

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021
Attorneys for Plaintiff and the Class

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

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

Plaintiff,

vs.

INLAND MARINE INDUSTRIES, INC., a
California corporation; INLAND METAL
TECHNOLOGIES, an unknown business
entity; INLAND METAL INDUSTRIES, an
unknown business entity; INLAND
METAL, INC., an unknown business entity;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: RG19039075

Honorable Frank Roesch
Department 17

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Service Award;
Declaration of Class Representative (Ciomara
Ayala Dolores); Declaration of Settlement
Administrator (Taylor Mitzner); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: September 29, 2022
Time: 3:30 p.m.
Department: 17

Complaint Filed: October 15, 2019
FAC Filed: November 13, 2019
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 Ciomara Ayala Dolores (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On April 18, 2022, in Department 17 of the above-entitled Court, the Honorable Frank Roesch preliminarily approved the Joint Stipulation of Class Action and Private Attorneys General Act Settlement, Settlement Agreement, and General Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Inland Marine Industries, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Ciomara Ayala Dolores to represent 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 (“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, no Settlement Class Members have objected to the Settlement or the contemplated request for Class Counsel Award, Service Award, Settlement Administration Costs, or allocation for the penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, et seq. (“PAGA”).

WORK PERFORMED BY CLASS COUNSEL

4. I have been actively engaged in litigating this matter since prior to the

1 commencement of the above-captioned action on October 15, 2019, as have several other
2 attorneys and members in our firm.

3 5. Lawyers *for* Justice, PC has actively participated in all phases of the litigation
4 process. Before initiating the action, Lawyers *for* Justice, PC investigated and researched the
5 facts and circumstances underlying the pertinent factual and legal issues and applicable law.
6 This required thorough discussions and interviews between attorneys at our firm and Plaintiff,
7 and research into the various legal issues involved in the case, namely, the current state of the
8 law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour
9 enforcement, the claims of Plaintiff, and potential defenses. After conducting initial
10 investigation, our firm determined that the claims of Plaintiff were well-suited for class-wide
11 adjudication owing to what appeared to be a common course of conduct affecting a similarly
12 situated group of current and former hourly-paid or non-exempt employees who worked for
13 Defendant, who were not properly compensated for, *inter alia*, all hours worked, non-compliant
14 meal and rest periods, and business expenses.

15 6. Prior to reaching the Settlement, the parties investigated the veracity, strength,
16 and scope of the claims, and were preparing the matter for class certification and trial. The
17 parties conducted significant formal and informal discovery and investigation into the facts of
18 the case, and also informally exchanged a large volume of information and data in preparation
19 for mediation. Class Counsel served multiple sets of written discovery requests in various forms
20 (specifically, Requests for Production of Documents (Set One), Special Interrogatories (Sets One
21 & Two), and Form Interrogatories-General (Set One)), reviewed Defendant's responses thereto,
22 and prepared and served numerous notices of deposition of person(s) most knowledgeable along
23 with requests for production of documents. Class Counsel also interviewed and obtained
24 information from Plaintiff and other Settlement Class Members, including and not limited to the
25 names of potential witnesses, and reviewed and analyzed thousands of pages of documents and
26 data obtained from Plaintiff, Defendant, and other sources. The documents and data reviewed
27 and analyzed by Class Counsel included, and were not limited to, employment records of
28 Plaintiff, a detailed sampling of Settlement Class Members' time and pay data, company policy

1 acknowledgements and agreements (including but not limited to Paycheck and Hours
2 Acknowledgement and Employee Agreement on Safety Glasses), internal memoranda, new hire
3 materials and checklists, and operations and employment policies, practices, forms, and
4 procedures (including but not limited to the Employee Policy Manual, General Employment
5 Policies, Dress Codes and Other Personal Standards, Punctuality and Attendance, and Meal and
6 Rest Periods policy), among other information and documents. Class Counsel researched
7 applicable law, developed damages/valuation models in preparation for mediation, and met and
8 conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues related to the
9 pleadings, case management, discovery, and production of various documents and data prior to
10 mediation. Other work performed by Class Counsel included, and was not limited to, case
11 strategy and analysis; drafting, reviewing, and revising pleadings, the mediation brief, and
12 settlement approval motion papers; preparing and appearing for court proceedings; and preparing
13 for and engaging in mediation and settlement negotiations, among other tasks.

