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Attorneys for Plaintiff Alex Hernandez and the Class

[Additional Counsel listed on next page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

ALEX HERNANDEZ, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

CHEP SERVICES, LLC, an unknown
business entity; CHEP SERVICES PALLET
SOLUTIONS, LLC, an unknown business
entity; BRAMBLES USA, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: CIVSB2123946

Honorable Christian Towns
Department S26

CLASS ACTION

**DECLARATION OF HELENE MAYER
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action and PAGA
Settlement, Attorneys' Fees and Costs, and
Enhancement Payments; Declaration of Class
Counsel (Jeremy F. Bollinger); Declarations
of Class Representatives (Alex Hernandez
and Martin Sohal); Declaration of Settlement
Administrator (Yami Burns of Phoenix
Settlement Administrators); and [Proposed]
Final Approval Order and Judgment filed
concurrently herewith]

Date: June 2, 2025
Time: 9:30 a.m.
Department: S26

Complaint Filed: August 16, 2021
Trial Date: None Set

Jeremy F. Bollinger (SBN 240132)
MOSS BOLLINGER, LLP
15300 Ventura Blvd., Suite 207
Sherman Oaks, California 91403
Tel: (310) 982-2984
Fax: (818) 963-5954

Attorneys for Plaintiff Martin Sohal and the Class

DECLARATION OF HELENE MAYER

I, Helene Mayer, 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 Alex Hernandez (“Plaintiff Hernandez”) 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 September 3, 2024, in Department S26 of the above-entitled Court, the Honorable Christian Towns preliminarily approved the Stipulation for Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff Hernandez and Martin Sohal (“Plaintiff Sohal”) (together, “Plaintiffs”) and Defendants CHEP Services, LLC and Brambles USA, Inc. (together, “Defendants”) (together with Plaintiffs, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Hernandez and Plaintiff Sohal as the representatives of the Class (“Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC and Moss Bollinger, LLP as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class and Representative 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. Further, on January 24, 2025, the Court entered the Stipulation and Order to Modify Order Granting Preliminary Approval of Class Action Settlement, approving the mailing of a revised version of Class Notice, in light of, and factoring in, an increase in the Total Settlement Amount (i.e., escalation of the Total Settlement Amount from the original, base amount of \$3,400,000 to \$3,712,978.38).

3. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement, Attorneys’ Fees and Costs, and Enhancement Payments (“Motion

for Final Approval”), no Class Members have objected to the Class Settlement, the contemplated requests for Attorneys’ Fees and Costs, Enhancement Payments, and Settlement Administration Costs, or the PAGA Penalty Amount.

WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above-captioned action (“*Hernandez* Class Action) and related case, San Bernardino County Superior Court, Case No. CIVSB2131140 (the “*Hernandez* PAGA Action”), since prior to the commencement of the *Hernandez* Class Action on August 16, 2021.

5. Before initiating the cases, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiff Hernandez 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 PAGA claims, off-the-clock theory, meal and rest periods, wage-and-hour law and enforcement, Plaintiff Hernandez’s claims and damages, and Defendants’ potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiff Hernandez were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees who worked for Defendants within the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Lawyers *for* Justice, PC eventually joined forces with Moss Bollinger, LLP, in approximately July 2023. Moss Bollinger, LLP represents Martin Sohal in a separate lawsuit against the same Defendants, titled *Martin Sohal v. CHEP Services, LLC*, Stanislaus County Superior Court, Case No. CV-22-000376 (“*Sohal* PAGA Action”), filed on January 27, 2022. Collectively, Lawyers *for* Justice, PC and Moss Bollinger, LLP are referred to herein as “Class Counsel.”

