

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Janardana Burns (SBN 337696)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

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

RAHMAD PERRY; 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.

BELLA BRU NATOMAS, LLC, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 34-2020-00281583-CU-OE-GDS

Honorable Jill H. Talley
Department 25

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
(Rahmad Perry); Declaration of Settlement
Administrator (Lindsay Kline); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: January 20, 2023
Time: 9:00 a.m.
Department: 25

Complaint Filed: July 8, 2020
FAC Filed: February 14, 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 Rahmad Perry (“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 May 31, 2022, in Department 25 of the above-entitled Court, the Honorable Jill H. Talley preliminarily approved the Class Action and PAGA Settlement Agreement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Bella Bru Natomas, LLC (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Rahmad Perry as representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Edwin Aiwarzian, Arby Aiwarzian, and Joanna Ghosh of Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class 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, Costs, and Enhancement Payment (“Motion for Final Approval”), no Class Members have objected to the Settlement or the request for Attorneys’ Fees and Costs, Enhancement Payment, Settlement Administration Expenses, or allocation for the penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, et seq. (“PAGA Payment”).

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 on July 8, 2020.

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, the claims of Plaintiff, and potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiff were well-suited for class-wide adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid 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. Class Counsel investigated the veracity, strength, and scope of the claims, and were preparing for class certification and trial, prior to reaching the Settlement. The parties conducted significant formal and informal discovery and investigation into the facts of the case, and also informally exchanged a large volume of information, documents, and data in connection with mediation and settlement negotiations. Class Counsel prepared and served multiple sets of written discovery requests on Defendant in various forms (specifically, Requests for Production of Documents (Sets One & Two); Special Interrogatories (Sets One, Two, & Three); and Form Interrogatories (Set One)), prepared and served numerous notices of deposition of Defendant's Person(s) Most Knowledgeable (along with requests for production of documents), and reviewed Defendant's responses and supplemental responses to Plaintiff's discovery requests. Class Counsel also worked with Plaintiff to review and prepare objections to a notice of deposition of Plaintiff Rahmad Perry. The parties also engaged in the *Belaire-West* Process, and Class Counsel received the Contact Information Release List for non-opt out putative class members. Class Counsel also interviewed and obtained information from Plaintiff and other Class Members, and reviewed and analyzed a large volume of documents and data obtained from

1 Plaintiff, Defendant, and other sources. The documents and data reviewed and analyzed by
2 Class Counsel included, and were not limited to: Plaintiff's employment records, a detailed
3 sampling of Class Members' time and pay data, multiple versions of Defendant's Employee
4 Handbook and Training Manual, multiple iterations of Defendant's Code of Conduct, company
5 policy acknowledgments, internal memoranda, job descriptions, Defendant's operations and
6 employment practices, procedures, and policies (including but not limited to Defendant's Pay
7 Period and Work Week Policy, Overtime Policy, Timekeeping Policy for Non-Exempt
8 Employees, Off-the Clock Work Policy for Non-Exempt Employees, Attendance Policy, and
9 Expense Reimbursement Policy), among other information, documents, and data. Class Counsel
10 researched applicable law, developed violation, damages, and penalties valuation models in
11 preparation for mediation and settlement negotiations, and met and conferred with Defendant's
12 counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, discovery, case
13 management, motion practice, and production of various documents and data in the course of
14 litigation and in connection with mediation and settlement negotiations. Class Counsel also
15 invested time researching and investigating the applicable law, which is constantly evolving as it
16 relates to certification, PAGA representative claims, off-the-clock theory, meal and rest periods,
17 wage-and-hour enforcement, *Pick-Up Stix* release agreements, Plaintiff's claims and allegations,
18 and Defendant's defenses thereto, as well as facts discovered. Other work performed by Class
19 Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and
20 revising pleadings, motion-related papers, and the mediation brief; and preparing and appearing
21 for court proceedings, mediation, and settlement negotiations, among other tasks.

