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Attorneys for Plaintiff Salina Gallegos and the Class

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

SALINA GALLEGOS, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

CENTRAL VALLEY BUILDERS SUPPLY,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

SALINA GALLEGOS, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff,

vs.

CENTRAL VALLEY BUILDERS SUPPLY,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 21CV001191 (Lead Case)
Consolidated Case No.: 21CV001446

Honorable Joseph J. Solga
Department B

CLASS ACTION

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT PAYMENT**

Date: June 20, 2025
Time: 9:30 a.m.
Department: B

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

DECLARATION OF VARTAN MADOYAN

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

PRELIMINARY APPROVAL OF SETTLEMENT

2. On January 16, 2025, in Department B of the above-entitled Court, the Honorable Joseph J. Solga preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Central Valley Builders Supply, (“Defendant,”) (together with Plaintiff referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Salina Gallegos as the representative of the Class (“Class Representative”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Payment (“Motion for Final Approval”), no Settlement Class Member has objected to the Class Settlement, including as to the contemplated request for Attorneys’ Fees and Costs, Enhancement Payment, Settlement Administration Costs, or the allocation for the PAGA Amount.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above captioned action entitled *Gallegos v. Central Valley Builders Supply*, Napa County

1 Superior Court, Case No. 21CV001191 (“Class Action”), which was filed on August 16, 2021,
2 and the representative Private Attorneys General Act (“PAGA”) action entitled *Gallegos v.*
3 *Central Valley Builders Supply*, Napa County Superior Court, Case No. 21CV001446 (“PAGA
4 Action”), which was filed on October 12, 2021, since prior to their commencement. On
5 February 1, 2022, the Class Action and PAGA Action (together, the “Actions”) were
6 consolidated and the Class Action was designated the lead action.

7 6. Before initiating the cases, Lawyers for Justice, PC investigated and researched
8 the facts and circumstances underlying the pertinent factual and legal issues and applicable law.
9 This required thorough discussions and interviews between attorneys at Lawyers for Justice, PC
10 and Plaintiff and research into the various legal issues involved in the cases, namely, the current
11 state of the law as it applied to class certification, representative adjudication, and trial; the law
12 relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense
13 reimbursements, recordkeeping and wage statement requirements, representative Private
14 Attorneys General Act (“PAGA”) claims and penalties, and wage-and-hour law and
15 enforcement, Plaintiff’s claims and allegations, and potential defenses. After conducting an
16 initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiff were well-
17 suited for class-wide and representative adjudication, owing to what appeared to be a common
18 course of conduct affecting a similarly situated group of current and former hourly-paid or non-
19 exempt employees of Defendant in California, who were not properly compensated for, *inter*
20 *alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

21 7. Collectively, Class Counsel conducted significant formal and informal discovery
22 and investigation into the facts of the cases, to assess the veracity, strength, and scope of the
23 claims, and were preparing the Class Action for class certification and trial, prior to reaching the
24 Settlement. The Parties exchanged thousands of pages of information, documents, and data
25 throughout the course of the litigation and in connection with the mediation and settlement
26 negotiations. On March 30, 2022, Defendant propounded Request for Production of Documents
27 (Set One) on Plaintiff. Thereafter, on May 24, 2022, Plaintiff provided her objections and
28 responses to Defendant’s written discovery requests and on July 5, 2022, Plaintiff provided her

