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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

EULALIA TRINIDAD, individually, and on behalf of other members of the general public similarly situated; and MARKO ASAULYUK, individually, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act,

Plaintiffs,

vs.

GROUNDWORK COFFEE LLC, an unknown business entity; GROUNDWORK COFFEE, LLC, a Delaware limited liability company; GROUNDWORK COFFEE HOLDINGS, LLC, a Delaware limited liability company; GROUNDWORK COFFEE ROASTERS, LLC, a Delaware limited liability company; EDWARD COLA, individually; STEVEN LEVAN, individually; and DOES 1 through 100, inclusive,

Defendants.

Case No. 19STCV09758

Honorable Stuart M. Rice
Department SSC-1

CLASS ACTION

**DECLARATION OF JOANNA GHOSH
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
COUNSEL FEES PAYMENT, CLASS
COUNSEL LITIGATION EXPENSES
PAYMENT, AND CLASS
REPRESENTATIVES SERVICE
PAYMENTS**

[Notice of Motion and Motion for Final Approval of Class Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representatives Service Payments; Declarations of Class Representatives (Eulalia Trinidad and Marko Asaulyuk); Declaration of Settlement Administrator (Nick Castro); and [Proposed] Final Approval Order and Judgment filed concurrently herein]

Date: May 24, 2024
Time: 10:30 a.m.
Department: SSC-1

Complaint Filed: March 22, 2019
FAC Filed: November 13, 2023
Trial Date: None Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Eulalia Trinidad and Mark Asaulyuk (together, “Plaintiffs”) and the Class in the above-captioned matter. 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 December 7, 2023, in Department SSC-1 of the above-entitled Court, the Honorable Stuart M. Rice preliminarily approved the First Amended Class Action and PAGA Settlement Agreement and Class Notice (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendants Groundwork Coffee LLC, Groundwork Coffee Holdings, LLC, Groundwork Coffee Roasters, LLC, Edward Cola, and Steven Levan (collectively, “Defendants”) (collectively with Plaintiffs, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Eulalia Trinidad and Mark Asaulyuk as the representatives of the Class (collectively, “Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed ILYM Group, Inc. (“ILYM” 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, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representatives Service Payments (“Motion for Final Approval”), no Participating Class Members have objected to the Class Settlement or the contemplated request for Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, Class Representatives

Service Payments, Administration Costs, and the allocation for PAGA Penalties.

WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in this matter since prior to the commencement of Plaintiff Eulalia Trinidad’s (“Plaintiff Trinidad”) putative class action (i.e., the above-captioned action) (“Trinidad Action”) on March 22, 2019 in the Los Angeles County Superior Court, and Plaintiff Mark Asaulyuk’s (“Plaintiff Asaulyuk”) representative Private Attorneys General Act (“PAGA”) action that was filed on January 7, 2022 in the Los Angeles County Superior Court (“Asaulyuk Action”).

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

6. Class Counsel conducted significant litigation and formal and informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and was preparing the cases for class certification and trial prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with the mediations and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiffs and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiffs, Defendants, and other sources. Class Counsel

propounded multiple sets of written discovery requests on Defendant (including, but not limited to Form Interrogatories—General (Set One), Special Interrogatories (Sets One, Two, and Three), Requests for Production of Documents (Sets One and Two), noticed several depositions of Defendants’ person(s) most knowledgeable, reviewed Defendants’ objections to depositions notices and accompanying requests for production of documents, and worked with Plaintiff Trinidad to provide responses to formal written discovery propounded by Defendants. Class Counsel also prepared for and defended the deposition of Plaintiff Trinidad. The volume of information, documents, and data reviewed and analyzed by Class Counsel included, and were not limited to: employment records of Plaintiffs, a detailed sampling of Class Members’ time and pay data, Defendants’ Employee Handbooks, earning statements, job descriptions, company policy acknowledgements (Handbook Acknowledgement and Agreement), internal memoranda, and operations and employment practices, forms, procedures, and policies (including but not limited to Code of Conduct, Audio Video Monitoring, Meal Break Waiver Choice), and extensive documents regarding Defendants’ financial circumstances, among other information and documents. Class Counsel also developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediations and settlement negotiations and met and conferred with Defendants’ counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery and the production of information, documents, and data in the course of litigation and in connection with mediations and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation briefs, and settlement documents; preparing for and attending court proceedings, two mediations, and settlement negotiations; and conducting review, analysis, and assessment of Defendant’s financial circumstances, among other tasks.

7. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating the cases, mediations, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and

1 data obtained from Plaintiffs, Defendants, and other sources. The information, documents, and
2 data provided a critical understanding of the nature of the work performed by the Class Members
3 and Aggrieved Employees, as well as Defendants' operations and employment policies, practices,
4 and procedures, and were used in analyzing liability, damages, penalties, and other valuation
5 issues in connection with all phases of the litigation, and ultimately, in connection with the
6 mediations and settlement negotiation process. Class Counsel also performed significant research
7 into the applicable law, which is evolving as it relates to class certification, manageability, off-
8 the-clock theory, regular rate, meal and rest periods, representative PAGA claims and penalties,
9 wage-and-hour law and enforcement, Plaintiffs' claims and allegations, and Defendants' defenses
10 thereto, as well as facts discovered.

11 8. After conducting significant investigation of the facts and law during the
12 prosecution of the cases, counsel for the Parties engaged in extensive settlement negotiations to
13 try to resolve the cases. These efforts included participating in two (2) formal mediation sessions
14 conducted on November 2, 2020 and October 26, 2021 by Honorable Michael Latin (Ret.), a
15 well-regarded mediator experienced in handling complex labor and employment matters. During
16 all settlement discussions, the Parties conducted their negotiations at arm's length in an
17 adversarial position. In the course of mediation and settlement discussions, the Parties exchanged
18 information, documents, and data, and discussed various aspects of the cases, including and not
19 limited to, the risks and delays of further litigation, the risks and expenses to the Parties of
20 proceeding with class certification and trial, the law relating to class certification, manageability,
21 off-the-clock theory, regular rate, meal and rest periods, representative PAGA claims, and wage-
22 and-hour law and enforcement, as well as the evidence produced and analyzed, and the possibility
23 of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was
24 not easy. Defendants contended that individualized questions of fact predominate over any
25 common issues, and these issues would pose challenges to class certification and representative
26 adjudication. Defendants and their counsel felt strongly about Defendants' ability to avoid class
27 certification and prevail on the merits, while Plaintiffs and Class Counsel believed that they would
28 be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation,

the Parties ultimately agreed that the cases were well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the cases, and the real possibility of no monetary recovery after years of litigation, especially in light of Defendants' financial circumstances.

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$166,666.67, which is one-third (1/3) of the Gross Settlement Amount of \$500,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs and Class Counsel, Plaintiffs have each agreed to a contingency fee of at least one-third (1/3) of the recovery.

10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (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 cases; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter.

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 cases such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **512.00 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, 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 Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$850 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action 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 compensation at the rate of \$936.47 per hour; 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 compensation at the rate of \$919.57 per hour; and 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 compensation at the rate of \$855.96 per hour.

**EXPERIENCE AND ADEQUACY OF
LAWYERS for JUSTICE, PC**

13. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is attorney of record in dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of

compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or

representative action cases.

15. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upton v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative cases have resulted in settlements that have been granted court approval, including and not limited to, those listed in paragraph 18 herein. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

16. Yasmin Hosseini is a Member of Lawyers *for* Justice, PC. She received her Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned her Juris Doctor degree from Pepperdine University School of Law in 2017. She was admitted to practice law in California in 2019. She is admitted to practice before all courts of the State of California and all federal district courts in the State of California. She has worked on many wage and hour class action and PAGA representative matters, and her work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and

1 finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation
2 and analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, she
3 represented filmmakers and talent, negotiating and structuring various types of agreements on
4 their behalf. She is a member of the California Employment Lawyers Association, Beverly Hills
5 Bar Association, and Iranian American Bar Association.

6 17. I am a Managing Member of Lawyers *for* Justice, PC. I received a Bachelor of Arts
7 degree from California State University, Los Angeles in 2006, a Master of Science degree from
8 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University
9 Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since
10 2013) and I am also admitted to practice in all U.S. District Courts in California, the U.S.
11 Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. I have taken
12 and defended dozens of depositions and successfully handled motion practice in class action cases
13 regarding discovery (including and not limited to, regarding class contact information), class
14 certification (both contested class certification and stipulated class certification), arbitration
15 agreements, coordination, and intervention. I have successfully handled briefing and oral
16 argument on appeal and obtained notable decisions regarding Private Attorneys General Act
17 claims and employer efforts to compel arbitration of such claims, e.g., *Betancourt v. Prudential*
18 *Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24,
19 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th 175 (2019). I
20 have significant experience with class actions, including and not limited to working on cases to
21 obtain class certification through contested motion practice and working on cases in the post-
22 certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study,
23 and trial preparation in conjunction with co-counsel in a case involving a certified class consisting
24 of approximately 2,600 individuals). I also have extensive experience with class action and/or
25 representative action settlements, and have handled this process in over three hundred (300) cases.
26 Under Edwin Aiwazian, Arby Aiwazian, and my supervision, Lawyers *for* Justice, PC has
27 handled the class certification and court approval process for hundreds of class action and/or
28 representative action matters that have successfully resolved. I am a member of the California

