

**BIBIYAN LAW GROUP, P.C.**

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Attorneys for Plaintiffs, BRIGIT NAVARRO and  
THADDIUS MUELLER, on behalf of themselves and  
all others similarly situated and aggrieved

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SACRAMENTO**

BRIGIT NAVARRO and THADDIUS  
MUELLER, individuals, and on behalf of all  
others similarly situated and aggrieved,

Plaintiffs,

v.

CRESTWOOD BEHAVIORAL HEALTH,  
INC., a Delaware corporation doing business  
as IDYLWOOD CARE CENTER; HELIOS  
HEALTHCARE, LLC, a California limited  
liability company doing business as  
IDYLWOOD CARE CENTER; and DOES 1  
through 100 inclusive,

Defendants.

CASE NO.: 34-2021-00312914

[Assigned for All Purposes to the Hon. Jill H.  
Talley in Dept. 23]

**DECLARATION OF DAVID D. BIBIYAN  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR APPROVAL OF REPRESENTATIVE  
ACTION SETTLEMENT**

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1        8.        I am an active member of the California Employment Lawyers' Association  
2 ("CELA"). I am one of its founding members and actively remain a member of its Reverse  
3 Auctions Subcommittee; in doing so, I serve as a mediator between other plaintiffs' counsel who  
4 bring overlapping class actions. I have also attended various Continuing Legal Education courses  
5 pertaining to advocacy on behalf of employees.

6        9.        I also created the content for, helped organize, and served as the Moderator for the  
7 2023 California Complex Symposium Wage and Hour/PAGA Section, a Continuing Legal  
8 Education seminar and forum featuring four respected Judges serving in the Complex Divisions  
9 of their respective county Superior Courts. In addition, my firm served as a sponsor of that event.

10       10.       Not only have I practiced almost exclusively in this field for years and have  
11 contributed to the legal education curriculum for attorneys practicing within it, I am also a  
12 published author in the Daily Journal as a contributor in the Wage and Hour and PAGA context,  
13 including, in December 15, an article entitled: "PAGA: What's Gone, What's Left and What's  
14 Next." I have also been a quoted source in multiple other publications, including in article  
15 published by Bloomberg Law dated November 1, 2023 entitled: "Adidas, Home Depot Sued in  
16 Test Cases on Job Ad Pay Transparency."

17       11.       My firm has the experience, resources, and means necessary to allow us to provide  
18 adequate representation as PAGA Counsel to all aggrieved employees in this litigation. With  
19 approximately 30 attorneys, as well as supporting staff consisting of paralegals and legal  
20 assistants, my office has the capacity to represent hundreds of thousands of class members, bring  
21 forth efficient resolution of class actions and PAGA actions, engage in complex litigation, file  
22 contested motions for class certification, and engage in trial practice.

23       12.       My office has filed contested motions for class certification in the past and have  
24 been appointed Class Counsel by the Superior Court of California in the past for purposes of  
25 certifying a class for settlement purposes. Some examples of Actions in which I was appointed  
26 Class Counsel for include:

27       • *Santoyo v. Consolidated Foundries, Inc.*, Case No. BC612298, California Superior  
28 Court, County of Los Angeles, Honorable Judge Ann I. Jones, presiding;

1           • *Arendsdorff v. Stanley Steamer International, Inc.*, Case No. BC681368, California  
2 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos, presiding;  
3           • *Barreto v. Don Roberto Jewelers, Inc.*, Case No. BC495451, California Superior Court,  
4 County of Los Angeles, Honorable Ann I. Jones, presiding;  
5           • *Junior Amilcar Laguna Gonzalez v. Takaaki Koyama*, Case No. BC641998, Los Angeles  
6 Superior Court, Honorable Elihu M. Berle, presiding;  
7           • *Rios v. Nongshim America, Inc.*, Case No. CIVDS1807390, California Superior Court,  
8 County of San Bernardino, Honorable David S. Cohn, presiding;  
9           • *Stoddard v. Molded Fiber Glass – West*, Case No. 1517758, California Superior Court,  
10 County of San Bernardino, Honorable David S. Cohn, presiding;  
11           • *Mata v. Sahara Scaffold, Inc.*, Case No. CIVDS1810785, California Superior Court,  
12 County of San Bernardino, Honorable David S. Cohn, presiding;  
13           • *Carrasco v. Pure Dental Solutions*, Case No. BC645995, Los Angeles Superior Court,  
14 Honorable Kenneth R. Freeman, presiding;  
15           • *Gonzalez v. Gochez, et al.*, Case No. BC648729, Los Angeles Superior Court, Honorable  
16 Maren Nelson, presiding;  
17           • *Montoya v. Superior Paving Co.*, Case No. CIVDS1833422, County of San Bernardino,  
18 Honorable David S. Cohn, presiding;  
19           • *Lopez v. Norred & Associates, Inc.*, Case No. CIVDS1824109, California Superior  
20 Court, County of San Bernardino, David S. Cohn, presiding;  
21           • *Noyola v. Lacren, LLC*, Case No. BC717024, California Superior Court, County of Los  
22 Angeles, Hon. Anthony Mohr, presiding;  
23           • *Luciano, et al. v. O’Tasty Foods, Inc., et al.*, Case No. BC711988, California Superior  
24 Court, County of Los Angeles, Honorable Maren Nelson, presiding;  
25           • *Gordon v. Hospice Source, LLC*, Case No. 34-2018-00250022-CU-OE-GDS, California  
26 Superior Court, County of Sacramento, Honorable Christopher E. Krueger, presiding;  
27           • *Barragan v. Refrigeration Supplies Distributor*, Case No. 19STCV09312, California  
28 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;