1 amended objections and responses to Defendant's written discovery requests. On July 6, 2022,
2 Class Counsel served Plaintiff's Requests for Production of Documents (Set One), Special
3 Interrogatories (Sets One and Two), Requests for Admissions (Set One), and Form
4 Interrogatories – General (Set One). Thereafter on August 29, 2022, Defendant served its
5 objections and responses to Plaintiff's written discovery requests. The volume of information,
6 documents, and data that Class Counsel reviewed and analyzed included and was not limited to:
7 Plaintiffs' employment records, a detailed sampling of Plaintiff's and other Class Members' time
8 data and pay records, Defendant's Employee Handbook, internal memoranda, earning
9 statements, employment orientation checklist, company policy acknowledgments (including but
10 not limited to Acknowledgement and Receipt of Defendant's Handbook), forms, procedures, and
11 policies (including but not limited to Dress Code Policy, Overtime Policy, Policy Against
12 Harassment, and Rest Breaks and Meal Period Policies), among other information and
13 documents. Class Counsel had the opportunity to interview and obtain information from
14 Plaintiff and percipient witnesses, and reviewed and analyzed a volume of information, data, and
15 documents obtained from Plaintiff, Defendant, and other sources. Class Counsel developed
16 liability, damages, violation, and penalties valuation models in the course of litigation and in
17 connection with the mediation and settlement negotiations, and met and conferred with
18 Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case
19 management, motion practice, formal and informal discovery, and the production of information,
20 documents, and data in the course of litigation and in connection with mediation and settlement
21 negotiations, and settlement. Other work performed by Class Counsel included, and was not
22 limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the
23 pleadings, motion-related papers, the mediation briefing and supporting materials, and settlement
24 documents; drafting and propounding multiple sets of formal written discovery requests on
25 Defendant and notices of depositions of Defendant's persons most knowledgeable designees;
26 reviewing Defendant's responses and objections to written discovery requests; and preparing for
27 and attending court proceedings, mediation, and settlement negotiations, among other tasks.

1 8. As outlined herein, the Parties have conducted significant investigation and
2 formal and informal discovery during the course of litigating this matter, mediation, and
3 extensive settlement negotiations. Class Counsel analyzed a large volume of information,
4 documents, and data obtained from Plaintiff, Defendant, and other sources that provided a
5 critical understanding of the nature of the work performed by the Class Members and PAGA
6 Employees, as well as Defendant's organizational structure and their operations and employment
7 policies, practices, and procedures. The information, documents, and data were used in analyzing
8 liability, damages, penalties, and other valuation issues in connection with all phases of the
9 litigation, and ultimately, in connection with the mediation and settlement negotiations process.
10 Class Counsel also performed significant research into the applicable law, which is evolving as it
11 relates to class certification, manageability, off-the-clock theory, meal and rest periods,
12 representative PAGA claims and penalties, wage-and-hour enforcement, Plaintiff's claims and
13 allegations, and Defendant's defenses thereto, as well as facts discovered.

14 9. After conducting significant investigation of the facts and law during the
15 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to
16 try to resolve the cases. These efforts included participating in a mediation session conducted by
17 the late Jeffrey Krivis, Esq., a well-regarded mediator who was experienced in handling complex
18 labor and employment matters. During all settlement discussions, the Parties conducted their
19 negotiations at arm's length in an adversarial position. In the course of the mediation and
20 settlement negotiations, the Parties exchanged documents and data, and discussed various
21 aspects of the cases, including and not limited to, the risks and delays of further litigation, the
22 risks and expenses to the Parties of proceeding with class certification, representative
23 adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory,
24 regular rates of pay, meal and rest periods (including *inter alia*, on premises breaks), expense
25 reimbursements, recordkeeping and wage statement requirements, representative PAGA claims
26 and penalties, and wage-and-hour law and enforcement; Plaintiff's claims and allegations, and
27 Defendant's defenses thereto, as well as the evidence produced and analyzed; and the possibility
28 of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was

not easy. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class certification prevail on the merits and, while Plaintiff and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$871,500.00, which is thirty-five percent (35%) of the Maximum Settlement Amount of \$2,490,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to these cases. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Maximum Settlement Amount of \$2,490,000.00 (with a Net Settlement Amount of approximately at least \$1,332,829.89 to be paid to Settlement Class Members (with gross Individual Settlement Payments averaging approximately more than \$1,588.62), payment of \$62,500.00 to PAGA Employees (with Individual PAGA Payment averaging approximately

1 \$95.27) and payment of \$187,500.00 to the State of California)—support the percentage fee
2 sought and the application of a lodestar multiplier.

