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Attorneys for Plaintiff and the Class

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

SONNY LE, 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.

BALBOA WATER GROUP LLC, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 30-2019-01042358-CU-OE-CXC

Honorable Peter J. Wilson
Department CX101

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Service Award;
Declaration of Class Representative (Sonny
Le); Declaration of Settlement Administrator
(Stephen Gomez); and [Proposed] Final
Approval Order and Judgment filed
concurrently herein]

Date: December 8, 2022
Time: 2:00 p.m.
Department: CX101

Complaint Filed: January 7, 2019
FAC Filed: March 28, 2019
SAC Filed: December 30, 2021
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 Sonny Le (“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 July 29, 2022, in Department CX102 of the above-entitled Court, the Honorable Peter J. Wilson preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release and Amendment No. 1 to Joint Stipulation of Class Action and PAGA Settlement and Release (together, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Balboa Water Group LLC (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Sonny Le as representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Edwin Aiwazian, Arby Aiwazian, and Joanna Ghosh of Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class and Representative Action Settlement (“Class Notice”), Request for Exclusion Form (“Exclusion Form”), and Notice of Objection Form (“Objection Form”) (together, “Notice Packet”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party 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 Service Award (“Motion for Final Approval”), no Class Members have objected to the Class Settlement or the request for Attorneys’ Fees and Costs, Service 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 January 7, 2019, as have several other attorneys and members in our firm.

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

6. Prior to reaching the Settlement, the parties investigated the veracity, strength, and scope of the claims, and were preparing for class certification and trial. The parties conducted significant formal and informal discovery and investigation into the facts of the case, and also informally exchanged a large volume of information, documents, and data in preparation for mediation. Class Counsel prepared and served multiple sets of written discovery requests on Defendant in various forms (specifically, Requests for Production of Documents (Sets One & Two); Special Interrogatories (Sets One, Two, and Three); and Form Interrogatories – General (Set One)), prepared and served numerous notices of depositions of Defendant's Person(s) Most Knowledgeable designees (along with accompanying requests for production of documents), and reviewed Defendant's objections and responses to Plaintiff's discovery requests. Class Counsel also worked with Plaintiff to prepare and provide responses and supplemental responses to formal written discovery propounded by Defendant (specifically, Request for Production of Documents (Set One), Special Interrogatories (Set One), and Request

for Admissions (Set One)). Class Counsel also interviewed and obtained information from Plaintiff and other Class Members, including and not limited to the names of potential witnesses, and reviewed and analyzed a large volume of pages of documents and data obtained from Plaintiff, Defendant, and o other sources. The documents and data reviewed and analyzed by Class Counsel included, and were not limited to: Plaintiff's employment records, a detailed sampling of Class Members' time and pay data, multiple iterations of Defendant's Employee Handbook, company policy acknowledgements and agreements (including, but not limited to, Defendant's Acknowledgement & Receipt of Company Handbook and Agreement to Resolve by Reference Employee Disputes), internal memoranda, job descriptions, new hire orientation checklists and guidelines, and Defendant's operations and employment practices, forms, procedures, and policies (including, but not limited to, Defendant's Rest & Meal Periods, Reporting to Work When There is No Work, Overtime, and Expense Reimbursement policies), among other information and documents. Class Counsel researched applicable law, developed violation, damages, and penalties valuation models in preparation for mediation, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, discovery, case management, motion practice, and the production of documents and data in the course of litigation and in connection with mediation. Class Counsel also invested time researching and investigating the applicable law, which is constantly evolving as it relates to certification, PAGA representative claims, the Fair Labor Standards Act, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, arbitration agreements, release agreements, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising pleadings, motion-related papers, and the mediation brief; preparing and appearing for court proceedings; and preparing for and attending mediation and settlement negotiations.

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 a large volume of information, documents, and data obtained from Plaintiff, Defendant, or other

1 sources. These documents and data provided a critical understanding of the nature of the work
2 performed by the Class Members, as well as Defendant's operations and employment policies,
3 practices, and procedures, and were used in analyzing liability, damages, penalties, and valuation
4 issues in connection with all phases of the litigation, and ultimately with the mediation and
5 settlement negotiation process.

