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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

CHRISTOPHER RODRIGUEZ, 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.

ARKEMA INC., an unknown business entity;  
BOSTIK, INC., an unknown business entity;  
and DOES 1 through 100, inclusive,

Defendants.

Case No.: BC721328

Honorable Maren E. Nelson  
Department SSC-17

**CLASS ACTION**

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

[Notice of Motion and Motion for Final  
Approval of Class Action Settlement, Class  
Counsel Award, and Class Representative  
Service Award; Declaration of Class  
Representative (Christopher Rodriguez);  
Declaration of Settlement Administrator  
(Desirae Burton); and [Proposed] Final  
Approval Order and Judgment filed  
concurrently herein]

Date: September 26, 2023  
Time: 9:00 a.m.  
Department: SSC-17

Complaint Filed: September 17, 2018  
1AC Filed: October 31, 2018  
2AC Filed: December 26, 2018  
3AC Filed: August 25, 2020  
4AC Filed: July 9, 2021  
5AC Filed: January 4, 2022  
Trial Date: None Set

**DECLARATION OF EDWIN AIWAZIAN**

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Christopher Rodriguez (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge, and, if called as a witness, I could and would competently testify as follows.

**PRELIMINARY APPROVAL OF SETTLEMENT**

2. On May 18, 2023, in Department SSC-17 of the above-entitled Court, the Honorable Maren E. Nelson preliminarily approved the First Amended Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendants Arkema Inc. and Bostik, Inc. (together, “Defendants”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Christopher Rodriguez 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 Pendency of Class Action Settlement and Final Approval Hearing Date (“Class Notice”), 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, Class Counsel Award, and Class Representative Service Award (“Motion for Final Approval”), no Class Members have objected to the Class Settlement or the contemplated request for Class Counsel Award, Class Representative Service Award, Settlement Administrator Costs, or allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

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**WORK PERFORMED BY CLASS COUNSEL**

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating this matter since prior to the commencement of the above-captioned action, which was filed on September 17, 2018.

5. Before initiating the case, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, Plaintiff's claims and allegations, and potential defenses. After conducting an initial investigation, our firm determined that the claims of Plaintiff were well-suited for class-wide adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former non-exempt employees who worked for Defendants in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel litigated the case for several years, investigated 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 conducted significant investigations and extensive formal and informal discovery and exchanged thousands of pages of information, documents, and data throughout the course of the litigation and in connection with mediation and settlement negotiations. The volume of information, data, and documents that Class Counsel reviewed and analyzed included and was not limited to: the exchange, review, and analysis of over 14,700 pages of documents and data obtained from Defendants, Plaintiff, and other sources. The large volume of information, data, and documents that Class Counsel reviewed and analyzed included and was not limited to: Plaintiff's employment records, class time and pay records (specifically, employee time records for Defendant Arkema, Inc., sampling of employee time records for Defendant Bostik, Inc., employee pay records for Defendant Arkema, Inc., and employee pay records for Defendant Bostik, Inc.), class lists, Defendant Bostik, Inc.'s alternative workweek

election letter, multiple iterations of Defendant Bostik, Inc.'s Employee Handbook, company policy acknowledgements, forms (including, but not limited to, Defendant Arkema Inc.'s Vacation/Time Off Request Form), internal memoranda, job descriptions, Defendant Bostik Inc.'s operations and employment policies, practices, and procedures documents (including, but not limited to, Timeclock Rules, Non-Exempt Overtime Pay Policy, Travel and Entertainment policy, Emergency Shut-Down Pay policy, Uniforms & Personal Protective Equipment (PPE) policy, and Dress Code policy), among other information and documents. Counsel for the parties also met and conferred on numerous occasions, e.g., to discuss issues relating to the pleadings, motion practice, discovery, and the production of documents and data in the course of litigation and mediation and settlement discussions. Class Counsel also drafted pleadings, drafted moving, opposition, and reply papers in connection with motion practice (e.g., Plaintiff's motion for leave to amend the complaint and Defendant Bostik Inc.'s demurrer and motion to strike the third amended complaint), prepared for mediation multiple times and drafted the mediation brief, and prepared for and attended court proceedings, mediation, and settlement negotiations, among other tasks.

7. As outlined herein, the parties have conducted significant formal and informal discovery and investigation during the course of litigating the case and mediation and settlement negotiations. Class Counsel propounded multiple sets of formal written discovery requests onto Defendant Arkema Inc. (specifically, Requests for Production of Documents (Set One), Special Interrogatories (Sets One and Two), and Form Interrogatories – General (Set One)) and noticed the depositions of Defendant Arkema Inc.'s Person Most Knowledgeable designees along with requests for production of documents. Class Counsel analyzed thousands of pages of information, documents, and data obtained from Plaintiff, Defendants, and other sources. The information, documents, and data provided a critical understanding of the nature of the work performed by the Class Members, as well as Defendants' operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and valuation issues in connection with all phases of the litigation, and ultimately in connection with the mediation and settlement negotiation process. Class Counsel also performed significant research

1 regarding the applicable law, which is evolving as it relates to class certification, off-the-clock  
2 theory, meal and rest periods, overtime and alternative workweeks, agency/joint employer/alter  
3 ego theories, PAGA representative claims, wage-and-hour enforcement, Plaintiff's claims and  
4 allegations, and Defendants' defenses thereto, as well as facts discovered.

