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

ANDRESS CASAS, 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.

MYERS POWER PRODUCTS, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: CIVDS1920109

Honorable David S. Cohn
Department S26

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Award; Declaration of Class Representative
(Andres Casas); Declaration of Settlement
Administrator (Desirae Burton); and [Proposed]
Final Approval Order and Judgment filed
concurrently herewith]

Date: September 14, 2023
Time: 9:00 a.m.
Department: S26

Complaint Filed: July 10, 2019
FAC Filed: December 20, 2019
SAC Filed: May 3, 2023
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 Andres Casas (“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 29, 2023, in Department S26 of the above-entitled Court, the Honorable David S. Cohn preliminarily approved the Stipulation for Leave to File Second Amended Complaint and Settlement and Release of Class Action and PAGA Claims (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Myers Power Products, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Andres Casas to represent the Class (“Plaintiff” or “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 (“Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc., (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator and to handle the notice and settlement administration process.

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

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WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned action (“Action”) since prior to its commencement on July 10, 2019.

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

6. Class Counsel investigated the veracity, strength, and scope of the claims, and was preparing for class certification and for trial, prior to reaching the Settlement. The parties conducted significant informal discovery and investigation into the facts of the case, and exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff and other percipient witnesses, and reviewed and analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included and were not limited to: Plaintiff’s employment records, Class Members’ time and pay data, job descriptions, checklists, internal memorandum, agreements, forms, and employment and operations policies, practices, and procedures documents, among other information and documents. Class Counsel researched applicable law, developed liability, damages, and penalties valuation models in the course of litigation and in

connection with mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, motion practice, case management, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings, motion-related papers, mediation briefs and related materials (in anticipation of the scheduled October 2020 mediation, which was ultimately canceled at the last minute because Defendant changed counsel, and the September 2021 mediation which went forward), and settlement documents; and preparing for and attended court proceedings and mediation and settlement negotiations, among other tasks.

7. The parties have conducted significant investigation and informal discovery during the course of litigating the case and mediation and settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. The information, documents, and data that were considered provided a critical understanding of the nature of the work performed by the Class Members and Aggrieved Employees, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Class Counsel also performed research into the applicable law, which is evolving as it relates to class certification, off-the-clock theory, meal and rest periods, waivers, rounding, representative PAGA claims and penalties, wage-and-hour enforcement, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

8. After conducting significant litigation and investigation of the facts and law during the prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve the case. These efforts included preparing for mediation that was originally scheduled for October 2020 but ultimately canceled at the last minute because Defendant changed counsel, and preparing for and participating in a formal, full-day mediation that was conducted in September 2021 by Lynn Frank, Esq., a well-regarded mediator

1 experienced in mediating complex labor and employment matters. During all settlement
2 discussions, the parties conducted their negotiations at arm's length in an adversarial position. In
3 the course of mediation and settlement negotiations, the parties exchanged information,
4 documents, and data, and discussed all aspects of the case, including and not limited to, the risks
5 and delays of further litigation, the risks to the parties of proceeding with class certification and
6 trial, the law relating to off-the-clock theory, meal and rest periods, waivers, rounding,
7 representative PAGA claims, and wage-and-hour enforcement, as well as the evidence produced
8 and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that
9 was acceptable to the parties was not easy. Defendant and its counsel felt strongly about
10 Defendant's ability to prevail on the merits and to avoid class certification and representative
11 adjudication, while Plaintiff and Class Counsel believed that they would be able to obtain class
12 certification and prevail at trial. With the aid of the mediator's evaluation, the parties ultimately
13 agreed that the case was well-suited for settlement given the legal issues relating to Plaintiff's
14 principal claims, as well as the costs and risks to the parties that would attend further litigation.
15 These risks of further litigation include, and are not limited to, a determination that the claims are
16 unsuitable for class treatment and/or representative adjudication, class de-certification after
17 certification of a class, allowing a jury to decide the claims asserted in the case, and the real
18 possibility of no monetary recovery after years of litigation.