6 8. After conducting significant investigation of the facts and law during the
7 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
8 try to resolve the entire matter. These efforts included participating in a formal, full-day
9 mediation conducted by Jeffrey A. Ross, Esq., a well-regarded mediator experienced in
10 mediating complex labor and employment matters. During all settlement discussions, the parties
11 conducted their negotiations at arm's length in an adversarial position. Prior to, during, and after
12 the mediation, the parties exchanged information and data, and discussed and considered all
13 aspects of the case, including the risks and delays of further litigation, the risks to the parties of
14 proceeding with class certification and trial, the law relating to off-the-clock theory, meal and
15 rest periods, representative PAGA claims, California Labor Code and the Fair Labor Standards
16 Act ("FLSA") violations, and federal and state wage-and-hour enforcement, the evidence
17 produced and analyzed, and the possibility of appeals, among other things. Arriving at a
18 settlement that was acceptable to the parties was not easy. Defendant contended, *inter alia*, that
19 it shut down its Tustin facility in or about March 2019 and its Valencia facility in or about April
20 2017 and laid off all the workers at these locations, and that the workers that were laid off from
21 these facilities signed individual release and severance agreements with Defendant. Defendant
22 contended that putative class members worked at different locations, held different job titles, and
23 had different job duties, that individualized questions of fact predominate over any common
24 issues, and that these issues would pose challenges to class certification and representative
25 adjudication. Defendant and its counsel felt very strongly about Defendant's ability to prevail on
26 the merits and to obtain a denial of class certification, while Plaintiff and Class Counsel believed
27 that class certification would be obtained and that they would prevail at trial. Even after
28 mediation, the parties' negotiations continued with the involvement of the mediator, and

1 additional information was exchanged. Ultimately, with the aid of the mediator's evaluation, the
2 parties agreed that the case was well-suited for settlement given the legal issues relating to
3 Plaintiff's principal claims, as well as the costs and risks to the parties that would attend further
4 litigation. These risks of further litigation include, and are not limited to, a determination that
5 the claims are unsuitable for class treatment and/or representative adjudication, class de-
6 certification after certification of a class, allowing a jury to decide the claims asserted in the case,
7 and the real possibility of no recovery after years of litigation.

8 9. As set forth more fully in the accompanying Motion for Final Approval, Class
9 Counsel seeks attorneys' fees in the amount of \$476,875.00, which is thirty-five percent (35%)
10 of the Gross Settlement Amount of \$1,362,500.00, as set forth in the Settlement Agreement and
11 the Class Notice. Pursuant to the contingency-fee agreement entered into by and between
12 Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five
13 percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk
14 that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class
15 Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4)
16 the results that Class Counsel has achieved throughout the litigation; (5) the value of the
17 settlement that Class Counsel has achieved in the case; and (6) the other cases that Class Counsel
18 has turned down in order to devote their time and efforts to this matter. Lawyers for Justice, PC
19 has not entered into a fee splitting agreement or arrangement with any other counsel regarding
20 the above-captioned action.

21 10. I am aware that the common and acceptable rate for contingency representation in
22 wage and hour class action litigation is normally 40% before trial, with the range being from
23 33.3% up to 50%.

24 11. While not necessarily required to be demonstrated because the percentage fee is
25 proper for this settlement, Class Counsel has incurred many hours of work in connection with
26 prosecuting the case such that the award of attorneys' fees is also justified under a simple
27 lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **689.50 hours**
28 performing tasks and obtaining recovery in this case. Attached hereto as "**EXHIBIT A**" is an

1 Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by
2 attorneys Lawyers for Justice, PC and the time incurred in performing those services. These
3 hours include work done by myself and several other attorneys at the firm. Additionally,
4 separately from the hours references herein, Lawyers for Justice, PC had litigation support
5 personnel actively engaged in assisting with the prosecution of this matter.

