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Attorneys for Plaintiffs and the Class

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

ASIA OSBY, individually, and on behalf of
other members of the general public similarly
situated;

Plaintiff,

vs.

SELF-REALIZATION FELLOWSHIP, an
unknown business entity; and DOES I through
100, inclusive,

Defendants

Honorable Carolyn B. Kuhl
Department 12

CLASS ACTION

**DECLARATION OF JOANNA GHOSH IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES AND
COSTS, AND ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final Approval
of Class Action Settlement, Attorneys' Fees and
Costs, and Enhancement Payment; Declarations
of Class Representatives (Asia Osby and Monica
Miranda); Declaration of Settlement
Administrator (Nick Castro); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: July 30, 2024

Time: 10:30 a.m.

Department: 12

Case No.: 21STCV30136

[Lead Case]

Complaint Filed: August 16, 2021

Trial Date: None Set

**DECLARATION OF JOANNA GHOSH IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT PAYMENT**

MONICA MIRANDA individually, and on behalf of other members of the general public similarly situated;

Plaintiff,
vs.

SELF-REALIZATION FELLOWSHIP CHURCH, a California Corporation; SELF-REALIZATION CHURCH, an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV41440

[Related Case]

Complaint Filed: November 10, 2021

Trial Date: None Set

ASIA OSBY, individually, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act

Plaintiff,
vs.

SELF-REALIZATION FELLOWSHIP CHURCH, a California Corporation; SELF-REALIZATION CHURCH, an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV39999

[Related Case]

Complaint Filed: October 29, 2021

Trial Date: None Set

MONICA MIRANDA, individually, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act

Plaintiff,
vs.

SELF-REALIZATION FELLOWSHIP, an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV43015

[Related Case]

Complaint Filed: November 22, 2021

Trial Date: None Set

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

2. On January 30, 2024 in Department SSC-12 of the above-entitled Court, the Honorable Carolyn B. Kuhl preliminarily approved the First Amended Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant Self-Realization Fellowship Church (“Defendant”) (collectively with Plaintiffs, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Asia Osby 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 ILYM Group, Inc. (“ILYM” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payment ("Motion for Final Approval"), no Settlement Class Members have raised any substantively objection to the Class Settlement, the contemplated request for Attorneys' Fees and Costs, Enhancement Payment, and Settlement Administration Costs, or the allocation for PAGA Amount. As discussed in the accompanying motion, said objection does not raise a substantive objection to the settlement or good cause for the court to find that the settlement is not fair, reasonable, and adequate, and the

1 objection should be overruled in its entirety; it appears that the so-called objection was submitted
2 by an individual who believes that he personally suffered little to no damages and does not wish
3 to partake in the above-captioned case as a class member, as such, the submission should be
4 treated as an opt out.

5 **WORK PERFORMED BY CLASS COUNSEL**

6 4. Several attorneys at Lawyers *for* Justice, PC have been actively performing work
7 in this matter since prior to the commencement of Plaintiff Osby's putative class action (i.e., the
8 above-captioned action) ("Osby Class Action") on August 16, 2021 in the Los Angeles County
9 Superior Court, the commencement of Plaintiff Osby's representative Private Attorneys General
10 Act ("PAGA") action entitled *Osby v. Self-Realization Fellowship Church, et al.*, Case No.
11 21STCV39999 ("Osby PAGA Action") on October 29, 2021 in the Los Angeles County Superior
12 Court, the commencement of Plaintiff Miranda's putative class action entitled, *Miranda v. Self-*
13 *Realization Fellowship Church, et al.*, Case No. 21STCV41440 ("Miranda Class Action") on
14 November 10, 2021, and the commencement of Plaintiff Miranda's representative PAGA action
15 entitled *Miranda v. Self-Realization Fellowship Church, et al.*, Case No. 21STCV43015
16 ("Miranda PAGA Action") on November 10, 2021 in the Los Angeles County Superior Court
17 (together, "Actions").

