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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

FARRAH FOWLER, 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.

TOTAL MERCHANT SERVICES, LLC, an
unknown business entity; TOTAL
MERCHANT SERVICES, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: BC722782

Honorable William F. Highberger
Department SSC10

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Award; Declaration of Class Representative
(Farrah Fowler); Declaration of Settlement Ad-
ministrator (Taylor Mitzner); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: September 29, 2022
Time: 10:00 a.m.
Department: SSC10

Complaint Filed: September 27, 2018
FAC Filed: January 10, 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 Farrah Fowler (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On June 6, 2022, in Department 10 of the above-entitled Court, the Honorable William F. Highberger preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff Farrah Fowler and Defendant Total Merchant Services, LLC (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Farrah Fowler as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”. The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval, no Class Members have objected to the Settlement or the contemplated request for Class Counsel Award, Enhancement Award, Settlement Administration Costs, or allocation for the penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, et seq. (“PAGA”).

WORK PERFORMED BY CLASS COUNSEL

4. I have been actively engaged in litigating this matter since prior to the commencement of the above-captioned action on September 27, 2018, as have several other attorneys and members in our firm.

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

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

Agreement), internal memoranda, new hire materials and checklists, and operations and employment policies, practices, forms, and procedures (including but not limited to Defendant's Rules of Conduct, Employment Categories, and Department Performance Reviews, Meal and Rest Period Policy, Sick Leave Policy, and California-Specific Overtime Policy), among other information and documents. Class Counsel researched applicable law, developed damages/valuation models in preparation for mediation, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues related to the pleadings, case management, discovery, and production of various documents and data prior to mediation. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising pleadings, the mediation brief, and settlement approval motion papers; preparing and appearing for court proceedings; and preparing for and engaging in 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. Class Counsel analyzed thousands of pages of documents and data obtained from Plaintiff, Defendant, and other sources. These documents and data provided a critical understanding of the nature of the work performed by the Class Members, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, and valuation issues in connection with all phases of the litigation, and ultimately with the mediation and settlement negotiation process. Class Counsel also performed significant research into the law concerning Defendant's defenses.

8. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve the entire matter. These efforts included participating in a formal, full-day mediation conducted by Mark Rudy, Esq., a well-regarded mediator experienced in mediating complex labor and employment matters. During all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position. Prior to, during, and after the mediation, and in the course of settlement discussions, the parties exchanged information and

1 data, and discussed all aspects of the case, including the risks and delays of further litigation, the
2 risks to the parties of proceeding with class certification and trial, the law relating to off-the-
3 clock theory, meal and rest periods, representative PAGA claims, and wage-and-hour
4 enforcement, the evidence produced and analyzed, and the possibility of appeals, among other
5 things. Arriving at a settlement that was acceptable to the parties was not easy. Defendant also
6 contended that individualized questions of fact predominate over any common issues, and these
7 issues would pose challenges to class certification and representative adjudication. Defendant
8 and its counsel felt very strongly about Defendant's ability to prevail on the merits and to obtain
9 a denial of class certification, while Plaintiff and Class Counsel believed that class certification
10 would be obtained and that they would prevail at trial. With the aid of the mediator's evaluation,
11 the parties agreed that the case was well-suited for settlement given the legal issues relating to
12 Plaintiff's principal claims, as well as the costs and risks to the parties that would attend further
13 litigation. These risks of further litigation include, and are not limited to, a determination that
14 the claims are unsuitable for class treatment and/or representative adjudication, class de-
15 certification after certification of a class, allowing a jury to decide the claims asserted in the case,
16 and the real possibility of no monetary recovery after years of litigation.

17 9. As set forth more fully in the accompanying Motion for Final Approval, Class
18 Counsel seeks attorneys' fees in the amount of \$1,050,000.00, which is thirty-five percent (35%)
19 of the Settlement Fund of \$3,000,000.00, as set forth in the Settlement Agreement and the Class
20 Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and
21 Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of
22 the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
23 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
24 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
25 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
26 has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to
27 devote their time and efforts to this matter.

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1 10. I am aware that the common and acceptable rate for contingency representation in
2 wage and hour class action litigation is normally 40% before trial, with the range being from
3 33.3% up to 50%.