1           • *Ramirez v. Acre Gourmet, Inc.*, Case No. CGC-19-575117, California Superior Court,  
2 County of San Francisco, Honorable Andrew Y.S. Cheng, presiding;  
3           • *Villafuerte v. Bay Alarm Company*, Case No. BC689110, California Superior Court,  
4 County of Los Angeles, Honorable Amy D. Hogue, presiding;  
5           • *Cazares v. Areas USA LAX, LLC*, Case No. 19STCV08209, California Superior Court,  
6 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;  
7           • *Magana v. Castlerock Environmental, Inc., et al.*, Case No. 19STCV38353, California  
8 Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;  
9           • *Chilel v. Sushi California, Inc.*, Case No. 19STCV08209, California Superior Court,  
10 County of Los Angeles, Honorable Ann I. Jones, presiding;  
11           • *Malone v. Orange Courier, Inc., et al.*, Case No. 30-2016-00763474, California Superior  
12 Court, County of Orange, Honorable Glenda Sanders, presiding;  
13           • *Rivera v. Talamo Food Services, Inc.*, Case No. 19CV355856, California Superior Court,  
14 County of Santa Clara, Honorable Patricia M. Lucas, presiding;  
15           • *Olguin v. Cal Central Harvesting, Inc.*, Case No. 18CV03860, California Superior Court,  
16 County of Santa Barbara, Honorable James F. Rigali, presiding;  
17           • *Pence v. Sober Living by the Sea, Inc.*, Case No. 2018-00988742, California Superior  
18 Court, County of Orange, Honorable Randall J. Sherman, presiding;  
19           • *Franco v. Vincent Rags, Inc.*, Case No. 20STCV07768, California Superior Court,  
20 County of Los Angeles, Honorable Ann I. Jones, presiding;  
21           • *Cabral v. Miller Castings, Inc.*, Case No. 19STCV39556, California Superior Court,  
22 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;  
23           • *Bolanos v. Texas Roadhouse, Inc.*, Case No. 19STCV39556, California Superior Court,  
24 County of Los Angeles, Honorable Sunshine Sykes, presiding;  
25           • *Rodriguez v. Scott A. Humphreys, Inc.*, Case No. 30-2021-01184556-CU-OE-CXC,  
26 California Superior Court, County of Ventura, Honorable Matthew P. Guasco, presiding; and  
27           • *Torres v. Primal Pet Foods, Inc.* Case No. FCS054783, California Superior Court,  
28 County of Solano, Honorable Wendy G. Getty, presiding;

