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

NORBERTO CEJA, 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.

WARE DISPOSAL, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 30-2021-01224571-CU-OE-CXC
[consolidated with 30-2021-01228821-CU-OE-
CXC]

Honorable William D. Claster
Department CX101

CLASS ACTION

**DECLARATION OF YASMIN HOSSEINI
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND
ENHANCEMENT AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and Enhancement
Award; Declaration of Class Representative
(Norberto Ceja); Declaration of Settlement
Administrator (Lisa Pavlik); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: December 6, 2024
Time: 9:00 a.m.
Department: CX101

Complaint Filed: October 1, 2021
FAC Filed: November 20 2023
Trial Date: None Set

DECLARATION OF YASMIN HOSSEINI

I, Yasmin Hosseini, 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 Norberto Ceja (“Plaintiff”) and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On July 2, 2024, in Department CX101 of the above-entitled Court, the Honorable William D. Claster preliminarily approved the Settlement Agreement and Stipulation to Resolve Class Action and PAGA Claims, Amendment No. 1 to Settlement Agreement and Stipulation to Resolve Class Action and PAGA Claims, and Amendment No. 2 to Settlement Agreement and Stipulation to Resolve Class Action and PAGA Claims (collectively, “Settlement,” “Agreement,” or “Settlement Agreement”), entered into between Plaintiff and Defendant Ware Disposal, Inc. (“Defendant”) (together with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Norberto Ceja as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), Request for Exclusion Form, and Workweek Dispute Form (collectively, “Notice Packet”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Award (“Motion for Final Approval”), no Class Members have objected to the Class Settlement, the contemplated request for Attorneys’ Fees and Costs, Enhancement Award, and Settlement Administration Costs, or the

allocation for PAGA Amount.

WORK PERFORMED BY CLASS COUNSEL

4. I and several attorneys at Lawyers for Justice, PC have been actively engaged in litigating this matter since prior to the commencement of Plaintiff's putative class action that was filed on October 1, 2021, entitled *Norberto Ceja v. Ware Disposal, Inc.*, Orange County Superior Court, Case No. 30-2021-01224571-CU-OE-CXC ("Class Action"), and Plaintiff's representative PAGA action that was filed on October 28, 2021, entitled *Norberto Ceja v. Ware Disposal, Inc., et al.*, Case No. 30-2021-01228821-CU-OE-CXC ("PAGA Action") (the PAGA Action and Class Action are together referred to as the "Actions"). On November 7, 2023, the Class Action and PAGA Action were consolidated and the Class Action was deemed the lead case.

5. Before initiating the matter, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers for Justice, PC and Plaintiff and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and potential defenses. After conducting initial investigations, Lawyers for Justice, PC determined that the claims of Plaintiff was well-suited for class-wide adjudication, owing to what appeared to be a common course of conduct affecting a similarly-situated group of current and former hourly-paid or non-exempt employees of Defendant 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. Class Counsel conducted significant investigation and informal discovery into the facts of the cases, to assess the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial prior to reaching the Settlement. The Parties exchanged a large volume of information, documents and data through the course of the litigation and in connection with the mediation and settlement negotiations. Class Counsel had the opportunity to

1 interview and obtain information from Plaintiff and percipient witnesses, and reviewed and
2 analyzed a large volume of information, data, and documents obtained from Plaintiff, Defendant,
3 and other sources. The volume of data and documents that Class Counsel reviewed and analyzed
4 included and was not limited to: Plaintiff's employment records, a detailed sampling of Plaintiff's
5 and other Class Member's time data and pay records (i.e., 30%), Defendant's Employee
6 Handbook, collective bargaining agreements applicable to some of the Class, internal
7 memoranda, new hire orientation checklists, job descriptions, company policy
8 acknowledgements (including but not limited to Final Pay Check Acknowledgement and
9 Employee Handbook Confirmation of Receipt), forms (including but not limited to Request for
10 Tool/Boot Allowance and Business Expense Report Summary), procedures (including but not
11 limited to Dispute Resolution Agreement, Confidentiality Agreement, and Employee Arbitration
12 Agreement), and policies (including but not limited to Anti-Fraternization Policy, Employee
13 Acknowledgement Cell Phone Usage Policy, Safety Program, Traffic Violation Policy, and
14 Injury, Illness Prevention Policy), among other information and documents. Class Counsel
15 developed liability, damages, and penalties valuation models in the course of litigation and in
16 connection with mediation and settlement negotiations, and settlement. Other work performed
17 by Class Counsel included, and was not limited to, case strategy and analysis; researching,
18 drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation brief, and
19 settlement documents; and preparing for and attending court proceedings, mediation, and
20 settlement negotiations, among other tasks.