Employment Lawyers Association.

**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

1 granted final approval of the class and PAGA representative action settlement. The Kern County
2 Superior Court Case Number is S-1500-CV-273194-LHB.

3 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
4 wage-and-hour class and PAGA representative action against a national wholesale distributor of
5 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
6 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
7 representative action settlement. The Sacramento County Superior Court Case Number is 34-
8 2012-00136285.

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

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

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

25 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a national retailer of upscale
27 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
28 court granted final approval of the class and PAGA representative action settlement. The Los

1 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
2 Council Coordination Proceeding Number is 4794.

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

7 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
8 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
9 involving allegations of misclassification of the “Department Manager” position. On August 12,
10 2016, the court granted the plaintiffs’ motion for class certification in part and certified a
11 class. On August 6, 2019, the court granted final approval of the class action settlement. The
12 Alameda County Superior Court Case Number is RG13680477.

13 m) LFJ represented the plaintiff in a PAGA representative action against a real
14 estate and property management company, on behalf of non-exempt employees. On November
15 4, 2016, the court granted approval of the PAGA representative action settlement. The Orange
16 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

26 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
27 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
28 the employer’s motion to compel arbitration, which resulted in a published opinion by the

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

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

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

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

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

26 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
27 representative action against a food company on behalf of non-exempt employees. On June 30,
28 2017, the court granted final approval of the class and PAGA representative action settlement.

1 The Sacramento County Superior Court Case Number is 34-2015-00175871.

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

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

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

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

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

26 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a global provider of flexible office
28 space solutions. On February 15, 2018, the court granted final approval of the class and PAGA

1 representative action settlement. The Los Angeles County Superior Court Case Number is
2 BC498401.

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

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

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

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

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

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

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

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

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

25 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
27 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the
28 court granted in part the plaintiff's motion for class certification and certified a class. The

Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the Judicial Council Coordination Proceeding Number is 4930.

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

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

nn) LFJ represents the plaintiffs in a wage-and-hour class action against a manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The Los Angeles County Superior Court Case Number is BC707670.

**LITIGATION COSTS AND EXPENSES INCURRED BY
LAWYERS FOR JUSTICE, PC**

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$17,963.29** in litigation costs and expenses incurred in the cases, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

CLASS REPRESENTATIVES SERVICE PAYMENTS TO PLAINTIFFS

20. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for Class Representatives Service Payments in the amount of \$5,000.00 each to Plaintiffs (for a total of \$10,000.00). The requested service payments are fair and appropriate.

1 Plaintiffs spent a substantial amount of time and effort to produce relevant documents and
2 information and provided facts and evidence to support the prosecution of the claims. For
3 example, Plaintiff Trinidad expended efforts to review and provide responses to multiple sets of
4 discovery requests that were propounded by Defendants and Plaintiff Trinidad appeared for and
5 provided testimony at deposition. Plaintiffs were available whenever Class Counsel needed them
6 and actively tried to obtain and provide information that would facilitate the pursuit of the cases.
7 Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their
8 work experiences with Defendants, and gathering and reviewing documents. Accordingly, it is
9 appropriate for Plaintiffs Eulalia Trinidad and Marko Asauljuk to receive \$5,000.00 each as
10 reasonable Class Representative Service Payments for their services in the cases, in addition to
11 their individual settlement payments.

12 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
13 interests of Plaintiffs, Class Members, Aggrieved Employees, and the State of California.

