the Damages Sustained by Plaintiff and the Putative Class	7.80
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	6.90
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to the Employment of Plaintiff and the Aggrieved Employees	7.40
Legal Research & Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Certification Decisions in California, including all New and Relevant DLSE Materials	7.10
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	3.20

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	3.40
Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	2.40
Analysis of Competitors within 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	3.60
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, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	4.10
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members Worked Throughout California	3.30
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Reporting Time, Scheduling, Meetings (e.g., Pass-Down and Debriefing), Daily Reports, Security Sweeps, Site Access, Patrol Reports, Dispatch Calls, Emergencies, Assigned Stops, Timekeeping, Rounding, Meal/Rest Breaks, On-Premises Breaks, On-Duty Meal Agreements, Meal Waiver Forms, Meal/Rest Premiums, Non-Discretionary Bonus/Incentive/Shift Differential Pay, Regular Rate Calculation, Overtime Compensation, Dress Code, Usage of Personal Cell Phones, Reimbursement of Business-Related Expenses, and Arbitration Agreements	20.50
Research and Investigation Re: Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Payroll, Client Management, Communication, and Security Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post Shift, and During Meal Breaks	3.30

Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver/Release, Compliant Policies, and Arbitration Agreements	7.80
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	5.10
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	2.20
Research and Investigation on the Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' Work	6.20
Meet and Communicate with Plaintiff Margaret Macedo throughout the Pendency of the Case	47.50
Investigate, Meet and Communicate with, and Conduct Interviews of Putative Class Members and/or Percipient Witnesses	14.50
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 January 31, 2020)	7.30
Review Court's Notice of Case Assignment and Notice of Case Management Conference (filed on February 3, 2020)	0.10
Review Court's Order Dropping April 13, 2020 Appearance (filed on March 23, 2020)	0.10
Review Court's Order Dropping May 13, 2020 Appearance (filed on March 23, 2020)	0.10
Draft Plaintiff's Consent to Electronic Service and Notice of Electronic Service Address (filed on June 2, 2020)	0.10

Draft Plaintiff's Case Management Conference Statement (filed on June 5, 2020)	0.90
Review Defendant's Notice of Related Case (served on June 8, 2020)	0.20
Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on June 8, 2020)	1.20
Review Defendant's Case Management Conference Statement (served on June 11, 2020)	0.30
Review Defendant's Amended Case Management Conference Statement (served on June 12, 2020)	0.20
Review Court's Minute Order Re: Initial Status Conference (filed on June 22, 2020)	0.10
Draft Plaintiff's Case Management Conference Statement (filed on November 23, 2020)	0.90
Review Defendant's Case Management Conference Statement (served on November 23, 2020)	0.30
Review Court's Minute Order Re: Case Management Conference (filed on December 11, 2020)	0.10
Review Court's Notice of Hearing (filed on February 1, 2021)	0.10
Review Court's Notice of Hearing (filed on March 9, 2021)	0.10
Review Court's Notice Regarding Mandatory Participation in Discovery Facilitator Program (filed on March 19, 2021)	0.10
Review Defendant's Case Management Conference Statement (served on March 25, 2021)	0.30
Draft Plaintiff's Case Management Conference Statement (filed on March 26, 2021)	0.80
Review Court's Minute Order Re: Case Management Conference (filed on April 12, 2021)	0.10

Review Court's Notice of Appointment of Discovery Facilitator (filed on April 22, 2021)	0.10
Review Court's Notice of Hearing (filed on June 9, 2021)	0.10
Review Court's Minute Order Re: Plaintiff's Ex Parte Application (filed on June 10, 2021)	0.10
Review Court's Notice of Mandatory Participation in Discovery Facilitator Program (filed on June 14, 2021)	0.10
Review Court's Notice of Appointment of Discovery Facilitator Joseph Salama for Plaintiff's Motion Filed on January 29, 2021 (filed on June 25, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft [Corrected] Joint Stipulation to Continue Motion to Compel; and [Proposed] Order Thereon (filed on July 6, 2021)	0.80
Review Court's Order Granting [Corrected] Joint Stipulation to Continue Motion to Compel; and [Proposed] Order Thereon (filed on July 8, 2021)	0.10
Review Court's Notice of Rescheduled Hearing (filed on July 8, 2021)	0.10
Draft Plaintiff's Case Management Conference Statement (filed on July 30, 2021)	0.70
Review Court's Notice of Rescheduled Hearing (filed on August 5, 2021)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on August 23, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Motion to Compel; and [Proposed] Order Thereon (filed on September 7, 2021)	0.80
Review Court's Notice of Rescheduled Hearing (filed on September 8, 2021)	0.10