1           • *Hanson v. Zapata Nuccio, Inc.*, Case No. 20STCV28951, California Superior Court,  
2 County of Los Angeles, Honorable Elihu M. Berle, presiding;  
3           • *Molina v. Avibank Mfg, Inc.*, Case No. 20STCV03910, California Superior Court,  
4 County of Los Angeles, Honorable John P. Doyle, presiding;  
5           • *Cetina v. Lawry's Restaurants, Inc.*, Case No. 19STCV05201, California Superior Court,  
6 County of Los Angeles, Honorable Amy D. Hogue, presiding;  
7           • *Luna v. Pronto California General Agency, LLC*, Case No. 19STCV39951, California  
8 Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;  
9           • *Alvarez v. Kazak-Mars, Inc.*, Case No. 20STCV42587, California Superior Court,  
10 County of Los Angeles, Honorable Elihu M. Berle, presiding;  
11           • *Noe v. My Pillow, Inc.* Case No. CIVDS 2011360, California Superior Court, County of  
12 San Bernardino, Honorable David Cohn, presiding;  
13           • *Nunez v. 2751 West Coast Acquisition Company*, Case No. 30-2020-01145215-CU-  
14 OE-CXC, California Superior Court, County, County of Orange, Honorable Randall J. Sherman,  
15 Presiding;  
16           • *Smith v. McMillen Enterprises, Inc.*, Case No. CV-20-002938, California Superior Court,  
17 County of Stanislaus, Honorable John R. Mayne, presiding;  
18           • *Turner v. Plant Prefab Inc., et al.*, Case No. CIVDS2017517, California Superior Court,  
19 County of San Bernardino, Honorable David Cohn, presiding;  
20           • *Duran v. Fresh Select, LLC*, Case No. VCU284892, California Superior Court, County  
21 of Tulare, Honorable Bret Hillman, presiding;  
22           • *Reynoso, et al. v. Cream of the Crop AG Service, Inc.*, Case No. VCU278847, California  
23 Superior Court, County of Tulare, Honorable Bret Hillman, presiding;  
24           • *Michel v. Universal Waste Systems, Inc.*, Case No. 19STCV46181, California Superior  
25 Court, County of Los Angeles, Honorable David S. Cunningham presiding;  
26           • *Jungers v. U.S. Borax Inc., et al.*, Case No. BCV-21-10003, California Superior Court,  
27 County of Kern, Honorable Bernard C. Barmann Jr. presiding;  
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1           • *Fortune v. Amoroso Limited Partnership, et al.*, Case No. 20STCV25874, California  
2 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;  
3           • *Montoya, et al. v. Remo, Inc.* Case No. 20STCV34614, California Superior Court,  
4 County of Los Angeles, Honorable Maren Nelson presiding;  
5           • *Rincon, et al. v. New-Indy Tripaq, LLC, et al.* Case No. 20STCV17118, California  
6 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;  
7           • *De Leon, et al. v. Wismettac Asian Foods, Inc.* Case No. 19STCV18172, California  
8 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;  
9           • *Tapia v. Mercer Foods, Inc.* Case No. CV-21-000020, California Superior Court,  
10 County of Stanislaus, Honorable Sonny S. Sandhu presiding;  
11           • *Molina v. Reser's Fine Foods, Inc.* Case No. 37-2021-00013052-CU-OECTL, California  
12 Superior Court, County of San Diego, Honorable Eddie C. Sturgeon presiding;  
13           • *Reyes v. Imperial Sprinkler Supply, Inc.* Case No. 30-2020-01167748-CU-OE-CXC,  
14 California Superior Court, County of Los Angeles, Honorable Peter Wilson presiding;  
15           • *Zavala, et al. v. PLS Check Cashers, Inc.* Case No. 20STCV42586, California Superior  
16 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;  
17           • *Paz v. Hill Brothers Chemical Company.* Case No. 20STCV48279, California Superior  
18 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;  
19           • *Garcia v. Inwesco Incorporated.* Case No. 20STCV46833, California Superior Court,  
20 County of Los Angeles, Honorable Carolyn B. Kuhl presiding;  
21           • *Guevara v. J&K Culver, LLC, et al.* Case No. 19STCV39951, California Superior Court,  
22 County of Los Angeles, Honorable Elihu M. Berle presiding;  
23           • *Hamilton v. Michael Kors Stores, Inc. et al.*, Case No. 19STCV37061, California  
24 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;  
25           • *Arzooian v. A&M Administration, LLC, et al.* Case No. 21STCV05576, California  
26 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;  
27           • *Santos, et al. v. Maruzen of America, Inc.*, Case No. 19STCV37662, California Superior  
28 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;

1           • *Schaffino v. M.O. Dion & Sons., Inc., et al.*, Case No. 20STCV38023, California Superior  
2 Court, County of Los Angeles, Honorable Gail Killefer presiding;  
3           • *Moreno v. Santa Paula Post Acute, LLC, et al.* Case No. 21STCV12533, California  
4 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;  
5           • *Singer v. Desert Area Resources and Training*, Case No. BCV-21-101093, California  
6 Superior Court, County of Kern, Honorable Thomas S. Clark presiding;  
7           • *Clarizio v. Guard-Systems, Inc.*, Case No. 21STCV28667, California Superior Court,  
8 County of Los Angeles, Honorable Armen Tamzarian presiding;  
9           • *Guzman v. Freschco Painters, Inc.*, Case No. 21STCV04683, California Superior Court,  
10 County of Los Angeles, Honorable Lawrence P. Riff presiding;  
11           • *Koutny v. PAE Aviation and Technical Services, LLC*, Case No. 21C-0106, California  
12 Superior Court, County of Kings, Honorable Melissa R. D’Morias presiding;  
13           • *Rodriguez v. Pacifica Trucks, LLC*, Case No. 20STCV37576, California Superior Court,  
14 County of Los Angeles, Honorable Stuart Rice presiding;  
15           • *Ramos v. AEGIS Treatment Centers, LLC*, Case No. 20STCV41429, California Superior  
16 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;  
17           • *Valdez v. Integrated Building Services, Inc.* Case No. 20STCV37793, California Superior  
18 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;  
19           • *Harris v. America One Security, Inc.* Case No. 21STCV01399, California Superior  
20 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;  
21           • *Moreno v. M&J Seafood Company, Inc.* Case No. 22STCV03341, California Superior  
22 Court, County of Los Angeles, Honorable William F. Highberger presiding;  
23           • *Corrales v. Q&B Foods, Inc.* Case No. 20STCV40885, California Superior Court,  
24 County of Los Angeles, Honorable Elihu Berle presiding;  
25           • *Arteaga v. Demolition Specialist, Inc.* Case No. RIC2001133, California Superior Court,  
26 County of Riverside, Honorable Harold Hopp presiding;  
27           • *Vigil, et al. v. Capstone Turbine Corporation*, Case No. 20STCV32123, California  
28 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

