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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

REGINIA SAM, 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.

CONCORDANCE HEALTHCARE
SOLUTIONS, LLC, an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: CVRI2102017

Honorable Harold Hopp
Department 1

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
(Reginia Sam); Declaration of Settlement
Administrator (Jarrod Salinas); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: August 1, 2023
Time: 8:30 a.m.
Department: 1

Complaint Filed: April 29, 2021
FAC Filed: March 9, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Reginia Sam (“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 March 14, 2023, in Department 1 of the above-entitled Court, the Honorable Craig C. Riemer preliminarily approved the First Amended Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Concordance Healthcare Solutions, LLC (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Reginia Sam as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), Exclusion Form, and Objection Form (together, “Notice Packet”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions (“Phoenix” or “Settlement Administrator”) to serve as Settlement Administrator for handling the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Payment, no Class Members have objected to or requested exclusion from the Settlement or the request for Attorneys’ Fees and Costs, Enhancement Payment, Settlement Administration Costs, or PAGA Amount.

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WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers *for* Justice, OC have been actively engaged in litigating this matter since the inception of the above-captioned action, which was filed on April 29, 2021.

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

6. Class Counsel investigated the veracity, strength, and scope of the claims and were preparing the matter for class certification, representative adjudication, and trial prior to reaching the Settlement. The parties conducted significant informal discovery and investigation into the facts of the case, and also informally exchanged a large volume of information and data in preparation for mediation. Class Counsel interviewed and obtained information from Plaintiff and other Class Members, and reviewed and analyzed thousands of pages of documents and data produced by Defendant and obtained through other sources. The information, documents, and data reviewed and analyzed by Class Counsel included, and were not limited to, Plaintiff and other Class Members' employment records, Class Members' time and pay data (including, but not limited to, Timecard Records, Payroll Journal, and Defendant's Earnings Codes), Concordance Healthcare Solutions Employee Handbook, company policy acknowledgements (including, but not limited to, Employee Handbook Acknowledgement and Receipt, Receipt of Employee Handbook and Benefit Summary), job descriptions, Defendant's operations and

1 employment practices, forms (including, but not limited to, Employee Status Change Form and
2 Direct Deposit Form), and policies (including, but not limited to, Clock In & Out Policy,
3 Rounding Policy, Overtime Pay Policy, and Termination Matrix Procedures), among other
4 documents and data. Class Counsel researched applicable law, developed liability and damages
5 valuation models in preparation for mediation and settlement negotiations, and met and
6 conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the
7 pleadings, case management, discovery, and production of various documents and data prior to
8 mediation. Other work performed by Class Counsel included, and was not limited to, case
9 strategy and analysis; drafting, reviewing, and revising pleadings and the mediation brief;
10 preparing and appearing for court proceedings; and preparing for and attending mediation and
11 settlement negotiations, among other tasks.

12 7. As outlined herein, the parties have conducted significant informal discovery and
13 investigation during the course of litigating the case and mediation and settlement negotiations.
14 Class Counsel analyzed thousands of pages of information, documents, and data either obtained
15 from Plaintiff, Defendant, or other sources. These documents and data provided a critical
16 understanding of the nature of the work performed by the Class Members, as well as Defendant's
17 operations and employment policies, practices, and procedures, and were used in analyzing
18 liability, damages, and valuation issues in connection with all phases of the litigation, and
19 ultimately with the mediation and settlement negotiation process. Class Counsel also performed
20 significant research into applicable law, which is evolving as it relates to certification, off-the-
21 clock theory, meal and rest periods, Private Attorney General Act ("PAGA") representative
22 claims, on-premises rest breaks, rounding, regular rate of pay, business expense reimbursement,
23 wage-and-hour enforcement, Plaintiff's claims and damages, and Defendant's defenses.

24 8. After conducting significant investigation of the facts and law during the
25 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
26 try to resolve the entire matter. These efforts included participating in a formal, full-day
27 mediation conducted by Warren Jackson, Esq., a well-regarded mediator experienced in
28 mediating complex labor and employment matters. During all settlement discussions, the parties

1 conducted their negotiations at arm's length in an adversarial position. Prior to and during
2 mediation, the parties exchanged information and data, and discussed all aspects of the case,
3 including the risks and delays of further litigation; the risks to the parties of proceeding with
4 class certification and trial; the law relating to off-the-clock theory, meal and rest periods, on-
5 premises rest breaks, rounding, regular rate of pay, representative PAGA claims, business
6 expenses, and wage-and-hour enforcement; the evidence produced and analyzed; and the
7 possibility of appeals, among other things. Arriving at a settlement that was acceptable to the
8 parties was not easy. Defendant contended that individualized questions of fact predominate over
9 any common issues, and these issues would pose challenges to certification and representative
10 adjudication. Defendant and its counsel felt very strongly about Defendant's ability to prevail on
11 the merits and to obtain a denial of class certification. Meanwhile, Plaintiff and Class Counsel
12 disagreed with these contentions and believed that class certification would be obtained and that
13 they would prevail at trial. With the aid of the mediator's evaluation and extensive settlement
14 negotiations, the parties agreed that the case was well-suited for settlement given the legal issues
15 relating to Plaintiff's principal claims, as well as the costs and risks to the parties that would
16 attend further litigation. These risks of further litigation include, and are not limited to, a
17 determination that the claims are unsuitable for class treatment and/or representative
18 adjudication, failure to obtain certification, class de-certification after certification of a class,
19 allowing a jury to decide the claims asserted in the case, and the real possibility of no recovery
20 after years of litigation.