3 12. While not necessarily required to be demonstrated because a percentage fee is
4 proper for this settlement, it should be noted that Class Counsel has incurred many hours of work
5 in connection with prosecuting this matter such that the award of attorneys’ fees is also justified
6 under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **349.10**
7 **hours** performing tasks and obtaining recovery in this matter. Attached hereto as “**EXHIBIT 1**”
8 is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services
9 provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing
10 those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC.
11 Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had
12 litigation support personnel actively engaged in assisting with the prosecution of this matter.

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

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

14. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a 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.

15. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth

Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers for Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers for Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers for Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000 class action or representative action cases.

16. Arby Aiwarzian is a Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County

1 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
2 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
3 representative action cases have resulted in settlements that have been granted court approval.
4 He has handled over one hundred and fifty (150) mediations and worked on over two hundred
5 and fifty (250) class action or representative action cases which have resulted in settlement.

6 17. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
7 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
8 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
9 Georgetown University Law Center in 2010. She is admitted to practice in California (since
10 2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District
11 Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the
12 U.S. Supreme Court. She has taken and defended dozens of depositions and successfully
13 handled motion practice in class action cases regarding discovery (including and not limited to,
14 regarding class contact information), class certification (both contested class certification and
15 stipulated class certification), arbitration agreements, coordination, and intervention. She has
16 successfully handled briefing and oral arguments on appeal and obtained notable decisions
17 regarding Private Attorneys General Act claims and employer efforts to compel arbitration of
18 such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017)
19 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB,*
20 *N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions,
21 including and not limited to working on cases to obtain class certification through contested
22 motion practice and working on cases in the post-certification stage (e.g., post-certification
23 discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with
24 co-counsel in a case involving a certified class consisting of approximately 2,600 individuals).
25 She has extensive experience with class action and/or representative action settlements, and has
26 handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby
27 Aiwazian's supervision, Lawyers *for* Justice, PC has handled the class certification and court
28 approval process for hundreds of class action and/or representative action matters that have

1 successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers
2 Association and, on several occasions, has been a speaker regarding topics in wage and hour law
3 at the organization's continuing legal education events.

4 18. Matthew Soto is a Member of Lawyers *for* Justice, PC. He received his Bachelor
5 of Science degree and Bachelor of Arts degree from California State University, Los Angeles in
6 2020, and earned his Juris Doctor degree from Pepperdine Caruso School of Law in 2023. He
7 was admitted to practice law in California in 2023. He is admitted to practice before all courts of
8 the State of California and all federal district courts in the State of California. He has worked on
9 over fifty (50) wage-and-hour class action and PAGA representative cases, and his work on these
10 cases has included drafting pleadings and motions, drafting, negotiating, and finalizing
11 stipulations and settlement agreements, claims evaluation and analysis, and making court
12 appearances.

13 19. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree
14 in Economics from the University of California, San Diego in 2007, and a Juris Doctor degree
15 from Loyola Law School in 2011, graduating with Cum Laude and Order of the Coif honors. I
16 am admitted to practice before all courts in the State of California and all U.S. District Courts in
17 California. I externed for the Honorable Victoria S. Kaufman of the United States Bankruptcy
18 Court, Central District of California, from June 2009 to August 2009. I externed for the
19 Honorable Gary A. Feess of the United States District Court, Central District of California, from
20 January 2010 to May 2010. From 2011 through and including the present, my practice consisted
21 almost exclusively of complex wage and hour class action and PAGA action matters in
22 California. From October 2011 to June 2013, I was an Associate at Littler Mendelson's Century
23 City, California office, working for one of the largest employer-side labor and employment law
24 firms in the United States. From July 2013 to March 2014, I was an Associate at Sheppard,
25 Mullin, Richter & Hampton's Century City, California office. From March 2014 to July 2023, I
26 worked as an Associate and then as Counsel at Baker Hostetler LLP's Los Angeles office. From
27 August 2023 to the present, I have been a Member of Lawyers for Justice, PC. I have taken and
28 defended dozens of depositions and has successfully handled motion practice in class action and

