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

NAKITA CLARK, DAWN STEPHENSON,
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,

Plaintiffs,

vs.

WITTMAN ENTERPRISES, LLC, a
California limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 34-2019-00251989-CU-OE-GDS

Honorable Jill H. Talley
Department 25

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES, LITIGATION COSTS, AND
ENHANCEMENT PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Litigation Costs, and
Enhancement Payments; Declaration of Class
Representatives (Nakita Clark and Dawn
Stephenson); Declaration of Settlement
Administrator (Stephen Gomez); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: June 2, 2023
Time: 9:00 a.m.
Department: 25

Complaint Filed: March 6, 2019
FAC Filed: March 29, 2019
SAC Filed: July 18, 2019
TAC Filed: February 4, 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 Plaintiffs Nakita Clark and Dawn Stephenson (together, “Plaintiffs”) 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 January 11, 2023, in Department 25 of the above-entitled Court, the Honorable Jill H. Talley preliminarily approved the First Amended Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant Wittman Enterprises, LLC (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Nakita Clark and Dawn Stephenson to represent the Class (together, “Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed 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 and Costs, and Enhancement Payments (“Motion for Final Approval”), no Class Members have objected to the Class Settlement or the request for Attorneys’ Fees and Costs, Enhancement Payments, Administration 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 this matter since prior to the commencement of the above-captioned action (“Action”) on March 6, 2019.

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 Plaintiffs, 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, representative PAGA claims, wage-and-hour enforcement, Plaintiffs’ claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiffs were well-suited for class-wide and representative adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees who worked for Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel investigated the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial prior to reaching the Settlement. The parties conducted formal and informal discovery and investigation into the facts of the case, and formally and informally exchanged thousands of pages of information, documents, and data throughout the course of the litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiffs and other Class Members and reviewed and analyzed a large volume of information, documents, and data obtained from Plaintiffs, Defendant, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included, and was not limited to: Plaintiffs’ and other Class Members’ employment records, a sampling of Class Members’ time and pay records, new hire information checklists, multiple iterations of Defendant’s Employee Handbook, company policy acknowledgements (including but not limited to, Handbook

Acknowledgement, Acknowledgement of Receipt of Handbook Updates, At-Will Employment Agreement, and Acknowledgment of Receipt of Code of Safe Practices), internal memoranda, job descriptions, Defendant's operations and employment practices, procedures, and policies documents (including but not limited to, Electronic Device Policy, Cell Phone Usage, Meal Break Waiver Form, Telephone Monitoring Consent, Electronic Communication and Internet Use Policy, Electronic and Telephone Monitoring Consent, Employee Orientation Checklist, Annual Confidentiality Statement, Vacation and Sick Benefit Agreement Letter, and Guidelines for Dress) among other information and documents. Class Counsel propounded multiple sets of formal written discovery requests on Defendant, reviewed Defendant's objections, responses, and amended responses thereto, and worked with Plaintiffs to provide responses to discovery requests that were propounded on them by Defendant. Class Counsel noticed the depositions of Defendant's Persons Most Knowledgeable, and prepared for and took the deposition of Defendant's Chief Executive Officer. Class Counsel researched applicable law, developed liability, damages, and penalties valuation models in connection with mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery, and the production of information, documents, and data in the course of litigation as well as in connection with mediation and settlement negotiations. Class Counsel also drafted pleadings, motion-related papers (including and not limited to, in connection with Defendant's demurrer), and the mediation brief, prepared for and attended court proceedings, and prepared for and participated in mediation and settlement negotiations, among other tasks.

7. As outlined herein, the parties have conducted formal and informal discovery and investigation during the course of litigating the case and mediation and settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiffs, Defendant, and other sources. The information, documents, and data provided a critical understanding of the nature of the work performed by the Class Members and Aggrieved Employees, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and valuation issues in

1 connection with all phases of the litigation, and ultimately in connection with the mediation and
2 settlement negotiation process. Class Counsel also performed significant research into the
3 applicable law, which is evolving as it relates to class certification, off-the-clock theory, meal
4 and rest periods, representative PAGA claims, waiver, *Pick-Up Stix* agreements/releases, wage-
5 and-hour enforcement, Plaintiffs' claims and allegations, and Defendant's defenses thereto, as
6 well as facts discovered.