5         8. After conducting significant investigation of the facts and law during the  
6 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to  
7 try to resolve the case. The Parties scheduled and prepared for mediation multiple times; a  
8 mediation was originally scheduled for July 2019, then re-scheduled to December 2019, then re-  
9 scheduled to February 2020, and then ultimately re-scheduled and held on August 2, 2021. In  
10 the interim, the parties continued to litigate the case and meet and confer about and exchange  
11 extensive information, data, and documents regarding the wage-and-hour allegations in the case  
12 and Defendants' defenses, e.g., regarding Defendants' contention of separate ownership and  
13 operation of the facilities. The parties ultimately participated in a formal, full-day mediation  
14 conducted by Jeffrey Krivis, Esq., a well-regarded mediator experienced in mediating complex  
15 labor and employment matters. In the course of mediation and settlement discussions, the parties  
16 exchanged extensive information and engaged in discussions regarding their evaluations of the  
17 case and various aspects of the case, including but not limited to, the risks and delays of further  
18 litigation, the risks to the Parties of proceeding with class certification and/or representative  
19 adjudication, the law relating to off-the-clock theory, meal and rest periods, overtime and  
20 alternative workweeks, agency/joint employer/alter ego theories, PAGA representative actions,  
21 and wage-and-hour law and enforcement, as well as the evidence produced and analyzed, and the  
22 possibility of appeals, among other things. During all settlement discussions, the parties  
23 conducted their negotiations at arm's length in an adversarial position. Arriving at a settlement  
24 that was acceptable to all Parties was not easy. Defendant and their counsel felt strongly about  
25 their ability to prevail on the merits and obtain a denial of class certification, and Plaintiff and  
26 Class Counsel believed that they would be able to obtain class certification and prevail at trial.  
27 With the aid of the mediator's evaluation, the parties have agreed that the matter is well-suited  
28 for settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs

1 and risks to both sides that would attend further litigation. The Settlement is a fair, reasonable,  
2 and adequate resolution of the Released Class Claims of Plaintiff and Participating Class  
3 Members, and of the Released PAGA Claims of the State of California and PAGA Members.

4 9. Pursuant to Section III, Paragraph 28 of the Settlement Agreement, the Gross  
5 Settlement Fund is subject to increase if the number of Compensable Work Weeks for the Class  
6 Period exceeds 18,427 by more than ten percent (10%) (i.e., exceeds 20,270). The Settlement  
7 Administrator has confirmed that the total number of Compensable Work Weeks during the  
8 Class Period were twenty thousand five hundred thirty (20,530), and the Gross Settlement Fund,  
9 which originally was One Million One Hundred Thousand Dollars (\$1,100,000.00) increased to  
10 One Million One Hundred Fifteen Thousand Five Hundred Fifty-Six Dollars Fifty Two Cents  
11 (\$1,115,556.52).

12 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks  
13 attorneys' fees in the amount of Three Hundred Seventy-One Thousand Eight Hundred Fifty  
14 Two Dollars Seventeen Cents (\$371,852.17), which is one-third (1/3) of the escalated Gross  
15 Settlement Fund of \$1,115,556.52, although the Settlement Agreement provides for attorneys'  
16 fees of up to thirty-five percent (35%) of the total settlement. Pursuant to the contingency-fee  
17 agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a  
18 contingency fee of at least one-third (1/3) of the recovery. The attorneys' fees sought are  
19 commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time,  
20 effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that  
21 Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the  
22 litigation; (5) the value of the settlement that Class Counsel has achieved in the case; and (6) the  
23 other cases that Class Counsel has turned down in order to devote its time and efforts to this  
24 matter.

25 11. I am aware that common and acceptable rates for contingency representation in  
26 wage and hour class action and representative action litigation are normally in the range of  
27 33.3% to 50%.

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12. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a simple lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **622.30 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. These hours include work done by myself and several other attorneys at Lawyers *for* Justice, PC. Additionally, separate from the hours referenced herein, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this case, in litigating complex wage-and-hour actions, and in particular, employment class and representative actions, support a reasonable blended hourly rate of compensation at the rate of \$650 for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the blended rate of at least \$650 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour 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; 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 compensation at the rate of \$766.05 per hour; 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 compensation at the rate of \$764.82 per hour; 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; 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 compensation at the rate of \$831.38 per hour; 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 compensation at the rate of \$780.77 per hour; 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 compensation at the rate of \$845.64 per hour.

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

***EDUCATION***

14. 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*.

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**JUDICIAL EXTERNSHIPS**

15. 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**

16. 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 a prominent plaintiff-side law firm.

17. At the prominent plaintiff-side law firm, 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 the prominent plaintiff-side law firm, I argued approximately 100 motions, took or defended approximately 150 depositions, and prepared dozens of expert witnesses for deposition or trial.

18. 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, 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 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, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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

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

e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a bank, involving allegations of misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court granted final approval of the class and PAGA representative action settlement. The Kern County

Superior Court Case Number is S-1500-CV-273194-LHB.

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

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

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

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

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

Council Coordination Proceeding Number is 4794.

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

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

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

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

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

p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer’s motion to compel arbitration, which resulted in a published opinion by the California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*

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

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

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

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

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

25 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA  
26 representative action against a food company on behalf of non-exempt employees. On June 30,  
27 2017, the court granted final approval of the class and PAGA representative action settlement.  
28 The Sacramento County Superior Court Case Number is 34-2015-00175871.

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

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

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

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

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

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

1 BC498401.

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

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

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

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

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

26 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
27 wage-and-hour class and PAGA representative action against a national retailer of apparel and  
28 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted

the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

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

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

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

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1                    ll)        LFJ, in association with co-counsel therein, represented the plaintiffs in a  
2 wage-and-hour class action against manufacturer and supplier of power products and services on  
3 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'  
4 motion for class certification and certified a class. On August 27, 2021, the court granted final  
5 approval of the class action settlement. The San Diego County Superior Court Case Number is  
6 37-2015-00025968-CU-OE-CTL.

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

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

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

17                  20.        To date, Class Counsel has borne all of the risks and costs of litigation and will  
18 not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC  
19 seeks reimbursement of **\$25,014.91** in litigation costs and expenses incurred in this matter, as  
20 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in  
21 the prosecution of the case and to obtain the Settlement.