21 7. As outlined herein, the Parties have conducted significant investigation and
22 informal discovery during the course of litigating the cases, mediation, and extensive settlement
23 negotiations. Class Counsel analyzed a large amount of information, data, and documents
24 obtained from Plaintiff, Defendant, and other sources, that provided a critical understanding of
25 the nature of the work performed by the Class Members and Aggrieved Employees, as well as
26 Defendant's operations and employment policies, practices, and procedures. The information,
27 documents, and data were used in analyzing liability, damages, penalties, and valuation issues in
28 connection with all phases of the litigation, and ultimately in connection with the mediation and

1 settlement negotiation process. Class Counsel also performed research regarding applicable law,
2 which is evolving as it relates to class certification, manageability, off-the-clock theory, regular
3 rate of pay, meal and rest periods, representative PAGA claims and penalties, wage-and-hour law
4 and enforcement, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as
5 facts discovered.

6 8. After conducting significant investigation of the facts and law during the
7 prosecution of the cases, counsel for the Parties engaged in extensive settlement negotiations to
8 try to resolve the cases. These efforts included participating in a formal, full-day mediation
9 conducted by the Lynn Frank, Esq., a well-regarded mediator experienced in handling complex
10 labor and employment matters. During all settlement discussions, the Parties conducted their
11 negotiations at arm's length in an adversarial position. In the course of mediation and settlement
12 negotiations, the Parties exchanged information, documents, and data, and discussed all aspects
13 of the cases, including and not limited to, the risks and delays of further litigation, the risks to the
14 Parties of proceeding with class certification and trial, the law relating to class certification,
15 manageability, off-the-clock theory, regular rate of pay, meal and rest periods, representative
16 PAGA claims, wage-and-hour law and enforcement, as well as the evidence produced and
17 analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was
18 acceptable to the Parties was not easy. Defendant contended that individualized questions of fact
19 predominate over any common issues, and these issues would pose challenges to class
20 certification and representative adjudication. Defendant and its counsel felt strongly about
21 Defendant's ability to avoid class certification and prevail on the merits, while Plaintiff and Class
22 Counsel believed that they would be able to obtain class certification and prevail at trial. With
23 the aid of the mediator's evaluation, the Parties ultimately agreed that the cases were well-suited
24 for settlement given the legal issues relating to principal claims, as well as the costs and risks to
25 the Parties that would attend further litigation. These risks of further litigation include, and are
26 not limited to, a determination that the claims are unsuitable for class treatment and/or
27 representative adjudication, class de-certification after certification of a class, allowing a jury to
28 decide the claims asserted in the cases, and the real possibility of no monetary recovery after

years of litigation.

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$612,500.00, which is thirty-five percent (35%) of the Gross Settlement Amount of \$1,750,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

10. 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 Class Counsel's time and efforts to the cases. The nature of the work performed, skill exercised, and the outcome in this matter support the percentage fee sought and the application of a lodestar multiplier. An outstanding monetary recovery has been obtained in this matter, involving a **Gross Settlement Amount of \$1,750,000.00** (with a Net Settlement Amount of **approximately \$954,553.03 to be paid to Participating Class Members** with an average payment of at least approximately \$1,951.75 per Participating Class Member, a **payment of \$37,500.00 to Aggrieved Employees** with an average payment of \$90.58 per Aggrieved Employee, and **payment of \$112,500.00 to the State of California**).

11. 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 with a multiplier of 1.92. Attorneys at Lawyers for Justice, PC have spent a total of **379.10 hours** performing tasks and obtaining recovery in this matter. 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 in performing those services. The hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had

litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this particular matter, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate 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/or 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

13. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. 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 compliant wage statements, reimbursement of business expenses, executive,

1 administrative, and other overtime exemptions to the State of California and federal overtime
2 compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers *for*
3 Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on
4 behalf of thousands of individuals in California.