18 5. Before initiating the cases, Lawyers *for* Justice, PC investigated and researched
19 the facts and circumstances underlying the pertinent factual and legal issues and applicable law.
20 This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC
21 and Plaintiffs and research into the various legal issues involved in the cases, namely, the current
22 state of the law as it applied to class certification, off-the-clock theory, misclassification, meal
23 and rest periods, representative PAGA claims, wage-and-hour law and enforcement, Plaintiffs'
24 claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers
25 *for* Justice, PC determined that the claims of Plaintiffs were well-suited for class-wide and
26 representative adjudication, owing to what appeared to be a common course of conduct affecting
27 a similarly situated group of current and former employees of Defendant in California, who were
28 not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods,

1 and business expenses.

2 6. Class Counsel conducted significant litigation and informal discovery and
3 investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims,
4 and was preparing the cases for class certification and trial prior to reaching the Settlement. The
5 Parties exchanged a large volume of information, documents, and data throughout the course of
6 the litigation and in connection with the mediation and settlement negotiations. Class Counsel
7 had the opportunity to interview and obtain information from Plaintiffs and percipient witnesses,
8 and reviewed and analyzed a volume of information, data, and documents obtained from
9 Plaintiffs, Defendant, and other sources.. Class Counsel also developed liability, damages,
10 violation, and penalties valuation models in the course of litigation and in connection with the
11 mediation and settlement negotiations and met and conferred with Defendant's counsel on
12 numerous occasions, e.g., to discuss issues relating to the pleadings, case management, the
13 production of information, documents, and data in the course of litigation and in connection with
14 mediation and settlement negotiations, and settlement. Other work performed by Class Counsel
15 included, and was not limited to, case strategy and analysis; researching, drafting, reviewing,
16 and/or revising the pleadings, motion-related papers, the mediation brief, and settlement
17 documents; and preparing for and attending court proceedings, mediation, and settlement
18 negotiations, among other tasks.

19 7. As outlined herein, the Parties have conducted significant investigation and
20 informal discovery during the course of litigating the cases, mediation, and extensive settlement
21 negotiations. Class Counsel analyzed a large volume of information, documents, and data
22 obtained from Plaintiffs, Defendant, and other sources, that provided a critical understanding of
23 the nature of the work performed by the Class Members and PAGA Members, as well as
24 Defendant's operations and employment policies, practices, and procedures. The information,
25 documents, and data were used in analyzing liability, damages, penalties, and other valuation
26 issues in connection with all phases of the litigation, and ultimately, in connection with the
27 mediation and settlement negotiation process. Class Counsel also performed significant research
28 into the applicable law, which is evolving as it relates to class certification, manageability, off-

1 the-clock theory, misclassification theory, exemption, regular rate, rounding, meal and rest
2 periods, waivers, representative PAGA claims and penalties, wage-and-hour law and
3 enforcement, Plaintiffs' claims and allegations, and Defendant's defenses thereto, as well as facts
4 discovered.

5 8. After conducting significant investigation of the facts and law during the
6 prosecution of the cases, counsel for the Parties engaged in extensive settlement negotiations to
7 try to resolve the cases. These efforts included participating in a formal mediation session
8 conducted on January 23, 2023 by Jeffrey Krivis, Esq., a well-regarded mediator experienced in
9 handling complex labor and employment matters. During all settlement discussions, the Parties
10 conducted their negotiations at arm's length in an adversarial position. In the course of mediation
11 and settlement discussions, the Parties exchanged information, documents, and data, and
12 discussed various aspects of the cases, including and not limited to, the risks and delays of further
13 litigation, the risks and expenses to the Parties of proceeding with class certification and trial, the
14 law relating to class certification, manageability, off-the-clock theory, misclassification theory,
15 exemption, regular rate, rounding, meal and rest periods, waivers, representative PAGA claims,
16 and wage-and-hour law and enforcement, as well as the evidence produced and analyzed, and the
17 possibility of appeals, among other things. Arriving at a settlement that was acceptable to the
18 Parties was not easy. Defendant contended that individualized questions of fact predominate over
19 any common issues, and these issues would pose challenges to class certification and
20 representative adjudication. Defendant and its counsel felt strongly about Defendant's ability to
21 avoid class certification and prevail on the merits, while Plaintiffs and Class Counsel believed
22 that they would be able to obtain class certification and prevail at trial. With the aid of the
23 mediator's evaluation, the Parties ultimately agreed that the non-exempt putative class members'
24 wage and hour claims were well-suited for resolution on a class-wide and PAGA basis, given the
25 legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that
26 would attend further litigation. These risks of further litigation include, and are not limited to, a
27 determination that the claims are unsuitable for class treatment and/or representative adjudication,
28 class de-certification after certification of a class, allowing a jury to decide the claims asserted in

1 the cases, and the real possibility of no monetary recovery after years of litigation.