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

16 Executed this 2nd day of May 2024, at Glendale, California.

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19 _____
20 Joanna Ghosh
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EXHIBIT A

EULALIA TRINIDAD V. GROUNDWORK COFFEE, LLC, ET AL.
Los Angeles County Superior Court Case No. 19STCV09758 (“Trinidad Action”)
MARKO ASAULYUK V. GROUNDWORK COFFEE, LLC, ET AL.
Los Angeles County Superior Court Case No. 22SMCV00018 (“Asaulyuk Action”)

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, Commonality, and Manageability	8.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Eulalia Trinidad’s (“Plaintiff Trinidad”) Claims and the Merits of the Claims of the Putative Class Members	7.50
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendants Groundwork Coffee, LLC, Groundwork Coffee Holdings, LLC, Groundwork Coffee Roasters, LLC, Edward Cola, and Steven Levan (collectively, “Defendants”) With Respect to the Damages Sustained by Plaintiff Trinidad and the Putative Class Members	7.10
Pre-Notice Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California With Respect to Plaintiffs and the Aggrieved Employees	6.50
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendants With Respect to Plaintiffs and the Aggrieved Employees	5.80
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, IWC Wage Orders, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials	7.50
Investigation of Defendants, Their Business Relationships, and the Industry in Which They Operate	2.10

Investigation of Defendants' Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	3.30
Investigation of Defendants' Executives, Officers, and Leadership With a Focus on Involvement in Wage-and-Hour Issues, Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity	3.50
Analysis of Competitors In Various Relevant Geographic Areas Within Which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures With the Policies, Practices, and Procedures of Defendants' Competitors	3.60
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendants in California During the Class Period, Including Differences (If Any) Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	3.80
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	4.10
Research and Investigation Re: Defendants' Written and Non-Written Policies, Practices, and Procedures Relating to Opening and Closing Tasks, Customer Service, Food Safety, Reporting Time, Timekeeping, On-Call, Meal/Rest Breaks, On-Premises Breaks, Meal/Rest Premiums, Overtime Compensation, Non-Discretionary Bonus/Incentive/Shift Differential Pay, PPE/Tools/Supplies/Equipment, Uniforms/Dress Code, Footwear, Use of Personal Cell Phones, Use of Personal Vehicles, and Reimbursement of Business-Related Expenses	12.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendants Use to Conduct Everyday Business, Including Timekeeping, Sales, Inventory, Logistics, Distribution, Information and Document Sharing, Communications, Security, and Surveillance With a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal and Rest Breaks	3.90
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	7.50

Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.40
Research and Investigation Re: Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' Work, and Defendant's Financial Circumstances	8.50
Meet and Communicate With Plaintiff Eulalia Trinidad During the Case	46.50
Meet and Communicate With Plaintiff Marko Asauluk During the Case	34.50
Investigate, Meet, Communicate With, and/or Conduct Interviews of Putative Class Members and/or Percipient Witnesses	9.50
Pleadings and Court Filings	
Research and Draft Plaintiff Trinidad's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (served on March 22, 2019) (Trinidad Action)	7.10
Review Court's Notice of Case Assignment (filed on March 22, 2019) (Trinidad Action)	0.10
Review Court's Complex Determination Order and Initial Status Conference Order (filed on April 17, 2019) (Trinidad Action)	0.10
Review and Analyze Defendant Groundwork Coffee LLC's Answer to Class Action Complaint for Damages and Legal Research and Analysis of Affirmative Defenses in Defendant Groundwork Coffee LLC's Answer (served on May 3, 2019) (Trinidad Action)	1.50
Review Defendants' Notice of Errata (served on June 6, 2019) (Trinidad Action)	0.10
Review Court's Case Management Order and Order Authorizing Electronic Service (filed on June 24, 2019) (Trinidad Action)	0.10
Meet and Confer With Defendants' Counsel and Draft and/or Revise Joint Stipulation to Continue Motion for Class Certification Deadline and [Proposed] Order (filed on May 4, 2020) (Trinidad Action)	1.10
Review Order Granting Joint Stipulation to Continue Motion for Class Certification Deadline (filed on June 4, 2020) (Trinidad Action)	0.10