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7. Collectively, Class Counsel conducted significant litigation and informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and was preparing the cases for class certification and/or trial prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data in the course of the litigation and in connection with the mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiffs and other Class Members and/or percipient witnesses, and reviewed and analyzed a large volume of information, data, and documents obtained from Plaintiffs, Defendants, and other sources. The volume of information, data, and documents that Lawyers *for* Justice, PC reviewed and analyzed included and was not limited to: Plaintiff Hernandez's employment records, a detailed sampling of Plaintiff Hernandez's and other Class Members' time data and pay records, Defendants' Employee Handbook, company policy acknowledgements (including, and not limited to, Acknowledgement of Receipt of the CHEP Services Pallet Solutions, LLC Employee Handbook Supplement and CHEP Services Absenteeism & Tardiness Policy and Call-In Procedure), and forms, procedures, and policies (including, and not limited to, Absenteeism and Tardiness Policy; Payroll, Work Scheduling and Overtime Practices; Hourly Employee Timekeeping Rules; Breaks and Meal Period Policy; Fuel Allowance Program; and 2022 Production Employee Incentives), among other information and documents. Class Counsel also developed damages and penalties valuation calculations in the course of litigation and in connection with mediation and settlement negotiations and met and conferred with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, law and motion practice, 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 drafting Plaintiffs' pleadings and the mediation briefs; engaging in motion practice to remand the *Hernandez* Class Action from the United States District Court for the Central District of California to the San Bernardino County Superior Court; preparing for and attending court proceedings; preparing for and engaging in mediation and additional settlement negotiations; and other tasks.

1 8. Collectively, as outlined herein, the Parties have conducted significant
2 investigation and informal discovery, litigation (in both state and federal court), mediation
3 conducted by Hon. Jeffrey Winikow (Ret.), as well as additional settlement negotiations after the
4 mediation. Class Counsel analyzed a large volume of information, documents, and data obtained
5 from Plaintiffs, Defendants, and other sources that provided a critical understanding of the nature
6 of the work performed by the Class Members and PAGA Members, as well as Defendants'
7 operations and employment policies, practices, and procedures. The information, documents, and
8 data were used in analyzing violations, damages, penalties, and other valuation issues in
9 connection with all phases of the litigation, and ultimately, in connection with the mediation and
10 settlement negotiation process. Class Counsel also performed significant research into the
11 applicable law, which is evolving as it relates to class certification, representative PAGA claims,
12 off-the-clock theory, meal and rest periods, wage-and-hour law and enforcement, Plaintiffs'
13 claims and damages, and Defendants' defenses thereto, as well as facts discovered.

14 9. After conducting significant informal discovery and investigation of the facts and
15 law during the prosecution of the cases, counsel for the Parties, collectively, engaged in extensive
16 settlement negotiations to try to resolve the cases. These efforts included participating in a formal,
17 full-day mediation conducted by Hon. Judge Jeffrey Winikow (Ret.), a well-regarded mediator
18 experienced in handling complex labor and employment matters. During all settlement
19 discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In
20 the course of mediation and settlement discussions, the Parties exchanged information,
21 documents, and data, and discussed various aspects of the cases, including and not limited to, the
22 risks and delays of further litigation; the risks to the Parties of proceeding with class certification
23 and/or representative adjudication; the law relating to off-the-clock theory, meal and rest periods,
24 PAGA representative claims, and wage-and-hour law and enforcement; the evidence produced
25 and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that
26 was acceptable to the Parties was not easy. Defendants contended that individualized questions
27 of fact predominate over any common issues, and these issues would pose challenges to class
28 certification and representative adjudication. Defendants and their counsel felt strongly about

Defendants' ability to avoid class certification and prevail on the merits, while Plaintiffs and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation and after engaging in additional settlement negotiations, the Parties ultimately agreed that the cases were well-suited for settlement given the legal issues relating to Plaintiffs principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class decertification after certification of a class, allowing a jury to decide the claims asserted in the cases, and the real possibility of no monetary recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class Counsel seek attorneys' fees ("Attorneys' Fees") in the amount of \$1,299,542.43, which is 35% of the escalated Total Settlement Amount of \$3,712,978.38. Pursuant to the contingency-fee agreement entered into by and between Plaintiff Hernandez and Lawyers for Justice, PC, Plaintiff Hernandez has agreed to a contingency fee of at least 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 the cases; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to these matters.

12. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **463.70 hours** performing tasks and obtaining recovery in the Actions. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the

hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of the Actions.

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

EXPERIENCE AND ADEQUACY OF

LAWYERS *for* JUSTICE, PC

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 attorney of record in dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of

California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

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

certification by contested motion practice in approximately 16 cases in the last decade and litigated over 1,000 class action or representative action cases.

16. Arby Aiwarzian is a Member and Shareholder 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 States 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 cases have resulted in settlements that have been granted court approval. He has handled over 150 mediations and worked on over 250 class action or representative action cases which have resulted in settlement.