Review Court's Order Granting Joint Stipulation to Continue Motion to Compel; and [Proposed] Order Thereon (filed on September 8, 2021)	0.10
Draft Plaintiff's Notice of Hearing (filed on August 10, 2021)	0.20
Review Defendant's Notice of Substitution of Attorney (served on October 5, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Motion to Compel; and [Proposed] Order Thereon (filed on October 12, 2021)	0.80
Review Court's Notice of Rescheduled Hearing (filed on October 15, 2021)	0.10
Review Court's Order Granting Joint Stipulation to Continue Motion to Compel; and [Proposed] Order Thereon (filed on October 15, 2021)	0.10
Review Defendant's Case Management Conference Statement (served on November 23, 2021)	0.30
Draft Plaintiff's Case Management Conference Statement (filed on November 24, 2021)	0.70
Draft Plaintiff's Notice of Deposit Jury Fees (filed on December 1, 2021)	0.10
Review Defendant's Notice of Deposit Jury Fees (served on December 2, 2021)	0.10
Draft Plaintiff's Notice Regarding December 8, 2021 Case Management Conference (filed on December 8, 2021)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on December 8, 2021)	0.10
Draft Plaintiff's Case Management Conference Statement (filed on March 24, 2022)	0.50
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Further Status Conference; and [Proposed] Order Thereon (filed on March 29, 2022)	0.80

Review Court's Order Granting Joint Stipulation to Continue Further Status Conference; And [Proposed] Order Thereon (filed on March 30, 2021)	0.10
Review Court's Notice of Rescheduled Hearing (filed April 1, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement and Notice of Settlement (filed on April 5, 2022)	0.90
Draft Plaintiff's Notice of Entry of Order Granting Joint Stipulation to Continue Further Status Conference (filed on April 8, 2022)	0.10
Review Court's Notice of Rescheduled Hearing (filed on May 18, 2022)	0.10
Review Defendant's Case Management Conference Statement (filed on May 18, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Further Status Conference Statement (filed on June 2, 2022)	0.90
Research and Draft Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on June 23, 2022); Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint (filed on June 13, 2022)	3.40
Notice of Court's Dropped Appearance (filed on June 14, 2022)	0.10
Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed on June 15, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on June 20, 2022)	0.10
Review and Analyze Defendant's Answer to Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Research Affirmative Defenses in Defendant's Answer (served on July 26, 2022)	0.40

Review Court's Notice of Hearing (filed on August 1, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on October 4, 2022)	0.10
Appearances	
Prepare for and Remotely Attend Case Management Conference (June 22, 2020)	0.90
Prepare for and Remotely Attend Case Management Conference (December 11, 2020)	0.70
Prepare for and Remotely Attend Motion for Terminating and Monetary Sanctions Against Plaintiff Margaret Taylor and Her Attorneys (Code of Civ. Proc. 128.7) (April 6, 2021)	4.10
Prepare for and Remotely Attend Case Management Conference (April 12, 2021)	0.70
Prepare for and Remotely Attend Case Management Conference (May 18, 2021)	0.30
Prepare for and Remotely Attend Case Management Conference (June 10, 2021)	0.30
Prepare for and Remotely Attend Case Management Conference (August 23, 2021)	0.70
Prepare for and Remotely Attend Case Management Conference (December 8, 2021)	0.50
Prepare for and Remotely Attend Case Management Conference (June 20, 2022)	0.50
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment (January 24, 2023) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Margaret Macedo (served on November 5, 2019)	1.90

