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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

CHRISTOPHER MEJIA, 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.

TP-LINK USA CORPORATION DBA TP-
LINK NORTH AMERICA, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: CIVDS1906246

Honorable David S. Cohn
Department S26

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Payment; Declaration of Class Representative
(Christopher Mejia); Declaration of Settlement
Administrator (Lindsay Kline); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: December 6, 2022
Time: 10:00 a.m.
Department: S26

Complaint Filed: February 27, 2019
FAC Filed: July 6, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Christopher Mejia (“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 6, 2022, in Department S26 of the above-entitled Court, the Honorable David S. Cohn preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant TP-Link USA Corporation dba TP-Link North America, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Christopher Mejia to represent the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action and PAGA Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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

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WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned action since prior to its commencement on February 27, 2019.

5. Before initiating the case, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement and penalties, Plaintiff's claims and allegations, 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 current and former hourly-paid and/or non-exempt employees who worked 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, Class Counsel investigated the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial. The parties conducted significant formal and informal discovery and investigation into the facts of the case, and formally and informally exchanged a large volume of documents and data throughout the course of the litigation and in connection with mediation and settlement negotiations. Class Counsel served multiple sets of written discovery requests onto Defendant (specifically, Requests for Production of Documents (Sets One and Two), Special Interrogatories (Sets One, Two, and Three), and Form Interrogatories-General (Set One)), reviewed Defendant's responses thereto, and served notices of deposition of Defendant's person(s) most knowledgeable designees along with requests for production of documents. Class Counsel also interviewed and obtained information from Plaintiff and other Class Members and reviewed and analyzed a large volume of pages of data and documents obtained from Plaintiff, Defendant, and other sources. The documents and data reviewed and analyzed by Class Counsel included and were not limited to:

1 Plaintiff's employment records, a detailed sampling of Class Members time and pay data,
2 multiple iterations of Defendant's Employee Handbook, company policy acknowledgements,
3 internal memoranda, job descriptions, and Defendant's operations and employment practices,
4 procedures, and policies (including but not limited to Defendant's Warehouse Steel-Toed Shoes
5 Policy, Footwear Authorization Form, Meal Break Waiver – 2nd Meal, Mutual Arbitration
6 Agreement, Employee Mobile Phone Reimbursement policy, Dress Codes and Other Personal
7 Standards policy, Meal and Rest Periods policy, Employee Travel policy, Employee Purchase
8 Program and Policy, Employee Application, Employee Orientation Checklist, Forklift Safety
9 Training Services, Inc. – Written Test, Termination and Release Agreement, Employee
10 Termination Checklist, Organization Charts, Employee Confidentiality & Nondisclosure Policy,
11 Employee Telecommuting Policy Acknowledgement, Harassment Discrimination & Retaliation
12 Prevention Policy Acknowledgement, and Company Policies Acknowledgment), among other
13 information and documents. Class Counsel researched applicable law, developed liability,
14 damages, and penalties valuation models in preparation for two mediations, and met and
15 conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the
16 pleadings, contemplated motion practice, discovery, and production of various documents and
17 data for the mediations. Class Counsel also drafted pleadings and the mediation briefs and
18 prepared for and attended court proceedings and two mediations, and engaged in extensive
19 settlement negotiations, among other tasks.

20 7. As outlined herein, the parties have conducted significant formal and informal
21 discovery and investigation during the course of litigating the case. Class Counsel analyzed a
22 large volume of pages of information, documents, and data obtained from Plaintiff, Defendant,
23 and other sources. These documents and data provided a critical understanding of the nature of
24 the work performed by the Class Members, as well as Defendant's operations and employment
25 policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and
26 valuation issues in connection with all phases of the litigation, and ultimately, in connection with
27 the mediation and settlement negotiation process. Class Counsel also invested time researching
28 and investigating the applicable law, which is constantly evolving as it relates to certification,

1 off-the-clock theory, meal and rest periods, arbitration agreements, PAGA claims and penalties,
2 wage-and-hour enforcement, Plaintiff's claims and damages, and Defendant's defenses thereto,
3 as well as facts discovered.