19 9. The Settlement Agreement originally provided for a Gross Settlement Fund in the
20 amount of \$4,100,000, however, the Settlement Agreement also includes an Escalator Clause in
21 Paragraph 22. The Escalator Clause provides in pertinent part that, if the number of Workweeks
22 for all Class Members exceeds 62,946 by more than 10% (i.e., if the number of Workweeks
23 exceed 69,240), then at Defendant's option, the Gross Settlement Fund will be subject to
24 increase. After the Settlement Administrator confirmed that the total number of Workweeks
25 during Class Period was sixty-nine thousand eight hundred thirty-four (69,834) (which exceeds
26 the threshold by 10.94%) and that the Escalator Clause in the Settlement Agreement had been
27 triggered, Defendant agreed to increase the Gross Settlement Fund from \$4,100,000.00 to
28 \$4,138,651.22.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$1,379,550.41, which is one-third (33.33%) of the escalated Gross Settlement Fund of \$4,138,651.22, as set forth in the Settlement Agreement and the Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least one-third (33.33%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter. The nature of the work performed, skill exercised, and the outcome in this matter—which involves an outstanding monetary recovery involving a **gross settlement of \$4,138,651.22** (with a Net Settlement Fund of **at least \$2,566,698.88 to be paid to Participating Class Members, a payment of \$37,500.00 to Aggrieved Employees, and payment of \$112,500.00 to the State of California**)—support both the application of a lodestar multiplier and the percentage fee requested.

11. I am aware that common and acceptable rates for contingency representation in wage-and-hour class action and representative action litigation are in the range of 33.3% to 50%.

12. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a lodestar analysis with a 1.85 multiplier. Attorneys at Lawyers for Justice, PC have spent a total of **994.70** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred in performing those services. These hours include work done by myself and several other attorneys at Lawyers for Justice, PC. Additionally, separate from the hours referenced herein, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The work performed in this particular matter, the background of 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 and representative actions, support a reasonable blended hourly rate of compensation of at least \$750 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 \$750 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 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; 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 compensation at the rate of \$766.05 per hour; 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 compensation at the rate of \$764.82 per hour; 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; 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 compensation at the rate of \$831.38 per hour; 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 attorneys' fees involved compensation at the rate of \$780.77 per hour; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved compensation at the rate of \$845.64 per hour.

ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

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

JUDICIAL EXTERNSHIPS

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

LITIGATION AND CLASS ACTION EXPERIENCE

16. In December of 2004, I obtained a license to practice law from the California State Bar. From approximately December 2004 to approximately August 2008, I was employed by a prominent plaintiff-side law firm.

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1 17. At the prominent plaintiff-side law firm, my practice focused on class actions and
2 other complex cases involving toxic torts and products liability. In addition, I gained substantial
3 experience on cases involving insurance bad faith, premises liability, and medical negligence.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

26 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
27 representative action against a behavioral health service provider on behalf of non-exempt
28 employees. On November 13, 2018, the court granted final approval of the class and PAGA

1 representative action settlement. The Alameda County Superior Court Case Number is
2 RG16811450.

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

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

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

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

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

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

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

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

20 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
21 wage-and-hour class action against manufacturer and supplier of power products and services on
22 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
23 motion for class certification and certified a class. On August 27, 2021, the court granted final
24 approval of the class action settlement. The San Diego County Superior Court Case Number is
25 37-2015-00025968-CU-OE-CTL.

26 mm) LFJ represents the plaintiff in a wage-and-hour class action against a
27 nutritional products manufacturer on behalf of non-exempt production line employees. On
28 December 13, 2021, the court granted the plaintiff's motion for class certification in part and

1 certified a class. The Solano County Superior Court Case Number is FCS051001.

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

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

8 20. To date, Class Counsel has borne all of the risks and costs of litigation and will
9 not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC
10 seeks reimbursement of **\$20,501.93** in litigation costs and expenses incurred in this matter, as
11 reflected in **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in
12 the prosecution of the case and to obtain the Settlement.

13 **ENHANCEMENT AWARD TO PLAINTIFF**

14 21. In recognition of his efforts and work serving as the Class Representative, the
15 Settlement provides for an Enhancement Award in the amount of \$10,000.00 to Plaintiff Andres
16 Casas. The requested Enhancement Award is fair and appropriate. Plaintiff spent a substantial
17 amount of time and effort to provide the facts and evidence necessary to attempt to prove the
18 allegations. Plaintiff was available whenever Class Counsel needed him and actively tried to
19 facilitate the pursuit of the class and PAGA claims. Plaintiff spent numerous hours speaking
20 with Class Counsel about his claims, describing his work experience with Defendant, and
21 gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Andres Casas to
22 receive \$10,000.00 as a reasonable Enhancement Award, for his services on behalf of the Class
23 Members, State of California, and Aggrieved Employees, in addition to his individual settlement
24 payment.

25 ///

26 ///

27 ///

28 ///

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

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

Executed this 22nd day of August 2023, at Glendale, California.