Review and Analyze Documents Produced by Defendant in Response to the Request for Request for Personnel File, Pay Stubs, Time Records, and Payroll Records for Plaintiff Margaret Macedo (served on December 2, 2019, December 6, 2019, and December 26, 2019)	3.90
Review Defendant's Form Interrogatories – Employment Law (Set One) and Requests for Admission (Set One) to Plaintiff (served on October 7, 2020)	0.90
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Barbier Security Group and Requests for Production of Documents (noticed for December 7, 2020; Organizational Structure) (served on November 6, 2020)	3.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Barbier Security Group and Requests for Production of Documents (noticed for December 8, 2020; Wage and Hour Practices) (served on November 6, 2020)	3.70
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Barbier Security Group and Requests for Production of Documents (noticed for December 9, 2020; Affirmative Defenses) (served on November 6, 2020)	3.50
Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant (served on November 6, 2020)	6.70
Draft Plaintiff's Responses to Defendant's Form Interrogatories – Employment Law (Set One) and Request for Admission (Set One) to Plaintiff (served on December 15, 2020)	3.90
Draft Plaintiff's Supplemental Responses to Defendant's Form Interrogatories – Employment Law (Set One) and Request for Admission (Set One), to Plaintiff (served on January 15, 2021)	5.10

Review and Analyze Defendant's Objections and Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Requests for Production of Documents (Set One) to Defendant (served on February 19, 2021)	4.90
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Margaret Macedo for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on August 31, 2021)	4.30
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	22.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation • Employee Handbooks and Employment and Operations Policies, Practices, and Procedures • Sampling of Employee Paystubs • Sampling of Employee Time Data • Sampling of Employee Payroll Data	30.70
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, Performing Violation, Damages, and Penalties Analysis and Calculations, and Preparing PowerPoint Presentation (submitted on January 5, 2022)	18.50
Review and Analyze Defendant's Mediation Brief	3.90
Remotely Attend Mediation Session (January 12, 2022; Video Zoom Conference)	14.50
Meet and Confer with Defendant's Counsel and Revise Confidentiality Agreement (executed February 22, 2022)	2.50

Additional Exchange and Analysis of Confidential Information and Documents (Including, <i>Inter Alia</i>, Defendant's Financial Condition) and Additional Settlement Negotiations with Mediator and Defendant's Counsel (January 2022 – March 2022) • Balance Sheets • Profit and Loss Statements • Revenue Graph • 2018 -2020 Tax Returns	13.60
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement Agreement (executed on June 29, 2022) and Notice of Class Action Settlement	19.50
Review and Monitor Settlement Administration Process and Weekly Reports	4.20
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Consolidated Motion to Compel Defendant to Provide Responses to Plaintiff's Special Interrogatories (Set One, Two, and Three), Form Interrogatories (General, Set One), and Requests for Production of Documents (Sets One and Two), and For Monetary Sanctions, Declaration of Jenay Younger in Support Thereon, and [Proposed] Order Thereof (filed on January 28, 2021)	15.50
Research and Draft Plaintiff's Notice of Motion Re: Consolidated Motion to Compel Defendant to Provide Responses to Plaintiff's Special Interrogatories (Set One, Two, and Three), Form Interrogatories (General, Set One), and Requests for Production of Documents (Sets One and Two), and For Monetary Sanctions (filed on February 3, 2021)	0.20
Review Defendant's Notice of Motion and Motion for Terminating and Monetary Sanctions Against Plaintiff Margaret Macedo and Her Attorneys, Memorandum of Points and Authorities in Support Thereon, Index of Exhibits and Exhibits in Support Thereon, Declaration of Sarah S. Wright in Support Thereon, Declaration of Christopher Raschke in Support Thereon, Declaration of Evan Barbier in Support	4.10