22                    **CLASS REPRESENTATIVE SERVICE AWARD TO PLAINTIFF**

23                  21.        In recognition of his efforts and work serving as the Class Representative, the  
24 Settlement provides for a Class Representative Service Award in the amount of \$7,500.00 to  
25 Plaintiff Christopher Rodriguez. The requested Class Representative Service Award is fair and  
26 appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant  
27 documents and past employment records and provided the facts and evidence necessary to  
28 attempt to prove the allegations. Plaintiff was available whenever Class Counsel needed him and

1 actively tried to obtain and provide information that would facilitate the pursuit of the class and  
2 PAGA claims. Plaintiff spent numerous hours speaking with Class Counsel about his claims,  
3 describing his work experience with Defendants, and gathering and reviewing documents.  
4 Accordingly, it is appropriate for Plaintiff Christopher Rodriguez to receive \$7,500.00 as a  
5 reasonable service award, in addition to his individual settlement payment.

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

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

11 Executed this 31st day of August 2023, at Glendale, California.

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# **EXHIBIT A**

***CHRISTOPHER RODRIGUEZ V. ARKEMA INC., ET AL.***  
**(Los Angeles County Superior Court Case No. BC721328)**

**ATTORNEY TASK AND TIME CHART**

| TASK                                                                                                                                                                                                                                                                                   | LAWYERS FOR JUSTICE, PC |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                                                                                                                      |                         |
| Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality, and Manageability                                                                                                                   | 10.90                   |
| Pre-Lawsuit Investigation of the Merits of Plaintiff Christopher Rodriguez’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members                                                                                                                           | 9.80                    |
| Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendants Arkema Inc., and Bostik, Inc. (together, “Defendants”) with Respect to Plaintiff and the Putative Class Members                                                                                    | 9.20                    |
| Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, Private Attorneys General Act (“PAGA”), Class Certification, Agency, Joint Employer, and Alter Ego in California, Including all New and Relevant Enforcement Guidance and DLSE Materials | 8.50                    |
| Investigation of Defendants, Their Business Segments, Their Business Relationships, and the Industry in which They Operate                                                                                                                                                             | 5.90                    |
| Investigation of Defendants’ Ownership, Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees                                                                            | 8.50                    |
| Investigation of Defendants’ Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity, and Research and Analysis of Defendants’                                                                            | 5.30                    |

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| Past and Recent Litigation History and Agency Proceedings History Involving Labor, Wage-and-Hour, and Other Related Employment Issues                                                                                                                                                                                                                                                                                                                                                                                                  |       |
| Analysis of Competitors in Various Relevant Geographic Areas within which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendants' Competitors                                                                                                                                                                                                                                                                                    | 5.50  |
| Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendants in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues                                                                                                                                                                                                                  | 8.10  |
| Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other Reviews Regarding Defendants 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                                                                                                                                                                                                                                   | 6.50  |
| Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California                                                                                                                                                                                                                                                                                                                                                                             | 6.30  |
| Research and Investigation Re: Defendants' Written and Non-Written Policies, Practices, and Procedures Relating to Pre-Shift and Post-Shift Tasks, Attendance, Timekeeping, Rounding, Scheduling, Operations Shutdown, Meal/Rest Breaks, On-Premises Breaks, Non-Discretionary Bonus/Shift Differential/Incentive Pay, Regular Rate, Overtime Compensation, Uniforms/Dress Code, PPE/Supplies/Equipment/Tools, Use of Personal Cell Phones, Use of Personal Vehicle/Gas/Mileage/Travel, and Reimbursement of Business-Related Expenses | 25.50 |
| Research and Investigation Re: Various Software Programs, Applications, Systems, and Other Technology Defendants Use to Conduct Their Everyday Business, Including Document and Information Management, Communications, Timekeeping, Scheduling, Inventory, Operations, Quality Control, and Resource Management, Project Management, Surveillance, and Security Systems with a Focus on What Records                                                                                                                                  | 6.80  |

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| (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                                                                                                         |       |
| Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Alternative Workweeks, Waiver, and Compliant Policies                                                                                              | 8.10  |
| 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                                                                                                               | 5.20  |
| Review and Investigation of Impact of COVID-19 Pandemic on Defendants, Their Operations (including and not limited to, Defendant Bostik, Inc.'s cease of operations in California from approximately December 18, 2020 to July 17, 2021), and Class Members' and Aggrieved Employees' Work | 8.50  |
| Meet and Communicate with Plaintiff Christopher Rodriguez Throughout the Pendency of the Case                                                                                                                                                                                              | 41.50 |
| Investigate, Meet and Communicate with, and/or Conduct Interviews of Putative Class Members and Percipient Witnesses                                                                                                                                                                       | 16.50 |
| <b>Pleadings and Court Filings</b>                                                                                                                                                                                                                                                         |       |
| Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on September 17, 2018)                                                                                                                                                  | 7.50  |
| Review Court's Notice of Case Assignment (filed on September 17, 2018)                                                                                                                                                                                                                     | 0.10  |
| Review Court's Order Re: Newly Filed Class Action (filed on September 27 2018)                                                                                                                                                                                                             | 0.10  |
| Review Court's Initial Status Conference Order (filed on September 27, 2018)                                                                                                                                                                                                               | 0.20  |
| Draft Plaintiff's First Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on October 31, 2018)                                                                                                                                      | 2.90  |
| Draft Plaintiff's Notice and Acknowledgement of Receipt (filed on November 30, 2018)                                                                                                                                                                                                       | 0.10  |