6 12. The work performed in this particular case, the background of our firm, as well as
7 the individual backgrounds, training, and experience of the attorneys who worked on this matter,
8 in litigating complex wage-and-hour actions, and in particular, employment class and
9 representative actions, support a reasonable blended hourly rate of compensation at the rate of
10 \$725 for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded
11 attorneys' fees, compensating the firm at the rate of at least \$725 per hour for legal services
12 performed, by courts granting approval of settlements in other wage and hour cases: final
13 approval of the class and representative action settlement in *David Dugan v. TEC Equipment,*
14 *Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021,
15 and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class
16 and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los
17 Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of
18 attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in
19 *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court
20 Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of
21 attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative
22 action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County
23 Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of
24 attorneys' fees involved an hourly rate of \$764.82; final approval of the class and representative
25 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
26 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an
27 hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley*
28 *Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450)

1 was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of
2 \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler*
3 *Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was
4 granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77;
5 and final approval of the class and representative action settlement in *Demetrius Camarillo v.*
6 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
7 granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

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

9 ***EDUCATION***

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

18 ***JUDICIAL EXTERNSHIPS***

19 14. From approximately September 2002 to approximately December 2002, I served
20 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of*
21 *Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I
22 served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal*
23 *for the Second Appellate District*.

24 ***LITIGATION AND CLASS ACTION EXPERIENCE***

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

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

6 17. Since its inception, in or around October of 2008, *Lawyers for Justice, PC* has
7 almost exclusively focused on the prosecution of consumer and employment class actions,
8 involving wage-and-hour claims, race discrimination, unfair business practices or consumer
9 fraud. Currently, *Lawyers for Justice, PC* is the attorney of record in well over a dozen
10 employment-related putative class actions in both state and federal courts in the State of
11 California. The firm has successfully litigated cases involving the executive, administrative, and
12 other overtime exemptions to the State of California and federal overtime compensation
13 requirements. During this relatively short time, in association with other law firms, *Lawyers for*
14 *Justice, PC* has recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

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

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

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

16 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
17 wage-and-hour class and PAGA representative action against a national wholesale distributor of
18 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
19 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
20 representative action settlement. The Sacramento County Superior Court Case Number is 34-
21 2012-00136285.

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

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

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

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

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

22 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
23 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
24 involving allegations of misclassification of the “Department Manager” position. On August 12,
25 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
26 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
27 County Superior Court Case Number is RG13680477.

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

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

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

14 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
15 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
16 the employer's motion to compel arbitration, which resulted in a published opinion by the
17 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
18 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
19 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
20 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
21 5046.

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

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

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

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

16 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
17 representative action against a food company on behalf of non-exempt employees. On June 30,
18 2017, the court granted final approval of the class and PAGA representative action settlement.
19 The Sacramento County Superior Court Case Number is 34-2015-00175871.

20 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
21 representative action against a chocolate company on behalf of non-exempt employees. On July
22 19, 2017, the court granted final approval of the class and PAGA representative action
23 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

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

26 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
27 representative action against a behavioral health service provider on behalf of non-exempt
28 employees. On November 13, 2018, the court granted final approval of the class and PAGA

1 representative action settlement. The Alameda County Superior Court Case Number is
2 RG16811450.

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

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

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

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

24 hh) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
25 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
26 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
27 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
28 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted

1 approval of the PAGA representative action settlement. The San Diego County Superior Court
2 Case Number is 34-2015-00175330.

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

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

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

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

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

28 ///

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in the above-captioned action. Lawyers for Justice, PC seeks reimbursement of \$17,384.47 in litigation costs and expenses incurred in this case, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement.

SERVICE AWARD TO PLAINTIFF

20. In recognition of his efforts and work serving as the Class Representative, the Settlement provides for a Service Award in the amount of \$7,500.00 to Plaintiff Sonny Le. The requested Service 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, including and not limited to, by way of working with Class Counsel to provide responses and supplemental responses to discovery requests that were propounded on Plaintiff by Defendant. Plaintiff spent numerous hours speaking with Class Counsel about his claims, describing his work experience with Defendant, and gathering and reviewing documents. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information to support the pursuit of the class and PAGA claims. Accordingly, it is appropriate for Plaintiff Sonny Le to receive \$7,500.00 as a reasonable Service Award, in addition to his individual settlement payment, for his services in the case.

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, the State of California, and PAGA Members.

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

Executed this 14th day of November 2022, at Glendale, California.