7 8. After conducting significant investigation of the facts and law during the
8 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
9 try to resolve the case. These efforts included participating in a formal, full-day mediation
10 conducted by David L. Perrault, Esq., a well-regarded mediator experienced in mediating
11 complex labor and employment matters. During all settlement discussions, the parties conducted
12 their negotiations at arm's length in an adversarial position. In the course of mediation and
13 settlement negotiations, the parties exchanged information and data, and discussed all aspects of
14 the case, including the risks and delays of further litigation, the risks to the parties of proceeding
15 with class certification and trial, the law relating to class certification, off-the-clock theory, meal
16 and rest periods, representative PAGA claims, waiver, *Pick-Up Stix* agreements/releases, and
17 wage-and-hour enforcement, the evidence produced and analyzed, and the possibility of appeals,
18 among other things. Arriving at a settlement that was acceptable to the parties was not easy.
19 Defendant contended that individualized questions of fact predominate over any common issues,
20 and these issues would pose challenges to certification and representative adjudication.
21 Defendant and its counsel felt strongly about Defendant's ability to prevail on the merits and
22 obtain a denial of class certification, while Plaintiffs and Class Counsel believed that they would
23 be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation,
24 the parties ultimately agreed that the case was well-suited for settlement given the legal issues
25 relating to Plaintiffs' principal claims, as well as the costs and risks to the parties that would
26 attend further litigation. These risks of further litigation include, and are not limited to, a
27 determination that the claims are unsuitable for class treatment and/or representative
28 adjudication, class de-certification after certification of a class, allowing a jury to decide the

claims asserted in the case, and the real possibility of no recovery after years of litigation.

9. Pursuant to the escalator clause in Paragraph 4.8 of the Settlement Agreement, the Administrator confirmed that there were 27,804 Workweeks during the period from March 6, 2015 to April 19, 2021; therefore the Workweeks threshold was not exceeded and the Gross Settlement Amount will remain \$480,000.00.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$160,000.00, which is one-third (1/3) of the Gross Settlement Amount of \$480,000.00, as set forth in the Settlement Agreement and the Class Notice. Pursuant to the contingency-fee agreement entered into by and between each of the Plaintiffs and Class Counsel, Plaintiffs have each agreed to a contingency fee of at least one-third (1/3) 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 its time and efforts to this matter.

11. I am aware that common and acceptable rates for contingency representation in wage and hour class action litigation are normally in the range from 33.3% 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 lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **570.50 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred in performing those services. These hours include work done by myself and several other attorneys at Lawyers for Justice, PC. Additionally, separate from the hours referenced herein, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment and representative class actions, support a reasonable blended hourly rate of compensation at the rate of at least \$650 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$650 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v.*

1 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
2 granted on June 30, 2017, and the award of attorneys' fees involved a higher hourly rate of
3 \$845.64.

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

5 ***EDUCATION***

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

14 ***JUDICIAL EXTERNSHIPS***

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

20 ***LITIGATION AND CLASS ACTION EXPERIENCE***

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

24 17. At *Girardi & Keese*, my practice focused on class actions and other complex
25 cases involving toxic torts and products liability. In addition, I gained substantial experience on
26 cases involving insurance bad faith, premises liability, and medical negligence. While employed
27 by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150
28 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.

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

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

Case Number is BC430918.

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

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

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

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

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

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

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

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

17 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
18 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
19 involving allegations of misclassification of the “Department Manager” position. On August 12,
20 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
21 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
22 County Superior Court Case Number is RG13680477.

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

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

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

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

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

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

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

6 t) LFJ represented the plaintiff in a wage-and-hour class and PAGA
7 representative action against a property management company, on behalf of non-exempt
8 employees. On June 14, 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 BC586234.

11 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
12 representative action against a food company on behalf of non-exempt employees. On June 30,
13 2017, the court granted final approval of the class and PAGA representative action settlement.
14 The Sacramento County Superior Court Case Number is 34-2015-00175871.