22 7. As outlined herein, the parties have conducted significant formal and informal
23 discovery and investigation during the course of litigating the case. Class Counsel analyzed a
24 large volume of documents and data obtained from Plaintiff, Defendant, and other sources.
25 These documents and data provided a critical understanding of the nature of the work performed
26 by the Class Members, as well as Defendant's operations and employment policies, practices,
27 and procedures, and were used in analyzing liability, damages, penalties, and valuation issues in
28 connection with all phases of the litigation, and ultimately in connection with the mediation and

1 settlement negotiation process.

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

24 9. As set forth more fully in the accompanying Motion for Final Approval, Class
25 Counsel seeks attorneys' fees in the amount of \$113,540.00, which is thirty-five percent (35%)
26 of the Gross Settlement Amount of \$324,400.00, as set forth in the Settlement Agreement and
27 the Class Notice. Pursuant to the contingency-fee agreement entered into by and between
28 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.

10. 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%.

11. 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 **467.10 hours** performing tasks and obtaining recovery in this case. 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 the firm. 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.

12. 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 case, in litigating complex wage-and-hour actions, and in particular, employment class and representative actions, support a reasonable blended hourly rate of compensation at the rate of \$700 for work performed by Class Counsel. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$700 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,

1 and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class
2 and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los
3 Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of
4 attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in
5 *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court
6 Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of
7 attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative
8 action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County
9 Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of
10 attorneys' fees involved an hourly rate of \$764.82; final approval of the class and representative
11 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
12 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an
13 hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley*
14 *Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450)
15 was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of
16 \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler*
17 *Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was
18 granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77;
19 and final approval of the class and representative action settlement in *Demetrius Camarillo v.*
20 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
21 granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

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

23 **EDUCATION**

24 13. In May of 2004, I graduated from *Pepperdine University School of Law* with a
25 Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from
26 the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree
27 program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles
28 County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from

1 the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard*
2 *University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a
3 concentration in Natural Sciences from *Pepperdine University*.

4 ***JUDICIAL EXTERNSHIPS***

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

10 ***LITIGATION AND CLASS ACTION EXPERIENCE***

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

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

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

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

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

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

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

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

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

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

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.

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

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

Council Coordination Proceeding Number is 4794.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1 BC498401.

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

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

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

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

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

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

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

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

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

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

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

27 ll) LFJ, in association with co-counsel therein, represents the plaintiffs in a
28 wage-and-hour class action against manufacturer and supplier of power products and services on

1 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
2 motion for class certification and certified a class. The San Diego County Superior Court Case
3 Number is 37-2015-00025968-CU-OE-CTL.

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

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

9 19. To date, Class Counsel has borne all of the risks and costs of litigation and will
10 not receive any compensation until recovery is obtained in the above-captioned action. Lawyers
11 for Justice, PC seeks reimbursement of **\$14,795.80** in litigation costs and expenses incurred in
12 this matter, as reflected in **"EXHIBIT B"** attached hereto. These expenses were reasonable and
13 necessary in the prosecution of the case and to obtain the Settlement.

14 **ENHANCEMENT PAYMENT TO PLAINTIFF**

15 20. In recognition of his efforts and work serving as the Class Representative, the
16 Settlement provides for an Enhancement Payment in the amount of \$7,500.00 to Plaintiff
17 Rahmad Perry to compensate Plaintiff for the time and effort that he expended in the case. The
18 requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of
19 time and effort in producing relevant documents and past employment records and information
20 and provided the facts and evidence necessary to attempt to prove the allegations, including and
21 not limited to, by way of working with Class Counsel to provide responses to discovery requests
22 that were propounded on him by Defendant. Plaintiff spent numerous hours speaking with Class
23 Counsel about his claims, describing his work experience with Defendant, and gathering and
24 reviewing documents. Plaintiff was available whenever Class Counsel needed him and actively
25 tried to obtain and provide information to support the pursuit of the class and PAGA claims.
26 Accordingly, it is appropriate for Plaintiff Rahmad Perry to receive \$7,500.00 as a reasonable
27 Enhancement Payment for his services in the case, in addition to his individual payment under
28 the Settlement.