4 11. While not necessarily required to be demonstrated because the contingent fee is
5 proper for this settlement, Class Counsel has incurred many hours of work in connection with
6 prosecuting the case such that the award of attorneys' fees is also justified under a lodestar
7 analysis with a multiplier of 1.97. Attorneys at Lawyers for Justice, PC have spent a total of
8 **735.50 hours** performing tasks and obtaining recovery in the case. Attached hereto as
9 **"EXHIBIT A"** is an Attorney Task and Time Chart that sets forth in detail the nature of the
10 legal services provided by Lawyers for Justice, PC and the time incurred in performing those
11 services. These hours include work done by me and several other attorneys at the firm. Lawyers
12 for Justice, PC also had litigation support personnel actively engaged in assisting with the
13 prosecution of this matter.

14 12. The work performed in this particular case, the background of our firm, as well as
15 the individual backgrounds, training, and experience of the attorneys who worked on this case, in
16 litigating complex wage-and-hour matters, and in particular, employment class actions, support a
17 reasonable hourly rate of compensation at the rate of \$725 for work performed by Lawyers for
18 Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at
19 the rate of at least \$725 per hour for legal services performed, by courts granting approval of
20 wage and hour settlements in other cases: final approval of the class and representative action
21 settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No.
22 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly
23 rate of \$936.47; final approval of the class and representative action settlement in *Larry*
24 *Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was
25 granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57;
26 final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete*
27 *Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS)
28 was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of

\$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

ADEQUACY OF LAWYERS for JUSTICE, PC

EDUCATION

13. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

JUDICIAL EXTERNSHIPS

14. From approximately September 2002 to approximately December 2002, I served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of*

1 *Appeals for the Ninth Circuit.* From approximately June 2002 to approximately August 2002, I
2 served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal*
3 *for the Second Appellate District.*

4 ***LITIGATION AND CLASS ACTION EXPERIENCE***

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

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

13 17. Since its inception, in or around October of 2008, *Lawyers for Justice, PC* has
14 almost exclusively focused on the prosecution of consumer and employment class actions,
15 involving wage-and-hour claims, race discrimination, unfair business practices or consumer
16 fraud. Currently, we are the attorneys of record in over a dozen employment-related putative
17 class actions in both state and federal courts in the State of California. Our firm has successfully
18 litigated cases involving the executive, administrative, and other overtime exemptions to the
19 State of California and federal overtime compensation requirements. During this relatively short
20 time, in association with other law firms, we have recovered millions of dollars on behalf of
21 thousands of individuals in California.

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

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

26 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class action against a major property management company involving allegations
28 of misclassification of various “manager” positions. On September 20, 2010, the court granted

1 final approval of the class action settlement. The Los Angeles County Superior Court Case
2 Number is BC400414.

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

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

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

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

23 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
24 wage-and-hour class and PAGA representative action against a national wholesale distributor of
25 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
26 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
27 representative action settlement. The Sacramento County Superior Court Case Number is 34-
28 2012-00136285.

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

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

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

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

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

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1 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
3 involving allegations of misclassification of the “Department Manager” position. On August 12,
4 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
5 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
6 County Superior Court Case Number is RG13680477.

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

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

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

20 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
21 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
22 the employer’s motion to compel arbitration, which resulted in a published opinion by the
23 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
24 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
25 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
26 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
27 5046.
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1 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a consumer packaging company,
3 on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the
4 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
5 Number is BC590429.

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

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

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

21 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
22 representative action against a food company on behalf of non-exempt employees. On June 30,
23 2017, the court granted final approval of the class and PAGA representative action settlement.
24 The Sacramento County Superior Court Case Number is 34-2015-00175871.

25 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
26 representative action against a chocolate company on behalf of non-exempt employees. On July
27 19, 2017, the court granted final approval of the class and PAGA representative action
28 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

26 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
28 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.

1 The Tulare County Superior Court Case Number is VCU264528.

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

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

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

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

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

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

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

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

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

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

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

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

19. To date, Class Counsel has borne all the risks and costs of litigation and will not receive any compensation until recovery is obtained in the above-captioned action. Lawyers for Justice, PC has incurred \$20,259.70 in litigation costs and expenses as reflected in "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in the prosecution of this case and to obtain the Settlement.

