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12 Attorneys for Plaintiffs  
13 REBECCA HANNETT, MITZI YALOA BURCIAGA, and the Proposed Class

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER**

16 REBECCA HANNETT, individually, and on  
behalf of other members of the general public  
17 similarly situated; MITZI YALOA  
BURCIAGA, individually, and on behalf of  
18 other members of the general public similarly  
situated and on behalf of other aggrieved  
19 employees pursuant to the California Private  
Attorneys General Act;

20  
21 Plaintiffs,  
22 vs.  
23

24 SERENDIPITY HEARING, INC., a  
California corporation; WILLARD  
25 CLAYTON GILILLAND, individually;  
SONUS HEARING CARE  
26 PROFESSIONALS, an unknown business  
entity; and DOES 1 through 100, inclusive,  
27

Defendants.

Case No.: 30-2021-01216930-CU-OE-CXC  
(Related to Case No.: 30-2021-01229201 and  
Consolidated for Pre-Trial Purposes Only)

**DECLARATION OF ELIZABETH PARKER-  
FAWLEY IN SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT**

Hearing Information:

Date: March 27, 2025  
Time: 2:00 PM  
Dept.: CX104  
Judge: Hon. Melissa McCormick

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I, Elizabeth Parker-Fawley, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Rebecca Hannett and Mitzi Yaloha Burciaga (“Plaintiffs”). 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 thereto.

## EXPERIENCE AND ADEQUACY OF LAWYERS for JUSTICE, PC

2. 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. Below is a summary of the experience and qualifications of attorneys at Lawyers *for* Justice, PC (additional staff have also worked on the matter).

3. Edwin Aiwanian is the 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 education and 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

1 a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he  
2 studied Legal Writing at Harvard University. From approximately September 2002 to approximately  
3 December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United  
4 States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August  
5 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal  
6 for the Second Appellate District. In December of 2004, he obtained a license to practice law from the  
7 California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he  
8 has almost exclusively focused on the prosecution of consumer and employment class actions. While  
9 employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended  
10 over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and  
11 attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and  
12 in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive,  
13 administrative, and other overtime exemptions to the State of California and federal overtime  
14 compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained  
15 class certification by contested motion practice in approximately fifteen (15) cases in the last decade and  
16 litigated over 1,000 class action or representative action cases.

17 4. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his  
18 Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He  
19 earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007  
20 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the  
21 California Court of Appeal for the Second Appellate District. From approximately August 2008 to  
22 approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of  
23 the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in  
24 2010. He is admitted to practice before all courts of the State of California and all United States District  
25 Courts in the State of California. He has worked on many wage-and-hour class action and representative  
26 action cases, taking the lead in taking and defending depositions, arguing motions, and attending  
27 mediations. He has played an integral role in preparing matters for class certification, including

1 and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County  
2 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior  
3 Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case  
4 No. RG13680477). Under his supervision, dozens of class action or representative cases have resulted in  
5 settlements that have been granted court approval, including and not limited to, those listed in paragraph  
6 7 herein. He has handled over one hundred and fifty (150) mediations and worked on over two hundred  
7 and fifty (250) class action or representative action cases which have resulted in settlement.

8         5. Joanna Ghosh is a Senior Member of Lawyers *for* Justice, PC. She received a Bachelor of  
9 Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the  
10 London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center  
11 in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and is also  
12 admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central  
13 District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions  
14 and successfully handled motion practice in class action cases regarding discovery (including and not  
15 limited to, regarding class contact information), class certification (both contested class certification and  
16 stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully  
17 handled briefing and oral argument on appeal and obtained notable decisions regarding the Private  
18 Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall*  
19 *Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied  
20 (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has significant experience  
21 with class actions, including and not limited to working on cases to obtain class certification through  
22 contested motion practice and working on cases in the post-certification stage (e.g., post-certification  
23 discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel  
24 in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive  
25 experience with class action and/or representative action settlements, and has handled this process in over  
26 three hundred (300) cases. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, the firm has  
27 handled the class certification and court approval process for hundreds of class action and/or

1 representative action matters that have successfully resolved. She is a member of the California  
2 Employment Lawyers Association.

3         6. I am the Director of Legal Operations at Lawyers for Justice, PC. I earned my Bachelor of  
4 Arts in History at Chapman University in 2011 and my Juris Doctor from the UCLA School of Law in  
5 2014. In December 2014, I obtained a license to practice law from the California State Bar. I am admitted  
6 to practice in all courts in the State of California, as well as the Central, Southern, Northern, and Eastern  
7 District Courts of California and the Ninth Circuit Court of Appeal. Since December 2014, I have worked  
8 at Lawyers for Justice, PC, and my practice has almost exclusively focused on the prosecution of  
9 employment class actions and representative actions, handling cases in all stages of litigation from initial  
10 pleadings to assisting with class action trial matters, attending mediations, and preparing class action  
11 settlements. Previously, I was in the role of Manager of Litigation, in which I oversaw approximately  
12 twenty-five attorneys working on hundreds of employment class actions and representative actions and  
13 provided internal training for our litigation practice group and post-bar law clerks. In my current role, I  
14 oversee the legal operations of the firm, review and advise attorneys on work product and practices,  
15 provide training, and supervise cases from their inception to final accounting. I am a member of the  
16 California Lawyers Association Labor & Employment Group and the California Employment Lawyers  
17 Association.