14 7. As outlined herein, the parties have conducted significant formal and informal
15 discovery and investigation during the course of litigating the case. Class Counsel analyzed
16 thousands of pages of documents and data obtained from Plaintiff, Defendant, and other sources.
17 These documents and data provided a critical understanding of the nature of the work performed
18 by the Settlement Class Members, as well as Defendant's operations and employment policies,
19 practices, and procedures, and were used in analyzing liability, damages, and valuation issues in
20 connection with all phases of the litigation, and ultimately with the mediation and settlement
21 negotiation process. Class Counsel also performed significant research into the law concerning
22 Defendant's defenses.

23 8. After conducting significant investigation of the facts and law during the
24 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
25 try to resolve the entire matter. These efforts included participating in multiple formal, full-day
26 mediations and extensive follow-up sessions conducted by Jeffrey Ross, Esq., a well-regarded
27 mediator experienced in mediating complex labor and employment matters. During all
28 settlement discussions, the parties conducted their negotiations at arm's length in an adversarial

position. Prior to, during, and after the mediation, and in the course of settlement discussions, the parties exchanged information and data, and discussed all aspects of the case, including the risks and delays of further litigation, Defendant's financial condition, the risks to the parties of proceeding with class certification and trial, the law relating to off-the-clock theory, meal and rest periods, representative PAGA claims, and wage-and-hour enforcement, the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the parties was not easy. Defendant also contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendant and its counsel felt very strongly about Defendant's ability to prevail on the merits and to obtain a denial of class certification, while Plaintiff and Class Counsel believed that class certification would be obtained and that they would prevail at trial. Class Counsel reviewed and considered extensive information and documents, with expert assistance, regarding Defendant's financial condition. A settlement was not reached on the day of the July 2020 mediation, and with the assistance of the mediator, settlement discussions and review and consideration of extensive documents and information continued and took place over the course of approximately thirteen (13) months thereafter. After extensive assessment, with the aid of the mediator's evaluation, the parties ultimately agreed that the case was well-suited for settlement given the legal issues relating to Plaintiff's 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 case, and the real possibility of no monetary recovery after years of litigation.

9. The Settlement provides for attorneys' fees of up to thirty five percent (35%) of the Settlement Fund. At the time of granting preliminary approval of the Settlement, the Court indicated in its ruling that "the amount of attorneys' fees awarded to class counsel shall be reduced from \$350,000 to \$300,000." As such, Class Counsel seeks attorneys' fees in the amount of \$300,000.00, which is thirty percent (30%) of the original, non-escalated Settlement

Fund of \$1,000,000.00. It is important to note that, pursuant to the escalator clause in Paragraph 84 of the Settlement Agreement, the Settlement Fund has increased from \$1,000,000 to \$1,026,754.39. Also, pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty percent (30%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (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 case; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter.

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

11. While not necessarily required to be demonstrated because the contingent fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a simple lodestar analysis. Attorneys at Lawyers *for* Justice, PC has spent a total of **543.40 hours** performing tasks and obtaining recovery in the case. 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 Lawyers *for* Justice, PC and the time incurred in performing those services. These hours include work done by me and several other attorneys at the firm. Lawyers *for* Justice, PC also had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this particular case, 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 matters, and in particular, employment class actions, support a reasonable 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. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

ADEQUACY OF LAWYERS for JUSTICE, PC

EDUCATION

13. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from

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

JUDICIAL EXTERNSHIPS

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

LITIGATION AND CLASS ACTION EXPERIENCE

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

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

17. Since its inception, in or around October of 2008, *Lawyers for Justice, PC* has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer fraud. Currently, we are the attorneys of record in over a dozen employment-related putative class actions in both state and federal courts in the State of California. Our firm has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During this relatively short

time, in association with other law firms, we have recovered millions of dollars on behalf of thousands of individuals in California.