2 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
3 attorneys' fees in the amount of \$223,333.33, which is one-third (1/3) of the Gross Settlement
4 Amount of \$670,000.00. Pursuant to the contingency-fee agreement entered into by and between
5 Plaintiffs and Class Counsel, Plaintiffs have each agreed to a contingency fee of at least one-third
6 (1/3) of the recovery.

7 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
8 took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to
9 the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
10 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
11 has achieved in the cases; and (6) the other cases that Class Counsel has turned down in order to
12 devote their time and efforts to this matter.

13 11. While not necessarily required to be demonstrated because the percentage fee is
14 proper for this settlement, Class Counsel has incurred many hours of work in connection with
15 prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar
16 analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **381.00 hours** performing
17 tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney
18 Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys
19 at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These
20 hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the
21 hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel
22 actively engaged in assisting with the prosecution of this matter.

23 12. The work performed in this particular matter, the background of Lawyers *for*
24 Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who
25 worked on this matter, in litigating complex wage-and-hour actions, and in particular,
26 employment class action and representative action cases, support a reasonable blended hourly rate
27 of compensation of at least \$850 per hour for work performed by Lawyers *for* Justice, PC.
28 Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at

1 least \$850 per hour for legal services performed, by courts granting approval of settlements in
2 other wage-and-hour class action and representative action cases: final approval of the class and
3 representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles
4 Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys’
5 fees involved compensation at the rate of \$936.47 per hour; final approval of the class and
6 representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles
7 Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys’
8 fees involved compensation at the rate of \$919.57 per hour; and final approval of the class and
9 representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior
10 Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys’ fees
11 involved compensation at the rate of \$855.96 per hour.

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

14 13. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
15 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
16 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC
17 is attorney of record in dozens of employment-related putative class actions in both state and
18 federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who
19 focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”)
20 representative actions. The firm has successfully litigated cases involving nearly every aspect of
21 California wage and hour law, including payment of overtime and minimum wages, provision of
22 meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of
23 compliant wage statements, reimbursement of business expenses, executive, administrative, and
24 other overtime exemptions to the State of California and federal overtime compensation
25 requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has
26 recovered (sometimes in association with other law firms) millions of dollars on behalf of
27 thousands of individuals in California.

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

25 15. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
26 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
27 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
28 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the

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

17 16. Yasmin Hosseini is a Member of Lawyers *for* Justice, PC. She received her
18 Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned her Juris
19 Doctor degree from Pepperdine University School of Law in 2017. She was admitted to practice
20 law in California in 2019. She is admitted to practice before all courts of the State of California
21 and all federal district courts in the State of California. She has worked on many wage and hour
22 class action and PAGA representative matters, and her work has included, *inter alia*, researching
23 and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing
24 stipulations and settlement agreements, engaging in motion practice, claims evaluation and
25 analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, she
26 represented filmmakers and talent, negotiating and structuring various types of agreements on
27 their behalf. She is a member of the California Employment Lawyers Association, Beverly Hills
28 Bar Association, and Iranian American Bar Association.