21 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
22 attorneys' fees in the amount of \$157,500.00, which is thirty-five percent (35%) of the
23 Maximum Settlement Amount of \$450,000.00, as set forth in the Settlement Agreement and the
24 Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and
25 Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of
26 the recovery. Lawyers *for* Justice, PC has no fee-splitting agreement with any other attorney or
27 law firm regarding this case.

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10. 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 for the Class Members; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter.

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

12. Lawyers for Justice, PC has no fee-splitting agreement with any other attorney or law firm regarding this case.

13. 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. Lawyers for Justice, PC has spent a total of **390.60 hours**, performing tasks and obtaining recovery in the matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time and Chart that sets forth in detail the nature of the legal services provided by 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. Also, separate from the hours referenced herein, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

14. The attorneys identified below have worked on this case, and they have performed their work in this matter exclusively on a contingency basis.

LAWYERS for JUSTICE, PC – Attorney Hours, Rates, and Lodestar						
Attorney	Title	CA Bar No.	Admit Year	Rate	Total Hours	Lodestar
Edwin Aiwasian	Managing Attorney & Shareholder	232943	2004	\$850	78.50	\$66,725.00
Arby Aiwasian	Shareholder	269827	2010	\$775	83.70	\$64,868.00

Joanna Ghosh	Senior Attorney	272479	2010	\$725	10.10	\$7,323.00
Elizabeth Parker-Fawley	Attorney	301592	2014	\$675	26.30	\$17,753.00
Arman Marukyan	Attorney	327150	2019	\$575	8.20	\$4,715.00
Melissa LeBlanc	Attorney	283080	2012	\$575	29.00	\$16,675.00
Tara Zabehe	Attorney	314706	2017	\$575	5.60	\$3,220.00
Brian J. St. John	Attorney	304112	2015	\$575	17.80	\$10,235.00
Kyla Buenaventura	Attorney	237184	2005	\$425	14.00	\$5,950.00
Alexandra Rose	Attorney (formerly)	329407	2019	\$525	1.30	\$683.00
Janardana Burns	Attorney (formerly)	337696	2021	\$525	66.20	\$34,755.00
Julia Franco	Attorney (formerly)	334676	2021	\$475	26.80	\$12,730.00
Jennifer Maguire	Attorney (formerly)	288875	2013	\$475	17.70	\$8,408.00
Corrine Peters	Attorney (formerly)	336164	2021	\$425	5.40	\$2,295.00
Total:					390.60	\$256,332.50

15. The billing rates for each of the attorneys listed above who worked on this matter, which range from \$425 to \$850 per hour, are reasonable and commensurate with the background, training, and experience of the attorneys that are listed above as well as our firm, in litigating complex wage-and-hour class and representative actions. The California Supreme Court has held that the reasonable hourly rate used for the lodestar calculation is the “prevailing [rate] in the community for similar work.” *PLCM Group v. Drexler* (2000) 22 Cal.4th 1084, 1095; see also *Ketchum v. Moses* (2001) 24 Cal.4th 1122, 1132 (stating that “the lodestar is the basic fee for comparable legal services in the community”). Courts in California have approved comparable hourly rates for similar work performed by other attorneys in the community. See *Lopez v. Management and Training Corporation* (S.D. Cal. 2020) No. 17cv1624 JM(RBM), 2020 WL 1911471, at **8-9 (approving rates up to \$900 for a partner and a rate of \$500 for an associate as reasonable in a wage-and-hour class action filed in southern California); *Hartless v. Clorox Co.* (S.D. Cal. 2011) 273 F.R.D. 630, 643-44, aff’d in part, 473 Fed.Appx. 716 (9th Cir. 2012) (approving rates of \$675-\$795 for partners and up to \$410 for associates in complex litigation involving product misrepresentation filed in San Diego County); see, e.g., *Campbell v. Best Buy Stores, L.P.* (C.D. Cal. 2016) No. LA CV12-07794 JAK (JEMx), 2016 WL 6662719, at *9 (finding that hourly rates between \$375 and \$875 for attorneys were reasonable in a wageand-hour class action filed in Los Angeles County); see *Ibarra v. Wells Fargo, N.A.* (C.D. Cal. 2018)

No. CV 17-4344 PA (ASX), 2018 WL 5276295, at *4 (approving an hourly rate of \$775 and \$725 for attorneys with experience in a wage-and-hour class action filed in Los Angeles County); see *Bradley Taylor, et al. v. TIC – The Indus. Co.* (C.D. Cal. 2018) No. EDCV16186VAPSPX, 2018 WL 6131198, at *10 (finding that hourly rates of \$695 to \$425 were reasonable in a wage-and-hour class action filed in San Bernardino County).

16. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the blended 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;

1 and final approval of the class and representative action settlement in *Demetrius Camarillo v.*
2 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
3 granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

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

5 ***EDUCATION***

6 17. 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 18. 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 19. 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 a prominent plaintiff-side law firm.

24 20. At the prominent plaintiff-side law firm, my practice focused on class actions and
25 other complex cases involving toxic torts and products liability. In addition, I gained substantial
26 experience on cases involving insurance bad faith, premises liability, and medical negligence.
27 While employed by the prominent plaintiff-side law firm, I argued approximately 100 motions,

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1 took or defended approximately 150 depositions, and prepared dozens of expert witnesses for
2 deposition or trial.

3 21. Since its inception, in or around October of 2008, our firm has almost exclusively
4 focused on the prosecution of consumer and employment class actions, involving wage-and-hour
5 claims, race discrimination, unfair business practices or consumer fraud. Currently, we are the
6 attorneys of record in over a dozen employment-related putative class actions in both state and
7 federal courts in the State of California. Our firm has successfully litigated cases involving the
8 executive, administrative, and other overtime exemptions to the State of California and federal
9 overtime compensation requirements. During this relatively short time, in association with other
10 law firms, we have obtained millions of dollars on behalf of thousands of individuals in
11 California.

12 ***EXAMPLES OF CLASS ACTION RESULTS***

13 22. What follows are just a few examples of the type of results we have achieved on
14 behalf of our clients:

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

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

25 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against a national property management company involving
27 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court

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1 granted final approval of the class action settlement. The Los Angeles County Superior Court
2 Case Number is BC430918.

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

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

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

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

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

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.

27 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of

1 non-exempt employees. On November 18, 2016, the court granted final approval of the class and
2 PAGA representative action settlement. The San Francisco County Superior Court Case Number
3 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

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

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

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

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

25 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a lumber and hardware company
27 on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the

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1 class and PAGA representative action settlement. The Orange County Superior Court Case
2 Number is 30-2014-00747750-CU-OE-CXC.

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

8 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
9 representative action against a food company on behalf of non-exempt employees. On June 30,
10 2017, the court granted final approval of the class and PAGA representative action settlement.
11 The Sacramento County Superior Court Case Number is 34-2015-00175871.

12 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
13 representative action against a chocolate company on behalf of non-exempt employees. On July
14 19, 2017, the court granted final approval of the class and PAGA representative action
15 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

20 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
21 representative action against a manufacturer of plastic containers on behalf of non-exempt
22 employees. On October 31, 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 BC577233.

25 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
27 employees. On December 11, 2017, the court granted final approval of class and PAGA

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1 representative action settlement. The Los Angeles County Superior Court Case Number is
2 BC569646.

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

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

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

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

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

28 ///

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

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

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

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

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

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

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

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

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

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

24 23. To date, Class Counsel has borne all the risks and costs of litigation and will not
25 receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC
26 seeks reimbursement of \$12,882.24 in litigation costs and expenses incurred in this matter, as
27 reflected in **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in
28 the prosecution of this matter and to obtain the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

24. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Payment in the amount of \$7,500.00 to Plaintiff Reginia Sam to compensate Plaintiff for the time and effort that she expended on behalf of the Class. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant documents and past employment records and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain information that would benefit the Class. Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing her work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Reginia Sam to receive \$7,500.00 as a reasonable Enhancement Payment, in addition to her Individual Settlement Payment and Individual PAGA Payment, for her services on behalf of the Class.

25. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiff and other Class Members.

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

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



Edwin Aiwasian

EXHIBIT A

REGINIA SAM V. CONCORDANCE HEALTHCARE SOLUTIONS LLC
(RIVERSIDE COUNTY SUPERIOR COURT CASE NO. CVRI2102017)
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 • Edwin Aiwazian (March 2021 – April 2021) – 4.20 hours • Arby Aiwazian (March 2021 – April 2021) – 2.90 hours • Elizabeth Parker-Fawley (March 2021 – April 2021) – 1.80 hours	8.90
Pre-Lawsuit Investigation of the Merits of Plaintiff Regina Sam’s (“Plaintiff”) Claims, the Merits of the Claims of the Putative Class Members, and the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiff and Aggrieved Employees • Edwin Aiwazian (March 2021 – April 2021) – 4.20 hours • Elizabeth Parker-Fawley (March 2021 – April 2021) – 3.10 hours	7.30
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Concordance Healthcare Solutions LLC (“Defendant”) with Respect to the Damages Sustained by Plaintiff, the Putative Class Members, and Aggrieved Employees • Edwin Aiwazian (April 2021) – 2.60 hours • Arby Aiwazian (April 2021) – 3.50 hours	6.10
Pre-Notice Investigation of 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	6.50