Edwin Aiwasian

EXHIBIT A

LE V. BALBOA WATER GROUP LLC
(ORANGE COUNTY SUPERIOR COURT CASE NO. 30-2019-01042358-CU-OE-CXC)
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	13.60
Pre-Lawsuit Investigation of the Merits of Plaintiff Sonny Le’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	12.90
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Balboa Water Group LLC (“Defendant”) with Respect to Plaintiff and the Putative Class Members	13.10
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Certification, and Fair Labor Standards Act Decisions and Guidance in California, Including all New and Relevant Government Labor Agency Materials	10.80
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	9.30
Investigation of Defendant’s Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members	6.60
Investigation of Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	4.50

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	5.30
Research and Investigation Re: Arbitration and Analysis of Enforceability	7.40
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	10.40
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	8.20
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members Worked Throughout California	8.60
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Customer Service, Schedules, Production Needs and Quotas, Orders, Timekeeping, Rounding, On-Premises Meal/Rest Breaks, Bonus/Incentive/Performance/Shift Differential Pay, Overtime Compensation, Maintenance of Machinery and Equipment, Use of Personal Cell Phones, Use of Personal Vehicles, Dress Code/Attire, Footwear, Protective Equipment and Gear, Tools, Reimbursement of Business-Related Expenses, and Severance and Release Agreements	38.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Customer Management, Production, Inventory, and Security Systems, 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 Breaks	6.80

Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, Release, and Compliant Policies	8.50
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	6.40
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	3.10
Research and Investigation Re: Closure and Opening of Defendant's Facilities, Layoffs, and Impact of COVID-19 on Defendant, Its Operations, and Putative Class Members' Work	8.60
Prepare a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, Damages, and Penalties	8.50
Meet and Communicate with Plaintiff Sonny Le Throughout the Pendency of the Case	40.50
Investigate, Meet, Communicate, and/or Conduct Interviews with Putative Class Members and Percipient Witnesses	21.30
Pleadings and Court Filings	
Research and Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on January 7, 2019)	8.50
Review Court's Notice of Case Assignment (filed on January 7, 2019)	0.10
Review Court's Minute Order Re: Complex Determination (filed on January 29, 2019)	0.10
Review Defendant's Declaration of Mary E. Lynch Pursuant to Code of Civil Procedure §430.41 in Support of Defendant's Attempt to Meet and Confer Regarding Its Demurrer to Plaintiff's Unverified Complaint (served on March 13, 2019)	0.40

Draft Plaintiff's Notice of Posting Jury Fees (filed on March 14, 2019)	0.20
Research and Draft Plaintiff's First Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on March 28, 2019)	6.50
Review Defendant's Case Management Conference Statement (served on April 16, 2019)	0.30
Draft Plaintiff's Initial Case Management Statement (filed on April 19, 2019)	1.30
Review Court's Minute Order (filed on April 24, 2021)	0.10
Draft Plaintiff's Notice of Continuance of Hearing (filed on April 25, 2019)	0.30
Draft Plaintiff's Notice and Acknowledgement of Receipt – Civil (filed on April 26, 2019)	0.20
Review Defendant's Updated Case Management Conference Statement (served on June 14, 2019)	0.50
Draft Plaintiff's Case Management Statement (filed on June 21, 2019)	1.20
Review Court's Minute Order (filed on June 28, 2019)	0.10
Review and Analyze Defendant's Answer to Plaintiff's Unverified First Amended Complaint and Research Affirmative Defenses in Defendant's Answer (served on July 16, 2019)	2.40
Draft Plaintiff's Notice Regarding June 28, 2019 Status Conference (filed on July 17, 2019)	0.50
Review and Analyze Defendant's Amended Answer to Plaintiff's Unverified First Amended Complaint and Research Affirmative Defenses in Defendant's Answer (served on August 6, 2019)	1.80
Review Defendant's Notice of Substitution of Counsel (served on August 21, 2019)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on August 23, 2019)	1.30
Review Court's Minute Order (filed on August 30, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (filed on October 28, 2019)	1.30
Review Court's Minute Order (filed on November 1, 2019)	0.10
Review Court's Minute Order (filed on November 12, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Updated Joint Case Management Statement (filed on January 27, 2020)	1.50
Review Court's Minute Order (filed on January 31, 2020)	0.10
Review Court's Notice of Continuance (filed on May 14, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Status Conference; and [Proposed] Order (submitted on July 7, 2020)	1.10
Review Court's Minute Order (filed on July 8, 2020)	0.10
Review Court's Minute Order (filed on August 25, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Updated Joint Case Management Statement (filed on November 2, 2020)	1.50
Review Court's Minute Order (filed on November 5, 2020)	0.10
Review Court's Notice of Case Reassignment (filed on December 10, 2020)	0.10