Thereon, Declaration of Carla Bonilla-Barbier in Support Thereon, and Declaration of Alexa Adame in Support Thereon (served on February 9, 2021)	
Review Defendant's Declaration of Sarah S. Wright Regarding Notice of Filing of Defendant Barbier Security Group's Motion for Terminating and Monetary Sanctions Against Plaintiff Margaret Macedo and Her Attorneys (served on March 9, 2021)	0.30
Research and Draft Plaintiff's Opposition to Defendant's Motion for Terminating and Monetary Sanctions, Objections to Evidence, Declaration of Jenay Younger in Support Thereof, Declaration of Edwin Aiwezian in Support Thereof, Declaration of Margaret Macedo in Support Thereof, and [Proposed] Order Thereon (filed on March 24, 2021)	20.40
Review Defendant's Reply to Plaintiff's Opposition to Motion for Terminating and Monetary Sanctions and Plaintiff Margaret Macedo and Her Attorneys, Declaration of Sarah S. Wright in Support Thereof, Declaration of Carla Bonilla-Barbier In Reply to Opposition to Defendant's Motion, and Objections to the Declaration of Edwin Aiwezian, Jenay Younger, and Margaret Macedo (served on March 29, 2021)	1.80
Research and Draft Plaintiff's Rule 3.1344 Separate Statement in Support of Plaintiff's Motion to Compel Further Responses to Request for Production of Documents (Set One) to Defendant (filed on April 1, 2021)	3.90
Review Court's Tentative Ruling Re: Defendant's Motion for Terminating and Monetary Sanctions (issued on April 5, 2021)	0.80
Review Court's Minute Order Re: Defendant's Motion for Monetary and Terminating Sanctions (filed on April 6, 2021)	0.10
Research and Draft Plaintiff's [Proposed] Order Denying Motion for Terminating and Monetary Sanctions Against Plaintiff and Her Attorneys (filed on April 7, 2021)	0.20
Review Court's Order Denying Motion for Terminating and Monetary Sanctions Against Plaintiff Margaret Macedo And Her Attorneys (filed on April 9, 2021)	0.10

Review Defendant's Memorandum of Points and Authorities in Opposition to Plaintiff's Consolidated Motion to Compel Defendant to Provide Responses to Plaintiff's Special Interrogatories (Set One, Two, and Three), Form Interrogatories (General, Set One), and Requests for Production of Documents (Sets One and Two), and for Monetary Sanctions, and Declaration of Sarah S. Wright in Support Thereof (served on May 5, 2021)	2.10
Research and Draft Plaintiff's Reply in Support of Consolidated Motion to Compel Defendant to Provide Responses to Plaintiff's Special Interrogatories (Set One, Two, and Three), Form Interrogatories (General, Set One), and Requests for Production of Documents (Sets One and Two), and for Monetary Sanctions (filed on May 11, 2021)	3.20
Review Court's Minute Order Re: Motion to Compel (filed on May 18, 2021)	0.10
Draft Plaintiff's Ex Parte Application for an Order to Reset and Expedite the Hearing on Plaintiff's Consolidated Motion to Compel, Declaration of Jenay Younger In Support Thereof, and [Proposed] Order Thereon (filed on June 8, 2021)	4.50
Review Defendant's Response to Plaintiffs Ex Parte Application to Expedite Hearing on Plaintiff's Motion to Compel (filed on June 8, 2021)	0.60
Draft Plaintiff's Reply to Defendant's Response to Plaintiffs Ex Parte Application to Expedite Hearing on Plaintiff's Motion to Compel (filed on June 9, 2021)	1.20
Review Court's Order Granting Plaintiff's Ex Parte Application for an Order to Reset and Expedite the Hearing on Plaintiff's Consolidated Motion to Compel (filed on June 10, 2021)	0.10
Draft Plaintiff's Declaration of Non-Resolution Regarding Plaintiff's Consolidated Motion to Compel Defendant to Provide Responses to Plaintiff's Special Interrogatories (Set One, Two, and Three), Form Interrogatories (General, Set One), and Requests for Production of Documents (Sets One) (filed on July 7, 2021)	0.50
Draft Plaintiff's Declaration of Non-Resolution Regarding Plaintiff's Consolidated Motion to Compel Defendant to Provide Responses to Plaintiff's Special Interrogatories (Set One, Two, and Three), Form	0.40