5 14. Edwin Aiwarzian is the Managing Member and Shareholder of Lawyers *for* Justice,
6 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
7 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
8 extensive formal training in dispute resolution and negotiation from the Straus Institute for
9 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
10 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
11 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
12 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
13 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
14 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
15 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
16 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
17 Appellate District. In December of 2004, he obtained a license to practice law from the California
18 State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he
19 has almost exclusively focused on the prosecution of consumer and employment class actions,
20 involving wage-and-hour claims, race discrimination, unfair business practices, or consumer
21 fraud. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
22 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
23 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.
24 Together with other attorneys at the firm, and in many cases in conjunction with co-counsel, he
25 has successfully litigated cases involving the executive, administrative, and other overtime
26 exemptions to the State of California and federal overtime compensation requirements. Under
27 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested
28 motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000

1 class action or representative action cases.

2 15. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
3 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
4 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
5 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
6 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
7 From approximately August 2008 to approximately December 2008, he served as a Judicial
8 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the
9 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
10 before all courts of the State of California and all United States District Courts in the State of
11 California. He has worked on many wage-and-hour class action and representative action cases,
12 taking the lead in taking and defending depositions, arguing motions, and attending mediations.
13 He has played an integral role in preparing matters for class certification, including and not
14 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
15 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
16 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
17 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
18 representative action cases have resulted in settlements that have been granted court approval,
19 including and not limited to, those listed in paragraph 19 herein. He has handled over one hundred
20 and fifty (150) mediations and has worked on over two hundred and fifty (250) class action or
21 representative action cases which have resulted in settlement.

22 16. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
23 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
24 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
25 Georgetown University Law Center in 2010. She is admitted to practice in California (since
26 2010) and in New York (since 2013) and is also admitted to practice in all U.S. District Courts in
27 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
28 Court. She has taken and defended dozens of depositions and successfully handled motion

1 practice in class action cases regarding discovery (including and not limited to, regarding class
2 contact information), class certification (both contested class certification and stipulated class
3 certification), arbitration agreements, coordination, and intervention. She has successfully
4 handled briefing and oral argument on appeal and obtained notable decisions regarding Private
5 Attorneys General Act claims and employer efforts to compel arbitration of PAGA claims, e.g.,
6 *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th
7 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior*
8 *Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including and not
9 limited to working on cases to obtain class certification through contested motion practice and
10 working on cases in the post-certification stage (e.g., post-certification discovery, appeal,
11 statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case
12 involving a certified class consisting of approximately 2,600 individuals). She also has extensive
13 experience with class action and/or representative action settlements, and have handled this
14 process in over three hundred (300) cases. Under her, Edwin Aiwazian, Arby Aiwazian's
15 supervision, Lawyers *for* Justice, PC has handled the class certification and court approval
16 process for hundreds of class action and/or representative action matters that have successfully
17 resolved. She is a member of the California Employment Lawyers Association and, on several
18 occasions, has been a speaker regarding topics in wage and hour law at the organization's
19 continuing legal education events.

20 17. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree
21 from University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from
22 Pepperdine University School of Law in 2017. I was admitted to practice law in California in
23 2019. I was admitted to practice before all courts of the State of California and all federal district
24 courts in the State of California. I have worked on many wage and hour class action and PAGA
25 representative matters, and my work has included, *inter alia*, researching and drafting pleadings,
26 administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement
27 agreements, engaging in motion practice, claims evaluation and analysis, and making court
28 appearances. Prior to working at Lawyers *for* Justice, PC, I represented filmmakers and talent,

1 negotiating and structuring various types of agreements on their behalf. I am a member of the
2 California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian
3 American Bar Association.

4 18. Selena Matavosian is a Member of Lawyers *for* Justice, PC. She received a
5 Bachelor of Science degree from California State University, Northridge in 2019 and earned a
6 Juris Doctor degree from Southwestern Law School in 2022. She was admitted to practice law
7 in California in 2022. She is admitted to practice before all courts of the State of California and
8 all federal district courts in the State of California. She has worked on many wage-and-hour class
9 action and PAGA representative cases, and her work on these cases has included researching and
10 drafting pleadings and motions, administrative notice exhaustion, drafting, negotiating, and
11 finalizing stipulations and settlement agreements, claims evaluation and analysis, and making
12 court appearances.