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| Draft Plaintiff's Second Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on December 26, 2018); Meet and Confer with Defendant Arkema Inc.'s Counsel and Draft Joint Stipulation and [Proposed] Order Granting Plaintiff Leave to File [Proposed] Amended Class Action Complaint for Damages (submitted on December 26, 2018) | 4.10 |
| Review Court's Order Granting Plaintiff Leave to File Amended Class Action Complaint for Damages (filed on January 4, 2019)                                                                                                                                                                                                                                                            | 0.10 |
| Meet and Confer with Defendant Arkema Inc.'s Counsel and Draft Joint Initial Status Conference Class Action Response Statement (filed on January 16, 2019)                                                                                                                                                                                                                             | 1.60 |
| Review Court's Minute Order Re: Initial Status Conference (filed on January 25, 2019)                                                                                                                                                                                                                                                                                                  | 0.10 |
| Meet and Confer with Defendant Arkema Inc.'s Counsel and Draft [Proposed] Order Authorizing Electronic Service (submitted on January 29, 2019)                                                                                                                                                                                                                                         | 0.70 |
| Review Court's Order Authorizing Electronic Service (filed on February 1, 2019)                                                                                                                                                                                                                                                                                                        | 0.10 |
| Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on February 5, 2019)                                                                                                                                                                                                                                                                          | 0.10 |
| Review Defendant Arkema Inc.'s Peremptory Challenge to Judicial Officer (served on March 6, 2019)                                                                                                                                                                                                                                                                                      | 0.10 |
| Review Court's Minute Order re: Peremptory Challenge (filed on March 8, 2019)                                                                                                                                                                                                                                                                                                          | 0.10 |
| Review Court's Initial Status Conference Order (filed on March 19, 2019)                                                                                                                                                                                                                                                                                                               | 0.10 |
| Review Court's Order Re: Complex Designation (filed on March 19, 2019)                                                                                                                                                                                                                                                                                                                 | 0.10 |
| Review Defendant Arkema Inc.'s Notice of Ruling Regarding Defendant's Peremptory Challenge (served on March 27, 2019)                                                                                                                                                                                                                                                                  | 0.10 |

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| Meet and Confer with Defendant Arkema Inc.'s Counsel and Draft Joint Initial Status Conference Class Action Response Statement (filed on May 21, 2019)                                               | 1.70 |
| Review Court's Minute Order Re: Initial Status Conference (filed on May 28, 2019)                                                                                                                    | 0.10 |
| Draft Plaintiff's Notice Regarding May 28, 2019 Initial Status Conference (filed on May 29, 2019)                                                                                                    | 0.30 |
| Draft Plaintiff's Notice and Acknowledgement of Receipt (filed on May 30, 2019)                                                                                                                      | 0.20 |
| Draft Plaintiff's Notice of Entry of Judgment or Order (filed on May 30, 2019)                                                                                                                       | 0.10 |
| Review and Analyze Defendant Arkema Inc.'s Answer to Plaintiff's Second Amended Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on June 26, 2019) | 2.10 |
| Meet and Confer with Defendant Arkema Inc.'s Counsel and Draft Joint Stipulation to Continue Post-Mediation Status Conference; and [Proposed] Order (submitted on August 6, 2019)                    | 1.50 |
| Review Court's Order to Continue Post-Mediation Status Conference (filed on August 9, 2019)                                                                                                          | 0.10 |
| Draft Plaintiff's Notice of Entry of Judgment or Order (filed on August 22, 2019)                                                                                                                    | 0.10 |
| Meet and Confer with Defendant Arkema Inc.'s Counsel and Draft Joint Status Conference Class Action Response Statement (filed on December 24, 2019)                                                  | 1.80 |
| Review Court's Minute Order Re: Post-Mediation Status Conference (filed on January 10, 2020)                                                                                                         | 0.10 |
| Review Court's Notice Re: Continuance of Hearing and Order (filed on March 23, 2020)                                                                                                                 | 0.10 |
| Meet and Confer with Defendant Arkema Inc.'s Counsel and Draft Joint Further Status Conference Class Action Response Statement (filed on August 13, 2020)                                            | 1.60 |

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| Review Court's Minute Order Re: Further Status Conference (filed on August 19, 2020)                                                                                                                                                                                                                           | 0.10 |
| Review and File Third Amended Class Action Complaint for Damages (filed on August 25, 2020)                                                                                                                                                                                                                    | 0.10 |
| Meet and Confer with Defendants' Counsel and Draft Joint Further Status Conference Class Action Response Statement (filed on October 16, 2020)                                                                                                                                                                 | 1.60 |
| Review Court's Minute Order Re: Further Status Conference (filed on October 23, 2020)                                                                                                                                                                                                                          | 0.10 |
| Draft Plaintiff's Notice of Ruling Re October 23, 2020 Further Status Conference (filed on November 12, 2020)                                                                                                                                                                                                  | 0.20 |
| Meet and Confer with Defendants' Counsel and Draft Joint Stipulation to (1) Continue Hearing for Plaintiff's Motion for Class Certification and (2) Continue Hearing Date and Briefing Schedule for Defendant's Demurrer to Plaintiff's Third Amended Complaint; [Proposed] Order (submitted on March 8, 2021) | 1.60 |
| Review Court's Order Denying the Continuance of Hearing for Plaintiff's Motion for Class Certification and Hearing Date and Briefing Schedule for Defendant's Demurrer to Plaintiff's Third Amended Complaint (file don March 12, 2021)                                                                        | 0.20 |
| Meet and Confer with Defendants' Counsel and Draft Joint Status Conference Statement (filed on April 1, 2021)                                                                                                                                                                                                  | 1.50 |
| Review Court's Minute Order Re: Status Conference (filed on April 12, 2021)                                                                                                                                                                                                                                    | 0.10 |
| Draft Plaintiff's Fourth Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on July 9, 2021)                                                                                                                                                             | 2.50 |
| Meet and Confer with Defendants' Counsel and Draft Joint Stipulation to Vacate Class Certification Deadline and Related Deadlines; and [Proposed] Order (submitted on August 10, 2021)                                                                                                                         | 1.10 |