• Edwin Aiwarzian (October 2021 - November 2021) – 3.00 hours • Elizabeth Parker-Fawley (October 2021 - November 2021) – 2.20 hours • Arman Marukyan (November 2021) – 1.30 hours	
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to the Employment of Plaintiff and the Aggrieved Employees • Edwin Aiwarzian (October 2021 - November 2021) – 3.20 hours • Elizabeth Parker-Fawley (October 2021 - November 2021) – 2.10 hours	5.30
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Class Certification Decisions in California, Including all New Relevant DLSE Materials • Edwin Aiwarzian (April 2021 - September 2021) – 3.40 hours • Elizabeth Parker-Fawley (May 2021 – September 2021) – 2.30 hours	5.70
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates • Arby Aiwarzian (April 2021 - October 2021) – 3.50 hours	3.50
Investigation of Defendant’s Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees • Arby Aiwarzian (April 2021 - October 2021) – 4.30 hours	4.30
Investigation, Research, and Analysis Regarding Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues To Evaluate Willfulness and Uniformity • Arby Aiwarzian (April 2021 - October 2021) – 1.80 hours	1.80

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 Arby Aiwazian (April 2021 - October 2021) – 5.50 hours	5.50
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 Arby Aiwazian (April 2021 - October 2021) – 5.20 hours	5.20
Comparative Analysis and Cross-Checking of All Available Job Postings and/or Job 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 Arby Aiwazian (April 2021 - October 2021) – 2.40 hours	2.40
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members and Aggrieved Employees Worked Throughout California - Edwin Aiwazian (April 2021 - September 2021) – 1.60 hours - Arby Aiwazian (September 2021 - October 2021) – 2.20 hours	3.80
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Reporting Time, Scheduling, Timekeeping, Rounding, Meal/Rest Breaks, On-Premises Breaks, On-Duty Meal Agreements, Meal/Rest Premiums, Non-Discretionary Bonus/Incentive/Shift Differential Pay, Regular Rate Calculation, Overtime Compensation, Dress Code, Reimbursement of Business-Related Expenses, and Arbitration Agreements - Edwin Aiwazian (March 2021 – September 2021) – 5.10 hours - Arby Aiwazian (September 2021 – October 2021) – 5.30 hours - Elizabeth Parker-Fawley (March 2021 – April 2021) – 4.40 hours	23.30

• Corrine Peters (March 2021 – April 2021) – 2.60 hours • Melissa Leblanc (October 2021) – 3.60 hours • Julia Franco (October 2021) – 2.30 hours	
Research and Investigation Re: Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Payroll, Client Management, Communication, 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 During Meal Breaks • Edwin Aiwazian (March 2021 – September 2021) – 1.80 hours • Arby Aiwazian (September 2021 – October 2021) – 1.70 hours	3.50
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies • Edwin Aiwazian (March 2021 – September 2021) – 2.60 hours • Arby Aiwazian (September 2021 – October 2021) – 2.80 hours	5.40
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 • Edwin Aiwazian (March 2021 – September 2021) – 4.90 hours	4.90
Research and Analysis of Defendant’s Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues • Edwin Aiwazian (April 2021) – 2.30 hours	2.30
Research and Investigation on the Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members’ Work • Edwin Aiwazian (April 2021) – 3.60 hours	3.60

Meet and Communicate with Plaintiff Reginia Sam Throughout the Pendency of the Case • Edwin Aiwazian (March 2021 – September 2021) – 8.40 hours • Arby Aiwazian (September 2021 – October 2021) – 8.80 hours • Elizabeth Parker-Fawley (March 2021 – April 2021) – 2.60 hours • Arman Marukyan (November 2021) - 2.60 hours • Tara Zabehi (June 2021 – August 2021) - 1.20 hours • Jennifer Maguire (June 2021 – August 2021) – 3.70 hours • Melissa Leblanc (October 2021 - December 2021) – 4.40 hours • Julia Franco (September 2021 - October 2021) – 3.70 • Janardana Burns (August 2022 – March 2023) – 6.80 hours • Kyla Buenaventura (June 2023) – 1.30 hours	39.80
Investigate Percipient Witnesses and Meet and Communicate with Putative Class Members • Edwin Aiwazian (March 2021 – September 2021) – 6.60 hours • Arby Aiwazian (September 2021 – October 2021) – 5.80 hours	12.40
Pleadings and Court Filings	
Research and Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on April 29, 2021) • Edwin Aiwazian (March 2021 – April 2021) – 2.40 hours • Elizabeth Parker-Fawley (March 2021 – April 2021) – 3.20 hours • Corrine Peters (March 2021 – April 2021) – 2.80 hours	8.40
Review Court's Notice of Department Assignment (filed on May 4, 2021) • Edwin Aiwazian (May 28, 2021) – 0.50 hour	0.50
Review Court's Notice of Case Management Conference (filed on May 4, 2021) • Edwin Aiwazian (May 28, 2021) – 0.10 hour	0.10