PAGA cases regarding discovery (including and not limited to motions regarding class contact information), class certification (both contested class certification and stipulated class certification), dispositive motions, arbitration agreements, coordination, and intervention. I have successfully handled a complex wage and hour class action and PAGA case through a trial verdict in the matter of Estrada v. Royalty Carpet Mills, Orange County Superior Court, Case No. 30-2013-00692890. I also successfully handled briefing on appeal regarding employer efforts to compel arbitration. TitleMax of Cal. v. Pena, California Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28, 2023) (unpublished decision). Further, I have extensive experience with settlements of class actions and PAGA actions and have handled and supervised this process in over one hundred (100) cases.

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS FOR JUSTICE, PC

20. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to \$20,000.00. Lawyers for Justice, PC seeks reimbursement of **\$13,665.11** in litigation costs and expenses incurred in the matter, as reflected in “**EXHIBIT 2**” attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. The cost savings of \$6,334.89 will be part of the Net Settlement Amount, which will be distributed to the Settlement Class Members in accordance with the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

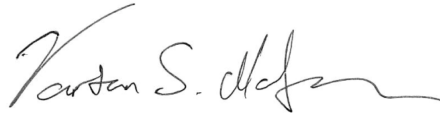
21. In recognition of her efforts and work spearheading the prosecution of this matter and serving as the Class Representative, the Settlement provides for an Enhancement Payment, in the amount of up to \$10,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing her employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is

1 appropriate for Plaintiff to receive \$10,000.00 as a reasonable Enhancement Payment for her
2 services performed in this matter.

3 22. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
4 interests of Plaintiff, the Class, and the State of California.

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

7 Executed this 23rd day of May 2025, at Glendale, California.

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11 _____
12 Vartan Madoyan
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EXHIBIT 1

SALINA GALLEGOS V. CENTRAL VALLEY BUILDERS SUPPLY
Napa County Superior Court, Case No. 21CV001191 (“Class Action” or “Consolidated Action”)

SALINA GALLEGOS V. CENTRAL VALLEY BUILDERS SUPPLY
Napa County Superior Court, Case No. 21CV001446 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Salina Gallegos (“Plaintiff”)	21.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and Percipient Witnesses	11.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Action Claims, Conduct Legal Research and Analysis of Claims, and Draft, Review and/or Revise Plaintiff’s Class Action Complaint for Damages (filed on August 16, 2021) (Class Action)	9.50
Review Court’s Notice to Appear (issued on August 16, 2021) (Class Action)	0.10
Investigate the Merits of Plaintiff’s PAGA Claim, Conduct Legal Research and Analysis of PAGA Claim, and Draft, Review and/or Revise Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on October 12, 2021) (PAGA Action)	7.70
Review Court’s Notice of Case Management Conference (issued on October 13, 2021) (PAGA Action)	0.10