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

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

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

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

27 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class action against a national property management company involving

1 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court
2 granted final approval of the class action settlement. The Los Angeles County Superior Court
3 Case Number is BC430918.

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

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

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

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

25 h) LFJ, in association with co-counsel therein, represented the plaintiff in a
26 wage-and-hour class and PAGA representative action against a national retailer of household
27 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted
28 final approval of the class and PAGA representative action settlement. The San Francisco County

1 Superior Court Case Number is CGC-13-532344.

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

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

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

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

24 m) LFJ represented the plaintiff in a PAGA representative action against a real
25 estate and property management company, on behalf of non-exempt employees. On November
26 4, 2016, the court granted approval of the PAGA representative action settlement. The Orange
27 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

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

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

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

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

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

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

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

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

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

28 ///

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

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

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

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

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

26 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 PAGA representative action against a global provider of products and services to the energy
28 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court

1 granted approval of the PAGA representative action settlement. The Kern County Superior Court
2 Case Number is S-1500-CV-280215-SDC.

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

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

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

19 hh) LFJ, in association with co-counsel therein, represented the plaintiff in a
20 wage-and-hour class and PAGA representative action against a medical equipment supplier on
21 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
22 for class certification and certified a class. On November 2, 2023, the court granted final approval
23 of the class and PAGA representative action settlement. The San Bernardino County Superior
24 Court Case Number is CIVDS1505744.

25 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
26 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
27 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
28 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,

1 ZB, N.A. v. Superior Court (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
2 approval of the PAGA representative action settlement. The San Diego County Superior Court
3 Case Number is 37-2016-00005578-CU-OE-CTL.

4 jj) LFJ, in association with co-counsel therein, represented the plaintiff in a
5 wage-and-hour class and PAGA representative action against a large national drug testing
6 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
7 plaintiff's motion for class certification and certified a class. On October 28, 2022, the court
8 granted final approval of the class and PAGA representative action settlement. The San Diego
9 County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

16 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
17 wage-and-hour class and PAGA representative action against a plastic packaging company on
18 behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs' motion
19 for class certification and certified a class. On November 8, 2021, the court granted approval of
20 the partial settlement of the action. On April 22, 2024, the court granted approval of the PAGA
21 settlement and entered an order dismissing the action. The San Bernardino County Superior
22 Court Case Number is CIVDS1507361.

23 mm) LFJ, in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class action against manufacturer and supplier of power products and services on
25 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
26 for class certification and certified a class. On August 27, 2021, the court granted final approval
27 of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-
28 00025968-CU-OE-CTL.

nn) LFJ represented the plaintiff in a wage-and-hour class action against a nutritional products manufacturer on behalf of non-exempt production line employees. On December 13, 2021, the court granted the plaintiff's motion for class certification in part and certified a class. On January 16, 2024, the court granted final approval of the class and PAGA representative action settlement. The Solano County Superior Court Case Number is FCS051001.

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

pp) LFJ represents the plaintiffs in a wage-and-hour class action against a chain of restaurants on behalf of non-exempt employees. On July 22, 2024, the court granted in part the plaintiffs' motion for class certification and certified a class. The San Francisco Superior Court Case Number is CGC-20-582809.

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

20. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$15,946.97** in litigation costs and expenses incurred in the cases, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

ENHANCEMENT AWARD TO PLAINTIFF

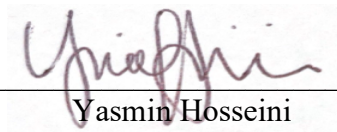
21. In recognition of his efforts and work serving as the Class Representative, as well as his broader individual release and waiver of claims, the Settlement provides for an Enhancement Award in the amount of \$7,500.00 to Plaintiff. The requested Enhancement Award is fair and appropriate. Plaintiff spent a substantial amount of time and effort to produce relevant documents and information, and provided facts and evidence to support the prosecution of the

claims. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information that would facilitate the pursuit of the cases. Accordingly, it is appropriate for Plaintiff to receive \$7,500.00 as a reasonable Enhancement Award, in addition to his individual settlement payment.