///

///

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

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

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

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

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

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

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

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

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

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

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

28 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a

1 wage-and-hour class and PAGA representative action against a national retailer of upscale
2 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
3 court granted final approval of the class and PAGA representative action settlement. The Los
4 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
5 Council Coordination Proceeding Number is 4794.

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

10 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
11 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
12 involving allegations of misclassification of the “Department Manager” position. On August 12,
13 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
14 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
15 County Superior Court Case Number is RG13680477.

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

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

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

1 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
2 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
3 the employer's motion to compel arbitration, which resulted in a published opinion by the
4 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
5 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
6 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
7 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
8 5046.

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

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

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

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

1 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
2 representative action against a food company on behalf of non-exempt employees. On June 30,
3 2017, the court granted final approval of the class and PAGA representative action settlement.
4 The Sacramento County Superior Court Case Number is 34-2015-00175871.

5 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
6 representative action against a chocolate company on behalf of non-exempt employees. On July
7 19, 2017, the court granted final approval of the class and PAGA representative action
8 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

18 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
19 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
20 employees. On December 11, 2017, the court entered an order granting final approval of the
21 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
22 Number is BC569646.

23 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class and PAGA representative action against a property management company
25 on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court entered an
26 order granting final approval of the class and PAGA representative action settlement. The Los
27 Angeles County Superior Court Case Number is JCCP4819 and the Judicial Council
28 Coordination Proceeding Number is 4819.

1 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a global provider of flexible office
3 space solutions. On February 15, 2018, the court entered an order granting final approval of the
4 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
5 Number is BC498401.

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

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

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

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

25 ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a
26 wage-and-hour class and representative action against a bank on behalf of non-exempt
27 employees. On September 27, 2019, the court granted the plaintiffs' motion for class
28

1 certification in part and certified a class. The Alameda County Superior Court Case Number is
2 RG15757606 and the Judicial Council Coordination Proceeding Number is 4921.

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

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

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

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

26 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
28 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the

1 court granted in part the plaintiff's motion for class certification and certified a class. The
2 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
3 Judicial Council Coordination Proceeding Number is 4930.

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

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

13 nn) LFJ represents the plaintiff in a wage-and-hour class action against an
14 iconic lifestyle accessories brand and retailer on behalf of non-exempt employees. On March 15,
15 2022, the court granted the plaintiff's motion for class certification in part and certified a class.
16 The San Francisco Superior Court Case Number is CGC-16-550794.

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

18 19. To date, Class Counsel has borne all the risks and costs of litigation and will not
19 receive any compensation until recovery is obtained in the above-captioned action. Lawyers *for*
20 Justice, PC has incurred \$25,126.14 in litigation costs and expenses as reflected in **"EXHIBIT**
21 **B"** attached hereto. These expenses were reasonable and necessary in the prosecution of this
22 case and to obtain the Settlement.

23 **SERVICE AWARD TO PLAINTIFF**

24 20. In recognition of her efforts and work serving as the Class Representative, the
25 Settlement provides for a Service Award in the amount of \$7,500.00 to Plaintiff to compensate
26 her for the time and effort that she expended in the case. The requested service award is fair and
27 appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant
28 documents and information and provided the facts and evidence necessary to attempt to prove

1 the allegations. Plaintiff was available whenever Class Counsel needed her and actively tried to
2 obtain information that would benefit the pursuit of the class and PAGA claims. Plaintiff spent
3 numerous hours speaking with Class Counsel about her claims, describing her work experience
4 with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for
5 Plaintiff to receive \$7,500.00 as a reasonable service award, in addition to her Individual
6 Settlement Payment, for her services in the case.

7 21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
8 Settlement is in the best interests of Plaintiff, other Settlement Class Members, and the State of
9 California.