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| Review Court's Order to Vacate Class Certification Deadline and Related Deadlines (filed on August 11, 2021)                                                                                                                                                                                                                                         | 0.10 |
| Meet and Confer with Defendants' Counsel and Draft Joint Post-Mediation Status Conference Statement and Notice of Settlement (filed on August 23, 2021)                                                                                                                                                                                              | 1.10 |
| Draft Plaintiff's Notice of Entry of Judgment or Order (filed on August 25, 2021)                                                                                                                                                                                                                                                                    | 0.10 |
| Review Court's Minute Order Re: Post-Mediation Status Conference (filed on August 30, 2021)                                                                                                                                                                                                                                                          | 0.10 |
| Draft Plaintiff's Notice Regarding August 30, 2021 Post-Mediation Status Conference (filed on August 31, 2021)                                                                                                                                                                                                                                       | 0.20 |
| Draft Plaintiff's Fifth Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on January 4, 2022); Meet and Confer with Defendants' Counsel and Draft Joint Stipulation Granting Plaintiff's Leave to File Fifth Amended Complaint; and [Proposed] Order Thereon (submitted on December 27, 2021) | 4.50 |
| Review Court's Order Granting Plaintiff's Leave to File Fifth Amended Complaint (filed on January 3, 2022)                                                                                                                                                                                                                                           | 0.10 |
| Meet and Confer with Defendants' Counsel and Draft Joint Status Conference Statement (filed on January 31, 2022)                                                                                                                                                                                                                                     | 1.10 |
| Review Court's Minute Order Re: Status Conference (filed on February 7, 2022)                                                                                                                                                                                                                                                                        | 0.10 |
| Review Court's Minute Order Re: <i>Nunc Pro Tunc</i> Order (filed on February 7, 2022)                                                                                                                                                                                                                                                               | 0.10 |
| Meet and Confer with Defendants' Counsel and Draft Joint Status Conference Statement (filed on December 13, 2022)                                                                                                                                                                                                                                    | 1.30 |
| Review Court's Minute Order Re: Status Conference (filed on December 20, 2022)                                                                                                                                                                                                                                                                       | 0.10 |

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| Draft Plaintiff's Notice Regarding December 20, 2022 Status Conference Hearing (filed on December 22, 2022)                                 | 0.20 |
| <b>Appearances</b>                                                                                                                          |      |
| Prepare for and Attend Initial Status Conference (May 28, 2019)                                                                             | 3.90 |
| Prepare for and Attend Post-Mediation Status Conference (January 10, 2020)                                                                  | 1.50 |
| Prepare for and Telephonically Attend Further Status Conference Hearing on Motion for Leave to Amend Complaint (August 19, 2020)            | 3.30 |
| Prepare for and Telephonically Attend Case Management Conference (October 23, 2020)                                                         | 1.60 |
| Prepare for and Telephonically Attend Status Conference (April 12, 2021)                                                                    | 3.50 |
| Prepare for and Telephonically Attend Hearing on Demurrer (May 17, 2021)                                                                    | 2.70 |
| Prepare for and Telephonically Attend Post-Mediation Status Conference (August 30, 2021)                                                    | 1.10 |
| Prepare for and Telephonically Attend Status Conference (February 7, 2022)                                                                  | 0.80 |
| Prepare for and Telephonically Attend Hearing on Motion for Preliminary Approval of Class Action Settlement (June 20, 2022)                 | 2.50 |
| Prepare for and Telephonically Attend Hearing on Supplemental Motion for Preliminary Approval of Class Action Settlement (October 18, 2022) | 1.80 |
| Prepare for and Telephonically Attend Status Conference (December 20, 2022)                                                                 | 0.30 |
| Prepare for and Telephonically Attend Hearing on Renewed Motion for Preliminary Approval of Class Action Settlement (May 18, 2023)          | 5.80 |

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| Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Class Counsel Award, and Class Representative Service Award (September 26, 2023) (Anticipated)                          | 1.50  |
| <b>Discovery and Deposition</b>                                                                                                                                                                                                            |       |
| Draft Letter to Defendant Arkema Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on July 13, 2018)                                                                                                  | 1.90  |
| Review and Analyze Documents Produced by Defendant Arkema Inc. in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff                                                                                    | 4.50  |
| 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 Arkema Inc. (served on January 29, 2019) | 7.80  |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Arkema Inc. and Request for Production of Documents (noticed for March 4, 2019; Organizational Structure) (served on January 29, 2019)                    | 3.50  |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Arkema Inc. and Request for Production of Documents (noticed for March 5, 2019; Wage and Hour Practices) (served on January 29, 2019)                     | 4.30  |
| <b>Letters and Correspondence</b>                                                                                                                                                                                                          |       |
| Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Christopher Rodriguez for Penalties Under California Labor Code section 2 698, <i>et seq.</i> (served on August 10, 2021)                        | 4.50  |
| Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel                                                                                                                                                | 21.50 |
| <b>Mediation/Settlement</b>                                                                                                                                                                                                                |       |

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| <p>Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources Prior to Mediation Scheduled for July 2019 (Re-Scheduled), Mediation Scheduled for December 2019 (Re-Scheduled), February 2020 (Re-Scheduled), and Mediation Scheduled for August 2021 (Completed)</p> <ul style="list-style-type: none"> <li>• Employee Handbooks and Employment and Operations, Policies, Practices, and Procedures Documents</li> <li>• Employee Time Records for Arkema and Sampling of Employee Time Records for Bostik</li> <li>• Employee Pay Records for Arkema and Employee Pay Records for Bostik</li> <li>• Arkema Class List</li> <li>• Temecula Class Lists</li> <li>• Torrance Class Lists</li> <li>• Alternative Workweek Election Results</li> <li>• Temecula Schedules</li> <li>• Payroll Code Map</li> </ul> | 93.50 |
| <p>Prepare for Mediation Scheduled for December 2019 (Re-Scheduled), 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 and Calculations</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 21.50 |
| <p>Prepare for Mediation Scheduled for August 2021 (Completed), 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 and Calculations (submitted on July 26, 2021)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 34.50 |
| <p>Attend Mediation Session (August 2, 2021; Zoom Video Conference)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 8.50  |
| <p>Draft, Review, Revise, Negotiate, and Finalize Memorandum of Agreement – Rodriguez Class Action (fully executed August 3, 2021)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 4.10  |