ENHANCEMENT AWARD TO PLAINTIFF

20. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Award in the amount of \$10,000.00 to Plaintiff to compensate her for the time and effort that she expended in the case. The requested Enhancement Award is fair and appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant documents and information and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain information that would benefit the pursuit of the class and PAGA claims. Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing her work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff to receive \$10,000.00 as a reasonable Enhancement Award for her services in the case, in addition to her Individual Settlement Payment.

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

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

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



Edwin Aiwasian

EXHIBIT A

FOWLER V. TOTAL MERCHANT SERVICES, LLC
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. BC722782)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, including Adequacy, Typicality, Superiority, and Commonality	14.90
Pre-Lawsuit Investigation of the Merits of Plaintiff Farrah Fowler’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	12.60
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Total Merchant Services, LLC (“Defendant”) with Respect to Plaintiff Farrah Fowler and the Putative Class	11.40
Legal Research & Analysis of Latest Off-the-Clock, Meal and Rest Break Law, and Certification Decisions in California, Including all New and Relevant DLSE Materials	10.70
Investigation of Defendant, Its Business Relationships, Potential Affiliates, and the Industry in which It Operates	8.30
Investigation of Defendant’s Organizational and Corporate Structure, and Executive Reporting Structure as They Relates to the Employment and Management of the Putative Class Members	6.50
Investigation of Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	5.40

Analysis of Competitors within Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	5.90
Research and Investigation Re: Financial Services and Payment Processing Industry Regulations/Requirements and Common Policies, Practices, and Procedures	11.20
Research and Investigation Re: Defendant's Soft and Hard Products and Services Offered, Including <i>Inter Alia</i> , Related to Point of Sale Systems and Merchant Accounts	13.50
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	8.70
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Consumer Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	9.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members Worked Throughout California	7.80
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Non-Discretionary Bonus/Commission/Incentive/Shift Differential Pay, Timekeeping, Rounding, Regular Rate Calculations, Scheduling, Customer Service, Meetings and Trainings, Reporting Time Pay, Meal/Rest Breaks, Meal Waivers, On-Premises Breaks, Overtime Compensation, Dress Code, Equipment, Personal Cell Phone Usage, Personal Internet Usage, and Reimbursement of Business-Related Expenses	44.50
Research and Investigation Re: Software Programs, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Timekeeping, Attendance, Information Technology, Call	8.40

Management, Sales, CRM, Document Management, and Project Management with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post Shift, and During Meal Breaks	
Research and Analysis of Potential Defenses Defendant May Raise, Including De Minimis Work, Non-Compensable Off-the-Clock Work, Exemptions, Waiver, and Compliant Policies	12.50
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	7.80
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	5.20
Prepare a Discovery Strategy and Outline Plan of Action, including Topics Important to Certification, Liability, and Damages/Civil Penalties	10.40
Research and Outline Anticipated Class Certification Issues for Contemplated Motion and Trial Plan	68.50
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' Work	9.30
Meet and Communicate with Plaintiff Farrah Fowler throughout the Pendency of the Case	41.50
Meet and Communicate with Putative Class Members	28.50
Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on September 27, 2018)	9.10
Review Court's Notice of Case Assignment (filed on September 27, 2018)	0.30

Review Court's Initial Status Conference Order and Minute Order (filed on October 19, 2018)	0.20
Review Defendant's Notice of Appearance (served on November 13, 2018)	0.10
Review Defendant's Notice of Peremptory Challenge Pursuant to Code of Civil Procedure Section 170.6; Memorandum of Points and Authorities in Support Thereof, and Declaration of Jennifer L. Katz in Support Thereof (served on November 14, 2018)	0.30
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice, and Minute Order (filed on November 20, 2018)	0.10
Review Court's Initial Status Conference Order and Minute Order (filed on December 10, 2018)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Class Action Response Statement (submitted on January 29, 2019)	1.90
Review Court's Minute Order (filed on February 5, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (submitted on June 24, 2019)	1.40
Review Court's Minute Order (filed on July 1, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (submitted on December 30, 2019)	1.60
Review Court's Minute Order (filed on January 3, 2020)	0.10
Draft Plaintiff's Notice re: January 3, 2020 Post-Mediation Status Conference (filed on January 8, 2020)	0.20
Review Court's Case-Anywhere Message Board Posting Re: Hearing of 5/13/20 (posted on April 16, 2020)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Post-Mediation Status Conference; [Proposed] Order (submitted on August 7, 2020)	1.40
Review Court's Order Granting Joint Stipulation to Continue Post-Mediation Status Conference (filed on August 11, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Post-Mediation Status Conference Statement and Notice of Settlement (submitted on October 6, 2020)	1.10
Review Court's Case-Anywhere Message Board Posting Re: Hearing of 10/16/20 (posted on October 14, 2020)	0.10
Review Court's Minute Order (filed on October 16, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Non-Appearance Case Review re Status of Motion for Preliminary Approval; [Proposed] Order (submitted on February 10, 2021)	1.30
Review Court's Order Granting Joint Stipulation to Continue Non-Appearance Case Review re Status of Motion for Preliminary Approval and Minute Order (filed on February 11, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report (submitted on April 8, 2021)	0.80
Review Court's Minute Order (filed on April 12, 2021)	0.10
Review Court's Minute Order (filed on August 2, 2021)	0.10
Draft Declaration of Brian J. St. John re: Delay in Settlement Process (filed on September 22, 2021)	1.10
Review Court's Minute Order (filed on September 22, 2021)	0.10
Draft Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of	5.60