1           • *Ramirez v. Sea-Win, Inc.* Case No. 21STCV22026, California Superior Court, County  
2 of Los Angeles, Honorable Lawrence P. Riff presiding;  
3           • *Ortega Chavez v. Winpak Lane, Inc.* Case No. CIVSB2207313, California Superior  
4 Court, County of San Bernardino, Honorable Jessica Morgan presiding;  
5           • *Garcia v. American Licorice Company.* Case No. RG21107049, California Superior  
6 Court, County of Alameda, Honorable Brad Seligman presiding;  
7           • *Madrono v. Vitale Nursing, Inc, et al.,* Case No. 21STCV09845, California Superior  
8 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding; and  
9           • *Orellana v. Advanced Building Maintenance.* Case No. 34-2020-00286791-CU-OE-  
10 GDS, California Superior Court, County of Sacramento, Honorable Jill Talley presiding.  
11           • *Aguilar v. Bioness, Inc., et al.,* Case No. 21STCV41702, California Superior Court,  
12 County of Los Angeles, Honorable Lawrence P. Riff presiding;  
13           • *Antoine v. Pinky Beverly Hills, LLC., et al.* Case No. 19STCV44856, California  
14 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;  
15           • *Phambui v. Fashion Marketing and Merchandising Group, Inc., et al.* Case No.  
16 21STCV06634, Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;  
17           • *Ortega Chavez v. Winpak Lane, Inc., et al.* Case No. CIVSB2202274, California  
18 Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;  
19           • *Carrasco v O.H. Barkhordar D.D.S., Inc., et al.* Case No. 22STCV21188, California  
20 Superior Court, County of Los Angeles, Honorable Lawrence Riff presiding;  
21           • *Correia v. Gallo Glass Company, et al.* Case No. CV-21-006459, California Superior  
22 Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;  
23           • *Davis v. Beeline Import and Services, LLC, et al.* Case No. CIVSB2119287, California  
24 Superior Court, County of San Bernardino, Honorable David Cohn presiding;  
25           • *Angel Lopez v Innovative Coatings Technology Corporation dba Incotec, et al.* Case No.  
26 30-2020-01173245-CU-OE-CXC, California Superior Court, County of Orange, Honorable Lon  
27 Hurwitz presiding;  
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1           • *Lopez v UPM, Inc., et al. Case No. 20STCV36695*, California Superior Court, County of  
2 Los Angeles, Honorable Lawrence P. Riff presiding;

3           • *Moreno v. Infiniti Group LLC., et al. Case No. CIVSB2223551*, California Superior  
4 Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;

5           • *Kelley v. Applus Technologies, Inc., et al. Case No. CIVSB2204889*, California Superior  
6 Court, County of San Bernardino, honorable Jessica Morgan presiding;

7           • *Hernandez v Bromley Foods, Inc., et al. Case No. 56-2021-00561326-CU-OE-VTA*,  
8 California Superior Court, County of Ventura, Honorable Henr Walsh presiding;

9           • *Heredia v. Alan Smith Pool Plastering, Inc., et al. Case No. 30-2020-01163609-CU-OE-*  
10 *CXC*, California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;

11           • *Martinez Guzman v Freshco Painters Inc., et al. Case No. 21STCV04683*, California  
12 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

13           • *Gomez Mireles v. USG Ceilings Plus, LLC., et al. Case No. 21STCV45606*, California  
14 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

15           • *Garzon v. Mobile Hi-Tech Wheels, LLC., et al., Case No. 21STCV15396*, California  
16 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

17           • *Dethrasavong v. ASI Computer Technologies, Inc., et al. Case No. 20STCV32312*,  
18 California Superior Court, County of Contra Costa, Honorable Kenneth R. Freeman presiding;

19           • *Lopez v. Waldorf Astoria Management LLC., et al. Case No. 20STCV17212*, California  
20 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

21           • *Viveros v. Mission Produce, Inc., et al. Case No. 20STCV15737*, California Superior  
22 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;

23           • *Flores v. United Maintenance Company, Inc., et al. Case No. 21STCV07008*, California  
24 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

25           • *Blandi v. Francesca Restaurant, LLC., et al. Case No. 37-2022-00049034-CU-OE-CTL*,  
26 California Superior Court, County of San Diego, Honorable Marcella O. McLaughling presiding;

27           • *Lopez Cabrera v. South Valley Almond Company, LLC, et al. Case No. BCV-2-100722*,  
28 California Superior Court, County of Kern, Honorable Bernard C. Barmann, Jr. presiding;