Meet and Confer With Defendants' Counsel, and Draft and/or Review Joint Stipulation to Continue Motion for Class Certification Deadline and [Proposed] Order (filed on May 5, 2021) (Trinidad Action)	0.90
Review Court's Order Granting Joint Stipulation to Continue Motion for Class Certification Deadline (filed on May 10, 2021) (Trinidad Action)	0.10
Research and Draft Plaintiff Plaintiff Asauluk's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, <i>Et Seq.</i> , and Legal Research and Analysis of All Claims Involved (filed on January 7, 2022) (Asauluk Action)	6.90
Review Court's Notice of Case Assignment (filed on January 7, 2022) (Asauluk Action)	0.10
Review Court's Notice of Case Management Conference (filed on January 10, 2022) (Asauluk Action)	0.10
Meet and Confer With Defendants' Counsel, and Draft, and/or Revise Joint Stipulation to Continue Motion for Class Certification Deadline, and [Proposed] Order (submitted on February 16, 2022) (Trinidad Action)	0.90
Review Order Granting Joint Stipulation to Continue Motion for Class Certification Deadline (filed on February 22, 2022) (Trinidad Action)	0.10
Review and Analyze Defendants' Answer to Plaintiff Asauluk's PAGA Complaint and Legal Research and Analysis of Affirmative Defenses in Defendants' Answer (served on February 22, 2022) (Asauluk Action)	1.50
Draft Plaintiff's Notice of Posting Jury Fees (filed on February 25, 2022) (Asauluk Action)	0.10
Draft Plaintiff's Case Management Statement (filed on June 17, 2022) (Asauluk Action)	1.10
Draft Plaintiff's Case Management Statement (filed on September 28, 2022) (Asauluk Action)	1.10
Review Defendants' Case Management Statement (served on October 3, 2022) (Asauluk Action)	0.20
Review Court's Minute Order Re: Trial Setting Conference (filed on October 13, 2022) (Asauluk Action)	0.10
Review Order Granting Joint Stipulation to Vacate Trial Setting Conference and Notice of Settlement (filed on November 7, 2022) (Asauluk Action)	0.10

Draft Notice of Entry of Order to Vacate Trial Setting Conference and Notice of Settlement (filed on November 7, 2022) (Asauluk Action)	0.10
Meet and Confer With Defendants' Counsel, and Draft and/or Revise Joint Stipulation to Vacate Motion for Class Certification Deadline and Non-Appearance Case Review and Notice of Settlement [Proposed] Order (submitted on November 4, 2022) (Trinidad Action)	1.10
Review Court's Order Granting Joint Stipulation to Vacate Motion for Class Certification Deadline and Non-Appearance Case Review and Notice of Settlement (filed on November 10, 2022) (Trinidad Action)	0.10
Meet and Confer With Defendants' Counsel, and Draft and/or Revise Joint Response to Order to Show Cause Re: Dismissal (filed on February 28, 2023) (Asauluk Action)	1.10
Review Court's Minute Order Re: Order to Show Cause re Dismissal (filed March on 7, 2023) (Asauluk Action)	0.10
Draft Notice Re: March 7, 2023 Order to Show Cause Re: Dismissal Hearing (filed on March 8, 2023) (Asauluk Action)	0.20
Meet and Confer With Defendants' Counsel and Draft, and/or Revise Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order (submitted on March 15, 2023) (Trinidad Action)	1.10
Review Order Granting Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (filed on March 21, 2023) (Trinidad Action)	0.10
Review Court's Minute Order Re: Rescheduling Hearing (filed on May 25, 2023) (Asauluk Action)	0.10
Meet and Confer With Defendants' Counsel, and Draft and/or Revise Joint Response to Order to Show Cause Re: Dismissal (filed on June 14, 2023) (Asauluk Action)	0.80
Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (filed on June 23, 2023) (Asauluk Action)	0.10
Draft Notice of Continuance of Order to Show Cause Re: Dismissal (filed on June 27, 2023) (Asauluk Action)	0.10

Meet and Confer With Defendants' Counsel, and Draft and/or Revise Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order (submitted on August 7, 2023) (Trinidad Action)	0.80
Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval and Minute Order Re: Deadline to File Motion for Preliminary Approval (filed on August 9, 2023) (Trinidad Action)	0.10
Meet and Confer With Defendants' Counsel, and Draft and/or Revise Joint Response to Order to Show Cause Re: Dismissal (filed September 6, 2023) (Asauluk Action)	0.80
Draft Notice Re: September 1, 2023 Order to Show Cause Re: Dismissal (filed on September 28, 2023) (Asauluk Action)	0.10
Meet and Confer With Defendants' Counsel, and Draft and/or Revise Joint Status Report (filed on October 3, 2023) (Trinidad Action)	0.70
Meet and Confer With Defendants' Counsel, and Draft and/or Revise Joint Stipulation to Deem the Filing of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement Timely; [Proposed] Order Thereon (submitted on October 17, 2023)	0.80
Draft Plaintiffs' First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, <i>Et Seq.</i> (filed on November 13, 2023)	1.90
Meet and Confer with Defendants' Counsel, and Draft, and/or Revise Joint Response to Order to Show Cause Re: Dismissal (filed December 5, 2023) (Asauluk Action)	0.60
Appearances	
Prepare for and Telephonically Attend Case Management Conference (July 11, 2022) (Asauluk Action)	1.10
Prepare for and Telephonically Attend Case Management Conference (October 21, 2022) (Asauluk Action)	0.90
Prepare for and Telephonically Attend Order to Show Cause Re: Dismissal (March 7, 2023) (Asauluk Action)	0.50