15 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a chocolate company on behalf of non-exempt employees. On July
17 19, 2017, the court granted final approval of the class and PAGA representative action
18 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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1 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
3 employees. On December 11, 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 BC569646.

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

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

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

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

26 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 PAGA representative action against a global provider of products and services to the energy
28 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court

1 granted approval of the PAGA representative action settlement. The Kern County Superior
2 Court Case Number is S-1500-CV-280215-SDC.

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

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

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

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

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

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

15 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
16 wage-and-hour class action against manufacturer and supplier of power products and services on
17 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
18 motion for class certification and certified a class. On August 27, 2021, the court granted final
19 approval of the class action settlement. The San Diego County Superior Court Case Number is
20 37-2015-00025968-CU-OE-CTL.

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

25 **LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL**

26 20. To date, Class Counsel has borne all of the risks and costs of litigation and will
27 not receive any compensation until recovery is obtained in this matter. Lawyers for Justice, PC
28 seeks reimbursement of **\$13,063.11** in litigation costs and expenses incurred in the Action, as

1 reflected in “EXHIBIT B” attached hereto. These expenses were reasonable and necessary in
2 the prosecution of the case and to obtain the Settlement.

3 **ENHANCEMENT PAYMENT TO PLAINTIFF**

4 21. In recognition of their efforts and work serving as the Class Representatives, the
5 Settlement provides for Enhancement Payments in the amount of \$7,500.00 each to Plaintiffs
6 Nakita Clark and Dawn Stephenson. The requested Enhancement Payments are fair and
7 appropriate. Plaintiffs spent a substantial amount of time and effort in producing relevant
8 documents and past employment records and provided the facts and evidence necessary to
9 attempt to prove the allegations. Plaintiffs were available whenever Class Counsel needed them
10 and actively tried to obtain information that would facilitate the pursuit of the class and PAGA
11 claims. For example, Plaintiffs both spent significant time responding to discovery requests
12 propounded on them by Defendants. Plaintiffs spent numerous hours speaking with Class
13 Counsel about their claims, describing their work experiences with Defendant, and gathering and
14 reviewing documents. Accordingly, it is appropriate for Plaintiffs Nakita Clark and Dawn
15 Stephenson to receive \$7,500.00 each as reasonable Enhancement Payments, for their services
16 on behalf of the Class Members, the State of California, and Aggrieved Employees, in addition
17 to their individual settlement payments.

18 22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
19 Settlement is in the best interests of Plaintiffs, other Class Members, the State of California, and
20 Aggrieved Employees.

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

23 Executed this 10th day of May 2023, at Glendale, California.

24
25 

26 Edwin Aiwanian
27
28

EXHIBIT A

NAKITA CLARK, ET AL. V. WITTMAN ENTERPRISES, LLC
SACRAMENTO SUPERIOR COURT CASE NO. 34-2019-00251989-CU-OE-GDS

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> 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, and Manageability	8.50
Pre-Lawsuit Investigation of the Merits of Plaintiffs Nakita Clark and Dawn Stephenson’s (together, “Plaintiffs”) Claims and the Merits of the Claims of the Putative Class Members	7.20
Pre-Lawsuit Investigation of Potential Damages of Defendant Wittman Enterprises, LLC (“Defendant”) with Respect to Plaintiffs and the Putative Class Members	7.90
Pre-Notice Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiffs and the Aggrieved Employees	6.90
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiffs and the Aggrieved Employees	7.50
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, Wage Order, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials	7.10
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	3.20

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 and Aggrieved Employees	3.10
Investigation, Research, and Analysis Regarding Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity; and Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	3.40
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	4.30
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	4.50
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and/or 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	3.90
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	4.80

Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Customer Service, Timesheets, Scheduling, Reporting Time, Timekeeping, Meal/Rest Breaks, On-Premises Breaks, Meal Waivers, Overtime Compensation, Non-Discretionary Bonus/Incentive/Performance/Shift Differential Pay, Equipment/Supplies, Uniform/Dress Code, and Reimbursement of Business-Related Expenses	16.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Payroll, Billing, Client Relations Management, Project Management, Resource Management, Safety, 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	4.50
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, <i>Pick-Up Stix</i> Agreements/Releases, and Compliant Policies	8.10
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	5.30
Prepare a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, Damages, and Penalties	4.70
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' Work	6.80
Meet and Communicate with Plaintiff Nakita Clark throughout the Pendency of the Case	36.50
Meet and Communicate with Plaintiff Dawn Stephenson throughout the Pendency of the Case	38.50
Investigate, Meet and Communicate with, and/or Conduct Interviews of Putative Class Members and Percipient Witnesses	14.50

Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on March 6, 2019)	7.20
Review Court's Notice and Order of Complex Case Determination (filed on March 12, 2019)	0.10
Draft Plaintiffs' First Amended Class Action Complaint for Damages (filed on March 29, 2019)	4.50
Draft Plaintiffs' Notice of Posting Jury Fees (filed on April 30, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Stipulation and [Proposed] Order Extending Defendant Wittman Enterprises, LLC's Time to Respond to Complaint [C.R.C. 3.110(d), (e)] (submitted on May 30, 2019)	0.60
Review Court's Order Extending Defendant Wittman Enterprises, LLC's Time to Respond to Complaint [C.R.C. 3.110(d), (e)] (filed on June 11, 2019)	0.10
Draft Plaintiffs' Second Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved; Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order Granting Plaintiff Leave to File [Proposed] Second Amended Class Action Complaint for Damages (submitted on July 16, 2019)	4.10
Review Court's Order Granting Plaintiff Leave to File Second Amended Class Action Complaint for Damages (filed on July 18, 2019)	0.10
Review Court's Notice of Assignment to Department 24 for Complex Case Management (filed on July 24, 2019)	0.10
Review Defendant's Case Management Statement (served on September 11, 2019)	0.10
Draft Plaintiffs' Case Management Statement (filed on September 12, 2019)	0.80

Review Court's Tentative Ruling Re: Case Management Conference (issued on September 26, 2019)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on September 27, 2019)	0.10
Review Defendant Wittman Enterprises, LLC's Answer to Plaintiffs' Complaint and Research and Analyze Defenses (served on October 1, 2019)	1.50
Draft Plaintiffs' Case Management Statement (filed on December 27, 2019)	0.80
Review Defendant's Case Management Statement (served on January 2, 2020)	0.20
Review Court's Tentative Ruling Re: Case Management Conference (issued on January 16, 2020)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on January 17, 2020)	0.10
Review Court's Minute Order and Notice of Re-Assignment of Complex Civil Case (filed on January 23, 2020)	0.10
Draft Plaintiffs' Case Management Statement (filed on March 4, 2020)	0.80
Review Court's Tentative Ruling Re: Case Management Conference (issued on March 5, 2020)	0.10
Review Court's Minute Order Resetting Complex Civil Case Management Conference (filed on July 7, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Updated Joint Case Management Conference Statement (filed on July 10, 2020)	0.90
Review Court's Tentative Ruling Re: Case Management Conference (issued on July 22, 2020)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on July 24, 2020)	0.10

Review Court's Notice of Change in Court's Department Number (filed on August 18, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Updated Joint Case Management Conference Statement (filed on November 30, 2020)	1.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on December 4, 2020)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on December 10, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Notice of Settlement and Case Management Statement (filed on April 29, 2021)	0.60
Review Court's Tentative Ruling Re: Case Management Conference (issued on May 25, 2021)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on May 28, 2021)	0.10
Draft Plaintiffs' Notice Re: Tentative Ruling and Continuance of Case Management Conference (filed on June 1, 2021)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on October 15, 2021)	0.90
Review Court's Tentative Ruling Re: Case Management Conference (issued on October 26, 2021)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on October 29, 2021)	0.10
Draft Plaintiffs' Third Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, Cal. Labor Code § 2698 Et Seq. and Legal Research and Analysis of All Claims Involved; Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiffs Leave to File a Third Amended Complaint and [Proposed] Order Thereon (submitted on December 23, 2021)	4.50