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| Draft, Review, Revise, Negotiate, and Finalize the Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (executed on March 17, 2022) and Notice of Pendency of Class Action Settlement and Final Approval Hearing Date                                                                                                                    | 18.90 |
| Draft, Review, Revise, Negotiate, and Finalize First Amended Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (executed on July 29, 2022) and Notice of Pendency of Class Action Settlement and Final Approval Hearing Date                                                                                                           | 2.50  |
| Review and Monitor Settlement Administration Process and Review Weekly Reports                                                                                                                                                                                                                                                                                   | 6.50  |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                                            |       |
| Draft Plaintiff's Third Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on August 25, 2020); Research and Draft Plaintiff's Notice of Motion and Motion for Leave to File Third Amended Complaint, Declaration of Melissa LeBlanc in Support Thereof, and [Proposed] Order (filed on February 25, 2020) | 8.70  |
| Review and Analyze Defendant Arkema Inc's Opposition to Plaintiff's Motion for Leave to File Third Amended Complaint, and Declaration of Aaron H. Cole in Support of Defendant Arkema Inc's Opposition to Plaintiff's Motion for Leave to File Third Amended Complaint (filed on March 27, 2020)                                                                 | 1.50  |
| Review Court's Minute Order Re: Hearing on Motion for Leave to Amend Third Complaint (filed on May 15, 2020)                                                                                                                                                                                                                                                     | 0.10  |
| Draft Plaintiff's Reply in Support of Motion for Leave to File Third Amended Complaint (filed on May 18, 2020)                                                                                                                                                                                                                                                   | 5.80  |
| Review and Analyze Court's [Tentative] Order Granting Leave to File Third Amended Complaint (filed on August 18, 2020)                                                                                                                                                                                                                                           | 0.40  |
| Review Court's Order Granting Leave to File Third Amended Complaint (filed on August 19, 2020)                                                                                                                                                                                                                                                                   | 0.10  |

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| Review Defendant Bostik Inc.'s Notice of Demurrer to Plaintiff's Complaint and Motion to Strike Portions of the Third Amended Complaint, Memorandum of Points and Authorities in Support Thereof, Declaration of Aaron H. Cole in Support Thereof, and [Proposed] Order Sustaining Defendant Bostik Inc.'s Demurrer to Plaintiff's Complaint (served on October 23, 2020) | 2.10  |
| Draft Plaintiff's Opposition to Defendant Bostik Inc.'s Demurrer to Plaintiff's Third Amended Complaint and Motion to Strike Portions of the Third Amended Complaint and Declaration of Daniel J. Kramer In Support Thereof (filed on April 26, 2021)                                                                                                                     | 14.50 |
| Review and Analyze Defendant Bostik Inc.'s Reply Memorandum In Support of Its Demurrer to Plaintiff's Third Amended Complaint and Motion to Strike Portions of the Third Amended Complaint (filed on May 3, 2021)                                                                                                                                                         | 1.50  |
| Review Court's Minute Order Re: Hearing on Demurrer – without Motion to Strike (filed on May 17, 2021)                                                                                                                                                                                                                                                                    | 0.10  |
| Review and Analyze Court's Order Sustaining Demurrer and Granting Motion to Strike (filed on June 10, 2021)                                                                                                                                                                                                                                                               | 0.40  |
| Review Court's Minute Order Re: Ruling on Submitted Matter (filed on June 10, 2021)                                                                                                                                                                                                                                                                                       | 0.10  |
| Meet and Confer with Defendants' Counsel and Draft Joint Stipulation to Continue February 7, 2022 Hearing on Motion for Preliminary Approval of Class Action Settlement; and [Proposed] Order Thereon (submitted on January 11, 2022)                                                                                                                                     | 1.30  |
| Review Court's Order to Continue February 7, 2022 Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on January 24, 2022)                                                                                                                                                                                                                       | 0.10  |
| Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Alexandra Rose in Support Thereof, Declaration of Christopher Rodriguez in Support Thereof, and [Proposed] Order (filed on June 1, 2022)                                                             | 20.50 |