Prepare for and Telephonically Attend Order to Show Cause Re: Dismissal (June 23, 2023) (Asauluk Action)	1.10
Prepare for and Telephonically Attend Order to Show Cause Re: Dismissal (September 13, 2023) (Asauluk Action)	0.40
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (October 30, 2023) (Trinidad Action)	0.90
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (December 7, 2023) (Trinidad Action)	2.50
Discovery and Deposition	
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Eulalia Trinidad (served on January 10, 2019)	1.90
Draft Follow-Up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Eulalia Trinidad (served on March 4, 2019)	0.80
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Eulalia Trinidad (served on June 5, 2020)	1.80
Review Defendants' Form Interrogatories– Employment Law (Set One) and Form Interrogatories – General (Set One) (served on May 15, 2019) (Trinidad Action)	0.50
Draft Plaintiff Trinidad's Responses to Form Interrogatories – Employment Law (Set One) and Form Interrogatories – General (Set One) (served on July 8, 2019) (Trinidad Action)	5.50
Draft Plaintiff's Form Interrogatories – General (Set One), Requests for Production of Documents (Sets One and Two), Special Interrogatories (Sets One, Two, and Three), (served on July 18, 2019) (Trinidad Action)	4.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Groundwork Coffee, LLC (noticed for September 23, 2019; Document Retention and Organizational Structure) and Requests for Production of Documents (served on July 18, 2019) (Trinidad Action)	2.10

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Groundwork Coffee, LLC (noticed for September 24, 2019; Wage and Hour Practices) and Requests for Production of Documents (served on July 18, 2019) (Trinidad Action)	2.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Groundwork Coffee LLC (noticed for September 25, 2019; Affirmative Defenses) and Requests for Production of Documents (served on July 18, 2019) (Trinidad Action)	2.40
Review and Analyze Defendants' Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Groundwork Coffee LLC (noticed for September 23, 2019; Document Retention and Organizational Structure) and Requests for Production of Documents (served on September 23, 2019) (Trinidad Action)	0.80
Review and Analyze Defendants' Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Groundwork Coffee LLC (noticed for September 24, 2019; Wage and Hour Practices) and Requests for Production of Documents (served on September 16, 2019) (Trinidad Action)	1.10
Review and Analyze Defendants' Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Groundwork Coffee LLC (noticed for September 25, 2019; Affirmative Defenses) and Requests for Production of Documents (served on September 17, 2019) (Trinidad Action)	2.10
Draft Plaintiff's Responses to Form Interrogatories – Employment Law (Set One) and Form Interrogatories – General (Set One) (served on July 8, 2019) (Trinidad Action)	5.10
Review Defendants' Notice of Deposition of Plaintiff Trinidad (for July 17, 2019) (served on July 9, 2019) (Trinidad Action)	0.10
Draft Plaintiff Trinidad's Objections to Defendants' Notice of Deposition of Plaintiff Trinidad (for July 17, 2019) and Requests for Production of Documents (served on July 9, 2019) (Trinidad Action)	0.90
Review Defendants' Notice of Deposition of Plaintiff Trinidad and Requests for Production of Documents (for February 5, 2020) (served on January 21, 2020) (Trinidad Action)	0.10
Draft Plaintiff Trinidad's Objections and Responses to Defendants' Notice of Taking Deposition of Plaintiff and Requests for Production of Documents (served on January 31, 2020) (Trinidad Action)	6.50