1 17. I am a Managing Member of Lawyers *for* Justice, PC. I received a Bachelor of
2 Arts degree from California State University, Los Angeles in 2006, a Master of Science degree
3 from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown
4 University Law Center in 2010. I am admitted to practice in California (since 2010) and in New
5 York (since 2013) and I am also admitted to practice in all U.S. District Courts in California, the
6 U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. I have
7 taken and defended dozens of depositions and successfully handled motion practice in class action
8 cases regarding discovery (including and not limited to, regarding class contact information),
9 class certification (both contested class certification and stipulated class certification), arbitration
10 agreements, coordination, and intervention. I have successfully handled briefing and oral
11 argument on appeal and obtained notable decisions regarding Private Attorneys General Act
12 claims and employer efforts to compel arbitration of such claims, e.g., *Betancourt v. Prudential*
13 *Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24,
14 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). I
15 have significant experience with class actions, including and not limited to working on cases to
16 obtain class certification through contested motion practice and working on cases in the post-
17 certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study,
18 and trial preparation in conjunction with co-counsel in a case involving a certified class consisting
19 of approximately 2,600 individuals). I also have extensive experience with class action and/or
20 representative action settlements, and have handled this process in over three hundred (300) cases.
21 Under Edwin Aiwasian, Arby Aiwasian, and my supervision, Lawyers *for* Justice, PC has
22 handled the class certification and court approval process for hundreds of class action and/or
23 representative action matters that have successfully resolved. I am a member of the California
24 Employment Lawyers Association and, on several occasions, have been a speaker regarding
25 topics in wage and hour law at the organization's continuing legal education events.

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

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

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

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

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

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

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

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

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

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

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

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

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

1 Council Coordination Proceeding Number is 4794.

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

6 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
7 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
8 involving allegations of misclassification of the “Department Manager” position. On August 12,
9 2016, the court granted the plaintiffs’ motion for class certification in part and certified a
10 class. On August 6, 2019, the court granted final approval of the class action settlement. The
11 Alameda County Superior Court Case Number is RG13680477.

12 m) LFJ represented the plaintiff in a PAGA representative action against a real
13 estate and property management company, on behalf of non-exempt employees. On November 4,
14 2016, the court granted approval of the PAGA representative action settlement. The Orange
15 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

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

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

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

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

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

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

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

1 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
2 representative action against a chocolate company on behalf of non-exempt employees. On July
3 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
4 The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

1 BC498401.

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

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

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

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

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

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

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

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

9 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
10 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
11 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
12 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
13 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
14 approval of the PAGA representative action settlement. The San Diego County Superior Court
15 Case Number is 37-2016-00005578-CU-OE-CTL.

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

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

28 ///

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

8 mm) LFJ, in association with co-counsel therein, represented the plaintiffs in a
9 wage-and-hour class action against manufacturer and supplier of power products and services on
10 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs’
11 motion for class certification and certified a class. On August 27, 2021, the court granted final
12 approval of the class action settlement. The San Diego County Superior Court Case Number is
13 37-2015-00025968-CU-OE-CTL.

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

18 oo) LFJ represents the plaintiffs in a wage-and-hour class action against a
19 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the
20 restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July
21 13, 2023, the court granted the plaintiffs’ motion for class certification and certified a class. The
22 Los Angeles County Superior Court Case Number is BC707670.

23 **LITIGATION COSTS AND EXPENSES INCURRED BY**
24 **LAWYERS *FOR* JUSTICE, PC**

25 19. To date, Class Counsel has borne all of the risks and costs of litigation and will
26 not receive any compensation until recovery is obtained in the cases. Lawyers *for* Justice, PC
27 seeks reimbursement of **\$19,342.48** in litigation costs and expenses incurred in the cases, as
28 reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in

1 the prosecution of the cases and to obtain the Settlement.

2 **ENHANCEMENT PAYMENT TO PLAINTIFF OSBY**

3 20. In recognition of her efforts and work serving as the Class Representative, the
4 Settlement provides for an enhancement payment in the amount of \$7,500.00 to Plaintiff Osby.
5 The requested enhancement payment is fair and appropriate. Plaintiff spent a substantial amount
6 of time and effort to produce relevant documents and information and provided facts and evidence
7 to support the prosecution of the claims pertaining to non-exempt putative class members.
8 Plaintiff Osby was available whenever Class Counsel needed her and actively tried to obtain and
9 provide information that would facilitate the pursuit of the cases. Plaintiff Osby spent numerous
10 hours speaking with Class Counsel about her claims, describing her work experiences with
11 Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff
12 Asia Osby to receive \$7,500.00 as a reasonable enhancement payment for her services in the Osby
13 Class Action and Osby PAGA Action, in addition to her individual settlement payment.

14 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
15 interests of the Class, PAGA Members, and the State of California.