17. Joanna Ghosh is a Managing Member 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) and in New York (since 2013) and is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion

practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Betancourt v. Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th 175 (2019). 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 also has extensive experience with class action and/or representative action settlements, and has handled this process in over 300 cases. Under her, Edwin Aiwazian, 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. She 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, Helene Mayer, am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree from University of San Diego in 2017, and I earned my Juris Doctor degree from University of San Diego School of Law in 2020. I was admitted to practice law in California in 2021. I am admitted to practice before all courts of the State of California and all U.S. Federal District Courts in the State of California. I have worked on wage-and-hour class action and PAGA representative cases, and my work has included, *inter alia*, researching and drafting pleadings and motion-related papers; conducting claims evaluation; administrative notice exhaustion; drafting, negotiating, and finalizing stipulations and settlement agreements; and making court appearances. Prior to working at Lawyers for Justice, PC, I worked at law firms focused primarily on family law matters, including, *inter alia*, representing clients in divorce, parentage, child

1 custody, and domestic violence restraining order proceedings; researching and drafting pleadings;
2 negotiating and finalizing marital settlement agreements; engaging in motion practice; and
3 making court appearances.

4 **LITIGATION COSTS AND EXPENSES INCURRED BY**
5 **LAWYERS *for* JUSTICE, PC**

6 19. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation
7 and will not receive any compensation until recovery is obtained in the Actions. Lawyers *for*
8 Justice, PC seeks reimbursement of **\$12,942.88** in litigation costs and expenses incurred in the
9 cases, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and
10 necessary in the prosecution of the *Hernandez* Class Action and *Hernandez* PAGA Action and to
11 obtain the Settlement.

12 **ENHANCEMENT PAYMENTS TO PLAINTIFFS**

13 20. In recognition of their efforts and work serving as the Class Representatives and
14 their broader, general release of claims, the Settlement provides for Enhancement Payments in
15 the total amount of \$30,000.00 to Plaintiffs Hernandez and Sohal (in the amounts of \$15,000.00
16 each to Plaintiffs). The requested Enhancement Payments are fair and appropriate. Collectively,
17 Plaintiffs have spent a substantial amount of time and effort to produce relevant documents and
18 information and provided facts and evidence to support the prosecution of the claims. Plaintiffs
19 were available whenever Class Counsel needed them and actively tried to obtain and provide
20 information that would facilitate the pursuit of the cases. Plaintiffs spent numerous hours
21 speaking with Class Counsel about their claims, describing their work experiences with
22 Defendants, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs
23 to each receive \$15,000.00 (collectively \$30,000.00) as reasonable Enhancement Payments, in
24 addition to their individual settlement payments.

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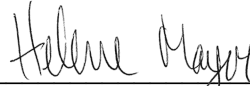
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21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiffs, Class Members, PAGA Members, and the State of California.

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

Executed this 8th day of May 2025, at Mooresville, North Carolina.



Helene Mayer

EXHIBIT A

HERNANDEZ V. CHEP SERVICES, LLC
San Bernardino County Superior Court, Case No. CIVSB2123946 (“Class Action”); U.S. District Court, Central District of California, Case No. 5:21-CV-01838-JWH-SHK (“Federal Class Action”)

HERNANDEZ V. CHEP SERVICES, LLC
San Bernardino County Superior Court Case No. CIVSB2131140 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Alex Hernandez (“Plaintiff Hernandez”) During the Case	44.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	16.50
Review and Analyze Register of Actions and/or Court Filings in <i>Sohal v. CHEP Services, LLC</i> , Stanislaus County Superior Court, Case No. CV-22-000376	1.50
Review and Analyze Register of Actions and/or Court Filings in <i>Brown, et. al. v. CHEP Services, LLC</i> , San Bernardino County Superior Court, Case No. CIVSB2310342	1.50
Review and Analyze Register of Actions and/or Court Filings in <i>Nyx v. CHEP Services, LLC</i> , San Bernardino Superior Court, Case No. CIVSB2312107	1.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Hernandez’s Claims, Legal Research and Analysis of Claims, and Draft, Review, and/or Revise Plaintiff’s Class Action Complaint for Damages (filed on August 16, 2021) (Class Action)	9.50
Review Court’s Initial Case Management Conference Order (filed on September 24, 2021) (Class Action)	0.20