Draft Plaintiff's Initial Case Management Conference Statement (filed on June 22, 2021) Jennifer Maguire (June 21, 2021) – 1.50 hours	1.50
Draft Plaintiff's Notice of Posting Jury Fees (filed on June 24, 2021) Edwin Aiwarzian (June 23, 2021) – 0.10 hour	0.10
Review Defendant's Case Management Statement (filed on June 30, 2021) Jennifer Maguire (July 2, 2021) – 0.10 hour	0.10
Review Court's Minute Order Re: Case Management Conference (filed on July 2, 2021) Jennifer Maguire (July 3, 2021) – 0.10 hour	0.10
Review Court's Minute Order Re: Case Management Conference (filed on July 6, 2021) Jennifer Maguire (July 6, 2021) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Time to Respond to Complaint; [Proposed Order] (filed on July 21, 2021) Jennifer Maguire (July 19, 2021 – July 21, 2021) – 1.50 hours	1.50
Review Court's Order Granting Joint Stipulation to Continue Time to Respond to Complaint (filed on July 28, 2021) Jennifer Maguire (July 19, 2021 – July 21, 2021) – 1.50 hours	0.10
Meet and Confer with Defendant's Counsel, and Draft Second Joint Stipulation to Continue Time to Respond to Complaint; [Proposed Order] (filed on August 17, 2021) Jennifer Maguire (August 13, 2021 – August 17, 2021) – 1.50 hours	1.50

Review Court's Order Granting Second Joint Stipulation to Continue Time to Respond to Complaint (filed on September 2, 2021) Jennifer Maguire (September 10, 2021) – 0.10 hour	0.10
Review Court's Case Management Order #1 (filed on September 2, 2021) Jennifer Maguire (September 10, 2021) – 0.80 hour	0.80
Review Court's Notice of Return of Document (filed on September 13, 2021) Jennifer Maguire (September 16, 2021) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Statement (filed on September 24, 2021) Tara Zabehe (September 22, 2021 – September 24, 2021) – 1.60 hours	1.60
Review Court's Minute Order Re: Case Management Conference (filed on October 1, 2021) Tara Zabehe (October 2, 2021) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Notice of Settlement and Joint Stipulation to Stay Litigation and Vacate Case Management Conference; [Proposed] Order (filed on November 11, 2021) Melissa LeBlanc (November 10, 2021 - November 11, 2021) – 1.20 hours	1.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on December 7, 2021) Janardana Burns (December 6, 2021 – December 7, 2021) – 1.10 hours	1.10
Review Court's Order Granting Joint Stipulation to Stay Litigation and Vacate Case Management Conference (filed on December 7, 2021)	0.10

• Janardana Burns (December 7, 2021) – 0.10 hour	
Review Court's Notice of Telephonic Appearance (filed on January 25, 2022) • Janardana Burns (February 1, 2022) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on February 2, 2022) • Janardana Burns (January 31, 2022 – February 2, 2022) – 1.20 hours	1.20
Review Court's Notice of Telephonic Appearance (filed on February 4, 2022) • Janardana Burns (February 4, 2022) – 0.10 hour	0.10
Review Court's Minute Order Re: Order to Continue Hearing (filed on February 8, 2022) • Janardana Burns (February 10, 2022) – 0.10 hour	0.10
Review Court's Minute Order Re: Status Conference re: Filing Motion for Preliminary Approval (filed on February 9, 2022) • Janardana Burns (February 10, 2022) – 0.10 hour	0.10
Review Court's Notice of Return of Document (filed on February 28, 2022) • Janardana Burns (February 28, 2022) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order Thereon (filed on February 28, 2022) • Janardana Burns (February 26, 2022 – February 28, 2022) – 2.40 hours	2.40
Review Court's Order Granting Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint (filed on March 4, 2022)	0.10