Review Court's Order Granting Plaintiffs Leave to File a Third Amended Complaint (filed on January 14, 2022)	0.10
Review Court's Minute Order Re: Order and Notice Reassigning Case (filed on February 17, 2022)	0.10
Draft Plaintiff's Notice Regarding February 17, 2022 Minute Order and Reassignment of Case (filed on February 28, 2022)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on March 4, 2022)	0.60
Review Court's Tentative Ruling Re: Case Management Conference (issued on March 17, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on March 18, 2022)	0.10
Draft Plaintiff's Notice Regarding March 18, 2022 Minute Order (filed on March 24, 2022)	0.20
Review Court's Minute Order Re: Case Reassignment (filed on April 1, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on May 20, 2022)	0.60
Draft Plaintiff's Notice of Remote Appearance (filed on May 31, 2022)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on June 2, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on June 3, 2022)	0.10
Draft Plaintiff's Notice Regarding June 3, 2022 Minute Order (filed on June 9, 2022)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on July 20, 2022)	0.60

Review Court's Tentative Ruling Re: Case Management Conference (issued on August 3, 2022)	0.10
Draft Plaintiff's Notice of Remote Appearance (filed on August 3, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on August 4, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on October 25, 2022)	0.60
Review Court's Tentative Ruling Re: Case Management Conference (issued on November 9, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on November 10, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on November 15, 2022)	0.10
Draft Plaintiff's Notice of Continuance of Case Management Conference (filed on November 15, 2022)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on December 1, 2022)	0.60
Review Court's Tentative Ruling Re: Case Management Conference and Tentative Ruling Re: Status Conference (issued on December 7, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference and Minute Order Re: Status Conference (filed on December 8, 2022)	0.10
Draft Plaintiff's Notice of Continuance of Case Management Conference (filed on December 8, 2022)	0.10
Draft Plaintiff's Notice Regarding December 8, 2022 Minute Order (filed on January 24, 2023)	0.20
Review Court's Minute Order Re: Notice of Change in Departments (filed on January 30, 2023)	0.10

Appearances	
Prepare for and Telephonically Attend Case Management Conference (March 6, 2020)	1.10
Prepare for and Telephonically Attend Case Management Conference (November 15, 2022)	0.20
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payments (June 2, 2023) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Dawn Stephenson (served on January 17, 2019)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Nakita Clark (served on January 30, 2019)	1.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Dawn Stephenson (served on February 1, 2019)	3.50
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Nakita Clark (served on February 12, 2019)	1.10
Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Wittman Enterprises, LLC and Requests for Production of Documents (Organizational Structure; noticed for August 1, 2019) (served on June 6, 2019)	3.50
Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Wittman Enterprises, LLC and Requests for Production of Documents (Wage and Hour Practices; noticed for August 2, 2019) (served on June 6, 2019)	4.30

Draft Plaintiffs' Form Interrogatories – General (Set One), Requests for Production of Documents (Set One), Special Interrogatories (Set One), and Special Interrogatories (Set Two) to Defendant Wittman Enterprises, LLC (served on June 6, 2019)	5.90
Review and Analyze Defendant Wittman Enterprises, LLC's Objections to Plaintiffs' Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (served on July 31, 2019)	1.50
Review and Analyze Defendant Wittman Enterprises, LLC'S Responses to Plaintiff's Form Interrogatories – General (Set One), Requests for Production of Documents (Set One), Special Interrogatories (Set One), and Special Interrogatories (Set Two) to Defendant Wittman Enterprises, LLC (served on July 31, 2019)	4.50
Review Defendant Wittman Enterprises, LLC's Notice of Deposition of Plaintiff Nakita Clark and Requests for Production of Documents (served on August 1, 2019)	0.20
Review Defendant Wittman Enterprises, LLC's Notice of Deposition of Plaintiff Dawn Stephenson and Requests for Production of Documents (served on August 1, 2019)	0.20
Review and Analyze Defendant Wittman Enterprises, LLC's Form Interrogatories – Employment to Plaintiff Nakita Clark (Set One) (served on August 1, 2019)	0.20
Review and Analyze Defendant Wittman Enterprises, LLC's Form Interrogatories – Employment to Plaintiff Dawn Stephenson (Set One) (served on August 1, 2019)	0.20
Draft Plaintiff Nakita Clark's Objections and Responses to Defendant Wittman Enterprises, LLC's Notice of Deposition of Plaintiff Nakita Clark and Requests for Production of Documents (served on August 27, 2019)	2.50
Draft Plaintiff Dawn Stephenson's Objections and Responses to Defendant Wittman Enterprises, LLC's Notice of Deposition of Plaintiff Dawn Stephenson and Requests for Production of Documents (served on August 27, 2019)	2.10