1           • *Guillermo Cruz v. Alma Family Services, et al.* Case No. 21STCV18156, California  
2 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;  
3           • *Davood v. NKSFB, LLC, et al.* Case No. 22STCV17305, California Superior Court,  
4 County of Los Angeles, Honorable Christopher K. Lui presiding;  
5           • *Ferrer v. Ineos USA, LLC., et al.,* Case No. 21STCV28076, California Superior Court,  
6 County of Los Angeles, Honorable Elihu M. Berle presiding;  
7           • *Portillo Sanchez v. Paragon Services Janitorial Orange County, LLC, et al.* Case No.  
8 20STCV38562, California Superior Court, County of Los Angeles, Honorable William F.  
9 Highberger presiding;  
10          • *Trigueros Garcia v. Highland Plastics, Inc., et al.,* Case No. CVRI2202836, California  
11 Superior Court, County of Riverside, Honorable Harold Hopp presiding;  
12          • *Magana Ramirez v. 360 Support Services, et al.* Case No. 22STCV20456, California  
13 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;  
14          • *Morales v. Baldy's Restaurant Group, LLC., et al.* Case No. 20STCV36535, California  
15 Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;  
16          • *Gonzales v. El Monte Rents, Inc., et al.* Case No. 21STCV10209, California Superior  
17 Court, County of Los Angeles, Honorable Stuart M. Rice presiding;  
18          • *Gonzalez v. Total Education Solutions, Inc., et al.* Case No. 20STCV37984, California  
19 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;  
20          • *Helaire v. Smithfield Packaged Meats Corp, et al.* Case No. JCCP5244, California  
21 Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding; *Hernandez v.*  
22 *Central Valley Recovery Services, et al.* Case No. VCU290220, California Superior Court, County  
23 of Tulare, Honorable Brett Hillman presiding;  
24          • *Hernandez v. SC Commercial, LLC, et al.* Case No. 30-2020-01166961-CU-OE-CXC,  
25 California Superior Court, County of Orange, Honorable Lon Hurwitz presiding;  
26          • *Hines v. Constellis Integrated Risk Management Services, et al.* Case No.  
27 20STCV26962, California Superior Court, County of Los Angeles, Honorable Christopher K. Lui  
28 presiding;

1           • *Moya v. Valassis Direct Mail, Inc., et al.* Case No. 21STCV09412, California Superior  
2 Court, County of Los Angeles, Honorable Stuart Rice presiding;  
3           • *Jordan v. The Martin-Brower Company, LLC, et al.*, Case No. 21STCV41435, California  
4 Superior Court, County of Los Angeles, honorable Stuart Rice presiding;  
5           • *Juarez v. Calmet Services, Inc., et al.* Case No. 21STCV33668, California Superior  
6 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;  
7           • *Mcintosh v. WWL Vehicle Services Americas Inc., et al.* Case No. 56-2022-00562544-  
8 CU-OE-VTA, California Superior Court, County of Ventura, Honorable Benjamin Coats  
9 presiding;  
10          • *Mendoza v. Amusement Industry, Inc., et al.* Case No. 21STCV09790, California  
11 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;  
12          • *Moore v. Dnata US Inflight Catering LLC, et al.* Case No. CGC-20-586512, California  
13 Superior Court, County of San Francisco, Honorable Curtis Karnow presiding;  
14          • *Peterson v. Sorenson Engineering, Inc., et al.* Case No. CIVDS2023994, California  
15 Superior Court, County of San Bernardino, Honorable David Cohn presiding;  
16          • *Torres v. Laurel Avenue, LLC, et al.* Case No. CIVSB2202708, California Superior  
17 Court, County of San Bernardino, Honorable David Cohn presiding;  
18          • *Nunley v. Cardinal Logistics Management Corporation et al.* Case No. CIVSB2210430,  
19 California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;  
20          • *Pastrana v. National Sign & Marketing Corporation et al.* Case No. CIVSB2118749,  
21 California Superior Court, County of San Bernardino, Honorable David Cohn presiding;  
22          • *Pineda v. Grand Life, Inc., et al.* Case No. 21STCV28066, California Superior Court,  
23 County of Los Angeles, Honorable Elihu M. Berle presiding;  
24          • *Pattingale v. Laird Family Estate, LLC et al.* Case No. 22CV000048, California Superior  
25 Court, County of Napa, Honorable Cynthia P. Smith presiding;  
26          • *Ramirez v. Sea Win, Inc., et al.* Case No. 21STCV22026, California Superior Court,  
27 County of Los Angeles, Honorable Lawrence P. Riff presiding;  
28 ///

1       • *Reategui v. Cal Building & Maintenance Industries, Inc.*, Case No. 20STCV39648,  
2 California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;  
3       • *Rodriguez v. ACRA Aerospace, LLC, et al.* Case No. 30-2020-01171360-CU-OE-CXC,  
4 California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;  
5       • *Rodriguez v. Ultra Pro International LLC, et al.* Case No. 21STCV11250, California  
6 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;  
7       • *Ruiz v. Kleen Harvest, Inc., et al.* Case No. 21CV002319, California Superior Court,  
8 County of Monterey, Honorable Thomas W. Wills presiding;  
9       • *Roberto Ruiz v. Protech Delivery and Installation et al.* Case No. 21STCV07001,  
10 California Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;  
11       • *Russell v. CIMC Reefer Trailer, Inc., et al.* Case No. RIC2001777, California Superior  
12 Court, County of Riverside, Honorable Harld Hopp presiding;  
13       • *Russell v. Staffmark Investment LLC, et al.* Case No. CVRI12103921, California  
14 Superior Court, County of Riverside, Honorable Harold Hopp presiding;  
15       • *Quintanilla et al. v. Chrome Hearts LLC, et al.* Case No. 21STCV43180, California  
16 Superior Court, County of Los Angeles, Honorable Elihu B. Berle presiding;  
17       • *Taat v. Acell, Inc., et al.* Case No. 37-2022-00005437-CU-OE-CTL, California Superior  
18 Court, County of San Diego, Honorable Matthew C. Braner presiding;  
19       • *Todd v. Motivate, LLC, et al.* Case No. CGC-23-605052, California Superior Court,  
20 County of San Francisco, Honorable Anne- Christine Massullo presiding;  
21       • *Turner Sr., v. The Sidewalk Café, Inc., et al.* Case No. 21STCV10154, California  
22 Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;  
23       • *Vargas-Flores v. Harbor Bay Club, Inc., et al.* Case No. 21CV002396, California  
24 Superior Court, County of Alameda, Honorable Michael Markman presiding;  
25       • *Vasquez v. Liquid Technologies, Inc., et al.* Case No. CIVDS2023892, California  
26 Superior Court, County of San Bernardino, Honorable Joseph Ortiz presiding;  
27       • *Vasquez et al. v. Kingswood LLC, et al.*, Case No. 20STCV32123, California Superior  
28 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