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

18 Executed this 8th day of July 2024, at Glendale, California.

19
20 

21 _____
Joanna Ghosh

EXHIBIT A

ASIA OSBY V. SELF REALIZATION FELLOWSHIP CHURCH (“Osby Class Action”)
Los Angeles Superior Court Case No. 21STCV30136

ASIA OSBY V. SELF-REALIZATION FELLOWSHIP CHURCH (“Osby PAGA Action”)
Los Angeles Superior Court Case No. 21STCV39999

MONICA MIRANDA V. SELF-REALIZATION FELLOWSHIP CHURCH (“Miranda Class Action”)
Los Angeles Superior Court Case No. 21STCV41440

MONICA MIRANDA V. SELF-REALIZATION FELLOWSHIP CHURCH (“Miranda PAGA Action”)
Los Angeles Superior Court Case No. 21STCV43015

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, Commonality, and Manageability, With Respect to Plaintiff Asia Osby’s (“Plaintiff Osby”) Claims on Behalf of the Putative Class Members (“Putative Class Members”)	8.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Asia Osby’s (“Plaintiff Osby”) Claims and the Merits of the Claims of the Putative Class Members	7.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Monica Miranda’s (“Plaintiff Miranda”) Claims	4.50

Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Self Realization Fellowship Church (“Defendant”) With Respect to the Damages Sustained by Plaintiff Osby and Plaintiff Miranda (together, “Plaintiffs”) and the Putative Class Members	6.50
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant With Respect to Plaintiffs and the Allegedly Aggrieved Non-Exempt Employees (“Aggrieved Employees”)	5.80
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Rounding, Meal and Rest Break, Misclassification, IWC Wage Orders, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials	7.50
Investigation of Defendant, Its Business Relationships, and the Industry in Which it Operates	2.10
Investigation of Defendant’s Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	3.30
Investigation of Defendant’s Executives, Officers, and Leadership, With a Focus on Involvement in Wage-and-Hour Issues, and Defendant’s Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity	3.50
Analysis of Competitors in Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant’s Policies, Practices, and Procedures With the Policies, Practices, and Procedures of Defendant’s Competitors	3.10
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 (If Any) Between them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	2.90
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	4.10

Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Opening and Closing Tasks, Food Safety, Misclassification, Timekeeping, Rounding, On-Call, Meal/Rest Breaks, On-Premises Breaks, Meal/Rest Premiums, Meal Waivers, Overtime Compensation, Non-Discretionary Bonus/Incentive/Shift Differential Pay, COVID-19 and Health Protocols and Screenings, Donning and Doffing, Supplies/Tools/PPE, Uniforms/Dress Code, Footwear, Use of Personal Cell Phones, Use of Personal Vehicles, and Reimbursement of Business-Related Expenses	12.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Timekeeping, Calendar, Inventory, Logistics, Information and Document Sharing, Communications, Controlled Access, Security, and Surveillance With a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal and Rest Breaks	3.20
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Exemption, Waiver, and Compliant Policies	7.50
Research and Investigation Re: Post- <i>Duran v. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.10
Research and Investigation Re: Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' Work	6.50
Meet and Communicate With Plaintiff Asia Osby During the Case	39.50
Meet and Communicate With Plaintiff Monica Miranda During the Case	25.50
Investigate, Meet, Communicate With, and/or Conduct Interviews of Putative Class Members and/or Percipient Witnesses	9.50
Pleadings and Court Filings	
Research and Draft Plaintiff Osby's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on August 16, 2021) (Osby Class Action)	7.10
Review Court's Notice of Case Assignment (filed on August 16, 2021) (Osby Class Action)	0.10