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

12 Executed this 6th day of September 2022, at Glendale, California.

13
14 

15
16
17
18
19
20
21
22
23
24
25
26
27
28

Edwin Aiwanian

EXHIBIT A

DOLORES V. INLAND MARINE INDUSTRIES, INC., ET AL.
(ALAMEDA COUNTY SUPERIOR COURT CASE NO. RG19039075)
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	11.80
Pre-Lawsuit Investigation of the Merits of Plaintiff Ciomara Dolores's ("Plaintiff") Claims and the Merits of the Claims of the Putative Class Members	10.50
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Inland Marine Industries, Inc. ("Defendant") with Respect to Plaintiff and the Putative Class Members	10.20
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Certification Decisions in California, Including all New and Relevant DLSE Materials	7.40
Investigation of Defendant, Its Business Relationships, Potential Affiliates, and the Industry in which It Operates	8.30
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	4.80
Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	3.40
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	5.50

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 the Various Location(s), Division(s), and/or Department(s) to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	6.80
Comparative Analysis and Cross-Checking of All Available Job Postings and Job Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	7.40
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members Worked Throughout California	6.10
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Bonuses/Incentive/Shift Differential Pay, Timekeeping, Rounding, Regular Rate Calculations, Scheduling, Mandatory Meetings and Trainings, Reporting Time Pay, Meal/Rest Breaks, On-Premises Breaks, Overtime Compensation, Dress Code, PPE, Footwear, Tools, Personal Cell Phone Usage, Personal Vehicle Usage/Gas/Mileage/Travel, and Reimbursement of Business-Related Expenses	24.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Timekeeping, Attendance, Project Management, Resource Management, and Advanced Planning & Scheduling, 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 Time Worked During Meal Breaks	5.20
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	7.30
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	5.90
Research and Analysis of Defendant's Past and Recent History Involving Wage-and-Hour Issues and Other Related Employment Issues and Complaints in Court and/or Other Forums (e.g., Administrative Agencies)	5.10

Prepare a Discovery Strategy and Outline Plan of Action, Including Topics Important to Certification, Liability, and Damages/Civil Penalties	14.60
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' Work	7.50
Meet and Communicate with Plaintiff Ciomara Dolores Throughout the Pendency of the Case	36.50
Meet and Communicate with Putative Class Members	22.50
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 October 15, 2019)	8.90
Review Court's Notice of Hearing (filed on October 21, 2019)	0.10
Review and Analyze Defendant Inland Marine, Inc.'s Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on November 15, 2019)	2.50
Review Court's Order Re: Complex Determination (filed on November 26, 2019)	0.10
Review Defendant's Notice of Peremptory Challenge Pursuant to Code of Civil Procedure §170.6 and Declaration of Stephanie T. Yang in Support Thereof (served on December 3, 2019)	0.50
Review Court's Order Granting Peremptory Challenge as to Brad Seligman (filed on December 4, 2019)	0.10
Review Court's Notice of Hearing Re: Case Management Conference (filed on December 4, 2019)	0.10
Review Court's Notice of Reassignment of Judge for All Purposes (filed on December 4, 2019)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on January 2, 2020)	0.20

Meet and Confer with Defendant's Counsel, and Draft Joint Initial Complex Case Management Conference Statement (submitted on January 7, 2020)	1.60
Review Court's Case Management Order (filed on January 14, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order to Continue the Case Management Conference Pending Mediation (submitted on February 19, 2020)	1.10
Review Court's Order Granting Stipulation to Continue the Case Management Conference (filed on February 25, 2020)	0.10
Review Court's Notice of Reassignment of Judge for All Purposes (filed on April 23, 2020)	0.10
Review Court's Notice of Hearing Re: Case Management Conference (filed on May 11, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and Protective Order – Confidential Designation Only and [Proposed] Order (submitted on June 15, 2020)	1.40
Review Court's Order Granting in Part Stipulation Re: Protective Order (filed on June 24, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on August 3, 2020)	1.20
Review Court's Minute Order Re: Case Management Conference and Case Management Order (filed on August 7, 2020)	0.10
Review Court's Minute Order Re: Case Management Conference and Case Management Order (filed on November 13, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Updated Joint Complex Case Management Conference Statement (submitted on February 5, 2021)	1.10
Review Court's Case Management Order (filed on February 17, 2021)	0.10