Prepare for, Travel To/From, and Defend Deposition of Plaintiff Trinidad (February 5, 2020; Los Angeles, California) and Review Deposition Transcript (Trinidad Action)	10.50
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Marko Asaulyuk (served on July 19, 2021)	1.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Marko Asaulyuk (served on August 13, 2021) (Asaulyuk Action)	2.10
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Marko Asaulyuk for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on November 3, 2021)	4.50
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Eulalia Trinidad for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on November 12, 2021)	4.50
Meet With, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	12.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant (approximately 14,562 pages), and Other Sources Prior to Mediations	69.50
Prepare for First Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Draft Plaintiffs' Mediation Brief, Compile the Mediation Exhibits in Support of Mediation Brief, and Perform Damages and Penalties Analysis and Calculations (submitted on October 30, 2020)	25.50
Attend First Mediation Session (November 2, 2020; Zoom Video Conference)	8.50
Prepare for Second Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Draft Plaintiffs' Mediation Brief, Compile the Mediation Exhibits in Support of Mediation Brief, and Perform Damages and Penalties Analysis and Calculations (submitted October 18, 2021)	18.50
Prepare for and Attend Second Mediation Session (October 26, 2021; Zoom Video Conference)	12.50

Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action/PAGA Settlement	2.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on October 17, 2023) and Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	13.50
Draft, Review, Revise and Negotiate and Finalize First Amended Class Action and PAGA Settlement Agreement (executed December 15, 2023) and Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	3.50
Review Weekly Reports from Settlement Administrator and Monitor Settlement Notice Administration Process	2.50
Law and Motion	
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Eulalia Trinidad in Support Thereof, Declaration of Marko Asauluk in Support Thereof, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on October 17, 2023)	16.50
Review Court's Los Angeles Superior Court Complex Civil Department Checklist for Preliminary Approval of Class Action Settlement (filed on October 24, 2023)	1.50
Review Court's Minute Order Re: Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed October 30, 2023)	0.10
Draft Supplemental Declaration of Yasmin Hosseini in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; Declaration of Defendants in Support Thereof; Declaration of Richard L. Mojica In Support Thereof (Filed on November 13, 2023)	8.50
Review Court's Minute Order Re: Scheduling Hearing on Motion for Preliminary Approval of Class action Settlement (filed on November 21, 2023)	0.10
Review Court's Minute Order Re: Hearing on Motion on Motion for Preliminary Approval of Class Action Settlement (filed on December 7, 2023)	0.10

Draft Further Supplemental Declaration of Yasmin Hosseini in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (submitted on December 15, 2023)	2.10
Review Order Granting Preliminary Approval of Class Action Settlement (filed on December 18, 2023)	0.20
Draft Notice of Entry of Order Granting Preliminary Approval of Class Action Settlement (filed December 20, 2023)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representatives Service Payments, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on May 2, 2024)	18.50
Total Hours:	512.00

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Trinidad v. Groundwork Coffee, LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/10/2019	U.S. Postmaster	Postage	6.70
3/4/2019	U.S. Postmaster	Postage	14.00
3/22/2019	Los Angeles Superior Court	Complaint Filing Fee	435.00
3/22/2019	Los Angeles Superior Court	Complex Filing Fee	1,000.00
4/3/2019	ProLegal	Attorney Service	140.85
5/21/2019	Golden State Overnight	Courier Service	16.94
6/3/2019	FedEx Express	Courier Service	22.14
6/24/2019	Cinela Aziz	Travel Reimbursement	40.43
7/9/2019	Golden State Overnight	Courier Service	13.43
7/18/2019	Golden State Overnight	Courier Service	13.43
10/3/2019	Case Anywhere, LLC	Attorney Service	99.60
1/8/2020	Case Anywhere, LLC	Attorney Service	120.00
1/30/2020	General Logistics Systems US, Inc.	Courier Service	13.30
1/31/2020	Legal Document Server, Inc.	Attorney Service	185.00
2/5/2020	Travis Maher	Travel Reimbursement	54.51
2/6/2020	Signature Resolution LLC	Mediation Fee	6,450.00
3/3/2020	General Logistics Systems US, Inc.	Courier Service	14.14
3/3/2020	Norman Schall & Associates	Court Reporter	709.85
3/13/2020	General Logistics Systems US, Inc.	Courier Service	18.92
4/9/2020	Case Anywhere, LLC	Attorney Service	120.00
5/1/2020	General Logistics Systems US, Inc.	Courier Service	13.77
5/4/2020	Legal Document Server, Inc.	Attorney Service	110.70
5/4/2020	Los Angeles Superior Court	Stipulation & Order Fee	20.00
6/17/2020	Los Angeles Superior Court	Document Download Fee	5.00
7/8/2020	Case Anywhere, LLC	Attorney Service	120.00
10/7/2020	Case Anywhere, LLC	Attorney Service	120.00
10/30/2020	FedEx Express	Courier Service	52.34
1/8/2021	Case Anywhere, LLC	Attorney Service	120.00
4/3/2021	Case Anywhere, LLC	Attorney Service	120.00
5/5/2021	Legal Document Server, Inc.	Attorney Service	205.70
5/5/2021	Los Angeles Superior Court	Stipulation & Order Fee	20.00
7/3/2021	Case Anywhere, LLC	Attorney Service	126.00
10/5/2021	Case Anywhere, LLC	Attorney Service	120.00
10/8/2021	Signature Resolution LLC	Mediation Fee	4,200.00
1/5/2022	Case Anywhere, LLC	Attorney Service	120.00
2/17/2022	Legal Document Server, Inc.	Attorney Service	16.15
2/17/2022	Los Angeles Superior Court	Stipulation & Order Fee	20.00
2/24/2022	Los Angeles Superior Court	Document Download Fee	5.40
2/25/2022	Legal Document Server, Inc.	Attorney Service	15.20