Review and Analyze Defendant Central Valley Builders Supply's ("Defendant") Answer to Class Action Complaint for Damages (served on November 15, 2021), and Research Affirmative Defenses in Defendant's Answer (Class Action)	1.60
Review and Analyze Defendant's Amended Answer to Class Action Complaint for Damages (served on November 29, 2021), and Research Affirmative Defenses in Defendant's Answer (Class Action)	1.10
Review and Analyze Defendant's Answer to Complaint for Enforcement Under the Private Attorneys General Act (served on December 3, 2021), and Research Affirmative Defenses in Defendant's Answer (PAGA Action)	1.70
Review Defendant Central Valley Builders Supply's Case Management Statement (served January 10, 2022) (Class Action)	0.30
Draft, Review and/or Revise Plaintiff's Case Management Statement (filed on January 11, 2022) (Class Action)	1.10
Review Court's Minute Order Re: Case Management Conference (issued on January 25, 2022) (Class Action)	0.10
Draft Plaintiff Salina Gallegos' Notice of Posting Jury Fees (filed on January 28, 2022) (Class Action)	0.10
Review Defendant's Case Management Statement (served on March 7, 2022) (Consolidated Action)	0.30
Draft, Review and/or Revise Plaintiff's Case Management Statement (filed on March 7, 2022) (Consolidated Action)	0.90
Review Court's Minute Order Re: Case Management Conference (issued on March 22, 2022) (Consolidated Action)	0.10
Draft, Review and/or Revise Plaintiff's Notice Re: Status Conference (filed on March 24, 2022) (Consolidated Action)	0.20
Draft, Review and/or Revise Plaintiff's Case Management Statement (filed on July 18, 2022) (Consolidated Action)	0.90

Review Defendant Central Valley Builders Supply's Case Management Statement (served on July 19, 2022) (Consolidated Action)	0.30
Review Court's Minute Order Re: Case Management Conference (issued on August 03, 2022) (Consolidated Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review and/or Revise Stipulated Protective Order – Confidential Designation Only (filed on August 16, 2022) (Consolidated Action)	2.10
Review Court's Order Granting Stipulated Protective Order – Confidential Designation Only (issued on August 22, 2022) (Consolidated Action)	0.10
Draft, Review and/or Revise Plaintiff's Notice of Entry Re: Stipulated Protective Order (filed on August 25, 2022) (Consolidated Action)	0.10
Draft Notice of Appearance on Behalf of Plaintiff Salina Gallegos (filed on September 13, 2022) (Consolidated Action)	0.10
Draft, Review and/or Revise Plaintiff's Case Management Statement (filed on January 11, 2023) (Consolidated Action)	0.80
Review Defendant's Case Management Statement (served on January 27, 2023) (Consolidated Action)	0.30
Review Court's Minute Order Re: Case Management Conference (issued on January 31, 2023) (Consolidated Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review and/or Revise Joint Case Management Statement (filed on October 19, 2023) (Consolidated Action)	1.10
Draft, Review and/or Revise Notice of Settlement of Entire Case (filed on October 19, 2023) (Consolidated Action)	0.10
Review Court's Notice of Order to Show Cause Re: Dismissal of Case (issued on October 20, 2023) (Consolidated Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review and/or Revise Joint Response to Order to Show Case Regarding the Court's Motion to Dismiss (filed on November 28, 2023) (Consolidated Action)	0.90

Review Court's Minute Order Re: Order to Show Cause Re: Court's Motion to Dismiss (issued on December 5, 2023) (Consolidated Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review and/or Revise Joint Case Management Statement (filed on February 27, 2024) (Consolidated Action)	0.80
Review Court's Minute Order Re: Case Management Conference (issued on March 13, 2024) (Consolidated Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review and/or Revise Joint Response to Order to Show Cause Regarding the Court's Motion to Dismiss (filed on April 23, 2024) (Consolidated Action)	0.80
Review Court's Minute Order Re: Order to Show Cause Re: Court's Motion to Dismiss (issued on May 8, 2024) (Consolidated Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review and/or Revise Joint Response to Order to Show Cause Regarding the Court's Motion to Dismiss (filed on July 30, 2024) (Consolidated Action)	0.90
Review Court's Minute Order Re: Order to Show Cause Re: Court's Motion to Dismiss (issued on August 14, 2024) (Consolidated Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review and/or Revise Joint Response to Order to Show Cause Regarding the Court's Motion to Dismiss (filed on November 19, 2024) (Consolidated Action)	0.90
Review Court's Minute Order Re: Order to Show Cause Re: Court's Motion to Dismiss (issued on December 4, 2024) (Consolidated Action)	0.10
Draft Plaintiff's Notice of Change of Address (filed on January 22, 2025) (Consolidated Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review and/or Revise Joint Response to Order to Show Cause Regarding the Court's Motion to Dismiss (filed on April 16, 2025) (Consolidated Action)	0.90
Appearances	
Prepare for and Remotely Attend Case Management Conference (January 25, 2022)	1.10
Prepare for and Remotely Attend Case Management Conference (March 22, 2022)	0.50