Edwin Aiwarzian

EXHIBIT A

ANDRES CASAS V. MYERS POWER PRODUCTS, INC.
(San Bernardino County Superior Court Case No. CIVDS1920109)

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	15.30
Pre-Lawsuit Investigation of the Merits of Plaintiff Andres Casas's ("Plaintiff") Claims and the Putative Class Members' Claims	13.50
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Myers Power Products. ("Defendant") with Respect to Plaintiff and the Putative Class Members	11.50
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	11.20
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiff and the Aggrieved Employees	10.50
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Wage Orders, Representative PAGA, and Class Certification Decisions in California, Including all New and Relevant DLSE Materials	11.50
Investigation of Defendant, Its Products and Services, Business Relationships, Customers, Certifications/Licenses, Contracts, and the Industries/Markets in which It Operates (including, <i>inter alia</i> , Agro-Chem, Commercial, Energy, Government, Healthcare, Mining, Marine, Military, Residential, Oil & Gas, Rail/Transit, Utilities, and Waste)	14.10

Investigation of Defendant's Organizational, Corporate, and Executive Reporting Structure, as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	5.70
Investigation, Research, and Analysis Regarding Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues To Evaluate Willfulness and Uniformity	7.50
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	5.90
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 Layout and Any Differences Between Them to Determine Whether Individual Issues Predominate Over Common Issues	7.30
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Consumer and Other 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	8.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California	8.50
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Scheduling, Assignments, Bell System, Facility/Operations Shutdown, Reports and Paperwork, Timekeeping, Shift Pass-Downs, Rounding, Auto-Deduction of Time, Meal/Rest Breaks, On-Premises Breaks, Overtime Sign-Up/Meal Waiver Sheets, Meal/Rest Premiums, Non-Discretionary Commission/Bonus/Incentive/Shift Differential Pay, Regular Rate Calculation, Overtime Compensation, Dress Code, Donning and Doffing, PPE, Footwear, Tools/Equipment/Supplies, Use of Personal Cell Phones and Computing Devices, and Reimbursement of Business-Related Expenses	39.50
Research and Investigation Re: Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Bell, Payroll, Inventory, Production, Resource Management, Quality Control, Logistics, Client/Project Management, Communication, Information and	7.80

Document Management, 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	
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Exemption, Waiver, and Compliant Policies	11.30
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	8.90
Prepare a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, Damages, and Penalties	7.50
Research and Preliminarily Outline Issues Important to Class Certification and Trial Manageability	58.50
Research and Investigation on the Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' and Aggrieved Employees' Work	13.50
Meet and Communicate with Plaintiff Andres Casas Throughout the Pendency of the Case	55.50
Investigate Putative Class Members and Percipient Witnesses	17.30
Meet, Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	20.50
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 July 10, 2019)	8.10
Review Court's Initial Case Management Conference Order and Guidelines for Complex Litigation Program (filed on July 30, 2019)	0.20
Review Defendant Myers Power Products, Inc.'s Notice of Appearance (filed on August 13, 2019)	0.10

Draft Plaintiff's Proof of Service of Court's Initial Case Management Conference Order and Guidelines for Complex Litigation Program (filed on August 16, 2019)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on August 21, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Case Management Conference Statement (filed on October 15, 2019)	1.70
Draft Plaintiff's First Amended Class Action Complaint for Damages, and Legal Research and Analysis of All Claims Involved (filed on December 20, 2019)	4.50
Review Court's Notice of Continuance of Complex Case Management Conference (filed on April 8, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Stipulation to Continue Case Management Conference; [Proposed] Order (filed on August 3, 2020)	1.20
Draft Declaration of Benjamin Haber Regarding Order to Show Cause (filed on August 24, 2020)	0.80
Review Defendant's Declaration of Hider J. Al-Mashat, Counsel for Defendant, Regarding Order to Show Cause (filed on August 31, 2020)	0.20
Review and Analyze Defendant's Answer to Plaintiff's First Amended Complaint and Legal Research and Analysis of Allegations and Affirmative Defenses (filed on September 2, 2020)	5.70
Draft Plaintiff's Further Case Management Conference Statement (filed on December 15, 2020)	0.80
Review Defendant's Notice of Substitution of Attorney (filed on December 17, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Further Case Management Conference Statement (filed on February 5, 2021)	1.10
Review Court's Minute Order Re: Case Management Conference (filed on February 10, 2021)	0.10
Review Defendant's Notice of Change of Address of A. Beverlin (filed on September 29, 2021)	0.10