4 8. After conducting significant investigation of the facts and law during the
5 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
6 try to resolve the case. These efforts included participating in two formal mediations conducted
7 by Paul Grossman, Esq., a well-regarded mediator experienced in mediating complex labor and
8 employment matters. During all settlement discussions, the parties conducted their negotiations
9 at arm's length in an adversarial position. Prior to, during, and after the mediation, and in the
10 course of settlement discussions, the parties exchanged information and data, and discussed all
11 aspects of the case, including the risks and delays of further litigation, the risks to the parties of
12 proceeding with class certification and trial, the law relating to off-the-clock theory, meal and
13 rest periods, arbitration agreements, representative PAGA claims, and wage-and-hour
14 enforcement, the evidence produced and analyzed, and the possibility of appeals, among other
15 things. Arriving at a settlement that was acceptable to the parties was not easy. Defendants
16 contended that individualized questions of fact predominate over any common issues, and these
17 issues would pose challenges to class certification and representative adjudication. Defendant
18 and its counsel felt very strongly about Defendant's ability to prevail on the merits and at
19 certification, and Plaintiff and Class Counsel believed that they would be able to obtain class
20 certification and prevail at trial. After conducting investigations, formal and informal discovery,
21 exchange of information, extensive settlement negotiations, and with the aid of the mediator's
22 evaluation, the parties ultimately agreed that the case was well-suited for settlement given the
23 legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the parties that
24 would attend further litigation. These risks of further litigation include, and are not limited to, a
25 determination that the claims are unsuitable for class treatment and/or representative
26 adjudication, class de-certification after certification of a class, allowing a jury to decide the
27 claims asserted in the case, and the real possibility of no monetary recovery after years of
28 litigation.

9. Pursuant to the Escalator Clause in Paragraph XVIII.I. of the Settlement Agreement, Defendant provided Plaintiff a declaration on or about July 28, 2022, confirming that there were twenty-nine (29) individuals who worked for Defendant as hourly-paid and/or non-exempt employees during the period of February 27, 2015 to July 13, 2020 who previously signed individual settlement/termination and release agreements with Defendant that released any claims those individuals may have had arising from their employment with Defendant, and that for this relevant time period, these twenty-nine (29) individuals collectively worked approximately 2,365 released workweeks, therefore the total non-released workweeks during this relevant time period was 12,222, excluding the released workweeks. As such, it was determined that the Escalator Clause in the Settlement Agreement was not triggered, and the Gross Settlement Amount continues to be \$500,000.00.

10. As set forth more fully in the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$166,650.00 ("Attorneys' Fees"), which is one-third (33.33%) of the Gross Settlement Amount of \$500,000.00, as set forth in the Settlement Agreement and the Class Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter.

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

12. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a simple

1 lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **526.40 hours**
2 performing tasks and obtaining recovery in this matter. Attached hereto as “**EXHIBIT A**” is an
3 Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by
4 attorneys at Lawyers *for* Justice, PC and the time incurred in performing those services. These
5 hours include work done by myself and several other attorneys at the firm. Also, separate from
6 the hours referenced herein, Lawyers *for* Justice, PC had litigation support personnel actively
7 engaged in assisting with the prosecution of this matter.

8 13. The work performed in this particular matter, the background of our firm, as well
9 as the individual backgrounds, training, and experience of the attorneys who worked on this case,
10 in litigating complex wage-and-hour matters, and in particular, employment class and
11 representative actions, support a reasonable blended hourly rate of compensation at the rate of at
12 least \$650 for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been
13 awarded attorneys’ fees, compensating the firm at the rate of at least \$650 per hour for legal
14 services performed, by courts granting approval of wage and hour settlements in other cases:
15 final approval of the class and representative action settlement in *David Dugan v. TEC*
16 *Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on
17 July 8, 2021, and the award of attorneys’ fees involved an hourly rate of \$936.47; final approval
18 of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan*
19 (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award
20 of attorneys’ fees involved an hourly rate of \$919.57; final approval of the class action settlement
21 in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court
22 Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of
23 attorneys’ fees involved an hourly rate of \$766.05; final approval of the class and representative
24 action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County
25 Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of
26 attorneys’ fees involved an hourly rate of \$764.82; final approval of the class and representative
27 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
28 SCV258764) was granted on February 6, 2019, and the award of attorneys’ fees involved an

hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

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

JUDICIAL EXTERNSHIPS

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

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LITIGATION AND CLASS ACTION EXPERIENCE

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

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

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

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

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

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

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

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

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

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

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

27 g) LFJ, in association with co-counsel therein, represented the plaintiff in a
28 wage-and-hour class action against a multinational corporation that provides global workplace

1 solutions, involving allegations of misclassification of the “Operations Manager” position. On
2 September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles
3 County Superior Court Case Number is BC478769.