Prepare for and Remotely Attend Case Management Conference (August 3, 2022)	1.30
Prepare for and Remotely Attend Case Management Conference (January 31, 2023)	0.70
Prepare for and Remotely Attend Case Management Conference (December 5, 2023)	0.40
Prepare for and Remotely Attend Case Management Conference (March 13, 2024)	0.60
Prepare for and Remotely Attend Order to Show Cause Re: Dismissal (May 8, 2024)	0.70
Prepare for and Remotely Attend Order to Show Cause Re: Dismissal (August 14, 2024)	0.50
Prepare for and Remotely Attend Order to Show Cause Re: Dismissal (December 4, 2024)	1.10
Prepare for and Remotely Attend Order to Show Cause Re: Dismissal (April 23, 2025)	0.50
Discovery and Deposition	
Draft, Review and/or Revise Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on February 11, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on March 25, 2021)	3.10
Review and Analyze Defendant Central Valley Builders Supply's Request for Production of Documents (Set One) to Plaintiff Salina Gallegos (served on March 30, 2022) (Consolidated Action)	0.80
Draft, Review and/or Revise Plaintiff Salina Gallegos's Responses to Defendant Central Valley Builders Supply's Request for Production of Documents (Set One) (served on May 24, 2022) (Consolidated Action)	10.20
Draft, Review and/or Revise Plaintiff Salina Gallegos's Amended Responses to Defendant Central Valley Builders Supply's Request for Production of Documents (Set One) (served on July 5, 2022) (Consolidated Action)	6.90
Draft, Review and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Defendant Central Valley Builders Supply (served on July 6, 2022) (Consolidated Action)	4.50

Draft, Review, and/or Revise Proposed <i>Belaire-West</i> Notice and Opt-Out Postcard (served on August 2, 2022)	1.90
Review and Analyze Defendant Central Valley Builders Supply's Responses to Plaintiff Salina Gallegos's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Admission (Set One), and Requests for Production of Documents (Set One) (served on August 29, 2022) (Consolidated Action)	4.80
Letters and Correspondence	
Draft, Review and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff under the Private Attorneys General Act (served on August 5, 2021)	4.70
Draft Correspondence to, Meet and Confer with, and Respond to Correspondence from, Defendant's Counsel	24.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	67.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages and Penalties Analyses and Calculations (submitted on October 4, 2023)	45.80
Attend Mediation Session (October 11, 2023; via Video Conference)	16.80
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed October 12, 2023)	4.70
Draft, Review, Revise, Negotiate, and Finalize Individual Settlement Agreement and Release (executed on June 25, 2024)	4.40
Draft, Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement (executed on July 8, 2024), and Draft, Review and/or Revise Notice of Class Action and PAGA Settlement	17.50

Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	7.50
Law and Motion	
Review and Analyze Defendant's Notice of Motion and Motion to Consolidate Actions, Request for Judicial Notice in Support Thereof, Declaration of Sarah E. Lucas in Support Thereof, Memorandum of Points and Authorities in Support Thereof, and Proposed Order Consolidating Actions (served on December 29, 2021) (Class Action and PAGA Action)	3.10
Draft, Review, and/or Revise Plaintiff's Notice of Non-Opposition (filed on January 20, 2022) (Class Action)	0.20
Review Defendant's Notice of Entry of Order Granting Motion to Consolidate Actions (served on February 2, 2022) (Consolidated Action)	0.10
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Brian J. St. John in Support Thereof, Declaration of Plaintiff Salina Gallegos in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on November 18, 2024) (Consolidated Action)	18.60
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on December 13, 2024) (Consolidated Action)	0.10
Draft, Review, and/or Revise Plaintiff's Re-Notice of Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on December 16, 2024) (Consolidated Action)	0.30
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on January 16, 2025) (Consolidated Action)	0.20
Review Court's Order Granting Preliminary Approval of Class Action Settlement (issued January 16, 2025) (Consolidated Action)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on January 22, 2025) (Consolidated Action)	0.10