1           • *Sandoval Villafana v. Satco, Inc., et al.* Case No. 21STCV17085, California Superior  
2 Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;  
3           • *Williams v. Marrs Services, Inc., et al.* Case No. 21STCV23775, California Superior  
4 Court, County of Los Angeles, Honorable Stuart M. Stuart presiding;  
5           • *Low v. Triple Canopy, Inc., et al.* Case No. 37-2023-0007078-CU-OE-CTL, California  
6 Superior Court, County of San Diego, Honorable Carolyn Caietti presiding;  
7           • *Camacho v. Premium Electric Corp, et al.* Case No. 22STCV26878, California Superior  
8 Court, County of Los Angeles, Honorable David S. Cunningham presiding;  
9           • *Lopez v. Bachem Americas, Inc., et al.* Case No. 23STCV04258, California Superior  
10 Court, County of Los Angeles, Honorable Laura Seigle presiding;  
11           • *Mendoza Cendejas v. E. & J. Gallo Winery, et al.* Case No. CV-22-005396, California  
12 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;  
13           • *Romero v. Armstrong Installation Service, et al.* Case No. 22CV022519, California  
14 Superior Court, County of Alameda, Honorable Noel Wise presiding;  
15           • *Perez v. D&G Restaurants, LLC, et al.* Case No. 30-2021-01209638-CU-OE-CXC,  
16 California Superior Court, County of Orange, Honorable Peter Wilson presiding;  
17           • *Sarmiento, et al. v. Neil Jones Food Company* Case No. 21CECG03825, California  
18 Superior Court, County of Fresno, Hon. Kristi Culver Kapetan presiding; and  
19           • *Garcia v. Nature Fresh Farms, LLC, et al.* Case No. ECU001961, California Superior  
20 Court, County of Imperial, Honorable Jeffery B. Jones presiding.

21       13.       I have also settled matters on a “PAGA Only” basis for aggrieved employees in the  
22 past, including in:

23           • *Flores v. Delta Apparel, Inc.*, Case No. BC641499, California Superior Court, County  
24 of Los Angeles, Honorable Daniel J. Buckley, presiding;  
25           • *Segura v. CJ Foods Service Holdings USA, LLC*, Case No. 19STCV24918, California  
26 Superior Court, County of Los Angeles, Honorable Maureen Duffy-Lewis, presiding;  
27           • *Sierra v. Nexem-Allied, LLC*, Case No. 20STCV11281, California Superior Court,  
28 County of Los Angeles, Honorable Randolph M. Hammock, presiding;

1       • *Nodal v. Sodexo, Inc.*, Case No. 20STCV40601, California Superior Court, County of  
2 Los Angeles, Honorable Lawrence Riff, presiding; and  
3       • *Cooper v. Lucas Health Partners*, Case No. 20STCV20050, California Superior Court,  
4 County of Los Angeles, Honorable Maren Nelson, presiding;  
5       • *Herrera v. Greystar Management, LP, et al.*, Case No. 37-2020-00009672-CU-OE-CTL,  
6 California Superior Court, County of San Diego, Honorable Carolyn Caietti, presiding;  
7       • *Slater v. Jo-Ann Stores, LLC.*, Case No. 21STCV18454, California Superior Court,  
8 County of Los Angeles, Honorable Maurice A. Leiter, presiding;  
9       • *Bolanos v. Canoga Park Heating & Air Conditioning, Co., Inc.*, Case No. 21STCV12674,  
10 California Superior Court, County of Los Angeles, Honorable Yolanda Orozco, presiding;  
11       • *Granados v. Cosmetic Ideas, Inc.* Case No. 21STCV10797, California Superior Court,  
12 County of Los Angeles, Honorable Richard L. Fruin, presiding;  
13       • *Ruano v. DPC Woodwork, Inc.* Case No. 21STCV00408, California Superior Court,  
14 County of Los Angeles, Honorable Jon R. Takasugi presiding;  
15       • *Hardy v. Texas Roadhouse Management Corp., et al.* Case No. CIVSB2222259,  
16 California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;  
17       • *Iraheta v Legacy Farmers, Inc., et al.* Case No. MSC21-00762, California Superior  
18 Court, County of Los Angeles, Honorable Charles S. Treat presiding;  
19       • *Landin v Central Janitors' Supply Co., Inc., et al.* Case No. CV-21-006391, California  
20 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;  
21       • *Bailey v. Cannon Constructors, et al.* Case No. 21STCV38274, California Superior  
22 Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;  
23       • *Johns, et al. v. Whelan Security of California, Inc., et al.* Case No. 22STCV68687,  
24 California Superior Court, County of Los Angeles, Honorable Laura Seigle presiding;  
25       • *Carrion v. Clutter, Inc., et al.* Case No. 23STCV06709, California Superior Court,  
26 County of Los Angeles, Honorable Kerry Bensinger presiding;  
27       • *Delia v. The Irvine Company, LLC, et al.* Case No. 30-2019-01050823-CU-OE-CXC,  
28 California Superior Court, County of Orange, Honorable William D. Claster presiding;