Draft Plaintiff's Initial Status Conference Statement (filed on October 20, 2021) (Osby Class Action)	0.80
Research and Draft Plaintiff Osby's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on October 29, 2021) (Osby PAGA Action)	6.90
Review Court's Notice of Case Assignment Unlimited Civil Case and First Amended General Order Re Mandatory Electronic Filing for Civil (filed on October 29, 2021) (Osby PAGA Action)	0.10
Review Notice of Case Management Conference (filed on November 2, 2021) (Osby PAGA Action)	0.10
Research and Draft Plaintiff Miranda's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on November 10, 2021) (Miranda Class Action)	7.50
Review Court's Notice of Case Assignment Unlimited Civil Case and Alternative Dispute Resolution (ADR) Information Packet (served on November 10, 2021) (Miranda Class Action)	0.10
Draft Notice of Case Management Conference (filed on November 12, 2021) (Osby PAGA Action)	0.80
Review Notice of Appearance of Defendant (filed on November 18, 2021) (Osby Class Action)	0.10
Research and Draft Plaintiff Miranda's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on November 22, 2021) (Miranda PAGA Action)	7.10
Review Court's Notice of Case Assignment Unlimited Civil Case and First Amended General Order Re Mandatory Electronic Filing For Civil (served on November 22, 2021) (Miranda PAGA Action)	0.10
Draft Notice of Filing of Proof of Service of Complaint and Request to Vacate Order to Show Cause Re Sanctions for Failure to Serve the Complaint and Set Initial Status Conference (filed on November 29, 2021) (Osby Class Action)	0.50

Review Notice of Case Management Conference (filed on November 29, 2021) (Miranda PAGA Action)	0.10
Review Notice of Related Case (served on December 3, 2021) (Osby Class Action) (Osby PAGA Action) (Miranda Class Action) (Miranda PAGA Action)	0.10
Review Notice Re Continuance of Hearing (Initial Status Conference) and Order (filed on December 3, 2021) (Miranda Class Action)	0.10
Draft Notice of Ruling Re Order to Show Cause Re Sanctions (filed on December 6, 2021) (Osby Class Action)	0.20
Review Notice of Ruling Re Defendant's Notice of Related Case (served on December 6, 2021) (Osby Class Action)	0.10
Review Court Order Re Related Cases (filed December 9, 2021) (Osby Class Action)	0.10
Review Notice of Appearance by Matthew Sonne and Lauren J. Blaes on Behalf of Defendant Self-Realization Fellowship Church (served on December 17, 2021) (Miranda Class Action)	0.10
Review Notice of Ruling Regarding Defendant's Notice of Related Case (served on December 20, 2021) (Osby Class Action)	0.10
Review Notice of Appearance by Matthew M. Sonne and Lauren Blaes on Behalf of Defendant Self-Realization Fellowship Church (served on December 22, 2021) (Osby PAGA Action)	0.10
Draft Plaintiff Osby's Notice of Posting Complex Fees (filed on December 28, 2021) (Osby PAGA Action)	0.10
Draft Plaintiff Miranda's Notice of Posting Complex Fees (filed on December 28, 2021) (Miranda PAGA Action)	0.10
Review Notice of Appearance by Matthew M. Sonne and Lauren J. Blaes on Behalf of Defendant Self-Realization Fellowship Church (filed on January 19, 2022) (Miranda PAGA Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft, Joint Initial Status Report (filed on January 28, 2022) (Osby Class Action)	1.60

Draft Notice and Acknowledgment of Receipt of Summons and Complaint to Defendant (filed on February 7, 2022) (Miranda PAGA Action)	0.10
Review Court's Message Posting (Case Anywhere) Re Continuance of Status Conference (posted on March 17, 2022) (Osby Class Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Status Report (filed on March 22, 2022) (Osby Class Action)	1.30
Meet and Confer With Defendant's Counsel, and Draft Joint Status Report (filed on April 27, 2022) (Osby Class Action)	1.10
Draft Plaintiffs' Notice of Settlement and Post-Mediation Status Report (filed on February 21, 2023) (Osby Class Action)	0.90
Review Message Posting (Case Anywhere) Re Post Mediation Status Conference (posted on February 24, 2023) (Osby Class Action)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Sanctions (filed on August 10, 2023) (Miranda Class Action)	1.10
Meet and Confer With Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Sanctions (filed on October 3, 2023) (Osby Class Action)	0.80
Appearances	
Prepare for and Remotely Attend Order to Show Cause Re Sanctions for Failure to Serve Complaint via Video Conference (Microsoft Teams) (December 2, 2021)	0.10
Prepare for and Remotely Attend Initial Status Conference via Video Conference (Microsoft Teams) (February 4, 2022)	0.90
Prepare for and Remotely Attend Status Conference via Video Conference (Microsoft Teams) (March 24, 2022)	0.70
Prepare for and Remotely Attend Further Status Conference via Video Conference (Microsoft Teams) (May 4, 2022)	0.70