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| Meet and Confer with Defendants' Counsel and Draft Joint Stipulation to Deem the Filing of Plaintiff's Motion for Preliminary Approval of Class Action Settlement Timely; [Proposed] Order Thereon (submitted on June 2, 2022)                                    | 0.80 |
| Review Court's Order to Deem the Filing of Plaintiff's Motion for Preliminary Approval of Class Action Settlement Timely (filed on June 9, 2022)                                                                                                                  | 0.10 |
| Review and Analyze Court's Checklist Re: Motion for Preliminary Approval of Class Action Hearing (filed on June 17, 2022)                                                                                                                                         | 0.40 |
| Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on June 20, 2022)                                                                                                                                                 | 0.10 |
| Draft Plaintiff's Notice Regarding June 20, 2022 Motion for Preliminary Approval hearing (filed on June 27, 2022)                                                                                                                                                 | 0.20 |
| Meet and Confer with Defendants' Counsel and Draft Joint Stipulation to Continue Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on July 27, 2022) | 0.90 |
| Review Court's Order to Continue Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement (filed on August 2, 2022)                                                                              | 0.10 |
| Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on August 4, 2022)                                                                                                                                                | 0.10 |
| Draft Plaintiff's Notice of Entry of Judgment or Order Re: Court's Order to Continue Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement (filed on August 5, 2022)                          | 0.10 |
| Review and Analyze Declaration of Aaron Cole and Declaration of Eric Springer on Behalf of Simpluris, Inc., and Meet and Confer with Defendants' Counsel and Draft Joint Supplemental Brief in Support of                                                         | 9.50 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Alexandra Rose in Support Thereof, and [Revised Proposed] Order (submitted on September 14, 2022)                                                                                                                                                                                                                                                                                                                                |       |
| Review Court's Minute Order Re: Non-Appearance Case Review re: Filing Motion for Preliminary Approval (filed on September 15, 2022)                                                                                                                                                                                                                                                                                                                                                                                                  | 0.10  |
| Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on September 16, 2022)                                                                                                                                                                                                                                                                                                                                                                                                               | 0.10  |
| Draft Plaintiff's Notice of Entry of Judgment or Order Re: Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on September 19, 2022)                                                                                                                                                                                                                                                                                                                                                           | 0.10  |
| Review Court's Notice Re: Continuance of Hearing and Order Re: Hearing on Plaintiff's Motion for Preliminary Approval (filed on October 13, 2022)                                                                                                                                                                                                                                                                                                                                                                                    | 0.10  |
| Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on October 18, 2022)                                                                                                                                                                                                                                                                                                                                                                                                                 | 0.10  |
| Review Court's Minute Order Re: Ruling on Submitted Matter Re: Plaintiff's Motion for Preliminary Approval (filed on October 27, 2022)                                                                                                                                                                                                                                                                                                                                                                                               | 0.10  |
| Review and Analyze Court's Order Denying Motion for Preliminary Approval of Class Action Settlement Without Prejudice (filed on October 27, 2022)                                                                                                                                                                                                                                                                                                                                                                                    | 0.40  |
| Review and Analyze Declaration of Aaron Cole and Declaration of Eric Springer on Behalf of Simpluris, Inc., and Draft Plaintiff's Notice of Motion and Renewed Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Arby Aiwazian in Support Thereof, Declaration of Joanna Ghosh in Support Thereof, Declaration of Christopher Rodriguez in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on January 13, 2023) | 16.50 |

|                                                                                                                                                                                                                                                                                                                                                                                                             |        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Review Court's Minute Order Re: Non-Appearance Case Review re: Filing of Motion for Preliminary Approval of Class Action Settlement (filed on January 17, 2023)                                                                                                                                                                                                                                             | 0.10   |
| Review and Analyze Court's Order Granting Motion for Preliminary Approval of Class Action Settlement (filed on May 18, 2023)                                                                                                                                                                                                                                                                                | 0.40   |
| Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on May 18, 2023)                                                                                                                                                                                                                                                                                            | 0.10   |
| Draft Plaintiff's Notice of Entry of Judgment or Order Re: Court's Order Granting Motion for Preliminary Approval of Class Action Settlement (filed on May 19, 2023)                                                                                                                                                                                                                                        | 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, Class Counsel Award, and Class Representative Service Award, and Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on August 31, 2023) (Anticipated) | 23.50  |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                                                                                         | 622.30 |

# **EXHIBIT B**

**LAWYERS for JUSTICE PC CASE COST DETAIL**  
**Rodriguez v. Arkema, Inc.**

| <u>Date</u> | <u>Payee</u>                       | <u>Expense Description</u>  | <u>Amount</u> |
|-------------|------------------------------------|-----------------------------|---------------|
| 7/13/2018   | U.S. Postmaster                    | Postage                     | 6.67          |
| 9/17/2018   | Los Angeles Superior Court         | Complaint Filing Fee        | 435.00        |
| 9/17/2018   | Los Angeles Superior Court         | Complex Filing Fee          | 1,000.00      |
| 9/17/2018   | Los Angeles Superior Court         | Jury Fee                    | 150.00        |
| 10/8/2018   | ProLegal                           | Attorney Service            | 222.45        |
| 10/31/2018  | U.S. Postmaster                    | Postage                     | 1.84          |
| 11/2/2018   | Golden State Overnight             | Courier Service             | 17.48         |
| 11/26/2018  | FedEx Express                      | Courier Service             | 20.49         |
| 11/30/2018  | ProLegal                           | Attorney Service            | 69.27         |
| 12/26/2018  | Los Angeles Superior Court         | Stipulation Fee             | 20.00         |
| 12/26/2018  | U.S. Postmaster                    | Postage                     | 2.05          |
| 1/29/2019   | Golden State Overnight             | Courier Service             | 38.09         |
| 1/29/2019   | ProLegal                           | Attorney Service            | 58.51         |
| 5/28/2019   | Golden State Overnight             | Courier Service             | 35.38         |
| 5/29/2019   | Legal Document Server, Inc.        | Attorney Service            | 118.00        |
| 7/18/2019   | Paul Hastings LLP                  | Mediator's Cancellation Fee | 9,000.00      |
| 8/6/2019    | Los Angeles Superior Court         | Stipulation Fee             | 20.00         |
| 8/7/2019    | Case Anywhere LLC                  | Attorney Service            | 118.80        |
| 11/7/2019   | Case Anywhere LLC                  | Attorney Service            | 126.00        |
| 2/7/2020    | Case Anywhere LLC                  | Attorney Service            | 126.00        |
| 2/25/2020   | Los Angeles Superior Court         | Motion Fee                  | 60.00         |
| 5/6/2020    | Case Anywhere LLC                  | Attorney Service            | 144.00        |
| 5/18/2020   | Legal Document Server, Inc.        | Attorney Service            | 110.00        |
| 8/6/2020    | Case Anywhere LLC                  | Attorney Service            | 126.00        |
| 8/12/2020   | Legal Document Server, Inc.        | Attorney Service            | 205.00        |
| 8/24/2020   | Los Angeles Superior Court         | Remote Hearing Fee          | 15.00         |
| 8/25/2020   | Legal Document Server, Inc.        | Attorney Service            | 110.00        |
| 8/26/2020   | Legal Document Server, Inc.        | Attorney Service            | 95.00         |
| 9/3/2020    | General Logistics Systems US, Inc. | Courier Service             | 11.98         |
| 10/16/2020  | Legal Document Server, Inc.        | Attorney Service            | 205.00        |
| 10/28/2020  | Los Angeles Superior Court         | Remote Hearing Fee          | 15.00         |
| 11/9/2020   | Case Anywhere LLC                  | Attorney Service            | 150.00        |
| 11/12/2020  | Legal Document Server, Inc.        | Attorney Service            | 110.00        |
| 11/12/2020  | Legal Document Server, Inc.        | Attorney Service            | 95.00         |
| 2/5/2021    | Case Anywhere LLC                  | Attorney Service            | 126.00        |
| 3/8/2021    | Legal Document Server, Inc.        | Attorney Service            | 175.70        |
| 3/8/2021    | Los Angeles Superior Court         | Stipulation Fee             | 20.00         |
| 3/18/2021   | Los Angeles Superior Court         | Document Download Fee       | 5.40          |
| 4/26/2021   | Legal Document Server, Inc.        | Attorney Service            | 195.00        |
| 5/6/2021    | Case Anywhere LLC                  | Attorney Service            | 144.00        |