1 • *Landin v. Central Janitor's Supply Co., Inc., et al.* Case No. CV-21-006391, California  
2 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;

3 • *German Vaca et al., v. California Pizza Kitchen, Inc., et al.* Case No. 30-2022-01278828-  
4 CU-OE-CXC, California Superior Court, County of Orange, Honorable Randall Sherman  
5 presiding;

6 • *London Young v. Amazon.com LLC, et al.* Case No. 21STCV38280, California Superior  
7 Court, County of Los Angeles, Honorable Elaine Lu presiding;

8 • *Martinez v. Dick's Sporting Goods, Inc., et al.* Case No. 22STCV17283, California  
9 Superior Court, County of Los Angeles, Honorable Armen Tamzarian presiding;

10 • *Latrice Ackles v. Brinker Restaurant Corporation, et al.* Case No. 22STCV19068,  
11 California Superior Court, County of Los Angeles, Honorable Gail Killefer presiding; and

12 • *Ruiz v. Edelbrock Foundry, LLC, et al.* Case No. 20STCV19057, California Superior  
13 Court, County of Los Angeles, Honorable David S. Cunningham presiding.

14 Furthermore, my office has succeeded in certifying classes in contested motions for  
15 class certification. Some of the classes and theories we have certified include, without limitation,  
16 for failure to pay the regular rate of pay; failing to pay overtime and minimum wages, including,  
17 without limitation, for temperature checks; failure to provide meal and rest premiums, including,  
18 without limitation, for requiring employees to walk during breaks; failure to timely pay wages  
19 prior to separation of employment; wage statement violations; and unfair competition. Some  
20 examples of matters in which we have done so include, without limitation:

21 • *Hernandez, et al. v. C.R. Lawrence Co., Inc.,* Case No. 20STCV32372, California  
22 Superior Court, County of Los Angeles, Hon. William Highberger presiding; and

23 • *Lopez v. Rolling Hills Country Club,* Case No. 21STCV22636, California Superior  
24 Court, County of Los Angeles; Hon. Carolyn B. Kuhl presiding; and

25 • *Torres v. Johnston Nurseries, FLP,* Case No. BCV-19-100830 TSC, California Superior  
26 Court, County of Kern; Hon. Thomas S. Clark, presiding.

27 14. Currently, my firm is acting as counsel in dozens of wage and hour class actions  
28 and representative PAGA actions.

1       15.       I believe that I am sufficiently experienced and qualified to evaluate the claims  
2 alleged in this action and viability of Defendants' defenses.

3       16.       Vedang J. Patel has been a member of my law firm for over three (3) years and  
4 served as class counsel on numerous actions on which I was also named class counsel. Prior to  
5 working with Bibiyan Law Group, P.C., he practiced law with Murchison & Cumming, LLP on a  
6 variety of matter on behalf of defendants. Thereafter, he joined Bibiyan Law Group, P.C.,  
7 practicing law on behalf of plaintiffs in matters of employment law, and specifically on issue of  
8 unpaid wages and class action settlements. He is currently a Partner at Bibiyan Law Group, P.C.,  
9 and head of the Settlement Department. Among other tasks, he oversees and manages all  
10 settlements at Bibiyan Law Group, P.C. He also oversees several attorneys, paralegals, and legal  
11 assistants and has overseen the settlement of over one hundred (100) class and PAGA matters  
12 while with our office.

13       17.       After a thorough investigation and settlement discussions, I arrived at terms that I  
14 viewed was in the best interest of both Plaintiffs and PAGA Members.

15                   **Plaintiffs' Counsel's Requested Fees and Costs are Reasonable**

16       18.       I believe Plaintiffs' Counsel is entitled to recover attorneys' fees and costs.  
17 Plaintiffs' Counsel requests a fee of thirty-five percent (35%) of the Maximum Settlement  
18 Amount, which, unless and until escalated pursuant to the Parties' Settlement Agreement, amounts  
19 to \$630,000.00. The request of thirty-five percent (35%) of the Maximum Settlement Amount is  
20 consistent with the fees awarded in other PAGA settlements approved by California courts. The  
21 requested fee of only thirty-five percent (35%) of the Maximum Settlement Amount is reasonable,  
22 is well within the range of fees generally sought and approved in other class and representative  
23 cases, and is also reasonable based on Plaintiffs' Counsel's lodestar.