All Claims Involved (filed on January 10, 2022); Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order (submitted on December 21, 2021)	
Review Court's Order Granting Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint and Court's Minute Order (filed on January 3, 2022)	0.10
Review and Analyze Defendant's Answer to First Amended Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on January 14, 2022)	2.30
Review Court's Minute Order (filed on March 1, 2022)	0.10
Review Court's Minute Order (filed on March 8, 2022)	0.10
Review Court's Minute Order (filed on April 28, 2022)	0.10
Appearances	
Prepare for, Travel to, and Attend Initial Status Conference (February 5, 2019)	3.80
Prepare for, Travel to, and Attend Initial Status Conference (January 1, 2020)	0.50
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (June 6, 2022)	0.50
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Award (September 29, 2022) (Anticipated)	2.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on July 10, 2018)	2.10

Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Farrah Fowler (served on July 13, 2018)	2.10
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on July 25, 2018)	2.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on July 31, 2018)	4.20
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Farrah Fowler (served on August 10, 2018)	2.30
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Farrah Fowler (served on September 4, 2018) (served on September 10, 2018)	6.80
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 Total Merchant, LLC (served on January 6, 2020)	9.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Total Merchant Services, LLC and Requests for Production of Documents (February 4, 2020; Organizational Structure) (served on January 6, 2020)	5.70
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Total Merchant Services, LLC and Requests for Production of Documents (February 5; Wage and Hour Practices) (served on January 6, 2020)	6.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Total Merchant Services, Inc. and Requests for Production of Documents (February 6, 2020; Organizational Structure) (served on January 6, 2020)	5.20

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Total Merchant Services, Inc. and Requests for Production of Documents (February 7; Wage and Hour Practices) (served on January 6, 2020)	6.10
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Farrah Fowler for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 21, 2021)	4.50
Meet with Defendant's Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	28.50
Mediation/Settlement	
Review and Analyze Mediation Data and Documents Produced by Defendant (served on August 14, 2020, August 19, 2020, September 3, 2020, September 9, 2020, and September 10, 2020) • Employee Handbooks and Policies • Employee Time Records • Employee Pay Records • Sample Pay Stubs • Sample Meal Waivers • Payroll Codes • Class Data Points	95.60
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis/Calculations (submitted on August 28, 2020)	39.80
Attend Mediation Session (September 17, 2020; Zoom Video Conference)	17.50
Review Mediator's Proposal and Confer Regarding Parties' Acceptance Thereof (September 18, 2022 and October 2, 2020)	2.30

Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on January 12, 2022) and Exhibits	26.90
Monitor Settlement Administration Process, Review Administrator's Weekly Reports, and Response to Inquiries	7.60
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Farrah Fowler in Support Thereof, and [Proposed] Order Thereon (filed on February 4, 2022)	25.10
Review Court's Case-Anywhere Message Board Posting Re: Tentative Ruling on Motion for Preliminary Approval (posted on April 28, 2020)	0.10
Draft Supplemental Declaration of Brian J. St. John in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on May 27, 2022)	5.90
Review Court's Order Granting Preliminary Approval of Class Action Settlement and Minute Order (filed on June 6, 2022)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Award, and Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on September 6, 2022) (Anticipated)	28.20
Total Hours:	735.50