22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiff, Class Members, Aggrieved Employees, and the State of California.

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

Executed this 12th day of November 2024, at Glendale, California.



Yasmin Hosseini

EXHIBIT A

NORBERTO CEJA V. WARE DISPOSAL, INC.

Orange County Superior Court, Case No. 30-2021-01224571-CU-OE-CXC (“Class Action”)

NORBERTO CEJA V. WARE DISPOSAL, INC.

Orange County Superior Court, Case No. 30-2021-01228821-CU-OE-CXC (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Norberto Ceja (“Plaintiff”) During the Case	37.50
Investigate, Communicate with, and/or Interview Class Members, Aggrieved Employees, and/or Percipient Witnesses	10.50
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 1, 2021) (Class Action)	7.50
Research and Draft Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on October 28, 2021) (PAGA Action)	7.50
Review Court’s Case Management Conference Order and Minute Order Re: Chamber’s Work (filed on November 29, 2021) (Class Action)	0.10
Draft Plaintiff’s Notice Regarding March 29, 2022 Case Management Conference (filed on November 29, 2021) (PAGA Action)	0.20

Review and Analyze Defendant Ware Disposal, Inc.'s ("Defendant") Answer to Plaintiff's Class Action Complaint and Research Affirmative Defenses in Defendant's Answer (filed on December 7, 2021) (Class Action)	1.30
Review and Analyze Defendant's and Defendant Judith Helaine Ware's Answer to Plaintiff Norberto Ceja's Unverified Complaint and Research Affirmative Defenses in Defendant's and Defendant Judith Helaine Ware's Answer (filed on December 22, 2021) (PAGA Action)	1.20
Review Court's Minute Order Re: Case Management Conference (filed on February 2, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Case Management Conference Statement (filed on March 8, 2022) (Class Action)	1.50
Review Court's Minute Order Re: Chambers Work (filed on March 10, 2022) (PAGA Action)	0.10
Review Court's Minute Order Re: Chambers Work (filed on March 15, 2022) (PAGA Action)	0.10
Review Court's Minute Order Re: Chambers Work (filed on March 15, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on May 25, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on May 26, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Stipulation and [Proposed] Order Continuing Status Conference and Order to Show Cause Re: Monetary Sanctions Pending Mediation (filed on September 27, 2022) (Class Action)	1.30
Review Court's Order Continuing Status Conference and Order to Show Cause Re: Monetary Sanctions Pending Mediation (filed on September 29, 2022) (Class Action)	0.20
Review Defendant's Notice of Entry of Order (filed on September 29, 2022) (Class Action)	0.10
Meet and Confer with Defendant's and Defendant Judith Helaine Ware's Counsel and Draft Stipulation and [Proposed] Order Continuing Status Conference Pending Mediation (filed on October 25, 2022) (PAGA Action)	1.10
Review Court's Order Granting Stipulation Continuing Status Conference Pending Mediation (filed on October 26, 2022) (PAGA Action)	0.10

Review Defendant's Notice of Entry of Order (filed on October 28, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Status Conference and Vacate OSC Re Monetary Sanctions (filed on May 15, 2023) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement (filed on May 15, 2023) (Class Action)	0.50
Draft Declaration of Jacob Karczewski in Response to OSC Re Monetary Sanctions Per Minute Order of February 2, 2022 (filed on May 15, 2023) (Class Action)	1.10
Meet and Confer with Defendant's and Defendant Judith Helaine Ware's Counsel, and Draft Joint Stipulation to Continue Status Conference; [Proposed] Order (filed on May 15, 2023) (PAGA Action)	1.10
Meet and Confer with Defendant's and Defendant Judith Helaine Ware's Counsel and Draft Joint Notice of Settlement (filed on May 15, 2023) (PAGA Action)	0.50
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Status Conference and Vacate OSC Re Monetary Sanctions; [Proposed] Order (filed on May 22, 2023) (Class Action)	1.10
Meet and Confer with Defendant's and Defendant Judith Helaine Ware's Counsel, and Draft Joint Stipulation to Continue Status Conference; [Proposed] Order (filed on May 22, 2023) (PAGA Action)	1.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on June 12, 2023) (Class Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on June 12, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on September 20, 2023) (Class Action)	0.90
Meet and Confer with Defendant's and Defendant Judith Helaine Ware's Counsel, and Draft Joint Status Conference Statement (filed on September 20, 2023) (PAGA Action)	0.70
Review Court's Minute Order Re: Chambers Work (filed on September 25, 2023) (Class Action)	0.10
Draft Plaintiff's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on November 20, 2023),	4.20