Review and Analyze Defendant Wittman Enterprises, LLC's Objections to Plaintiffs' Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (served on September 11, 2019)	1.30
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on September 16, 2019)	1.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on October 5, 2019)	2.30
Draft Plaintiff Nakita Clark's Responses to Wittman Enterprises, LLC's Form Interrogatories – Employment (Set One) (served on September 19, 2019)	5.10
Draft Plaintiff Dawn Stephenson's Responses to Wittman Enterprises, LLC's Form Interrogatories – Employment (Set One) (served on September 19, 2019)	4.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on August 24, 2020)	1.90
Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Wittman Enterprises, LLC and Requests for Production of Documents (Wage and Hour Practices; noticed for October 13, 2020) (served on August 27, 2020)	2.50
Draft Plaintiffs' Requests for Production of Documents (Set Two), Special Interrogatories (Set Three), and Requests for Admission (Set One) to Defendant Wittman Enterprises, LLC (served on August 27, 2020)	5.10
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on September 15, 2020)	0.50

Review and Analyze Defendant Wittman Enterprises, LLC'S Amended Responses to Plaintiffs' Form Interrogatories – General (Set One), Requests for Production of Documents (Set One) and Special Interrogatories (Set One) to Defendant Wittman Enterprises, LLC (served on September 15, 2020)	6.30
Review and Analyze Defendant Wittman Enterprises, LLC'S Amended Responses to Plaintiffs' Special Interrogatories (Set Two) to Defendant Wittman Enterprises, LLC (served on September 30, 2020)	3.30
Review and Analyze Defendant Wittman Enterprises, LLC's Objections to Plaintiffs Nakita Clark and Dawn Stephenson's Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (served on October 8, 2020)	1.50
Review and Analyze Defendant Wittman Enterprises, LLC's Responses to Plaintiffs' Requests for Production of Documents (Set Two), Special Interrogatories (Set Three), and Requests for Admission (Set One) to Defendant Wittman Enterprises, LLC (served on October 8, 2020)	4.50
Draft Plaintiffs' Form Interrogatories – General (Set Two), Special Interrogatories (Set Three), and Requests for Admission (Set One) to Defendant Wittman Enterprises, LLC (served on October 16, 2020)	2.50
Review and Analyze Additional Documents Produced by Defendant including Personnel File, Pay Stubs, and Time Records for Plaintiffs (served on November 6, 2020)	14.50
Review Defendant Wittman Enterprises, LLC's Responses to Plaintiffs Nakita Clark and Dawn Stephenson's Form Interrogatories – General (Set Two) (served on November 12, 2020)	0.50
Draft Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant Wittman Enterprises, LLC and Requests for Production of Documents (Settlement Agreements; noticed for December 15, 2020) (served on December 1, 2020)	4.10
Prepare for and Take the Deposition of the Person Most Knowledgeable Corinne Wittman-Wong (December 15, 2020; Zoom Video Conference) and Review Deposition Transcript	9.50

Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiffs Nakita Clark and Dawn Stephenson for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 1, 2021)	7.10
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	21.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Defendant (in excess of 17,000 pages), Plaintiffs, and Other Sources (served on January 30, 2020, February 3, 2020) • Employee Handbooks, Employment and Operations Policies, Practices, and Procedures Documents • Meal Break Waiver • Time Records Sampling • Earning Statements Sampling • Meal Analysis Excel Sheets • Break Analysis Excel Sheets	64.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on February 14, 2020 for February 19, 2020 Mediation)	22.50
Attend Mediation Session (February 19, 2020)	8.70
Post-Mediation Follow-Up Discussions with Mediator and Ongoing Post-Mediation Settlement Negotiations and Discussions	8.50