Interrogatories (General, Set One), and Requests for Production of Documents (Sets One) (filed on September 7, 2021)	
Review Court's Tentative Ruling Re: Motion to Compel (filed on February 15, 2022)	0.10
Review Court's Minute Order Re: Motion to Compel (filed on February 15, 2022)	0.10
Draft Plaintiff's Notice of Withdrawal of Plaintiff's Consolidated Motion to Compel Defendant to Provide Responses to Plaintiff's Special Interrogatories (Set One, Two, and Three), Form Interrogatories (General, Set One), and Requests for Production of Documents (Sets One and Two) (filed on June 14, 2022)	0.30
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Brian J. St. John in Support Thereof, Declaration of Margaret Macedo in Support Thereof, and [Proposed] Order Thereon (filed on August 1, 2022)	14.50
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on September 13, 2022)	0.20
Review Court's Minute Order Granting Preliminary Approval of Class Action Settlement (filed on September 13, 2022)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on January 24, 2023) (Anticipated)	18.50
Total Hours:	477.60

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Taylor v. Barbier Security Group

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/3/2020	Labor & Workforce Development Agency	Filing Fee	75.00
2/3/2020	U.S. Postmaster	Postage	0.65
1/31/2020	Legal Document Server, Inc.	Attorney Service	165.22
1/31/2020	Marin County Superior Court	Filing Fee	435.00
2/13/2020	Legal Document Server, Inc.	Attorney Service	150.00
6/2/2020	Legal Document Server, Inc.	Attorney Service	140.00
6/5/2020	Legal Document Server, Inc.	Attorney Service	150.00
6/15/2020	Legal Document Server, Inc.	Attorney Service	150.00
10/9/2020	General Logistics System US, Inc.	Courier Service	24.57
11/13/2020	General Logistics System US, Inc.	Courier Service	17.63
11/23/2020	Legal Document Server, Inc.	Attorney Service	150.00
11/30/2020	General Logistics System US, Inc.	Courier Service	33.98
12/3/2020	General Logistics System US, Inc.	Courier Service	17.63
12/14/2020	General Logistics System US, Inc.	Courier Service	17.63
12/17/2020	General Logistics System US, Inc.	Courier Service	24.57
1/13/2021	General Logistics System US, Inc.	Courier Service	43.14
1/13/2021	Legal Document Server, Inc.	Attorney Service	175.00
1/14/2021	General Logistics System US, Inc.	Courier Service	27.30
1/20/2021	FedEx Express	Courier Service	22.82
1/29/2021	General Logistics System US, Inc.	Courier Service	31.93
1/29/2021	Legal Document Server, Inc.	Attorney Service	234.65
1/29/2021	Legal Document Server, Inc.	Attorney Service	214.50
1/29/2021	Marin County Superior Court	Filing Fee	90.00
2/4/2021	General Logistics System US, Inc.	Courier Service	32.22
2/4/2021	General Logistics System US, Inc.	Courier Service	30.62
2/4/2021	Legal Document Server, Inc.	Attorney Service	65.00
2/4/2021	Legal Document Server, Inc.	Attorney Service	153.15
2/4/2021	Marin County Superior Court	Filing Fee	90.00
2/23/2021	U.S. Postmaster	Postage	7.00
3/23/2021	General Logistics System US, Inc.	Courier Service	29.38
3/24/2021	Legal Document Server, Inc.	Attorney Service	170.00
3/24/2021	Legal Document Server, Inc.	Attorney Service	98.50
3/24/2021	Legal Document Server, Inc.	Attorney Service	65.00
3/24/2021	Legal Document Server, Inc.	Attorney Service	100.00
3/24/2021	Legal Document Server, Inc.	Attorney Service	244.50
3/26/2021	Legal Document Server, Inc.	Attorney Service	140.00
4/7/2021	General Logistics System US, Inc.	Courier Service	19.00
4/8/2021	Legal Document Server, Inc.	Attorney Service	155.00
4/8/2021	Legal Document Server, Inc.	Attorney Service	150.00
5/11/2021	Legal Document Server, Inc.	Attorney Service	65.00