Meet and Confer with Defendant's Counsel, and Draft Updated Joint Case Management Statement (filed on February 19, 2021)	1.10
Review Court's Minute Order (filed on February 26, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Stipulation and [Proposed] Protective Order – Confidential Designation Only (submitted on July 7, 2021)	1.80
Review Court's Order Granting Protective Order – Confidential Designation Only (filed on July 15, 2021)	0.10
Review Court's Notice of Case Reassignment (filed on September 2, 2021)	0.10
Review Court's Minute Order (filed on September 10, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Notice of Settlement (filed on September 24, 2021)	0.70
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on October 7, 2021)	1.20
Review Court's Minute Order (filed on October 12, 2021)	0.10
Draft Plaintiff's Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq and Legal Research and Analysis of All Claims Involved (filed on December 30, 2021); Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File Second Amended Complaint; and [Proposed] Order Thereon (submitted on December 21, 2021)	6.50
Review Court's Order Granting Plaintiff Leave to File Second Amended Complaint (filed on December 23, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on February 10, 2022)	0.80

Review Court's Minute Order (filed on February 14, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on March 24, 2022)	0.80
Review Court's Minute Order (filed on March 25, 2022)	0.10
Appearances	
Prepare for and Telephonically Attend Status Conference (June 28, 2019)	0.90
Prepare for and Telephonically Attend Status Conference (August 30, 2019)	1.10
Prepare for, Travel to/from, and Attend Status Conference (November 1, 2019)	3.20
Prepare for and Telephonically Attend Status Conference (January 31, 2020)	1.10
Prepare for and Telephonically Attend Status Conference (February 26, 2021)	0.80
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Award (December 8, 2022) (Anticipated)	3.10
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on October 18, 2018)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sonny Le (served on November 9, 2018)	1.90
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 4, 2018)	2.20

Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sonny Le (served on December 13, 2018)	2.20
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sonny Le (served on December 17, 2018)	6.50
Draft Additional Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 20, 2018)	2.50
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 December 27, 2018)	3.30
Review and Analyze Defendant's Special Interrogatories (Set One), Request for Production of Documents (Set One), and Request for Admissions (Set One) to Plaintiff (served on February 18, 2019)	1.10
Draft Plaintiff's Responses to Defendant's Special Interrogatories (Set One), Request for Production of Documents (Set One), and Request for Admissions (Set One) to Plaintiff (served on March 25, 2019)	8.70
Draft Plaintiff's Supplemental Responses to Defendant's Special Interrogatories (Set One), Request for Production of Documents (Set One), and Request for Admissions (Set One) to Plaintiff (served on July 10, 2019)	12.60
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 (served on July 18, 2019)	6.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for August 19, 2019; Organizational Structure) (served on July 18, 2019)	3.60

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for August 20, 2019; Wage and Hour Practices) (served on July 18, 2019)	4.20
Review and Analyze Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (August 19, 2019; Organizational Structure) (served on August 5, 2019)	1.50
Review and Analyze Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (August 20, 2019; Wage and Hour Practices) (served on August 5, 2019)	1.60
Draft Plaintiff's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant (served on September 20, 2019)	4.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for October 25, 2019; Affirmative Defenses) (served on September 20, 2019)	4.50
Review and Analyze Defendant's Objections to 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 (served on October 7, 2019)	4.10
Draft Plaintiff's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant (served on October 15, 2019)	3.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for November 27, 2019; Affirmative Defenses) (served on October 15, 2019)	3.50

Review and Analyze Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (November 27, 2019; Affirmative Defenses) (served on November 20, 2019)	1.20
Draft <i>Belaire-West</i> Notice for Consideration (drafted December 16, 2019)	1.20
Review and Analyze Defendant's Objections and Responses to Plaintiff's Special Interrogatories (Set Three) (served on January 30, 2020)	4.60
Review and Analyze Documents Produced by Defendant (served on February 10, 2020)	6.30
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Sonny Le for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 10, 2021)	4.50
Draft Follow-Up Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Sonny Le for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 15, 2021)	2.20
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	34.80
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Defendant and Other Sources Prior to Mediation	45.60
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 Violation, Damages, and Penalties Analysis and Calculations (submitted on July 29, 2021)	35.50