Draft Plaintiff's Case Management Statement (filed on May 6, 2021)	1.20
Review Defendant's Case Management Conference Statement (served on May 10, 2021)	0.50
Review Defendant's Notice of Substitution of Attorney (served on May 20, 2021)	0.10
Review Court's Minute Order Re: Case Management Conference and Case Management Order (filed on May 21, 2021)	0.10
Draft Plaintiff's Case Management Statement (filed on July 22, 2021)	0.80
Review Defendant's Case Management Statement (served on July 22, 2021)	0.50
Review Court's Minute Order Re: Case Management Conference and Case Management Order (filed on August 6, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement and Notice of Conditional Settlement (submitted on September 16, 2021)	1.10
Review Court's Case Management Conference Order (filed on September 29, 2021)	0.10
Research and Draft Plaintiff's 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 January 26, 2022); Meet and Confer with Defendant's Counsel, and Draft Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order (field on December 15, 2021)	5.40
Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed on January 10, 2022)	0.10
Review Defendant's Case Management Statement (served on January 20, 2022)	0.50
Draft Plaintiff's Case Management Conference Statement (filed on February 1, 2022)	0.60

Review Court's Minute Order Re: Case Management Conference and Case Management Conference Order (filed on February 4, 2022)	0.10
Review Defendant's Case Management Statement (served on April 7, 2022)	0.40
Review Court's Minute Order Re: Case Management Conference and Case Management Conference Order (filed on April 22, 2022)	0.10
Appearances	
Prepare for, Travel to/from, and Attend Status Conference Hearing (January 14, 2020)	2.60
Prepare for and Telephonically Attend Further Case Management Conference (August 7, 2020)	0.80
Prepare for and Telephonically Attend Further Case Management Conference (November 13, 2020)	0.90
Prepare for and Telephonically Attend Status Conference Hearing (May 21, 2021)	0.50
Prepare for and Telephonically Attend Status Conference Hearing (August 6, 2021)	1.30
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Award (September 29, 2022) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ciomara Dolores (served on September 19, 2019)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ciomara Dolores (serve on September 30, 2019)	3.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Inland Marine Industries, Inc. and Requests for Production of Documents (February 12, 2020; Organizational Structure) (served on December 11, 2019)	4.80

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Inland Marine Industries, Inc. and Requests for Production of Documents (February 13, 2020; Wage and Hour Practices) (served on December 11, 2019)	5.40
Draft 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 Inland Marine Industries, Inc. (served on December 11, 2019)	8.90
Review and Analyze Defendant Inland Marine Industries, Inc.'s Responses to Plaintiff's Special Interrogatories (Set One) and Special Interrogatories (Set Two) to Defendant (served on August 10, 2020)	4.50
Review and Analyze Defendant Inland Marine Industries, Inc.'s Amended Response to Plaintiff's Special Interrogatories (Set One) to Defendant (served on August 21, 2020)	4.20
Review and Analyze Defendant Inland Marine Industries, Inc.'s Responses to Plaintiff's Form Interrogatories - General (Set One) and Requests for Production of Documents (Set One) to Defendant (served on August 31, 2020)	5.70
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (February 2, 2021)	1.60
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Ciomara Dolores for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on August 24, 2021)	4.10
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	28.50
Mediation/Settlement	
Review and Analyze Mediation Data and Documents Produced by Defendant • Employee Handbooks and Policies • Sampling of Employee Time Data • Sampling of Employee Pay Data	75.70