Janardana Burns (March 9, 2022) – 0.10 hour	
Review Court's Minute Order Re: Granting Plaintiff Leave to File First Amended Complaint (filed on March 9, 2022) Janardana Burns (March 9, 2022) – 0.10 hour	0.10
Draft Notice of Entry of Judgment Re: Order Granting Plaintiff Leave to File First Amended Complaint (filed on March 9, 2022) Janardana Burns (March 9, 2022) – 0.50 hour	0.50
Research and Draft Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on March 9, 2022) - Edwin Aiwarzian (March 7, 2022 - March 9, 2022) – 2.70 hours - Joanna Ghosh (March 7, 2022 - March 9, 2022) – 3.20 hours	5.90
Review Court's Amended Notice of Hearing (filed on April 5, 2022) Janardana Burns (April 5, 2022) – 0.10 hour	0.10
Review and Analyze Defendant's Answer to First Amended Complaint and Research Affirmative Defenses in Defendant's Answer (filed on April 8, 2022) - Edwin Aiwarzian (April 8, 2022) – 0.50 hour - Janardana Burns (April 8, 2022) – 2.00 hours	2.50
Review Court's Notice of Department of Reassignment for All Purposes (filed on April 23, 2022) Janardana Burns (April 28, 2022) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on May 3, 2022)	1.60

Janardana Burns (May 2, 2022 - May 3, 2022) – 1.60 hours	
Review Court's Minute Order Re: Status Conference Hearing (filed on May 10, 2022) Janardana Burns (May 10, 2022) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on August 3, 2022) Janardana Burns (August 1, 2022 – August 3, 2022) – 1.20 hours	1.20
Review Court's Minute Order Re: Status Conference Hearing (filed on August 10, 2022) Janardana Burns (August 10, 2022) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on September 1, 2022) Janardana Burns (August 31, 2022 – September 1, 2022) – 1.20 hour	1.20
Review Court's Minute Order Re: Status Conference Hearing (filed on September 9, 2022) Janardana Burns (September 13, 2022) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on November 16, 2022) Janardana Burns (November 15, 2022 – November 16, 2022) – 0.90 hour	0.90
Review Court's Minute Order Re: Vacated Hearing (filed on November 21, 2022) Janardana Burns (November 21, 2022) – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Hearing on Motion for Preliminary Approval and Related Deadlines; [Proposed] Order Thereon (filed on December 8, 2022)	1.30

Janardana Burns (December 6, 2022 – December 8, 2022) – 1.30 hours	
Review Court’s Order Granting Joint Stipulation to Continue Hearing on Motion for Preliminary Approval and Related Deadlines (filed on December 13, 2022) Janardana Burns (December 13, 2022) – 0.20 hour	0.20
Draft Plaintiff’s Notice of Entry of Order Granting Joint Stipulation to Continue Hearing on Motion for Preliminary Approval and Related Deadlines (filed on December 13, 2022) Janardana Burns (December 13, 2022) – 0.50 hour	0.50
Review Defendant’s Notice of Remote Appearance (filed on March 7, 2023) Janardana Burns (March 7, 2023) – 0.10 hour	0.10
Review Court’s Notice of Department Reassignment for All Purposes (filed on May 16, 2023) Kyla Buenaventura (May 16, 2023) – 0.10 hour	0.10
Appearances	
Prepare for and Telephonically Attend Status Conference (May 10, 2022) Janardana Burns (May 10, 2022) – 1 hour	1.0
Prepare for and Telephonically Attend Status Conference (August 10, 2022) Janardana Burns (August 10, 2022) – 0.75 hour	0.75
Prepare for and Telephonically Attend Status Conference (September 9, 2022) Janardana Burns (September 9, 2022) – 0.75 hour	0.75
Prepare for and Telephonically Attend Hearing on Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (March 14, 2023)	5.0

• Arby Aiwazian (March 12, 2023 – March 14, 2023) – 1.50 hour • Joanna Ghosh (March 12, 2023 – March 14, 2023) – 1.50 hours • Janardana Burns (March 12, 2023 – March 14, 2023) – 2 hours	
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Award (August 1, 2023) (Anticipated) • Kyla Buenaventura (August 1, 2023) – 2.50 hours	2.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Reginia Sam (served on March 3, 2021) • Edwin Aiwazian (March 3, 2021) – 1.70 hours	1.70
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Reginia Sam • Edwin Aiwazian (March 31, 2021) – 4.10 hours	4.10
Letters and Correspondence	
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Reginia Sam for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on November 12, 2021) • Edwin Aiwazian (November 11, 2021 – November 12, 2021) – 1.20 hours • Arman Marukyan (November 11, 2021 – November 12, 2021) – 2.40 hours	3.60
Meet with Defendant's Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel • Edwin Aiwazian (March 2021 – April 2021) – 4.40 hours • Arby Aiwazian (April 2021 – October 2021) – 3.80 hours	26.40