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

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

5 Executed this 27th day of December 2022, at Glendale, California.

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EXHIBIT A

RAHMAD PERRY V. BELLA BRU NATOMAS LLC
(SACRAMENTO COUNTY SUPERIOR COURT CASE NO. 34-2020-00281583-CU-OE-GDS)

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	10.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Rahmad Perry’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	9.10
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Bella Bru Natomas, LLC (“Defendant”) with Respect to Plaintiff and the Putative Class Members	9.80
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	8.50
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to the Plaintiff and the Aggrieved Employees	7.90
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	8.50
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	2.90

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	3.70
Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	2.60
Analysis of Competitors within Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	3.50
Research and Investigation Re: Location(s), Divisions(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	5.10
Comparative Analysis and Cross-Checking of All Available Job Postings and Job Reviews Regarding Work with 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	4.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	5.60
Research and Investigation Re: Defendant's Policies, Practices, and Procedures Relating to Customer Service, Timekeeping, Opening and Closing Procedures, Scheduling and Attendance, Catering and Catering Logs, Meal/Rest Breaks, On Premises Breaks, Meal Waivers, Meal/Rest Premiums, Overtime Compensation, Non-Discretionary Commission/Bonus/Incentive/Performance/Shift Differential Pay, Dress Code/Uniform, Footwear, PPE, Use of Personal Vehicle, Use of Personal Cell Phone, Reimbursement of Business-Related Expenses, <i>Pick-Up Stix</i> Release Agreements	18.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Payroll, Point of Sale, and Resource Management Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the	4.50

Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver/Release, and Compliant Policies	8.10
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
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	2.30
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' Work	5.10
Meet and Communicate with Plaintiff Rahmad Perry throughout the Pendency of the Case	45.50
Investigate, Meet and Communicate with, and/or Conduct Interviews of Putative Class Members and Percipient Witnesses	16.90
Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on July 8, 2020)	7.50
Review Court's Notice and Order of Complex Case Determination (filed on July 29, 2020)	0.10
Review Court's Notice of Case Assignment and Notice of Complex Case Management Procedures (filed on August 11, 2020)	0.10
Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on September 16, 2020)	2.10

Review and Analyze Defendant's First Amended Answer to Plaintiff's Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on October 01, 2020)	1.90
Draft Plaintiff's Notice of Posting Jury Fees (filed on October 21, 2020)	0.10
Review Defendant's Notice of Change of Firm Name (served on November 4, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on January 6, 2021)	1.30
Review Court's Tentative Ruling re Initial Case Management Conference (filed on January 19, 2021)	0.10
Review Court's Minute Order re Case Management Conference (filed on January 22, 2021)	0.10
Draft Plaintiff's Notice of Ruling (filed on February 4, 2021)	0.20
Draft Plaintiff's Letter requesting continuance of hearing for Plaintiff's Motion to Compel (filed on February 25, 2021)	0.80
Review Court's Minute Order re Case Management Conference (filed on June 16, 2021)	0.10
Draft Plaintiff's Notice of Continuance of Case Management Conference (filed on June 22, 2021)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (submitted on August 16, 2021)	1.10
Review Court's Tentative Ruling for the Case Management Conference (filed on August 31, 2021)	0.10
Review Court's Minute Order re Case Management Conference (filed on September 3, 2021)	0.10
Draft Plaintiff's Notice of Continuance of Case Management Conference (filed on September 10, 2021)	0.20

Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on January 10, 2022)	1.10
Review Court's Tentative Ruling Case Management Conference (filed on January 20, 2022)	0.10
Review Court's Minute Order re Case Management Conference (filed on January 21, 2022)	0.10
Review Court's Minute Order re Order and Notice Reassigning Case (filed on January 26, 2022)	0.10
Draft First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved; Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order Thereon (submitted on January 28, 2022)	5.50
Draft Plaintiff's Notice Regarding Reassignment and Continuance of Case Management Conference (filed on February 7, 2022)	0.30
Review Court's Order Granting Joint Stipulation for Leave to File First Amended Complaint (filed on February 8, 2022)	0.10
Draft Plaintiff's Notice of Entry of Order (filed on February 14, 2022)	0.10
Review Court's Minute Order re Notice Assigning Complex Case for All Purposes (filed on March 30, 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 May 10, 2022)	0.50
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on May 12, 2022)	0.80