Review Court's Guidelines for the Complex Litigation Program (served on September 27, 2021) (Class Action)	0.20
Review and Analyze Defendant CHEP Services, LLP's Answer to Plaintiff's Complaint (served on October 29, 2021), and Research Affirmative Defenses in Defendant CHEP Services, LLP's Answer (Class Action)	1.50
Investigate the Merits of Plaintiff Hernandez's PAGA Claim, Legal Research and Analysis of the PAGA Claim, and Draft, Review, and/or Revise Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on October 29, 2021) (PAGA Action)	7.50
Review Defendant CHEP Services, LLC's Civil Case Cover Sheet and Certification and Notice of Interested Parties (filed on November 1, 2021) (Federal Class Action)	0.20
Review Court's Notice of Assignment to United States Judges, Notice to Parties of Court-Directed ADR Program, and Notice to Counsel Re Consent to Proceed Before a United States Magistrate Judge (filed on November 2, 2021) (Federal Class Action)	0.20
Review and Analyze Court's Standing Order (filed on November 8, 2021) (Federal Class Action)	0.50
Review and Analyze Court's Order Setting Scheduling Conference (filed on November 27, 2021) (Federal Class Action)	0.40
Review Court's Portal Minute Order Regarding December 10, 2021 Complex Case Management Conference (filed on December 10, 2021) (Class Action)	0.10
Draft, Review, and/or Revise Joint Rule 26(f) Report (filed on January 7, 2022) (Federal Class Action)	2.10
Meet and Confer with Defendant CHEP Services, LLC's Counsel, and Draft, Review, and/or Revise Parties' Joint Stipulation to Continue Scheduling Conference and Modify Briefing Schedule and [Proposed] Order Thereon (filed on January 7, 2022) (Federal Class Action)	1.50
Review Court's Order Granting Parties' Stipulation to Continue Scheduling Conference and/or Modify Briefing Schedule (filed on January 11, 2022) (Federal Class Action)	0.20

Draft Plaintiff Hernandez's Notice of Appearance or Withdrawal of Counsel (filed on February 28, 2022) (Federal Class Action)	0.10
Draft Plaintiff Hernandez's Notice of Appearance or Withdrawal of Counsel (filed on March 2, 2022) (Federal Class Action)	0.10
Review and Analyze Defendant CHEP Services, LLC's Answer to Plaintiff Hernandez's Complaint for Enforcement of the California Private Attorneys General Act, Cal. Lab Code §2698, Et Seq. (served on March 14, 2022), and Research Affirmative Defenses in Defendant CHEP Services, LLC's Answer (PAGA Action)	1.40
Draft Plaintiff Hernandez's Notice of Appearance or Withdrawal of Counsel (filed on March 28, 2022) (Federal Class Action)	0.10
Draft Plaintiff Hernandez's Notices of Appearance or Withdrawal of Counsel (filed on March 29, 2022) (Federal Class Action)	0.20
Review Court's Notice of Case Assignment for All Purposes and Notice of Case Management Conference (served on August 29, 2022) (Class Action)	0.10
Draft Plaintiff Hernandez's Notice of Case Assignment for all Purposes & Notice of Case Management Conference (filed on September 7, 2022) (Class Action)	0.20
Meet and Confer with Defendants CHEP Services, LLC and Brambles USA, Inc.'s (together, "Defendants") Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference and [Proposed] Order Thereon (submitted on October 25, 2022) (Class Action)	1.50
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (filed on November 2, 2022) (Class Action)	0.10
Review Defendant CHEP Services, LLC's Notice of Related Case (served on November 23, 2023) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference and [Proposed] Order Thereon (submitted on April 7, 2023) (Class Action)	1.50

Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (filed on April 11, 2023) (Class Action)	0.10
Draft Plaintiff Hernandez's Notice of Entry of Judgment or Order (filed on April 24, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on July 5, 2023) (Class Action)	1.20
Review Court's Minute Order Regarding July 10, 2023 Complex Case Management Conference (served on July 10, 2023) (Class Action)	0.10
Draft, Review, and/or Revise Declaration of Jacquelyn Silva in Response to Order to Show Cause Regarding Sanctions for Plaintiff's Failure to Appear (filed on July 17, 2023) (Class Action)	1.10
Review Clerk's Notice of Continuance (served on August 23, 2024) (Class Action)	0.10
Draft Plaintiff's Clerk's Notice of Continuance (filed on August 29, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on September 5, 2023) (Class Action)	1.40
Review Defendants' Notice of Remote Appearance (filed on October 2, 2023) (Class Action)	0.10
Draft Plaintiff Hernandez's Notice of Remote Appearance (filed on October 2, 2023) (Class Action)	0.10
Review Court's Portal Minute Order Regarding October 4, 2023 Further Case Management Conference (filed on October 4, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on January 24, 2024) (Class Action)	0.90
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on January 24, 2024) (PAGA Action)	0.90
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on March 29, 2024) (Class Action)	1.20