Attend Mediation Session (August 5, 2021; Zoom Video Conference); Engage in Post-Mediation Settlement Discussions and Negotiations with Mediator; Review and Analyze Updated Datapoints from Mediator/Defendant's Third-Party Vendor; Review and Analyze Mediator's Proposal	37.20
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed September 24, 2021)	5.40
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release and Exhibits (Notice of Class and Representative Action Settlement, Request for Exclusion Form, and Notice of Objection Form) (executed on March 1, 2022)	25.20
Draft, Review, Revise, Negotiate, and Finalize Amendment No.1 to Joint Stipulation of Class Action and PAGA Settlement and Release and Revised Exhibits (Notice of Class and Representative Action Settlement, Request for Exclusion Form, and Notice of Objection Form) (executed on July 8, 2022)	4.30
Monitor Settlement Administration Process and Review Administrator's Weekly Reports	7.50
Law and Motion	
Review and Analyze Defendant's Notice of Demurrer and Demurrer to First Amended Complaint; Declaration of Mary E. Lynch in Support of Meet and Confer Requirement (served on May 20, 2019)	2.10
Review and Analyze Defendant's Notice of Motion and Motion to Strike Portions of Plaintiff's First Amended Complaint; Declaration of Mary E. Lynch in Support of Meet and Confer Requirements; and Index of Non-California Authority in Support Thereof (served on May 20, 2019)	2.90
Draft Plaintiff's Consolidated Opposition to Defendant's Motion to Strike and Demurrer to Plaintiff's First Amended Complaint (filed on June 14, 2019)	11.40
Review and Analyze Defendant's Reply in Support of Motion to Strike, Demurrer to Plaintiff's First Amended Complaint, and Index of Non-California Authority in Support Thereof (served on June 18, 2019)	2.10

Review and Analyze Court's Tentative Re: Demurrer and Motion to Strike (issued on June 26, 2019)	0.50
Review Court's Minute Order Re: Demurrer and Motion to Strike (filed on June 27, 2019)	0.60
Review Defendant's Notice of Ruling on Demurrer and Motion to Strike (served on June 27, 2019)	0.10
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Sonny Le in Support Thereof, and [Proposed] Order Thereon (filed on March 23, 2022)	23.50
Review and Analyze Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (issued on April 20, 2022)	0.80
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on April 21, 2022)	0.20
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on April 29, 2022)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on May 25, 2022)	1.10
Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement (filed on May 26, 2022)	0.10
Research and Draft Plaintiff's Supplemental Brief in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Order Thereon (filed on July 11, 2022)	15.40
Review and Analyze Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (issued on July 20, 2022)	0.20

Review Court's Minute Order Granting Preliminary Approval of Class Action Settlement (filed on July 21, 2022)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on July 29, 2022)	0.20
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on August 1, 2022)	0.20
Review and Analyze Settlement Administrator's Declaration Regarding Notice and Settlement Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Award, Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on November 14, 2022)	23.20
Total Hours:	689.50

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Le v. Balboa Water Group, LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/18/2018	U.S. Postmaster	Postage	6.70
11/9/2018	U.S. Postmaster	Postage	6.70
12/4/2018	U.S. Postmaster	Postage	6.91
12/13/2018	U.S. Postmaster	Postage	6.91
12/20/2018	U.S. Postmaster	Postage	7.40
1/8/2019	One Legal	Attorney Service	59.56
1/8/2019	Orange County Superior Court	Court Filing Fee	435.00
1/8/2019	Orange County Superior Court	Complex Court Filing Fee	1,000.00
2/14/2019	ProLegal	Attorney Service	171.35
2/25/2019	One Legal	Attorney Service	12.20
3/4/2019	Golden State Overnight	Attorney Service	16.39
3/11/2019	FedEx Express	Courier Service	21.88
3/14/2019	One Legal	Attorney Service	17.15
3/14/2019	Orange County Superior Court	Jury Fee	150.00
3/26/2019	Golden State Overnight	Courier Service	18.58
4/3/2019	One Legal	Attorney Service	12.20
4/18/2019	Golden State Overnight	Courier Service	13.33
4/19/2019	Golden State Overnight	Courier Service	13.33
4/19/2019	One Legal	Attorney Service	12.20
4/19/2019	Orange County Superior Court	Document Download Fee	7.50
4/25/2019	FedEx Express	Courier Service	21.72
4/25/2019	Golden State Overnight	Courier Service	13.33
4/25/2019	One Legal	Attorney Service	12.20
4/26/2019	One Legal	Attorney Service	12.20
5/7/2019	Golden State Overnight	Courier Service	12.88
6/14/2019	Golden State Overnight	Courier Service	19.10
6/14/2019	One Legal	Attorney Service	12.20
6/21/2019	Golden State Overnight	Courier Service	13.58
6/21/2019	One Legal	Attorney Service	12.20
6/28/2019	Court Call LLC	Attorney Service	124.00
7/10/2019	Golden State Overnight	Courier Service	23.41
7/17/2019	Golden State Overnight	Courier Service	13.43
7/18/2019	Golden State Overnight	Courier Service	13.43
7/18/2019	One Legal	Attorney Service	12.20
8/30/2019	Court Call LLC	Attorney Service	94.00
8/30/2019	Elliot Gonzalez	Travel Reimbursement	44.02
9/20/2019	Golden State Overnight	Courier Service	17.47
10/15/2019	Golden State Overnight	Courier Service	15.80
10/28/2019	Golden State Overnight	Courier Service	17.55
10/28/2019	Legal Document Server, Inc.	Attorney Service	12.25