Review Defendant's Notice of Change of Address of M. Kane (filed on September 29, 2021)	0.10
Review Court's Notice of Return of Documents (filed October 5, 2021)	0.10
Review Defendant Myers Power Products, Inc.'s Amended Notice of General Appearance in Response to Initial Status Conference Order (filed on October 22, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Further Case Management Conference Statement (filed on November 8, 2021)	0.90
Review Court's Notice of Continuance of Further Case Management Conference (filed on February 4, 2022)	0.10
Draft Plaintiff's Notice of Continuance of Further Case Management Conference (filed on February 14, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Further Case Management Conference Statement (filed on March 4, 2022)	0.80
Review Court's Notice of Continuance of Further Case Management Conference (filed on August 11, 2022)	0.10
Draft Plaintiff's Notice of Continuance of Further Case Management Conference (filed on August 25, 2022)	0.20
Draft Plaintiff's Further Case Management Conference Statement (filed on October 5, 2022)	0.70
Review Defendant's Further Case Management Conference Statement (filed on October 12, 2022)	0.10
Review Court's Notice of Continuance of Motion for Preliminary Approval of Class Action Settlement Hearing (filed on March 13, 2023)	0.10

Review Court's Notice of Return of Documents (filed on April 26, 2023)	0.10
Draft Plaintiff's Second 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 May 3, 2023)	6.50
Review Court's Notice of Continuance of Further Case Management Conference (filed on June 27, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Stipulation to Continue Final Approval Hearing Date and Related Deadlines; [Proposed] Order Thereon (filed on July 10, 2023)	3.70
Review Court's Order Granting Stipulation to Continue Final Approval Hearing Date and Related Deadlines (filed on July 17, 2023)	0.10
Appearances	
Prepare for and Attend Initial Status Conference (October 22, 2019)	4.50
Prepare for and Attend Hearing on Defendant's Demurrer and Motion to Strike Portions of Plaintiff's First Amended Complaint (March 11, 2020)	6.50
Prepare for and Telephonically Attend Case Management Conference (September 22, 2020)	2.10
Prepare for and Telephonically Attend Further Case Management Conference (February 10, 2021)	2.50
Prepare for and Telephonically Attend Further Case Management Conference (March 22, 2022)	1.40
Prepare for and Telephonically Attend Further Case Management Conference (October 18, 2022)	1.60
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (March 1, 2023)	0.50
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (March 29, 2023)	0.40

Prepare for and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Award (September 14, 2023) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Andres Casas (served on May 13, 2019)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on May 13, 2019)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Andres Casas (served on May 31, 2019)	4.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Andres Casas for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on December 28, 2021)	5.20
Meet, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	28.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (in excess of 11,200 pages), and Other Sources Prior to October 22, 2020 Scheduled Mediation	106.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on October 19, 2020)	28.50
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (in excess of 22,300 pages), and Other Sources Prior to September 21, 2021 Mediation	194.50

Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling Exhibits in Support of Mediation Brief, Performing Damages and Penalties Analysis and Calculations, and Preparing PowerPoint Presentation (submitted on September 8, 2021)	39.50
Remotely Attend Mediation Session (September 21, 2021; Zoom Video Conference)	14.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed September 21, 2021)	4.20
Draft, Review, Revise, Negotiate, and Finalize Stipulation for Leave to File Second Amended Complaint and Class Action and PAGA Settlement and Release of Claims (executed on November 15, 2022) and Draft Notice of Class Action Settlement	25.80
Meet and Confer with Settlement Administrator and Defendant's Counsel Regarding, and Review and Monitor, Settlement Administration Process and Analyze Weekly Reports	16.50
Law and Motion	
Review and Analyze Defendant Myers Power Products, Inc.'s Notice of Demurrer and Demurrer to Plaintiff's First Amended Complaint; Memorandum of Points and Authorities; Declaration of Hider J. Al-Mashat (filed on January 23, 2020)	2.50
Review and Analyze Defendant Myers Power Products, Inc.'s Notice of Motion and Motion to Strike Portions of Plaintiff's First Amended Complaint (filed on January 23, 2020)	2.30
Draft Plaintiff Andres Casas' Opposition to Defendant Myers Power Products, Inc.'s Demurrer to Plaintiff's First Amended Complaint (filed on February 27, 2020)	13.50
Draft Plaintiff Andres Casas' Opposition to Defendant Myers Power Products, Inc.'s Motion to Strike Portions of Plaintiff's First Amended Complaint (filed on February 27, 2020)	12.50