Draft, Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement and Release (executed on August 2, 2022) and Notice of Class Action Settlement	17.50
Draft, Review, Revise, Negotiate, and Finalize First Amended Stipulation of Class Action and PAGA Settlement and Release (executed on December 1, 2022) and Notice of Class Action Settlement	3.10
Review and Monitor Settlement Administration Process and Weekly Reports	6.50
Law and Motion	
Review and Analyze Defendant Wittman Enterprises, LLC's Notice of Demurrer and Demurrer to Plaintiff's Second Amended Complaint, Memorandum of Points and Authorities in Support Thereof, Declaration of Kent L. Bradbury in Support Thereof, and [Proposed] Order (served on August 16, 2019)	1.50
Draft Plaintiffs' Nakita Clark and Dawn Stephenson's Opposition to Defendant Wittman Enterprises, LLC's Demurrer to Plaintiffs' Second Amended Complaint and Declaration of D. Elliot Gonzales in Support Thereof (filed on September 11, 2019)	11.20
Review and Analyze Defendant Wittman Enterprises, LLC's Reply to Opposition to Demurrer to Plaintiffs' Second Amended Complaint (served on September 13, 2019)	1.10
Review Court's Minute Order Re: Hearing on Demurrer (filed on September 24, 2019)	0.20
Research and Draft Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Nakita Clark in Support Thereof, Declaration of Dawn Stephenson in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on October 21, 2022)	16.50
Review Defendant's Notice of Non-Opposition to Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (served on November 1, 2022)	0.10
Review Court's Tentative Ruling Re: Motion for Preliminary Approval (published on November 14, 2022)	0.20

Review Court's Minute Order Re: Motion for Preliminary Approval (filed on November 15, 2022)	0.10
Draft Supplemental Declaration of Yasmin Hosseini in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on December 1, 2022)	6.50
Review Court's Revised Order Granting Preliminary Approval of Class Action Settlement (filed on January 11, 2023)	0.80
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiffs' Hearing and Deadline to File Motion for Final Approval; [Proposed] Order Thereon (submitted on March 3, 2023)	1.30
Review Court's Order Continuing Plaintiffs' Hearing and Deadline to File a Motion for Final Approval (filed on March 6, 2023)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payments; Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Final Approval Order and Judgment (Anticipated)	18.50
Total Hours:	570.50

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Clark v. Wittman Enterprises LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/17/2019	U.S. Postmaster	Postage	6.70
1/30/2019	U.S. Postmaster	Postage	6.85
3/7/2019	Sacramento Superior Court	Court Filing Fee	435.00
3/7/2019	Sacramento Superior Court	Complex Court Filing Fee	1,000.00
3/7/2019	One Legal	Attorney Service	231.11
4/18/2019	One Legal	Attorney Service	177.00
4/25/2019	ProLegal	Attorney Service	196.20
4/26/2019	ProLegal	Attorney Service	159.95
4/30/2019	Sacramento Superior Court	Jury Fee	150.00
4/30/2019	ProLegal	Attorney Service	129.95
6/6/2019	General Logistics Systems US, Inc.	Courier Service	19.15
6/11/2019	Legal Document Server, Inc.	Attorney Service	130.00
6/11/2019	Legal Document Server, Inc.	Attorney Service	130.00
7/18/2019	Legal Document Server, Inc.	Attorney Service	130.00
9/11/2019	General Logistics Systems US, Inc.	Courier Service	36.00
9/19/2019	General Logistics Systems US, Inc.	Courier Service	25.40
9/20/2019	Federal Express	Courier Service	31.97
10/1/2019	U.S. Postmaster	Postage	1.75
12/27/2019	Legal Document Server, Inc.	Attorney Service	130.00
1/10/2020	CourtCall, LLC	Attorney Service	94.00
1/14/2020	Judicate West	Mediation Fee	3,000.00
1/17/2020	Sacramento Superior Court	Document Download Fee	1.00
1/31/2020	Legal Document Server, Inc.	Attorney Service	130.00
2/19/2020	Melissa LeBlanc	Travel Reimbursement	1,067.47
2/28/2020	CourtCall, LLC	Attorney Service	94.00
3/4/2020	Legal Document Server, Inc.	Attorney Service	195.00
7/10/2020	Legal Document Server, Inc.	Attorney Service	130.00
7/14/2020	General Logistics Systems US, Inc.	Courier Service	17.55
7/15/2020	Legal Document Server, Inc.	Attorney Service	80.00
7/24/2020	General Logistics Systems US, Inc.	Courier Service	17.55
7/28/2020	Legal Document Server, Inc.	Attorney Service	80.00
8/24/2020	U.S. Postmaster	Postage	6.95
8/27/2020	General Logistics Systems US, Inc.	Courier Service	26.57
8/28/2020	Legal Document Server, Inc.	Attorney Service	80.00
9/8/2020	U.S. Postmaster	Postage	6.95
9/16/2020	U.S. Postmaster	Postage	6.95
9/30/2020	U.S. Postmaster	Postage	6.95
10/20/2020	General Logistics Systems US, Inc.	Courier Service	14.48
11/30/2020	General Logistics Systems US, Inc.	Courier Service	20.13
11/30/2020	Legal Document Server, Inc.	Attorney Service	130.00