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

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

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

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

25 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
27 involving allegations of misclassification of the “Department Manager” position. On August 12,
28 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.

1 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
2 County Superior Court Case Number is RG13680477.

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

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

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

16 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
17 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
18 the employer's motion to compel arbitration, which resulted in a published opinion by the
19 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
20 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
21 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
22 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
23 5046.

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

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.

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

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

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

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

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

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

20. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in the case. Lawyers *for* Justice, PC seeks reimbursement of **\$34,097.01** in litigation costs and expenses incurred in this matter, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of the case and to obtain the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

21. In recognition of his efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Payment in the amount of \$9,000.00 to Plaintiff Christopher Mejia. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant documents and information and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain information that would facilitate the pursuit of the class and PAGA claims. Plaintiff spent numerous hours speaking with Class Counsel about his claims, describing his work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Christopher Mejia to receive \$9,000.00 as a reasonable Enhancement Payment, for his services on behalf of the Class Members, State of California, and Aggrieved Employees, in addition to his Individual Settlement Payment and Individual PAGA Payment.

22. 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 Aggrieved Employees.

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

Executed this 9th day of November 2022, at Glendale, California.



Edwin Aiwasian

EXHIBIT A

MEJIA V. TP- LINK USA COROPORATION DBA TP- LINK NORTH AMERICA, INC.
(SAN BERNARDINO COUNTY SUPERIOR COURT CASE NO. CIVDS1906246)

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	11.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Christopher Mejia’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	9.20
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant TP- Link USA Corporation dba TP- Link North America, Inc. (“Defendant”) with Respect to Plaintiff and the Putative Class Members	10.30
Pre-Notice Investigation of the Key Facts with a Focus on the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California With Respect to Plaintiff and the Aggrieved Employees	8.90
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break Law, PAGA, and Certification Decisions in California, Including all New and Relevant DLSE Materials	7.50
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	3.50

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	3.80
Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	3.10
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	3.90
Research and Investigation Re: Location(s), Department(s), and/or Division(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	4.80
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	5.90
Research and Investigation Re: Defendant's Policies, Practices, and Procedures Relating to Customer Service, Orders, Deliveries, Timekeeping, Scheduling, Opening and Closing Procedures, Meal/Rest Breaks, On-Premises Breaks, Meal Period Waivers, Meal/Rest Premiums, Overtime Compensation, Bonus/Incentive/Performance/Shift Differential Pay, Dress Code/Uniform, Footwear, Shoe Subsidy, Telecommuting and Travel, Use of Personal Vehicle, Reimbursement of Business-Related Expenses, Arbitration Agreements, and Individual Settlement/Termination/Release Agreements	23.50
Research and Investigation Re: Software Programs and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Call Routing, Resource Management, Sales, Inventory, Document and Information Management, and Client Relations Management 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 During Meal Breaks	4.60

Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver/Release, Compliant Policies, and Arbitration Agreements	8.50
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.70
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	2.50
Meet and Communicate with Plaintiff Christopher Mejia Throughout the Pendency of the Case	45.50
Investigate, Meet and Communicate with, and Conduct Interviews of Putative Class Members and Percipient Witnesses	16.10
Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 27, 2019)	7.50
Review Court's Initial Case Management Conference Order (filed on March 4, 2019)	0.50
Draft Plaintiff's Notice of Posting Jury Fees (filed on April 24, 2019)	0.10
Review Defendant's Notice of General Appearance (served on April 26, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Statement (submitted on April 26, 2019)	1.50
Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on June 3, 2019)	2.30

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Defendant to File First Amended Answer to Plaintiff's Complaint; [Proposed] Order (served on July 22, 2019)	1.80
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Defendant to File First Amended Answer to Plaintiff's Complaint; [Proposed] Order (served on July 31, 2019)	0.50
Review Court's Order Granting Defendant to File First Amended Answer to Plaintiff's Complaint (filed on August 7, 2019)	0.10
Review and Analyze Defendant's Amended Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on August 7, 2019)	1.70
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on October 23, 2019)	1.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on January 17, 2020)	1.10
Draft Plaintiff's Notice of Ruling at Case Management Conference (filed on June 25, 2020)	0.30
Review Defendant's Declaration of Kimberley L. Litzler in Response to Court's OSC Re Sanctions in the Amount of \$250 for Defendant's Failure to Appear at the June 25, 2020 Case Management Conference (served on August 4, 2020)	0.40
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on August 31, 2020)	1.10
Review Defendant's Substitution of Attorney (served on October 13, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on February 26, 2021)	1.10

Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on March 1, 2021)	1.10
Review Defendant's Notice of Posting Jury Fees (served on March 9, 2021)	0.10
Review Court's Minute Order Re: Further Case Management Conference (filed on March 10, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement (submitted on September 28, 2021)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Vacate Class Certification Related Deadline; and [Proposed] Order Thereon (submitted on October 26, 2021)	1.50
Meet and Confer with Defendant's Counsel, and Draft Joint Further Case Management Conference Statement (submitted on January 6, 2022)	1.20
Review Court's Minute Order Re: Further Case Management Conference (filed on January 10, 2022)	0.10
Draft Plaintiff's Notice Regarding Continuance of Further Case Management Conference and Minute Order (filed on January 19, 2022)	0.30
Draft Plaintiff's Notice Regarding Continuance of Further Case Management Statement (filed on March 23, 2022)	0.30
Review Court's Order Vacating Class Certification Related Deadline (filed on April 8, 2022)	0.20
Review Court's Notice of Continuance (filed on April 26, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Deem the Filing of Plaintiff's Motion for Preliminary Approval of Class Action Settlement Timely; [Proposed] Order Thereon (submitted on June 14, 2022)	0.90

Review Court's Order Deeming the Filing of Plaintiff's Motion for Preliminary Approval of Class Action Settlement Timely (filed on June 20, 2022)	0.10
Draft First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed July 6, 2022)	5.50
Appearances	
Prepare for, Travel to/from, and Attend Case Management Conference (May 3, 2019)	3.20
Prepare for and Telephonically Attend Case Management Conference (October 30, 2019)	0.80
Prepare for and Telephonically Attend Case Management Conference (June 25, 2020)	0.60
Prepare for and Telephonically Attend Case Management Conference (September 14, 2020)	1.10
Prepare for and Telephonically Attend Further Case Management Conference (January 10, 2022)	1.10
Prepare for and Telephonically Attend Case Management Conference (March 25, 2022)	1.10
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (July 6, 2022)	2.50
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment (December 6, 2022) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Christopher Mejia (served on February 6, 2019)	1.90

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Christopher Mejia (served on February 6, 2019)	2.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Christopher Mejia (served on February 14, 2019)	4.50
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on May 6, 2019)	7.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (June 24, 2019; Organizational Structure) (served on May 6, 2019)	4.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (June 25, 2019; Wage and Hour Practices) (served on May 6, 2019)	4.80
Draft Plaintiff's Special Interrogatories (Set Three) and Request for Production of Documents to Defendant (Set Two) (served on June 13, 2019)	4.90
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (August 8, 2019; Affirmative Defenses) (served on June 13, 2019)	5.10
Review and Analyze Defendant's Responses to Plaintiff's Special Interrogatories (Set One) to Defendant (served on July 22, 2019)	1.10
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (December 2, 2019, September 24, 2020, and March 8, 2020)	2.60
Review and Analyze Defendant's Responses to Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three),	7.80

Request for Production of Documents (Set One), and Request for Production of Documents (Set Two) (served on October 22, 2020)	
Review and Analyze Documents Produced by Defendant (served on October 22, 2020)	10.50
Review and Analyze Defendant's Supplemental Responses to Plaintiff's Special Interrogatories (Set One) to Defendant (served on October 29, 2020)	1.20
Review and Analyze Defendant's Responses to Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Request for Production of Documents (Set One), and Request for Production of Documents (Set Two) (served on January 15, 2021)	5.70
Review and Analyze Documents Produced by Defendant (served on January 15, 2021)	4.10
Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Christopher Mejia for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 8, 2021)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	24.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Defendant and Other Sources Prior to First Mediation (served on July 24, 2020)	48.50
Prepare for First 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/Calculations (submitted on August 6, 2020)	21.50
Remotely Attend First Mediation Session (August 11, 2020; Zoom Video Conference)	16.10