Review and Analyze Administrator's Declaration, and Research, Draft, Review and/or Revise Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Declaration of Plaintiff Salina Gallegos in Support Thereof, Declaration of Vartan Madoyan in Support Thereof, and [Proposed] Final Approval Order and Judgment (Consolidated Action)	21.50
Total Hours:	349.10

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Gallegos vs. Central Valley Builders Supply

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/11/2021	U.S. Postmaster	Postage	\$7.00
8/16/2021	Legal Document Server, Inc.	Attorney Service	\$66.47
8/16/2021	Napa Superior Court	Complex Filing Fee	\$1,000.00
8/16/2021	Napa Superior Court	Complaint Filing Fee	\$435.00
11/16/2021	Legal Document Server, Inc.	Attorney Service	\$16.25
1/12/2022	Legal Document Server, Inc.	Attorney Service	\$16.25
1/24/2022	Legal Document Server, Inc.	Attorney Service	\$16.25
1/31/2022	Legal Document Server, Inc.	Attorney Service	\$23.37
1/31/2022	Napa Superior Court	Jury Fee	\$150.00
3/7/2022	Legal Document Server, Inc.	Attorney Service	\$16.25
3/25/2022	Legal Document Server, Inc.	Attorney Service	\$16.25
7/19/2022	Legal Document Server, Inc.	Attorney Service	\$17.00
8/17/2022	Legal Document Server, Inc.	Attorney Service	\$193.35
8/17/2022	Napa Superior Court	Stipulation & Order Fee	\$20.00
8/26/2022	Legal Document Server, Inc.	Attorney Service	\$17.00
9/14/2022	Legal Document Server, Inc.	Attorney Service	\$17.00
1/11/2023	Legal Document Server, Inc.	Attorney Service	\$17.00
2/8/2023	First Mediation Corporation	Mediation Fee	\$10,000.00
10/11/2023	Samantha Costa	Travel Reimbursement	\$35.94
10/18/2023	Legal Document Server, Inc.	Attorney Service	\$11.95
10/20/2023	Legal Document Server, Inc.	Attorney Service	\$17.09
11/29/2023	Legal Document Server, Inc.	Attorney Service	\$17.09
2/27/2024	Legal Document Server, Inc.	Attorney Service	\$135.00
2/28/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
4/2/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
4/23/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
7/30/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
11/19/2024	Legal Document Server, Inc.	Attorney Service	\$21.37
11/19/2024	Napa Superior Court	Motion Fee	\$60.00
11/20/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
11/25/2024	Legal Document Server, Inc.	Attorney Service	\$135.53
12/18/2024	Legal Document Server, Inc.	Attorney Service	\$21.37
12/18/2024	Napa Superior Court	Motion Fee	\$60.00
12/19/2024	Legal Document Server, Inc.	Attorney Service	\$135.00
1/23/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
1/24/2025	Legal Document Server, Inc.	Attorney Service	\$156.60
Total:			<u>\$13,093.27</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Gallegos vs. Central Valley Builders Supply (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/5/2021	U.S. Postmaster	Postage	\$15.00
8/5/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
10/13/2021	One Legal	Attorney Service	\$30.59
10/13/2021	Napa Superior Court	Complaint Filing Fee	\$435.00
11/23/2021	Legal Document Server, Inc.	Attorney Service	\$16.25
		Total:	<u><u>\$571.84</u></u>