LAWYERS for JUSTICE PC CASE COST DETAIL

Taylor v. Barbier Security Group

5/11/2021	Legal Document Server, Inc.	Attorney Service	150.00
6/9/2021	Legal Document Server, Inc.	Attorney Service	195.00
6/9/2021	Legal Document Server, Inc.	Attorney Service	172.10
6/9/2021	Marin County Superior Court	Filing Fee	60.00
6/10/2021	Legal Document Server, Inc.	Attorney Service	65.00
6/10/2021	Legal Document Server, Inc.	Attorney Service	150.00
7/7/2021	Legal Document Server, Inc.	Attorney Service	65.00
7/7/2021	Legal Document Server, Inc.	Attorney Service	150.70
7/7/2021	Marin County Superior Court	Filing Fee	20.00
7/14/2021	Legal Document Server, Inc.	Attorney Service	150.00
7/15/2021	General Logistics System US, Inc.	Courier Service	31.65
7/30/2021	Legal Document Server, Inc.	Attorney Service	150.00
8/10/2021	Legal Document Server, Inc.	Attorney Service	150.00
8/13/2021	FedEx Express	Courier Service	35.58
9/7/2021	Legal Document Server, Inc.	Attorney Service	150.85
9/7/2021	Legal Document Server, Inc.	Attorney Service	150.00
9/7/2021	Marin County Superior Court	Filing Fee	20.00
9/21/2021	Labor & Workforce Development Agency	Filing Fee	75.00
9/28/2021	Jackson Lewis P.C.	Mediation Fee	8,000.00
10/7/2021	FedEx Express	Courier Service	35.91
10/8/2021	FedEx Express	Courier Service	35.82
10/18/2021	FedEx Express	Courier Service	24.01
10/18/2021	One Legal	Attorney Service	90.08
10/22/2021	FedEx Express	Courier Service	36.31
10/25/2021	FedEx Express	Courier Service	29.23
11/29/2021	Legal Document Server, Inc.	Attorney Service	65.00
11/29/2021	Legal Document Server, Inc.	Attorney Service	150.00
12/1/2021	Legal Document Server, Inc.	Attorney Service	156.38
12/1/2021	Marin County Superior Court	Jury Fee	150.00
12/9/2021	Legal Document Server, Inc.	Attorney Service	150.00
1/14/2022	Robert A. Parris	Damages Consulting Experts	7,200.00
3/24/2022	Legal Document Server, Inc.	Attorney Service	35.00
3/25/2022	Legal Document Server, Inc.	Attorney Service	170.00
3/29/2022	Legal Document Server, Inc.	Attorney Service	171.35
3/29/2022	Legal Document Server, Inc.	Attorney Service	35.00
4/1/2022	Legal Document Server, Inc.	Attorney Service	35.00
4/1/2022	Legal Document Server, Inc.	Attorney Service	170.00
4/5/2022	Legal Document Server, Inc.	Attorney Service	35.00
4/5/2022	Legal Document Server, Inc.	Attorney Service	170.00
4/8/2022	Legal Document Server, Inc.	Attorney Service	170.00
4/8/2022	Legal Document Server, Inc.	Attorney Service	35.00
6/2/2022	Legal Document Server, Inc.	Attorney Service	150.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Taylor v. Barbier Security Group

6/14/2022	Legal Document Server, Inc.	Attorney Service	321.35
6/14/2022	Marin County Superior Court	Filing Fee	20.00
6/23/2022	Legal Document Server, Inc.	Attorney Service	170.00
8/1/2022	Legal Document Server, Inc.	Attorney Service	269.33
8/1/2022	Marin County Superior Court	Filing Fee	90.00
9/29/2022	Marin County Superior Court	Filing Fee	20.00
10/4/2022	Legal Document Server, Inc.	Attorney Service	164.07
10/6/2022	Legal Document Server, Inc.	Attorney Service	175.00
10/11/2022	FedEx Express	Courier Service	27.64
Total:			24,502.95