Prepare for and Remotely Attend Order to Show Cause Re Sanctions via LA Court Connect (August 17, 2023)	0.50
Prepare for and Remotely Attend Order to Show Cause Re Sanctions via LA Court Connect (October 10, 2023)	0.50
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (December 14, 2023)	1.50
Prepare for and Remotely Attend Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (January 30, 2024)	0.80
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Asia Osby (served on June 1, 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 Asia Osby (served on June 28, 2021)	2.30
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Monica Miranda (served on August 10, 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 Monica Miranda (served on September 1, 2021)	3.10
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Asia Osby for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on August 25, 2021)	4.50
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Monica Miranda for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 17, 2021)	4.50
Meet With, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	12.50

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant (approximately 2,432 pages), and Other Sources Prior to Mediation	28.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting Plaintiffs' Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on January 16, 2023)	23.50
Attend Mediation Session (January 23, 2023; Via Zoom Video Conference)	14.50
Additional Settlement Negotiations Through Mediator and Review and Analyze Mediator's Proposal (issued February 10, 2023; accepted February 16, 2023)	4.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action and PAGA Settlement (March 30, 2023)	2.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement (executed on November 3, 2023) and Notice of Class Action Settlement	13.50
Draft, Review, Revise, Negotiate, and Finalize First Amended Joint Stipulation of Class Action and PAGA Settlement (executed on January 17, 2024) and Notice of Class Action	1.50
Review Weekly Reports from Settlement Administrator and Monitor Settlement Notice Administration Process	2.90
Law and Motion	
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Plaintiff Asia Osby in Support Thereof, Declaration of Plaintiff Monica Miranda in Support Thereof, and [Proposed] Order Thereon (filed on November 6, 2023)	16.50
Review Court's Message Posting (Case Anywhere) Re Motion for Preliminary Approval of Class Action Settlement (posted on December 13, 2023)	0.50

Meet and Confer With Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiffs' Hearing and Deadline to File Supplemental Papers in Support of Plaintiffs' Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on January 16, 2024)	1.40
Draft Message Posting Re Extension to file Motion for Preliminary Approval of Settlement (posted on January 17, 2024) (Osby Class Action)	0.20
Draft Supplemental Declaration of Yasmin Hosseini in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (submitted on January 23, 2024)	7.50
Review Order Granting Preliminary Approval of Class Action Settlement (filed on January 30, 2024) (Osby Class Action)	0.20
Draft Notice of Entry of Order Granting Preliminary Approval of Class Action Settlement (filed on January 31, 2024)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payment, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on July 8, 2024)	18.50
Total Hours:	381.00

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Osby vs. Self-Realization Fellowship - Class