Draft Plaintiff's Notice of Remote Appearance of Janardana Burns (filed on May 26, 2022)	0.20
Review Court's Tentative Ruling re Case Management Conference (filed on May 26, 2022)	0.10
Review Court's Minute Order re Case Management Conference (filed on May 27, 2022)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on June 6, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Final Approval Hearing (submitted on June 13, 2022)	1.10
Review Court's Order Granting Joint Stipulation to Continue Final Approval Hearing (filed on July 5, 2022)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on July 14, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on August 26, 2022)	0.80
Draft Plaintiff's Notice of Remote Appearance of Annabel Blanchard (filed on September 6, 2022)	0.20
Review Court's Tentative Ruling re Case Management Conference (filed on September 8, 2022)	0.10
Review Court's Minute Order re Continuance of Case Management Conference (filed on September 9, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Further Continue Final Approval Hearing; [Proposed] Order Thereon (submitted on October 12, 2022)	0.90
Review Court's Order Granting Joint Stipulation to Further Continue Final Approval Hearing (filed on October 25, 2022)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on November 3, 2022)	1.10
Review Court's Tentative Ruling re Case Management Conference (filed on December 2, 2022)	0.10
Review Court's Minute Order re Case Management Conference (filed on December 2, 2022)	0.10
Appearances	
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment (January 20, 2023) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rahmad Perry (served on October 17, 2019)	1.90
Draft Follow Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rahmad Perry (served on November 25, 2019)	2.10
Draft Follow Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rahmad Perry (served on May 4, 2020)	2.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rahmad Perry (served on June 5, 2020)	2.40
Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant (served on September 28, 2020)	7.50

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Bella Bru Natomas LLC and Requests for Production of Documents (noticed for November 2, 2020; Organizational Structure) (served on September 28, 2020)	3.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Bella Bru Natomas LLC and Requests for Production of Documents (noticed for November 3, 2020; Wage and Hour Practices) (served on September 28, 2020)	4.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Bella Bru Natomas LLC and Requests for Production of Documents (November 4, 2020; Affirmative Defenses) (served on September 28, 2020)	4.80
Review Defendant Bella Bru Natomas LLC's Notice of Taking Deposition of Plaintiff Rahmad Perry on Oral Examination and Request for Production of Documents and Notice of Intent to Record by Video Technology (October 29, 2020) (served on October 8, 2020)	0.90
Draft Plaintiff's Objections to Defendant Bella Bru Natomas LLC's Notice of Taking Deposition of Plaintiff Rahmad Perry on Oral Examination and Request for Production of Documents and Notice of Intent to Record by Video Technology (served on October 22, 2020)	2.50
Review and Analyze Defendant's Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Bella Bru Natomas LLC and Requests for Production of Documents (noticed for November 2, 2020; Organizational Structure) (served on October 28, 2020)	1.50
Review and Analyze Defendant's Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Bella Bru Natomas LLC and Requests for Production of Documents (noticed for November 3, 2020; Wage and Hour Practices) (served on October 28, 2020)	0.60
Review and Analyze Defendant's Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Bella Bru Natomas LLC and Requests for Production of Documents (noticed for November 4, 2020; Affirmative Defenses) (served on October 28, 2020)	0.60

Review and Analyze Defendant's Objections and Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant (served on November 17, 2020)	5.80
Review and Analyze Documents Produced by Defendant [000001-000344] (served on November 17, 2020)	2.80
Review and Analyze Documents Produced by Defendant [00345-00346] (served on March 31, 2021)	0.10
Review and Analyze Defendant's Supplemental Response to Plaintiff's Form Interrogatories – General (Set One) (served on April 22, 2021)	0.70
Review and Analyze Defendant's Supplemental Response to Plaintiff's Request for Production of Documents (Set One) (served on April 22, 2021)	0.70
Review and Analyze Defendant's Supplemental Response to Plaintiff's Special Interrogatories (Set Two) (served on April 22, 2021)	0.90
Review and Analyze Documents Produced by Defendant [00347-0004542] (served on April 22, 2021)	11.50
Review and Analyze Defendant's Amended Supplemental Response to Plaintiff's Request for Production of Documents (Set One) (served on May 4, 2021)	1.50
Review and Analyze Documents Produced by Defendant [004543-004554] (served on May 4, 2021)	0.50
Review and Analyze Documents Produced by Defendant [004555-4739] (served on May 25, 2021)	0.70
Review and Analyze Documents Produced by Defendant [4740-4895] (served on June 22, 2021)	1.10