• Elizabeth Parker-Fawley (March 2021 – April 2021) – 1.20 hours • Arman Marukyan (November 2021) - 1.90 hours • Tara Zabehe (June 2021 – August 2021) – 2.70 hours • Jennifer Maguire (June 2021 – August 2021) – 3.80 hours • Melissa Leblanc (September 2021 - December 2021) – 3.70 hours • Julia Franco (September 2021 - October 2021) – 2.40 • Janardana Burns (August 2022 – March 2023) – 2.50 hours	
Mediation/Settlement	
Review and Analyze Mediation Data and Documents Produced by Defendant • Arby Aiwazian (September 20, 2021 - October 12, 2021) – 10.80 hours • Melissa Leblanc (September 17, 2021 - October 12, 2021) – 11.60 hours • Julia Franco (September 17, 2021 - October 12, 2021) – 11.20 • Employee Handbooks and Employment and Operations Policies, Practices, and Procedures • Sampling of Employee Paystubs • Sampling of Employee Time Data • Sampling of Employee Payroll Data	33.60
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Mediation Brief (submitted on October 4, 2021) • Arby Aiwazian (October 3, 2021) – 2.30 hours • Melissa LeBlanc (September 27, 2021 – October 4, 2021) – 3.20 hours • Julia Franco (September 24, 2021 - October 4, 2021) – 8.90 hours	14.40
Remotely Attend Mediation Session (October 12, 2021; Zoom Video Conference) • Arby Aiwazian (October 12, 2021) – 8 hours • Julia Franco (October 12, 2021) – 4 hours	12.00

Draft, Review, Revise, Negotiate, and Finalize Confidential Memorandum of Agreement (executed December 7, 2021) • Melissa LeBlanc (October 12, 2021 – December 7, 2021) – 3.50 hours	3.50
Draft, Review, Revise, Negotiate, and/or Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on September 6, 2022) and Notice of Class Action Settlement • Edwin Aiwazian (August 22, 2022) – 0.90 hour • Joanna Ghosh (July 26, 2022; August 19, 2022) – 2.70 hours • Brian St. John (June 9, 2022; August 1, 2022) – 2.20 hours • Alexandra Rose (May 11, 2022) – 1.30 hours • Janardana Burns (May 10, 2022 – May 17, 2022; June 1, 2022 – June 10, 2022; June 23, 2022; July 6, 2022 – July 26, 2022; July 29, 2022 - August 2, 2022; August 9, 2022 – August 12, 2022; August 16, 2022 – August 19, 2022; August 22, 2022 – September 6, 2022) – 10.60 hours	17.70
Draft, Review, Revise, Negotiate, and/or Finalize First Amended Joint Stipulation of Class Action and PAGA Settlement and Release (executed on December 29, 2022), Revised Notice of Class Action Settlement, and Further Revised Notice of Class Action Settlement • Edwin Aiwazian (December 23, 2022) – 0.70 hours • Janardana Burns (December 11, 2022 - December 13, 2022; December 16, 2022 – December 21, 2022; December 23, 2022; February 1, 2023) – 5.60 hours	6.30
Law and Motion	
Research, Review, and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Janardana Burns in Support Thereof, Declaration of Reginia Sam in Support Thereof, Declaration of Christopher W. Decker in Support Thereof, Declaration of Defendant Doreen Nersesian in Support Thereof, Declaration of Proposed Settlement Administrator in Support Thereof, Compliance Chart in Support Thereof, and [Proposed] Order Thereon (filed on September 26, 2022)	22.10

• Brian St. John (September 20, 2022 - September 25, 2022) – 9.50 hours • Janardana Burns (September 16, 2023 – September 26, 2022) – 12.60 hours	
Review Court’s Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (filed on November 14, 2022) • Janardana Burns (November 14, 2022) – 0.10 hour	0.10
Review Court’s Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on November 17, 2022) • Janardana Burns (November 17, 2022) – 0.10 hour	0.10
Research and Draft Plaintiff’s Supplemental Declaration of Janardana Burns in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, and [Revised Proposed] Order Thereon (filed on January 10, 2023) • Janardana Burns (January 9, 2023 – January 10, 2023) – 3.40 hours	3.40
Review Court’s Tentative Ruling Re: Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (filed on January 18, 2023) • Janardana Burns (January 18, 2023) – 0.10 hour	0.10
Review Court’s Minute Order Re: Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (filed on January 19, 2023) • Janardana Burns (January 19, 2023) – 0.10 hour	0.10
Research and Draft Plaintiff’s Declaration of Arby Aiwarzian in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, Declaration of Joanna Ghosh in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, and [Further Revised Proposed] Order Thereon (filed on February 6, 2023) • Arby Aiwarzian – (February 6, 2023) – 1.00 hour • Joanna Ghosh – (February 4, 2023 – February 6, 2023) – 1.40 hours	4.60