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
6/1/2021	U.S. Postmaster	Postage	7.00
8/16/2021	Los Angeles Superior Court	Complex Court Filing Fee	1000.00
8/16/2021	Los Angeles Superior Court	Court Filling Fee	435.00
8/16/2021	Legal Document Server, Inc.	Attorney Service	180.23
10/15/2021	ProLegal	Attorney Service	95.04
10/20/2021	One Legal	Attorney Service	12.35
10/20/2021	One Legal	Attorney Service	16.68
11/1/2021	ProLegal	Attorney Service	160.29
11/18/2021	Legal Document Server, Inc.	Attorney Service	15.20
11/29/2021	Legal Document Server, Inc.	Attorney Service	15.20
11/29/2021	Legal Document Server, Inc.	Attorney Service	15.20
11/29/2021	General Logistics Systems US, Inc.	Courier Service	39.22
12/6/2021	Legal Document Server, Inc.	Attorney Service	15.20
1/28/2022	Legal Document Server, Inc.	Attorney Service	15.20
3/22/2022	Legal Document Server, Inc.	Attorney Service	15.20
4/9/2022	Case Anywhere LLC	Attorney Service	111.90
4/28/2022	Legal Document Server, Inc.	Attorney Service	15.20
7/6/2022	Case Anywhere LLC	Attorney Service	141.00
10/7/2022	Case Anywhere LLC	Attorney Service	135.00
1/8/2023	Case Anywhere LLC	Attorney Service	135.00
2/22/2023	Legal Document Server, Inc.	Attorney Service	15.95
4/16/2023	Case Anywhere LLC	Attorney Service	141.00
7/3/2023	Case Anywhere LLC	Attorney Service	135.00
8/10/2023	Legal Document Server, Inc.	Attorney Service	16.15
10/3/2023	Legal Document Server, Inc.	Attorney Service	16.15
10/5/2023	Case Anywhere LLC	Attorney Service	141.00
11/6/2023	Legal Document Server, Inc.	Attorney Service	20.32
11/6/2023	Los Angeles Superior Court	Motion Fee	60.00
11/6/2023	Legal Document Server, Inc.	Attorney Service	208.25
1/4/2024	Case Anywhere LLC	Attorney Service	177.00
1/17/2024	Los Angeles Superior Court	Stipulation Fee	20.00
1/17/2024	Legal Document Server, Inc.	Attorney Service	17.54
1/24/2024	Legal Document Server, Inc.	Attorney Service	16.15
2/1/2024	Legal Document Server, Inc.	Attorney Service	16.15
4/2/2024	Case Anywhere LLC	Attorney Service	165.00
			\$ 3,740.77

LAWYERS for JUSTICE PC CASE COST DETAIL
Osby vs. Self-Realization Fellowship - PAGA

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/1/2021	Los Angeles Superior Court	Court Filing Fee	435.00
11/1/2021	One Legal	Attorney Service	29.51
11/4/2021	ProLegal	Attorney Service	160.29
11/12/2021	Legal Document Server, Inc.	Attorney Service	15.20
12/28/2021	Legal Document Server, Inc.	Attorney Service	157.50
12/28/2021	Los Angeles Superior Court	Complex Court Filing Fee	1000.00
12/29/2021	Legal Document Server, Inc.	Attorney Service	15.20
1/6/2022	Legal Document Server, Inc.	Attorney Service	15.20
1/20/2022	Legal Document Server, Inc.	Attorney Service	15.20
8/25/2021	Labor & Workforce Development Agency	Filing Fee	75.00
1/28/2022	Legal Document Server, Inc.	Attorney Service	15.20
			\$ 1,933.30

LAWYERS for JUSTICE PC CASE COST DETAIL
Miranda vs. Self-Realization Fellowship

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/10/2021	U.S. Postmaster	Postage	7.00
11/10/2021	Los Angeles Superior Court	Complex Court Filing Fee	1,000.00
11/10/2021	Legal Document Server, Inc.	Attorney Service	76.19
11/10/2021	Los Angeles Superior Court	Court Filing Fee	435.00
11/11/2021	ProLegal	Attorney Service	169.29
12/29/2021	Legal Document Server, Inc.	Attorney Service	15.20
1/18/2022	Legal Document Server, Inc.	Attorney Service	15.20
1/23/2022	First Mediation Corporation	Mediation Fee	10,000.00
1/27/2022	Legal Document Server, Inc.	Attorney Service	15.20
1/28/2022	Legal Document Server, Inc.	Attorney Service	15.20

\$ 11,748.28

LAWYERS for JUSTICE PC CASE COST DETAIL
Miranda vs. Self-Realization Fellowship (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/17/2021	Labor & Workforce Development Agency	Filing Fee	75.00
11/23/2021	Legal Document Server, Inc.	Attorney Service	33.69
11/23/2021	Los Angeles Superior Court	Court Filing Fee	435.00
12/22/2021	ProLegal	Attorney Service	161.59
12/28/2021	Legal Document Server, Inc.	Attorney Service	157.50
12/28/2021	Los Angeles Superior Court	Complex Court Filing Fee	1000.00
1/28/2022	Legal Document Server, Inc.	Attorney Service	15.20
2/4/2022	Legal Document Server, Inc.	Attorney Service	15.20
2/7/2022	Legal Document Server, Inc.	Attorney Service	15.20
2/9/2023	Legal Document Server, Inc.	Attorney Service	11.75
			\$ 1,920.13