Review and Analyze Defendant Myers Power Products, Inc.’s Reply to Plaintiff’s Opposition to Defendant Myers Power Products, Inc.’s Motion to Strike Portions of Plaintiff’s First Amended Complaint (filed on March 4, 2020)	1.80
Review and Analyze Court’s Tentative Ruling on Demurrer and Motion to Strike (filed on March 11, 2020)	0.90
Review and Analyze Court’s Ruling on Demurrer and Motion to Strike (filed on March 11, 2020)	0.20
Research and Draft Plaintiff’s Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Alexandra Rose in Support Thereof, Declaration of Andres Casas in Support Thereof, and [Proposed] Order Thereon (filed on February 6, 2023)	23.10
Review and Analyze Court’s Tentative Ruling Re: Plaintiff’s Notice of Motion and Motion for Preliminary Approval of Class Action Settlement (filed on March 1, 2023)	0.80
Draft Plaintiff’s Supplemental Declaration of Alexandra Rose in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (filed on March 10, 2023)	7.50
Review and Analyze Court’s Tentative Ruling Re: Plaintiff’s Notice of Motion and Motion for Preliminary Approval of Class Action Settlement (filed on March 29, 2023)	0.70
Review and Analyze Court’s Order Granting Preliminary Approval of Class Action Settlement (filed on March 29, 2023)	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 Action Settlement, Attorneys’ Fees, Costs, and Enhancement Award, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on August 22, 2023)	25.60
Total Hours:	994.70

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Casas v. Myers Power Products

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/13/2019	U.S. Postmaster	Postage	13.70
7/10/2019	Legal Document Server, Inc.	Attorney Service	145.22
7/10/2019	San Bernardino Superior Court	Complaint Filing Fee	435.00
7/10/2019	San Bernardino Superior Court	Complex Filing Fee	1,000.00
7/18/2019	Legal Document Server, Inc.	Attorney Service	110.00
8/21/2019	San Bernardino Superior Court	Jury Fee	150.00
9/5/2019	General Logistics Systems US, LLC	Courier Service	20.91
10/15/2019	Legal Document Server, Inc.	Attorney Service	130.00
10/23/2019	CourtCall, LLC	Attorney Service	94.00
12/20/2019	Legal Document Server, Inc.	Attorney Service	130.00
2/27/2020	General Logistics Systems US, LLC	Courier Service	14.14
2/27/2020	Legal Document Server, Inc.	Attorney Service	130.00
3/11/2020	Kelly Odabashian	Travel Reimbursement	86.71
8/3/2020	Legal Document Server, Inc.	Attorney Service	195.70
8/3/2020	San Bernardino Superior Court	Stipulation Fee	20.00
8/24/2020	Legal Document Server, Inc.	Attorney Service	130.70
8/24/2020	San Bernardino Superior Court	Stipulation Fee	20.00
9/23/2020	CourtCall, LLC	Attorney Service	94.00
10/15/2020	First Mediation Corporation	Mediator's Cancellation Fee	7,500.00
12/14/2020	Legal Document Server, Inc.	Attorney Service	195.00
12/15/2020	San Bernardino Superior Court	Document Download Fee	2.00
2/11/2021	CourtCall, LLC	Attorney Service	94.00
8/20/2021	Lynn S. Frank	Mediation Fee	7,500.00
9/9/2021	FedEx Express	Courier Service	34.70
11/5/2021	Legal Document Server, Inc.	Attorney Service	130.00
12/8/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
12/28/2021	U.S. Postmaster	Postage	10.00
3/4/2022	Legal Document Server, Inc.	Attorney Service	145.00
3/23/2022	CourtCall, LLC	Attorney Service	94.00
8/23/2022	Legal Document Server, Inc.	Attorney Service	130.00
10/19/2022	CourtCall, LLC	Attorney Service	94.00
10/19/2022	CourtCall, LLC	Attorney Service	94.00
2/1/2023	Legal Document Server, Inc.	Attorney Service	364.58
2/1/2023	San Bernardino Superior Court	Motion Fee	90.00
3/2/2023	CourtCall, LLC	Attorney Service	72.00
3/9/2023	Legal Document Server, Inc.	Attorney Service	170.00
3/30/2023	CourtCall, LLC	Attorney Service	72.00
3/31/2023	Legal Document Server, Inc.	Attorney Service	138.82
4/3/2023	Legal Document Server, Inc.	Attorney Service	341.75
4/6/2023	Legal Document Server, Inc.	Attorney Service	65.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Casas v. Myers Power Products

5/3/2023 Legal Document Server, Inc.

Attorney Service

	<u>170.00</u>
Total:	20,501.93