LAWYERS for JUSTICE PC CASE COST DETAIL

Le v. Balboa Water Group, LLC

11/1/2019	Court Call LLC	Attorney Service	94.00
11/1/2019	Janessa Chun	Travel Reimbursement	64.56
11/22/2019	Golden State Overnight	Courier Service	13.63
1/27/2020	General Logistics Systems US, Inc.	Courier Service	20.80
1/27/2020	Legal Document Server, Inc.	Attorney Service	10.00
1/31/2020	Court Call LLC	Attorney Service	124.00
1/31/2020	Court Call LLC	Attorney Service	94.00
7/8/2020	One Legal	Attorney Service	13.52
7/8/2020	Orange County Superior Court	Court Filing Fee	40.00
7/23/2020	One Legal	Attorney Service	12.20
7/24/2020	One Legal	Attorney Service	12.20
7/31/2020	Court Call LLC	Attorney Service	94.00
11/2/2020	General Logistics Systems US, Inc.	Courier Service	20.08
11/2/2020	Legal Document Server, Inc.	Attorney Service	11.00
2/19/2021	General Logistics Systems US, Inc.	Courier Service	17.03
2/19/2021	Legal Document Server, Inc.	Attorney Service	11.00
2/22/2021	Legal Document Server, Inc.	Attorney Service	80.00
8/5/2021	Jeffrey A. Ross	Mediation Fee	7,000.00
8/6/2021	Robert A. Parris	Damages Consulting Expert	6,600.00
9/10/2021	Labor & Workforce Development Agency	Filing Fee	75.00
9/27/2021	One Legal	Attorney Service	14.67
10/7/2021	One Legal	Attorney Service	14.67
10/15/2021	Court Call LLC	Attorney Service	94.00
12/21/2021	Legal Document Server, Inc.	Attorney Service	13.25
12/28/2021	Legal Document Server, Inc.	Attorney Service	0.95
12/28/2021	Orange County Superior Court	Court Filing Fee	20.00
1/3/2022	Legal Document Server, Inc.	Attorney Service	13.25
1/3/2022	Legal Document Server, Inc.	Attorney Service	13.25
2/10/2022	Legal Document Server, Inc.	Attorney Service	13.25
3/23/2022	Legal Document Server, Inc.	Attorney Service	13.25
3/24/2022	Legal Document Server, Inc.	Attorney Service	64.05
3/24/2022	Legal Document Server, Inc.	Attorney Service	13.25
4/21/2022	Court Call LLC	Attorney Service	94.00
5/2/2022	Legal Document Server, Inc.	Attorney Service	13.25
5/25/2022	Legal Document Server, Inc.	Attorney Service	13.25
5/26/2022	Legal Document Server, Inc.	Attorney Service	1.35
5/26/2022	Orange County Superior Court	Court Filing Fee	20.00
7/11/2022	Legal Document Server, Inc.	Attorney Service	14.00
7/26/2022	Orange County Superior Court	Document Download Fee	7.50
8/2/2022	Legal Document Server, Inc.	Attorney Service	14.00

Total: 17,384.47