Post-Mediation Follow-Up Discussions with Mediator and Ongoing Post-Mediation Settlement Negotiations and Discussions	13.50
Review and Analyze Data and Documents Obtained from Defendant and Other Sources Prior to Second Mediation	24.50
Prepare for Second 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/Calculations (submitted on August 13, 2021)	16.50
Remotely Attend Second Mediation Session (August 20, 2021; Zoom Video Conference)	4.90
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement Agreement (executed on June 13, 2022) and Exhibits Thereto	15.50
Review and Monitor Settlement Administration Process and Weekly Reports	6.50
Law and Motion	
Research and Draft Plaintiff's 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 Christopher Mejia in Support Thereof, and [Proposed] Order Thereon (filed on June 14, 2022)	17.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on July 6, 2022)	0.20
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment, and Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on November 9, 2022) (Anticipated)	19.50
Total Hours:	526.40

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Mejia v. TP-Link USA Corporation

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/16/2019	U.S. Postmaster	Postage	6.70
2/26/2019	ProLegal	Attorney Service	180.24
2/27/2019	San Bernardino Superior Court	Court Filing Fee	435.00
2/27/2019	San Bernardino Superior Court	Complex Filing Fee	1,000.00
2/27/2019	ProLegal	Attorney Service	413.59
3/26/2019	ProLegal	Attorney Service	100.85
4/24/2019	ProLegal	Attorney Service	159.95
4/24/2019	San Bernardino Superior Court	Jury Fee	150.00
5/3/2019	ProLegal	Attorney Service	114.95
5/6/2019	General Logistics Systems US, Inc.	Courier Service	19.18
5/17/2019	Alik Orfalian	Travel Reimbursement	80.04
6/13/2019	General Logistics Systems US, Inc.	Courier Service	17.62
7/25/2019	San Bernardino Superior Court	Document Download Fee	1.00
10/23/2019	Legal Document Server, Inc.	Attorney Service	195.00
10/31/2019	Courtcall, LLC	Attorney Service	94.00
7/16/2020	Legal Document Server, Inc.	Attorney Service	80.00
8/6/2020	Paul Hastings LLP	Mediation Fee	12,000.00
8/6/2020	General Logistics Systems US, Inc.	Courier Service	27.40
8/11/2020	Robert A. Parris	Consulting Damages Expert	6,900.00
8/18/2020	General Logistics Systems US, Inc.	Courier Service	32.68
2/26/2021	General Logistics Systems US, Inc.	Courier Service	17.03
3/1/2021	Legal Document Server, Inc.	Attorney Service	195.00
3/11/2021	Courtcall, LLC	Attorney Service	94.00
8/17/2021	Paul Hastings LLP	Mediation Fee	7,000.00
8/25/2021	Paul Hastings LLP	Supplemental Mediation Fee	2,800.00
9/8/2021	US Postmaster	Postage	10.00
9/8/2021	Labor & Workforce Development Agency	Filing Fee	75.00
9/29/2021	Legal Document Server, Inc.	Attorney Service	130.00
10/27/2021	San Bernardino Superior Court	Court Filing Fee	20.00
10/27/2021	Legal Document Server, Inc.	Attorney Service	185.85
1/6/2022	Legal Document Server, Inc.	Attorney Service	185.00
1/10/2022	Courtcall, LLC	Attorney Service	94.00
1/19/2022	Legal Document Server, Inc.	Attorney Service	130.00
3/23/2022	Legal Document Server, Inc.	Attorney Service	125.00
3/25/2022	Courtcall, LLC	Attorney Service	94.00
4/29/2022	San Bernardino Superior Court	Document Download Fee	2.00
6/3/2022	San Bernardino Superior Court	Document Download Fee	8.00
6/14/2022	Legal Document Server, Inc.	Attorney Service	126.35
6/14/2022	San Bernardino Superior Court	Court Filing Fee	20.00
6/14/2022	San Bernardino Superior Court	Court Filing Fee	90.00
6/14/2022	Legal Document Server, Inc.	Attorney Service	228.58

LAWYERS for JUSTICE PC CASE COST DETAIL
Mejia v. TP-Link USA Corporation

7/7/2022	Legal Document Server, Inc.	Attorney Service	340.50
7/7/2022	Courtcall, LLC	Attorney Service	94.00
7/7/2022	San Bernardino Superior Court	Document Download Fee	24.50
Total:			34,097.01