Meet and Confer with Defendant's Counsel, Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard, Monitor Administration Process, and Review Contact Information Release List (mailing date May 19, 2021; release date June 25, 2021)	5.80
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Rahmad Perry for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on November 22, 2021)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	21.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	43.50
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/Calculations (submitted on October 27, 2021)	21.50
Review and Analyze Defendant's Mediation Brief (dated October 27, 2021)	6.80
Virtually Attend Mediation Session (November 3, 2021)	11.50
Additional Negotiations Through Mediator to Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed January 10, 2022)	6.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on March 23, 2022) and Exhibits Thereto	15.80
Review and Monitor Settlement Administration Process and Weekly Reports	4.50

Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion to Compel Defendant Bella Bru Natomas LLC to Provide Further Responses to Plaintiff's Special Interrogatories (Set Two) and Request for Monetary Sanctions, Rule 3.1345 Separate Statement in Support Thereof, Declaration of Travis Maher in Support Thereof, and [Proposed] Order Thereon (filed on February 2, 2021)	3.50
Research and Draft Plaintiff's Notice of Motion and Motion to Compel Defendant Bella Bru Natomas LLC to Provide Further Responses to Plaintiff's Form Interrogatories – General (Set One) and Request for Monetary Sanctions, Rule 3.1345 Separate Statement in Support Thereof, Declaration of Travis Maher in Support Thereof, and [Proposed] Order Thereon (filed on February 2, 2021)	2.50
Research and Draft Plaintiff's Notice of Motion and Motion to Compel Defendant Bella Bru Natomas LLC to Provide Further Responses to Plaintiff's Request for Production of Documents (Set One) and Request for Monetary Sanctions, Rule 3.1345 Separate Statement in Support Thereof, Declaration of Travis Maher in Support Thereof, and [Proposed] Order Thereon (filed on February 2, 2021)	3.50
Draft Plaintiff's Amended Notice of Motion to Compel Defendant Bella Bru Natomas LLC to Provide Further Responses to Plaintiff's Special Interrogatories (Set Two) and Request for Monetary Sanctions (filed on March 5, 2021)	0.10
Draft Plaintiff's Amended Notice of Motion to Compel Defendant Bella Bru Natomas LLC to Provide Further Responses to Plaintiff's Form Interrogatories – General (Set One) and Request for Monetary Sanctions (filed on March 5, 2021)	0.10
Draft Plaintiff's Amended Notice of Motion to Compel Defendant Bella Bru Natomas LLC to Provide Further Responses to Plaintiff's Request for Production of Documents (Set One) and Request for Monetary Sanctions (filed on March 5, 2021)	0.10
Review Court's Minute Order re Motion to Compel Further Responses to Form Interrogatories (filed on March 9, 2021)	0.10

Review Court's Minute Order re Motion to Compel Further Responses to Requests for Production of Documents (filed on March 9, 2021)	0.10
Review Court's Minute Order re Motion to Compel Further Responses to Special Interrogatories (filed on March 9, 2021)	0.10
Review Court's Minute Order re Motion to Compel Further Responses to Requests for Production of Documents (filed on May 6, 2021)	0.10
Review Court's Minute Order re Motion to Compel Further Responses to Special Interrogatories (filed on May 6, 2021)	0.10
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Janardana Burns in Support Thereof, Declaration of Rahmad Perry in Support Thereof, and [Proposed] Order Thereon (filed on May 10, 2022)	15.50
Review Court's Tentative Ruling re Motion for Preliminary Approval of Class Action Settlement (filed on May 27, 2022)	0.50
Review Court's Minute Order re Motion for Preliminary Approval of Class Action Settlement (filed May 31, 2022)	0.40
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 Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on December 27, 2022) (Anticipated)	17.50
Total Hours:	467.10