18                   **EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND**  
19                   **REPRESENTATIVE ACTION CASES**

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

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

26                 b) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
27 and-hour class action against a national retailer of household items involving allegations of

1 misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court granted final  
2 approval of the class action settlement. The Los Angeles County Superior Court Case Number is  
3 BC413498.

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

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

13 e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-  
14 hour class and PAGA representative action against a bank, involving allegations of misclassification of  
15 the “Assistant Branch Manager” position. On August 27, 2013, the court granted final approval of the  
16 class and PAGA representative action settlement. The Kern County Superior Court Case Number is S-  
17 1500-CV-273194-LHB.

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

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

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

6 i) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-  
7 hour class and PAGA representative action involving allegations of misclassification of the salaried  
8 residential “Property Manager” position. On September 17, 2015, the court granted plaintiff’s motion for  
9 class certification. On October 20, 2017, the court granted final approval of the class and PAGA  
10 representative action settlement. The Los Angeles County Superior Court Case Number is BC474784.

11 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
12 and-hour class and PAGA representative action against a national retailer of upscale hardware and home  
13 furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted final approval of  
14 the class and PAGA representative action settlement. The Los Angeles County Superior Court Case  
15 Numbers are BC516795 and JCCP4794, and the Judicial Council Coordination Proceeding Number is  
16 4794.

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

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

27 m) LFJ represented the plaintiff in a PAGA representative action against a real estate

1 and property management company, on behalf of non-exempt employees. On November 4, 2016, the court  
2 granted approval of the PAGA representative action settlement. The Orange County Superior Court Case  
3 Number is 30-2015-00775439-CU-OE-CXC.

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

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

13 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative action,  
14 successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer's  
15 motion to compel arbitration, which resulted in a published opinion by the California Court of Appeal in  
16 favor of employees. *Roberto Betancourt v. Prudential Overall Supply* (Cal. App. 4th Dist., Mar. 7, 2017)  
17 9 Cal.App.5th 439, review denied, cert. denied (U.S. Supreme Court Docket No. 17-254). The Riverside  
18 County Superior Court Case Numbers are RIC1503952 and RICJCCP5046, and the Judicial Council  
19 Coordination Proceeding Number is 5046.

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

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

1 00810013-CU-OE-CXC.

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

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

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

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

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

23 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative  
24 action against a manufacturer of plastic containers on behalf of non-exempt employees. On October 31,  
25 2017, the court granted final approval of the class and PAGA representative action settlement. The Los  
26 Angeles County Superior Court Case Number is BC577233.

27 y) LFJ, in association with co- counsel therein, represented the plaintiffs in a wage-

1 and-hour class and PAGA representative action against a bank on behalf of non-exempt employees. On  
2 December 11, 2017, the court granted final approval of the class and PAGA representative action  
3 settlement. The Los Angeles County Superior Court Case Number is BC569646.

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

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

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

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

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

26 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-  
27 hour class action against a parking company on behalf of non-exempt employees. On September 3,

1 2019, the court granted the plaintiff's motion for class certification and certified a class. The Santa Clara  
2 County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding  
3 Number is 4886.

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

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

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

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

26 jj) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-  
27 hour class and PAGA representative action against a large national drug testing laboratory on behalf of

1 non-exempt employees. On February 21, 2020, the court granted the plaintiff's motion for class  
2 certification and certified a class. The San Diego County Superior Court Case Number is 37-2018-  
3 00019611-CU-OE-CTL.

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

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

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

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

#### 24 **SUMMARY OF WORK PERFORMED**

25 8. Several attorneys at Lawyers *for* Justice, PC have worked on this matter since the inception  
26 of Plaintiffs' claims. Lawyers *for* Justice, PC and Domb & Rauchwerger LLP (collectively referred to as  
27 "Class Counsel") have worked cooperatively to achieve a global settlement resolution of the claims

1 filed by Plaintiff.

2           9. My office investigated the veracity, strength, and scope of the claims, and worked on  
3 preparing Plaintiffs' action for class certification and trial, prior to reaching a settlement in this action.  
4 Plaintiffs' action has involved extensive and ongoing investigations, research, and informal discovery into  
5 legal and factual issues. My office obtained information from Plaintiffs, reviewed and analyzed a volume  
6 of information, documents, and data obtained from Plaintiffs, Defendants, and other sources, researched  
7 applicable law, and undertook analyses and calculations of the value of claims, damages, and penalties  
8 exposure. My office requested and received a volume of data for purposes of the mediation, including  
9 timekeeping and payroll data for class members, along with relevant policies, agreements, and other  
10 documents relevant to the litigation. My office met and conferred with Defendants' counsel on numerous  
11 occasions, e.g., to discuss issues relating to the pleadings, case management, formal and informal  
12 discovery and data, and production of information, documents, and data in the course of litigation and  
13 mediation. Other work that my office performed included, and was not limited to, case strategy and  
14 analysis; drafting, reviewing, and revising pleadings and motion-related papers; case management; claims  
15 assessment and evaluation; and preparing for and attending court proceedings, mediation, and settlement  
16 negotiations.