Janardana Burns (January 30, 2023 – February 6, 2023) – 2.20 hours	
Review Court’s Tentative Ruling Re: Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (filed on February 13, 2023) Janardana Burns (February 13, 2023) – 0.10 hour	0.10
Review Court’s Minute Order Re: Tentative Ruling Re: Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (filed on February 14, 2023) Janardana Burns (February 14, 2023) – 0.10 hour	0.10
Research and Draft Plaintiff’s Amended Declaration of Arby Aiwazian in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (filed on March 6, 2023) - Arby Aiwazian (March 6, 2023) – 0.60 hour - Joanna Ghosh (March 4, 2023 – March 6, 2023) – 1.2 hours - Janardana Burns (March 3, 2023 – March 6, 2023) – 1.50 hours	3.30
Review Court’s Order Granting Preliminary Approval of Class Action Settlement (filed on March 14, 2023) Janardana Burns (March 14, 2023) – 0.10 hour	0.10
Review Court’s Tentative Ruling Re: Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (filed on March 14, 2023) Janardana Burns (March 14, 2023) – 0.10 hour	0.10
Review Court’s Minute Order Re: Granting Preliminary Approval of Class Action Settlement (filed on March 14, 2023) Janardana Burns (March 14, 2023) – 0.10 hour	0.10

Draft Plaintiff's Notice of Entry of Order Granting Preliminary Approval of Class Action Settlement (filed on March 14, 2023) Joanna Ghosh (March 14, 2023) – 0.10 hour	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Settlement, Attorneys' Fees, Costs, and Service Award, and Declaration of Edwin Aiwarzian in Support Thereof, and Revise [Proposed] Final Approval Order and Judgment (filed on July 10, 2023) (Anticipated) - Edwin Aiwarzian (July 5, 2023) – 1.70 hour - Elizabeth Parker-Fawley (July 5, 2023) – 3.40 hours - Brian J. St. John (July 5, 2023 – July 10, 2023) – 6.10 hours - Kyla Buenaventura (June 29, 2023 – July 10, 2023) – 10.20 hours	21.40
Total Hours:	390.66

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Sam v. Concordance Healthcare Solutions LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/3/2021	U.S. Postmaster	Postage	7.00
4/29/2021	Legal Document Server, Inc.	Attorney Service	200.75
4/29/2021	Riverside Superior Court	Complaint Filing Fee	450.00
4/29/2021	Riverside Superior Court	Complex Filing Fee	1,000.00
6/4/2021	ProLegal	Attorney Service	204.90
6/14/2021	Riverside Superior Court	Document Download Fee	12.00
6/22/2021	Legal Document Server, Inc.	Attorney Service	260.00
6/24/2021	Legal Document Server, Inc.	Attorney Service	135.25
6/24/2021	Riverside Superior Court	Jury Fee	150.00
9/13/2021	One Legal	Attorney Service	12.35
9/15/2021	One Legal	Attorney Service	15.39
9/21/2021	Signature Resolution LLC	Mediation Fee	6,450.00
9/24/2021	One Legal	Attorney Service	15.39
9/30/2021	Riverside Superior Court	Document Download Fee	1.00
11/9/2021	Riverside Superior Court	Document Download Fee	4.00
11/12/2021	U.S. Postmaster	Postage	9.16
11/13/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
11/15/2021	Codici	Analysis of Sampling of Time Records	3,300.00
12/7/2021	Legal Document Server, Inc.	Attorney Service	13.95
2/2/2022	Legal Document Server, Inc.	Attorney Service	14.80
2/10/2022	Riverside Superior Court	Document Download Fee	2.00
2/28/2022	Legal Document Server, Inc.	Attorney Service	11.00
3/4/2022	Legal Document Server, Inc.	Attorney Service	16.15
3/4/2022	Riverside Superior Court	Stipulation Fee	20.00
3/9/2022	Riverside Superior Court	Document Download Fee	22.50
3/15/2022	Legal Document Server, Inc.	Attorney Service	14.80
3/16/2022	Legal Document Server, Inc.	Attorney Service	14.80
5/4/2022	Legal Document Server, Inc.	Attorney Service	14.80
8/3/2022	Legal Document Server, Inc.	Attorney Service	15.55
9/2/2022	Legal Document Server, Inc.	Attorney Service	15.55
9/13/2022	Riverside Superior Court	Document Download Fee	1.00
9/27/2022	Legal Document Server, Inc.	Attorney Service	207.50
9/29/2022	Legal Document Server, Inc.	Attorney Service	19.60
9/29/2022	Riverside Superior Court	Motion Fee	60.00
11/16/2022	Legal Document Server, Inc.	Attorney Service	15.55
11/30/2022	Riverside Superior Court	Document Download Fee	1.00
12/8/2022	Legal Document Server, Inc.	Attorney Service	28.65
12/8/2022	Riverside Superior Court	Stipulation Fee	20.00
12/13/2022	Riverside Superior Court	Document Download Fee	5.00
12/14/2022	Legal Document Server, Inc.	Attorney Service	15.55

LAWYERS for JUSTICE PC CASE COST DETAIL
Sam v. Concordance Healthcare Solutions LLC

3/2/2023	Riverside Superior Court	Document Download Fee	2.00
3/15/2023	Legal Document Server, Inc.	Attorney Service	27.30
3/29/2023	Riverside Superior Court	Document Download Fee	1.00
Total:			12,882.24