● Financial Documents and Information	
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis/Calculations (submitted on June 25, 2020)	34.80
Attend Mediation Session (July 1, 2020; Zoom Video Conference)	8.50
Review Additional Financial Documents and Information, Confer with Expert(s), and Prepare for and Engage in Follow-Up Discussions with Mediator and Defendant's Counsel	28.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on March 8, 2022) and Exhibits	23.10
Monitor Settlement Administration Process and Review Administrator's Weekly Reports	4.50
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Ciomara Dolores in Support Thereof, and [Proposed] Order Thereon (filed on March 24, 2022)	20.90
Review Defendant's Notice of Non-Opposition to Motion for Preliminary Approval of Class Action Settlement (served on April 7, 2022)	0.60
Review Court's Tentative Ruling Re Plaintiff's Motion for Preliminary Approval of Class Action Settlement (issued on April 12, 2022)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on April 14, 2022)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on April 14, 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 Service Award, and Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on September 6, 2022) (Anticipated)	23.20
Total Hours:	543.40

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Ayala-Dolores v. Inland Marine Industries, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/15/2019	Alameda Superior Court	Filing Fee	435.00
10/15/2019	Alameda Superior Court	Complex Fee	1,000.00
10/15/2019	Legal Document Server, Inc.	Attorney Service	180.22
10/18/2019	Legal Document Server, Inc.	Attorney Service	600.00
11/14/2019	Legal Document Server, Inc.	Attorney Service	130.00
11/20/2019	Legal Document Server, Inc.	Attorney Service	65.00
12/11/2019	General Logistics Systems US, LLC	Courier Service	19.08
12/16/2019	Legal Document Server, Inc.	Attorney Service	260.00
1/3/2020	Alameda Superior Court	Jury Fee	150.00
1/3/2020	Legal Document Server, Inc.	Attorney Service	135.25
1/7/2020	General Logistics Systems US, LLC	Courier Service	19.94
1/7/2020	Legal Document Server, Inc.	Attorney Service	130.00
1/14/2020	Kelly Odabashian	Travel Reimbursement	1,490.54
2/7/2020	Jeffrey Ross	Mediation Fee	7,000.00
6/3/2020	Burkey Cox Evans & Bradford CPAs	Forensic Accountant	1,375.00
7/1/2020	Robert A. Parris	Damages Consulting Expert	2,700.00
8/13/2020	Legal Document Server, Inc.	Attorney Service	130.00
8/31/2020	Burkey Cox Evans & Bradford CPAs	Forensic Accountant	125.00
2/4/2021	General Logistics Systems US, LLC	Courier Service	29.12
2/8/2021	Legal Document Server, Inc.	Attorney Service	65.00
2/15/2021	Legal Document Server, Inc.	Attorney Service	130.00
4/30/2021	Burkey Cox Evans & Bradford CPAs	Forensic Accountant	2,500.00
5/6/2021	General Logistics Systems US, LLC	Courier Service	19.16
5/12/2021	Legal Document Server, Inc.	Attorney Service	130.00
5/14/2021	Burkey Cox Evans & Bradford CPAs	Forensic Accountant	1,250.00
7/22/2021	General Logistics Systems US, LLC	Courier Service	19.33
7/23/2021	Legal Document Server, Inc.	Attorney Service	95.00
8/18/2021	Burkey Cox Evans & Bradford CPAs	Forensic Accountant	3,375.00
8/31/2021	Burkey Cox Evans & Bradford CPAs	Forensic Accountant	750.00
9/17/2021	Legal Document Server, Inc.	Attorney Service	130.00
9/30/2021	Burkey Cox Evans & Bradford CPAs	Forensic Accountant	250.00
12/15/2021	Legal Document Server, Inc.	Attorney Service	39.90
1/31/2022	Legal Document Server, Inc.	Attorney Service	17.95
2/2/2022	Legal Document Server, Inc.	Attorney Service	17.95
3/30/2022	Legal Document Server, Inc.	Attorney Service	82.00
4/11/2022	Legal Document Server, Inc.	Attorney Service	201.75
4/15/2022	Alameda Superior Court	Document Download Fee	2.00
4/18/2022	Legal Document Server, Inc.	Attorney Service	17.95
8/10/2022	Alameda Superior Court	Document Download Fee	57.00
8/11/2022	Alameda Superior Court	Document Download Fee	2.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Ayala-Dolores v. Inland Marine Industries, Inc.

Total: 25,126.14