17           10. The parties engaged in extensive formal discovery. Prior to mediation, my office  
18 propounded Special Interrogatories (Sets One, Two, and Three), Form Interrogatories – General (Sets One  
19 and Two), Requests for Production of Documents (Sets One and Two), and Requests for Admission (Set  
20 One) in each case. My office engaged in meet and confer efforts with Defendants on numerous occasions,  
21 resulting in supplemental and substantive responses to much of the discovery propounded and the  
22 production of hundreds of pages of documents. In addition, Plaintiffs noticed the deposition of  
23 Defendants' person(s) most knowledgeable regarding Defendants' organizational structure and wage and  
24 hour practices. My office also prepared Plaintiff Hannett for her deposition and defended her at her  
25 deposition.

26           11. As outlined herein, the parties have conducted significant investigation and informal  
27 discovery during the course of litigation and mediation. Prior to the first day of mediation,

1 Defendants provided our offices with a sampling of timekeeping data and pay statements for  
2 approximately 40% of the Class. We also informally requested and received further class data for  
3 purposes of the mediation, including the number of Class Members, total Workweeks worked by the Class  
4 Members during the Class Period, applicable meal and rest period policies and practices, time keeping  
5 policies and practices, timekeeping and pay records, applicable expense reimbursement policies and  
6 practices, and other documents relevant to the litigation. Class Counsel analyzed over ten thousand pages  
7 of information, documents, and data obtained from Plaintiffs, Defendants, and other sources. This  
8 information, documents, and data provided a critical understanding of the nature of the work performed  
9 by class members, timekeeping and payroll records for a significant sampling of class members, as well  
10 as Defendants' operations and employment policies, practices, and procedures, and other employment  
11 records which were used in analyzing liability, damages, and penalties valuation issues in connection with  
12 litigation, and ultimately, in connection with the mediation and settlement negotiation process.  
13 Accordingly, sufficient investigation and review of information has taken place in order for the parties to  
14 be adequately informed of the nature and extent of the claims, and to enable all parties to fully evaluate  
15 the settlement for its fairness, adequacy, and reasonableness.

16 12. In addition to the above referenced efforts, the Parties held numerous meetings and  
17 informal conferences prior to the mediation wherein we exchanged information, additional class data, and  
18 theories of the case. The Parties also submitted detailed mediation briefs, which outlined the Parties'  
19 respective positions in the case.

20 13. On October 4, 2023, the Parties participated in a full-day mediation with Brandon  
21 McKelvey, Esq. Mr. McKelvey was agreed to by the Parties based on his excellent skills and experience  
22 as a mediator in wage-and-hour class actions such as this one. The first day of mediation did not lead to  
23 an agreement to settle the matter, so thereafter, the Parties scheduled a second day of mediation, which  
24 took place on November 21, 2023. The second day of mediation also did not result in a settlement of the  
25 claims; however, the Parties continued to discuss the possibility of a settlement. After a significant amount  
26 of additional discussion with further assistance from Brandon McKelvey, on February 28, 2024, the  
27 Parties tentatively agreed on a settlement of all the claims at issue in all three filed cases. After the

1 Parties agreed to settle the matters, a Memorandum of Understanding was negotiated, which was executed  
2 on April 23, 2024. Thereafter, my office consulted with and associated in as co-counsel the firm of Domb  
3 & Rauchwerger LLP to help facilitate moving the action towards approval and final resolution, which led  
4 to the long-form Settlement Agreement that is now presented to the Court for preliminary approval.

5 14. After conducting significant investigation of the facts and law, and engaging in formal  
6 discovery, during the prosecution of Plaintiffs' action, counsel for the parties engaged in mediation and  
7 extensive settlement negotiations to try to resolve Plaintiffs' action. During all settlement discussions, the  
8 parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation  
9 and settlement negotiations, the parties discussed all aspects of Plaintiffs' action, including the risks and  
10 delays of further litigation, class certification, and/or trial, the law relating to, *inter alia*, class certification,  
11 off-the-clock theory, rounding, automatic deduction of meal periods, meal and rest periods, and wage-  
12 and-hour enforcement, as well as the evidence produced and analyzed, and the possibility of appeals,  
13 among other things. Arriving at a settlement that was acceptable to all parties was not easy. After  
14 conducting extensive investigations, discovery, and settlement negotiations, and with the aid of the  
15 mediator's evaluations, the parties have agreed to resolve the action given the legal issues relating to  
16 Plaintiffs' principal claims, as well as the costs and risks to both sides that would attend further litigation,  
17 and the real possibility of no recovery after years of litigation.

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

20 Executed on October 31, 2024 at Glendale, California.

21 

22 \_\_\_\_\_  
Elizabeth Parker-Fawley