Review Court's Portal Minute Order Regarding April 4, 2024 Further Case Management Conference (filed on April 4, 2024) (Class Action)	0.10
Review Court's Portal Minute Order Regarding April 4, 2024 Complex Case Management Conference (filed on April 4, 2024) (PAGA Action)	0.10
Review Clerk's Notice of Continuance (served on July 30, 2024) (Class Action)	0.10
Review Clerk's Notice of Continuance (filed on July 30, 2024) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on August 15, 2024) (PAGA Action)	1.20
Draft Notice Regarding August 28, 2024 Motion for Preliminary Approval Hearing (filed on August 21, 2024) (Class Action)	0.20
Review Clerk's Notice of Continuance (filed on August 27, 2024) (PAGA Action)	0.10
Review Court's Portal Minute Order Regarding September 3, 2024 Further Case Management Conference (filed September 3, 2024) (PAGA Action)	0.10
Review Clerk's Notice of Continuance (filed on February 3, 2025) (PAGA Action)	0.10
Draft Notice of Change of Address or Other Contact Information (filed on February 13, 2025) (Class Action)	0.10
Draft Notice of Change of Address or Other Contact Information (filed on February 13, 2025) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on March 25, 2025) (PAGA Action)	1.10
Review Court's Portal Minute Order Regarding April 1, 2025 Other Predisposition Hearing (filed on April 1, 2025) (PAGA Action)	0.10

Appearances	
Prepare for and Remotely Attend Complex Case Management Conference (December 10, 2021) (Class Action)	1.70
Prepare for and Attempt to Remotely Attend Complex Case Management Conference (July 10, 2023) (Class Action)	0.90
Prepare for and Remotely Attend Further Case Management Conference and Order to Show Cause Regarding Sanctions for Plaintiff and Defense Counsel's Failure to Appear on July 10, 2023 (October 4, 2023) (Class Action)	0.80
Prepare for and Remotely Attend Further Case Management Conference Re: Status of Filing Motion for Preliminary Approval (April 4, 2024) (Class Action & PAGA Action)	1.80
Prepare for and Remotely Attend Hearing on Plaintiff Hernandez and Plaintiff Martin Sohal's ("Plaintiff Sohal") (together with Plaintiff Hernandez, "Plaintiffs") Motion for Preliminary Approval of Class Action and PAGA Settlement and Further Case Management Conference Re: Status of Filing Motion for Preliminary Approval (September 3, 2024) (Class Action & PAGA Action)	0.90
Prepare for and Remotely Attend Hearing on Ex Parte Application to Continue Final Approval Hearing (February 14, 2025) (Class Action)	0.50
Discovery and Deposition	
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alex Hernandez (served on April 26, 2021)	1.90
Draft Follow-Up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alex Hernandez (served on June 11, 2021)	1.10
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alex Hernandez (served on July 20, 2021)	4.10
Draft, Review, and/or Revise Plaintiff Hernandez's Initial Disclosures and Gather and Produce Documents (served on January 4, 2022) (Federal Class Action)	7.50

Review and Analyze Defendant CHEP Services, LLC's Initial Disclosures Pursuant to Fed. R. Civ. P. 26 (served on January 7, 2022) (Federal Class Action)	0.60
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 CHEP Services Pallett Solutions (prepared on May 23, 2023; not served) (Class Action)	2.50
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 CHEP Services, LLC (prepared on May 23, 2023; not served) (Class Action)	2.50
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 Brambles USA, Inc. (prepared on May 23, 2023; not served) (Class Action)	2.50
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 CHEP Pallett Solutions (prepared on June 15, 2023; not served) (PAGA Action)	2.50
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 CHEP Services, LLC ((prepared on June 15, 2023; not served) (PAGA Action)	2.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant CHEP Services Pallett Solutions and Requests for Production of Documents (Organizational Structure) (prepared on May 23, 2023; not served) (Class Action)	1.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant CHEP Services LLC and Requests for Production of Documents (Organizational Structure) (prepared on May 23, 2023; not served) (Class Action)	1.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Brambles USA Inc., and Requests for Production of Documents (Organizational Structure) (prepared on May 23, 2023; not served) (Class Action)	1.50

Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant CHEP Services Pallett Solutions and Requests for Production of Documents (Wage and Hour Practices) (prepared on May 23, 2023; not served) (Class Action)	1.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant CHEP Services LLC and Requests for Production of Documents (Wage and Hour Practices) (prepared on May 23, 2023; not served) (Class Action)	1.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Brambles USA Inc., and Requests for Production of Documents (Wage and Hour Practices) (prepared on May 23, 2023; not served) (Class Action)	1.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant CHEP Services Pallett Solutions and Requests for Production of Documents (Organizational Structure) (prepared on June 15, 2023; not served) (PAGA Action)	1.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant CHEP Services LLC and Requests for Production of Documents (Organizational Structure) (prepared on May 23, 2023; not served) (PAGA Action)	1.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant CHEP Services Pallett Solutions and Requests for Production of Documents (Wage and Hour Practices) (prepared on June 15, 2023; not served) (PAGA Action)	1.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant CHEP Services LLC and Requests for Production of Documents (Wage and Hour Practices) (prepared on June 15, 2023; not served) (PAGA Action)	1.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Alex Hernandez Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (served on August 25, 2021)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel and/or Plaintiff Sohal's Counsel	20.50

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources, Perform Claims Evaluation, and Prepare for February 23, 2023 Scheduled Mediation Prior to Cancellation by Defendants	19.50
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources Prior to May 15, 2023 Mediation (approximately 54,918 pages)	85.90
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Mediation Exhibits in Support of Plaintiff Hernandez's Mediation Brief, and Performing Damages and Penalties Analyses and Calculations (submitted on May 8, 2023)	36.50
Review and Analyze Plaintiff Sohal's Supplement to Plaintiffs' Mediation Brief (served on May 8, 2023)	2.10
Attend Mediation Session (May 15, 2023, via Video conference)	14.50
Engage in Additional Exchange, Review, and Analysis of Information, Data, and Documents, and Engage in Additional Settlement-Related Discussions Following Unsuccessful Mediation	17.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class and PAGA Settlement (fully executed on November 16, 2023)	6.50
Draft, Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement (executed on March 13, 2024), and Draft, Review, and/or Revise Notice of Class and Representative Action Settlement	19.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Review Calculations, Documents, and Weekly Reports	7.50
Law and Motion	
Review and Analyze Defendant CHEP Services, LLC's Notice of Removal of Action to Federal Court (filed on November 1, 2021) (Federal Class Action)	1.50
Review and Analyze Defendant CHEP Services, LLC's Notice to the Court and to Adverse Party of Removal of Civil Action to Federal Court (filed on November 1, 2021) (Class Action)	0.10

Draft, Review, and/or Revise Plaintiff Hernandez's Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. §1447, Memorandum of Points and Authorities in Support Thereof, Declaration of Charles Aramayo in Support Thereof, and [Proposed] Order Granting Plaintiff's Motion to Remand Pursuant to U.S.C. §1447 (filed on December 1, 2021) (Federal Class Action)	20.50
Review Court's Scheduling Notice and Order Regarding Plaintiff's Motion to Remand (generated on April 14, 2022) (Federal Class Action)	0.20
Draft Plaintiff Hernandez's Notice of Non-Opposition (filed on April 14, 2022) (Federal Class Action)	0.20
Review Court's Order Granting Plaintiff's Motion to Remand and Clerk's Notice of Order of Remand (filed on April 15, 2022) (Federal Class Action)	0.30
Review Court's Conformed Notice of Order of Remand (filed on September 9, 2022) (Federal Class Action)	0.10
Review Declaration of Jeremy F. Bollinger and Declaration of Martin Sohal, and Research, Draft, Review, and/or Revise Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, Memorandum of Points and Authorities, Declaration of Helene Mayer in Support Thereof, Declaration of Alex Hernandez in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on June 17, 2024) (Class Action)	22.50
Review Court's Portal Minute Order Regarding September 3, 2024 Motion for Preliminary Approval of Class Action Settlement (filed on September 3, 2024) (Class Action)	0.20
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on October 10, 2024) (Class Action)	0.20
Meet and Confer with Plaintiff Sohal's Counsel and Defendants' Counsel, and Draft, Review, and/or Revise Stipulation to Modify Order Granting Preliminary Approval of Class Action Settlement and [Proposed] Order Thereon (submitted on December 17, 2024)	2.50
Review Court's Order to Modify Order Granting Preliminary Approval of Class Action Settlement (filed on January 24, 2025) (Class Action)	0.20