LAWYERS for JUSTICE PC CASE COST DETAIL
Trinidad v. Groundwork Coffee, LLC

4/10/2022	Case Anywhere, LLC	Attorney Service	132.00
7/7/2022	Case Anywhere, LLC	Attorney Service	120.00
10/9/2022	Case Anywhere, LLC	Attorney Service	120.00
11/4/2022	Legal Document Server, Inc.	Attorney Service	17.30
11/4/2022	Los Angeles Superior Court	Filing Fee	20.00
11/10/2022	Legal Document Server, Inc.	Attorney Service	15.95
1/9/2023	Case Anywhere, LLC	Attorney Service	126.00
3/16/2023	Legal Document Server, Inc.	Attorney Service	17.30
3/16/2023	Los Angeles Superior Court	Stipulation & Order Fee	20.00
4/16/2023	Case Anywhere, LLC	Attorney Service	126.00
7/3/2023	Case Anywhere, LLC	Attorney Service	120.00
8/7/2023	Legal Document Server, Inc.	Attorney Service	17.54
8/7/2023	Los Angeles Superior Court	Stipulation & Order Fee	20.00
10/4/2023	Legal Document Server, Inc.	Attorney Service	16.15
10/5/2023	Case Anywhere, LLC	Attorney Service	126.00
10/18/2023	Legal Document Server, Inc.	Attorney Service	20.32
10/18/2023	Los Angeles Superior Court	Motion Fee	60.00
10/18/2023	Legal Document Server, Inc.	Attorney Service	17.54
10/18/2023	Los Angeles Superior Court	Stipulation & Order Fee	20.00
11/14/2023	Legal Document Server, Inc.	Attorney Service	16.15
11/14/2023	Legal Document Server, Inc.	Attorney Service	16.15
12/15/2023	Legal Document Server, Inc.	Attorney Service	16.15
12/20/2023	Legal Document Server, Inc.	Attorney Service	16.15
1/5/2024	Case Anywhere, LLC	Attorney Service	228.00
4/2/2024	Case Anywhere, LLC	Attorney Service	120.00
Total:			16,563.20

LAWYERS for JUSTICE PC CASE COST DETAIL
Asauluk v. Groundwork Coffee, LLC (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/3/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
11/3/2021	U.S. Postmaster	Postage	\$24.00
1/10/2022	Legal Document Server, Inc.	Attorney Service	\$35.86
1/10/2022	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
1/19/2022	ProLegal	Attorney Service	\$362.34
2/14/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
2/28/2022	Legal Document Server, Inc.	Attorney Service	\$37.53
2/28/2022	Los Angeles Superior Court	Jury Fee	\$150.00
6/17/2022	General Logistics Systems US, Inc.	Courier Service	\$18.20
6/20/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
9/29/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
9/29/2022	General Logistics Systems US, Inc.	Courier Service	\$17.61
11/4/2022	Legal Document Server, Inc.	Attorney Service	\$17.30
11/4/2022	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
11/7/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
2/28/2023	Legal Document Server, Inc.	Attorney Service	\$15.95
3/8/2023	Legal Document Server, Inc.	Attorney Service	\$15.95
6/14/2023	Legal Document Server, Inc.	Attorney Service	\$32.30
6/28/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
9/7/2023	Legal Document Server, Inc.	Attorney Service	\$32.30
10/2/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
12/6/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
Total:			<u>\$1,400.09</u>