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Perry v. Bella Bru Natomas LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/2/2020	U.S. Postmaster	Postage	6.95
7/8/2020	Legal Document Server, Inc.	Attorney Service	145.23
7/8/2020	Sacramento Superior Court	Court Filing Fee	435.00
8/7/2020	Legal Document Server, Inc.	Attorney Service	110.00
8/11/2020	U.S. Postmaster	Postage	7.10
8/17/2020	Legal Document Server, Inc.	Attorney Service	110.00
9/9/2020	Legal Document Server, Inc.	Attorney Service	120.00
9/11/2020	Legal Document Server, Inc.	Attorney Service	130.00
9/28/2020	General Logistics Systems US, Inc.	Courier Service	27.48
10/7/2020	Legal Document Server, Inc.	Attorney Service	130.00
10/12/2020	General Logistics Systems US, Inc.	Courier Service	27.48
10/15/2020	FedEx Express	Courier Service	32.28
10/21/2020	Legal Document Server, Inc.	Attorney Service	135.25
10/21/2020	Sacramento Superior Court	Jury Fee	150.00
2/2/2021	Legal Document Server, Inc.	Attorney Service	178.60
2/2/2021	ProLegal	Attorney Service	429.20
2/2/2021	Sacramento Superior Court	Filing Fee	120.00
2/2/2021	Sacramento Superior Court	Filing Fee	60.00
2/3/2021	Legal Document Server, Inc.	Attorney Service	183.50
2/4/2021	Legal Document Server, Inc.	Attorney Service	130.00
2/8/2021	Legal Document Server, Inc.	Attorney Service	209.35
2/8/2021	Sacramento Superior Court	Filing Fee	60.00
2/25/2021	Legal Document Server, Inc.	Attorney Service	95.00
3/5/2021	Legal Document Server, Inc.	Attorney Service	110.00
4/23/2021	General Logistics Systems US, Inc.	Courier Service	19.00
5/21/2021	Simpluris, Inc.	Notice Mailing	405.00
6/24/2021	Legal Document Server, Inc.	Attorney Service	110.00
9/21/2021	One Legal	Attorney Service	146.70
10/4/2021	Signature Resolution LLC	Mediation Fee	6,450.00
10/7/2021	General Logistics Systems US, Inc.	Courier Service	54.38
11/5/2021	Signature Resolution LLC	Supplemental Mediation Fee	2,400.00
1/28/2022	Legal Document Server, Inc.	Attorney Service	130.00
1/31/2022	Legal Document Server, Inc.	Attorney Service	0.95
1/31/2022	Sacramento Superior Court	Filing Fee	20.00
2/7/2022	Legal Document Server, Inc.	Attorney Service	110.00
2/10/2022	Sacramento Superior Court	Document Download Fee	18.20
2/14/2022	Legal Document Server, Inc.	Attorney Service	520.00
5/10/2022	Legal Document Server, Inc.	Attorney Service	283.40
5/10/2022	Sacramento Superior Court	Filing Fee	80.00
5/12/2022	Legal Document Server, Inc.	Attorney Service	100.00
5/27/2022	Legal Document Server, Inc.	Attorney Service	120.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Perry v. Bella Bru Natomas LLC

6/7/2022	Legal Document Server, Inc.	Attorney Service	100.00
6/13/2022	Legal Document Server, Inc.	Attorney Service	101.35
6/13/2022	Sacramento Superior Court	Filing Fee	20.00
7/13/2022	Sacramento Superior Court	Document Download Fee	5.00
7/14/2022	Legal Document Server, Inc.	Attorney Service	105.00
8/25/2022	Legal Document Server, Inc.	Attorney Service	105.00
9/6/2022	Legal Document Server, Inc.	Attorney Service	105.00
10/27/2022	Sacramento Superior Court	Document Download Fee	5.40
11/3/2022	Legal Document Server, Inc.	Attorney Service	125.00
12/2/2022	Sacramento Superior Court	Document Download Fee	14.00
Total:			<u>14,795.80</u>