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Consolidate Case Numbers 30-2021-01224571-CU-OE-CXC and 30-2021-01228821-CU-OE-CXC and Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order (filed on November 7, 2023) (Class Action)	
Review Court's Order Granting Joint Stipulation to Consolidate Case Numbers 30-2021-01224571-CU-OE-CXC and 30-2021-01228821-CU-OE-CXC and Granting Plaintiff Leave to File First Amended Complaint (filed on November 7, 2023) (Class Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on November 9, 2023) (Class Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Research Affirmative Defenses in Defendant's Answer (filed on December 6, 2023) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on December 11, 2023) (Class Action)	1.10
Review Court's Minute Order Re: Status Conference (filed on December 18, 2023) (Class Action)	0.10
Review Defendant's Notice of Related Case and Review Register of Action and Filings in <i>Juan Preciado Garibaldo v. Ware Disposal, Inc.</i> , Case No. 23STCV23254 and <i>Juan Preciado Garibaldo v. Ware Disposal, Inc.</i> , Case No. 23STCV29166 (filed on February 9, 2024) (Class Action)	1.60
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on February 13, 2024) (Class Action)	1.10
Review Court's Minute Order Re: Chambers Work (filed on February 14, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Deadline to File Supplemental Papers in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (filed on May 2, 2024) (Class Action)	1.10
Review Court's Order Granting Joint Stipulation to Continue Deadline to File Supplemental Papers in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on May 3, 2024) (Class Action)	0.20
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on May 3, 2024) (Class Action)	0.10

Draft Plaintiff's Notice of Entry of Judgment or Order (filed on July 17, 2024) (Class Action)	0.10
Appearances	
Prepare for and Remotely Attend Hearing on Initial Status Conference (March 15, 2022) (Class Action)	0.40
Prepare for and Remotely Attend Hearing on Status Conference (December 18, 2023) (Class Action)	0.50
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (May 17, 2024) (Class Action)	0.90
Discovery and Deposition	
Draft Letter to Defendant Judith Helaine Ware Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on June 12, 2020)	1.90
Draft Follow-Up Letter to Defendant Judith Helaine Ware Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on January 8, 2021)	1.50
Draft Follow-Up Letter to Defendant Judith Helaine Ware Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on April 5, 2021)	1.50
Draft Follow-Up Letter to Defendant Judith Helaine Ware Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on June 9, 2021)	1.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Norberto Ceja (served June 13, 2021)	3.70
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Norberto Ceja for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> ("PAGA") (served on August 24, 2021)	4.50
Draft Additional Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Norberto Ceja for Penalties Under PAGA (served on May 12, 2023)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	22.10

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to October 2022 Scheduled Mediation (Rescheduled on or about September 27, 2022)	44.10
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to April 2023 Scheduled Mediation	60.50
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 April 11, 2023)	34.80
Attend Mediation Session (April 25, 2023; Zoom Video Conference)	14.50
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding (fully executed on April 25, 2023)	3.50
Draft, Review, Revise, Negotiate, and/or Finalize Settlement Agreement and Stipulation to Resolve Class Action and PAGA Claims (executed on January 29, 2024) and Notice of Class Action Settlement	16.50
Draft, Review, Revise, Negotiate, and/or Finalize Amendment No. 1 to Settlement Agreement and Stipulation to Resolve Class Action and PAGA Claims (fully executed on May 14, 2024), Revised Notice of Class Action Settlement, Objection Form, and Request for Exclusion Form	3.80
Draft, Review, Revise, Negotiate, and/or Finalize Amendment No. 2 to Settlement Agreement and Stipulation to Resolve Class Action and PAGA Claims (fully executed on June 3, 2024), Revised Notice of Class Action Settlement, Request for Exclusion Form, Objection Form, and Workweek Dispute Form	3.50
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Selena Matavosian in Support Thereof, Declaration of Norberto Ceja in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on February 13, 2024) (Class Action)	21.80
Review Court's Tentative Ruling Re: Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement (issued on March 14, 2024) (Class Action)	0.20

Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on March 15, 2024) (Class Action)	0.20
Review Declaration of Jay Ware and Declaration of Noell Rice, and Draft Plaintiff's Supplemental Brief in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, and Plaintiff's Supplemental Declaration in Support Thereof (filed on May 14, 2024) (Class Action)	19.50
Draft Plaintiff's Further Supplemental Declaration of Selena Matavosian in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on May 15, 2024) (Class Action)	1.90
Review Court's Tentative Ruling Re: Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement (issued on May 16, 2024)	0.20
Review Court's Minute Order Re: Motion for Approval of Class Settlement (filed on May 17, 2024) (Class Action)	0.20
Draft Plaintiff's Further Supplemental Declaration of Selena Matavosian in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement; and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on June 4, 2024) (Class Action)	2.50
Review Court's Tentative Ruling Re: Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement (issued on June 13, 2024)	0.20
Review Court's Minute Order Re: Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Settlement (filed on June 14, 2024) (Class Action)	0.20
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on July 2, 2024)	0.30
Review and Analyze Declaration of Settlement Administrator, and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Award, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on November 12, 2024)	17.50
Total Hours:	379.10

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Ceja vs. Ware Disposal, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
6/12/2020	U.S. Postmaster	Postage	\$7.00
1/29/2021	U.S. Postmaster	Postage	\$7.00
4/5/2021	U.S. Postmaster	Postage	\$7.20
6/9/2021	U.S. Postmaster	Postage	\$7.20
1/13/2022	Legal Document Server, Inc.	Attorney Service	\$13.25
3/8/2022	Legal Document Server, Inc.	Attorney Service	\$13.25
3/9/2022	Legal Document Server, Inc.	Attorney Service	\$140.00
5/23/2022	Orange County Superior Court	Jury Fee	\$150.00
5/26/2022	Legal Document Server, Inc.	Attorney Service	\$23.37
8/23/2022	Lynn S. Frank	Mediation Fee	\$9,000.00
4/12/2023	General Logistics Systems US, Inc.	Courier Service	\$29.66
4/26/2023	Berger Consulting Group, LLC	Analysis of Sampling of Time Records	\$3,900.00
5/15/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
5/16/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
5/22/2023	Legal Document Server, Inc.	Attorney Service	\$1.39
5/22/2023	Orange County Superior Court	Stipulation Fee	\$20.00
6/13/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
9/20/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
11/6/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
11/7/2023	Legal Document Server, Inc.	Attorney Service	\$15.59
11/7/2023	Orange County Superior Court	Stipulation & Order Fee	\$20.00
11/14/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
11/20/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
12/11/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
2/13/2024	Legal Document Server, Inc.	Attorney Service	\$32.57
5/2/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
5/3/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
5/15/2024	Legal Document Server, Inc.	Attorney Service	\$273.40
5/16/2024	Legal Document Server, Inc.	Attorney Service	\$28.40
6/4/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
7/2/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
Total:			\$13,859.68

LAWYERS for JUSTICE PC CASE COST DETAIL
Ceja vs. Ware Disposal, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/24/2021	U.S. Postmaster	Postage	\$15.00
8/24/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
10/19/2021	ProLegal	Attorney Service	\$86.79
11/1/2021	One Legal	Attorney Service	\$57.00
11/1/2021	Orange County Superior Court	Complex Filing Fee	\$1,000.00
11/1/2021	Orange County Superior Court	Complaint Filing Fee	\$435.00
11/4/2021	ProLegal	Attorney Service	\$128.58
11/29/2021	Legal Document Server, Inc.	Attorney Service	\$13.25
1/13/2022	Legal Document Server, Inc.	Attorney Service	\$13.25
3/8/2022	Legal Document Server, Inc.	Attorney Service	\$13.25
5/27/2022	Legal Document Server, Inc.	Attorney Service	\$23.37
5/27/2022	Orange County Superior Court	Jury Fee	\$150.00
5/15/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
5/22/2023	Orange County Superior Court	Stipulation & Order Fee	\$20.00
6/13/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
9/20/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
7/18/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
Total:			<u>\$2,087.29</u>