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Fowler v. Total Merchant Services, LLC, et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/14/2018	Golden State Overnight	Courier Service	28.73
9/27/2018	Los Angeles Superior Court	Court Filing Fee	435.00
9/27/2018	Los Angeles Superior Court	Complex Court Filing Fee	1,000.00
9/27/2018	Los Angeles Superior Court	Jury Fee	150.00
10/4/2018	ProLegal	Attorney Service	303.20
11/9/2018	ProLegal	Attorney Service	139.10
11/21/2018	Pure Legal, Inc.	Attorney Service	195.90
12/21/2018	ProLegal	Attorney Service	80.02
1/29/2019	Golden State Overnight	Courier Service	26.56
1/29/2019	Pure Legal, Inc.	Attorney Service	197.40
2/5/2019	Arby Aiwarzian	Travel Reimbursement	8.25
6/24/2019	Golden State Overnight	Courier Service	27.16
6/25/2019	One Legal	Attorney Service	150.75
7/1/2019	Janessa Chun	Travel Reimbursement	22.69
12/30/2019	Golden State Overnight	Courier Service	23.56
1/3/2020	Joanna Ghosh	Travel Reimbursement	26.85
1/6/2020	Golden State Overnight	Courier Service	39.80
3/12/2020	Case Anywhere, LLC	Attorney Service	86.40
6/2/2020	Case Anywhere, LLC	Attorney Service	120.00
8/7/2020	Legal Document Server, Inc.	Attorney Service	110.70
8/7/2020	Los Angeles Superior Court	Court Filing Fee	20.00
8/10/2020	Legal Document Server, Inc.	Attorney Service	95.00
8/11/2020	Legal Document Server, Inc.	Attorney Service	95.00
8/17/2020	Legal Document Server, Inc.	Attorney Service	110.70
8/17/2020	Los Angeles Superior Court	Court Filing Fee	20.00
8/21/2020	Mark S. Rudy	Mediation Fee	10,000.00
9/2/2020	Case Anywhere, LLC	Attorney Service	120.00
9/17/2020	Robert A. Parris	Damage Consulting Expert	4,800.00
10/6/2020	Legal Document Server, Inc.	Attorney Service	205.00
10/21/2020	Los Angeles Superior Court	Remote Hearing Fee	15.00
12/2/2020	Case Anywhere, LLC	Attorney Service	120.00
2/10/2021	Legal Document Server, Inc.	Attorney Service	55.00
2/10/2021	Legal Document Server, Inc.	Attorney Service	90.70
2/10/2021	Los Angeles Superior Court	Court Filing Fee	20.00
3/3/2021	Case Anywhere, LLC	Attorney Service	126.00
4/8/2021	Legal Document Server, Inc.	Attorney Service	110.00
4/8/2021	Legal Document Server, Inc.	Attorney Service	95.00
6/3/2021	Case Anywhere, LLC	Attorney Service	126.00
9/2/2021	Case Anywhere, LLC	Attorney Service	120.00
9/22/2021	One Legal	Attorney Service	16.68

LAWYERS for JUSTICE PC CASE COST DETAIL
Fowler v. Total Merchant Services, LLC, et al.

12/6/2021	Case Anywhere, LLC	Attorney Service	126.00
12/23/2021	Legal Document Server, Inc.	Attorney Service	16.15
12/23/2021	Los Angeles Superior Court	Court Filing Fee	20.00
1/11/2022	Legal Document Server, Inc.	Attorney Service	15.20
2/4/2022	Legal Document Server, Inc.	Attorney Service	18.05
2/4/2022	Los Angeles Superior Court	Court Filing Fee	60.00
2/7/2022	Legal Document Server, Inc.	Attorney Service	117.75
3/3/2022	Case Anywhere, LLC	Attorney Service	132.00
5/31/2022	Legal Document Server, Inc.	Attorney Service	75.00
5/31/2022	Legal Document Server, Inc.	Attorney Service	15.20
6/6/2022	Case Anywhere, LLC	Attorney Service	126.00
6/6/2022	Legal Document Server, Inc.	Attorney Service	1.20
8/5/2022	Los Angeles Superior Court	Document Download Fee	5.00
Total:			20,259.70