LAWYERS for JUSTICE PC CASE COST DETAIL

Clark v. Wittman Enterprises LLC

12/1/2020	General Logistics Systems US, Inc.	Courier Service	20.13
12/15/2020	Esquire Deposition Solutions, LLC	Court Reporter	1,061.40
12/15/2020	Esquire Deposition Solutions, LLC	Videography Service	807.50
12/22/2020	Legal Document Server, Inc.	Attorney Service	130.00
4/29/2021	Legal Document Server, Inc.	Attorney Service	110.00
6/1/2021	Legal Document Server, Inc.	Attorney Service	110.00
9/2/2021	Labor & Workforce Development Agency	Filing Fee	150.00
10/15/2021	Legal Document Server, Inc.	Attorney Service	110.00
12/23/2021	Legal Document Server, Inc.	Attorney Service	130.95
12/23/2021	Sacramento Superior Court	Stipulation Fee	20.00
2/3/2022	Sacramento Superior Court	Document Download Fee	18.20
2/4/2022	Legal Document Server, Inc.	Attorney Service	130.00
2/22/2022	Sacramento Superior Court	Document Download Fee	3.00
2/28/2022	Legal Document Server, Inc.	Attorney Service	110.00
3/4/2022	Legal Document Server, Inc.	Attorney Service	120.00
3/21/2022	Sacramento Superior Court	Document Download Fee	2.00
3/25/2022	Legal Document Server, Inc.	Attorney Service	100.00
5/31/2022	Legal Document Server, Inc.	Attorney Service	100.00
6/9/2022	Sacramento Superior Court	Document Download Fee	2.00
6/10/2022	Legal Document Server, Inc.	Attorney Service	100.00
7/20/2022	Legal Document Server, Inc.	Attorney Service	105.00
8/4/2022	Legal Document Server, Inc.	Attorney Service	125.00
9/20/2022	Sacramento Superior Court	Document Download Fee	2.00
10/21/2022	Legal Document Server, Inc.	Attorney Service	207.80
10/21/2022	Sacramento Superior Court	Motion Fee	60.00
10/25/2022	Legal Document Server, Inc.	Attorney Service	125.00
11/15/2022	Legal Document Server, Inc.	Attorney Service	105.00
12/2/2022	Legal Document Server, Inc.	Attorney Service	125.00
12/2/2022	Legal Document Server, Inc.	Attorney Service	125.00
12/5/2022	Sacramento Superior Court	Document Download Fee	4.00
12/8/2022	Legal Document Server, Inc.	Attorney Service	125.00
1/17/2023	Sacramento Superior Court	Document Download Fee	2.00
1/24/2023	Legal Document Server, Inc.	Attorney Service	125.00
2/3/2023	Sacramento Superior Court	Document Download Fee	8.20
3/2/2023	Legal Document Server, Inc.	Attorney Service	126.35
3/2/2023	Sacramento Superior Court	Stipulation Fee	20.00
3/8/2023	Sacramento Superior Court	Document Download Fee	5.00
Total:			13,063.11