## LAWYERS for JUSTICE PC CASE COST DETAIL

### Rodriguez v. Arkema, Inc.

|            |                                      |                       |          |
|------------|--------------------------------------|-----------------------|----------|
| 6/24/2021  | First Mediation Corporation          | Mediation Fee         | 8,000.00 |
| 7/9/2021   | Legal Document Server, Inc.          | Attorney Service      | 175.00   |
| 8/3/2021   | Case Anywhere LLC                    | Attorney Service      | 132.00   |
| 8/10/2021  | Labor & Workforce Development Agency | PAGA Filing Fee       | 75.00    |
| 8/10/2021  | Legal Document Server, Inc.          | Attorney Service      | 175.70   |
| 8/10/2021  | Los Angeles Superior Court           | Stipulation Fee       | 20.00    |
| 8/10/2021  | U.S. Postmaster                      | Postage               | 8.50     |
| 8/23/2021  | Legal Document Server, Inc.          | Attorney Service      | 175.00   |
| 8/25/2021  | Legal Document Server, Inc.          | Attorney Service      | 175.00   |
| 8/31/2021  | Legal Document Server, Inc.          | Attorney Service      | 175.00   |
| 9/4/2021   | Los Angeles Superior Court           | Remote Hearing Fee    | 15.00    |
| 11/11/2021 | Case Anywhere LLC                    | Attorney Service      | 144.00   |
| 12/27/2021 | Legal Document Server, Inc.          | Attorney Service      | 16.15    |
| 12/27/2021 | Los Angeles Superior Court           | Stipulation Fee       | 20.00    |
| 1/4/2022   | Legal Document Server, Inc.          | Attorney Service      | 15.20    |
| 1/11/2022  | Legal Document Server, Inc.          | Attorney Service      | 16.15    |
| 1/11/2022  | Los Angeles Superior Court           | Stipulation Fee       | 20.00    |
| 1/31/2022  | Legal Document Server, Inc.          | Attorney Service      | 15.20    |
| 2/4/2022   | Case Anywhere LLC                    | Attorney Service      | 144.00   |
| 5/10/2022  | Case Anywhere LLC                    | Attorney Service      | 120.00   |
| 6/1/2022   | Legal Document Server, Inc.          | Attorney Service      | 19.25    |
| 6/1/2022   | Los Angeles Superior Court           | Motion Fee            | 60.00    |
| 6/2/2022   | Legal Document Server, Inc.          | Attorney Service      | 179.50   |
| 6/3/2022   | Legal Document Server, Inc.          | Attorney Service      | 16.55    |
| 6/3/2022   | Los Angeles Superior Court           | Stipulation Fee       | 20.00    |
| 6/20/2022  | Los Angeles Superior Court           | Document Download Fee | 4.00     |
| 6/28/2022  | Legal Document Server, Inc.          | Attorney Service      | 15.20    |
| 7/28/2022  | Legal Document Server, Inc.          | Attorney Service      | 17.30    |
| 7/28/2022  | Los Angeles Superior Court           | Stipulation Fee       | 20.00    |
| 8/7/2022   | Case Anywhere LLC                    | Attorney Service      | 168.00   |
| 9/15/2022  | Legal Document Server, Inc.          | Attorney Service      | 220.70   |
| 9/20/2022  | Legal Document Server, Inc.          | Attorney Service      | 15.95    |
| 11/9/2022  | Case Anywhere LLC                    | Attorney Service      | 168.00   |
| 12/13/2022 | Legal Document Server, Inc.          | Attorney Service      | 15.95    |
| 12/22/2022 | Legal Document Server, Inc.          | Attorney Service      | 15.95    |
| 1/17/2023  | Legal Document Server, Inc.          | Attorney Service      | 186.25   |
| 1/17/2023  | Los Angeles Superior Court           | Motion Fee            | 60.00    |
| 2/9/2023   | Case Anywhere LLC                    | Attorney Service      | 180.00   |
| 5/9/2023   | Case Anywhere LLC                    | Attorney Service      | 120.00   |
| 5/22/2023  | Legal Document Server, Inc.          | Attorney Service      | 16.15    |
| 8/2/2023   | Los Angeles Superior Court           | Document Download Fee | 13.20    |
| 8/6/2023   | Case Anywhere LLC                    | Attorney Service      | 126.00   |

**LAWYERS for JUSTICE PC CASE COST DETAIL**  
**Rodriguez v. Arkema, Inc.**

8/8/2023      Legal Document Server, Inc.

Attorney Service

|               |                  |
|---------------|------------------|
|               | 15.95            |
| <b>Total:</b> | <b>25,014.91</b> |