Meet and Confer with Plaintiff Sohal's Counsel, and Draft, Review, and/or Revise Plaintiffs' Ex Parte Application for Order Granting Stipulation to Continue the Hearing on Plaintiffs' Motion for Final Approval of the Class Action Settlement, [Proposed] Order Thereon, and Declaration of Jeremy F. Bollinger in Support of Plaintiffs' Ex Parte Application to Continue the Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement (filed on February 11, 2025) (Class Action)	0.50
Review Court's Portal Minute Order Regarding February 14, 2025 Ex Parte Hearing – Predisposition (filed on February 14, 2025) (Class Action)	0.20
Review Plaintiff Sohal's Notice Re: Continued Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement to June 2, 2025 (filed on February 14, 2025) (Class Action)	0.20
Review Declaration of Jeremy F. Bollinger and Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Payments, Declaration of Helene Mayer in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on May 8, 2025)	24.50
Total Hours:	463.70

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Hernandez vs. CHEP Services, LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/26/2021	U.S. Postmaster	Postage	\$7.00
4/26/2021	U.S. Postmaster	Postage	\$7.20
6/11/2021	U.S. Postmaster	Postage	\$7.00
8/16/2021	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
8/16/2021	Legal Document Server, Inc.	Attorney Service	\$200.23
8/16/2021	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
9/29/2021	ProLegal	Attorney Service	\$574.05
11/19/2021	Legal Document Server, Inc.	Attorney Service	\$120.00
11/24/2021	ProLegal	Attorney Service	\$263.33
12/3/2021	FedEx	Courier Service	\$68.69
12/13/2021	CourtCall, LLC	Attorney Service	\$94.00
12/22/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
12/23/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
1/4/2022	General Logistics Systems, Inc.	Courier Service	\$26.76
1/10/2022	Legal Document Server, Inc.	Attorney Service	\$165.00
4/15/2022	Legal Document Server, Inc.	Attorney Service	\$140.00
9/7/2022	Legal Document Server, Inc.	Attorney Service	\$150.00
10/26/2022	Legal Document Server, Inc.	Attorney Service	\$301.35
10/26/2022	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
10/28/2022	Legal Document Server, Inc.	Attorney Service	\$150.00
11/2/2022	Winikow Mediation	Mediation Fee	\$4,500.00
4/7/2023	Legal Document Server, Inc.	Attorney Service	\$151.39
4/7/2023	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
4/24/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
5/15/2023	Samantha Costa	Travel Reimbursement	\$32.64
5/15/2023	Melissa LeBlanc	Travel Reimbursement	\$24.48
7/17/2023	Legal Document Server, Inc.	Attorney Service	\$170.00
8/29/2023	Legal Document Server, Inc.	Attorney Service	\$195.00
9/5/2023	Legal Document Server, Inc.	Attorney Service	\$195.00
10/2/2023	Legal Document Server, Inc.	Attorney Service	\$17.09
3/28/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
3/29/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
6/17/2024	Legal Document Server, Inc.	Attorney Service	\$334.67
6/17/2024	San Bernardino Superior Court	Motion Fee	\$60.00
8/19/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
8/21/2024	Legal Document Server, Inc.	Attorney Service	\$200.00
9/20/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
10/2/2024	Legal Document Server, Inc.	Attorney Service	\$220.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Hernandez vs. CHEP Services, LLC

10/11/2024	San Bernandino Superior Court	Document Download Fee	\$8.36
Total:			\$10,474.62

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Hernandez vs. CHEP Services, LLC (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/25/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
8/25/2021	U.S. Postmaster	Postage	\$15.00
10/29/2021	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
10/29/2021	Legal Document Server, Inc.	Attorney Service	\$210.99
10/29/2021	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
2/4/2022	Legal Document Server, Inc.	Attorney Service	\$130.00
2/4/2022	ProLegal	Attorney Service	\$120.78
3/15/2022	Legal Document Server, Inc.	Attorney Service	\$145.00
7/5/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
2/5/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
8/15/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
8/16/2024	Legal Document Server, Inc.	Attorney Service	\$135.00
8/20/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
Total:			<u>\$2,468.26</u>