24       19.       Plaintiffs' Counsel invested time and resources into litigating this Action, with over  
25 \$20,341.11 of costs to date and counting deferred to the end of the case and entirely contingent  
26 on the outcome which, as set forth above, the recovery of which was far from certain with much  
27 of the litigation still potentially pending.

28       20.       During the period that this Action has been pending, Plaintiffs' Counsel has

1 advanced all expenses, and has not received any compensation for prosecuting the Action on  
2 behalf of the State and other PAGA Members.

3 **The Requested Fees are Also Reasonable Under a Lodestar Crosscheck**

4 21. I understand from my position as principal of Bibiyan Law Group, P.C., my  
5 involvement with the case, and information provided by my staff, that Bibiyan Law Group, P.C.,  
6 will have collectively billed 573.2 hours at customary hourly rates.

7 22. To summarize Plaintiffs' Counsel's lodestar request, Plaintiffs' Counsel at Bibiyan  
8 Law Group, P.C., will have collectively worked approximately 573.2 hours. Plaintiffs' Counsel's  
9 hourly rate in this case for David D. Bibiyan is \$1,100 per hour (approx. 81.7 hours); Diego Aviles  
10 is \$850 per hour (approx. 33.8 hours); Vedang J. Patel is \$800 per hour (approx. 66.9 hours); Bijan  
11 Mohseni is \$750 per hour (approx. 261.3 hours); Alexander Wallin is \$600 per hour (approx. 12.7  
12 hours); Adam Lonner is \$600 per hour (approx.. 14.5 hours); Joseph Rocha is \$500 per hour  
13 (approx.. 41.7 hours); Keaton Mendoza is \$450 per hour (approx. 3.8 hours); Paralegals are \$200  
14 per hour (approx.. 33.6 hours); and Legal Assistants are \$95 per hour (approx. 23.2 hours). At  
15 Plaintiffs' Counsel's hourly rates, this results in a total lodestar amount of \$415,899.

16 **Plaintiffs' Counsel's Hours Spent on the Case**

17 23. After diligent inquiry of the members of my firm, I can attest that Bibiyan Law  
18 Group, P.C., has spent over 573 hours litigating this Action to bring it to resolution, not including  
19 time which will be expended monitoring the administration of the settlement and distribution of  
20 funds to PAGA Members.

21 24. Plaintiffs' Counsel at Bibiyan Law Group, P.C., has spent over 573 hours litigating  
22 this Action to bring it to resolution, not including time which will be expended monitoring the  
23 administration of the settlement and distribution of funds to PAGA Members. The efforts  
24 expended by Plaintiffs' Counsel to achieve this result include, but are not limited to, the following:

- 25 • The investigation of the matter, including meeting with Plaintiffs, reviewing policies  
26 provided by Plaintiffs, review of documents in Plaintiffs' possession, review and  
27 analysis of Plaintiffs' personnel files, and exploring Defendants' corporate structure  
28

1 to determine whether any other individuals or entities should be named in the  
2 litigation;

- 3 • Researching the dockets for other cases filed against Defendants, determining  
4 whether they named all allegedly culpable defendants and included all theories  
5 available;
- 6 • Filing and serving pleadings in the Actions;
- 7 • Compliance with prerequisites in connection with Plaintiffs' cause of action under  
8 PAGA;
- 9 • Filing and serving of the PAGA Notice;
- 10 • Reviewing and analyzing Defendants' Answers to Plaintiffs' initial complaints;
- 11 • Review and analysis of the Court's Minute Orders, attention to scheduling and  
12 delegation of actions in light thereof, drafting and filing Case Management  
13 Statements, and preparation for appearance at the Case Management Conferences;
- 14 • Meeting and conferring with counsel for Defendants, drafting and filing Joint  
15 Statements and Joint Reports in advance of the conferences and hearings held by the  
16 Court, and preparation and attendance of the same;
- 17 • Review and analysis of Defendants' purported arbitration agreements, extensive  
18 discussions with Defense counsel regarding enforceability of the arbitration  
19 agreements, and negotiating, drafting, reviewing, and filing the Stipulation Re:  
20 Arbitration;
- 21 • Obtaining and reviewing informal discovery from Defendants, including time and  
22 payroll records for a sampling of the PAGA Members, Defendants' written policies,  
23 and other informal discovery produced for Plaintiffs to evaluate the claims;
- 24 • Discussing the potential merits of mediation, as well as negotiating the parameters  
25 thereof and the informal discovery to be exchanged beforehand, which involved  
26 various iterations of written correspondence back and forth and several telephone  
27 discussions between counsel regarding the potential scope of discovery, as well as  
28 the scope of the pleadings;

- 1 • Negotiating, drafting, and executing pre-mediation joint stipulation which included
- 2 an agreement by Defendants to refrain from attempting to individually settle
- 3 employees' claims alleged in the Action;
- 4 • Working with opposing counsel and consultants for the receipt of a representative
- 5 sampling and analyzing the same with the aid of retained expert data consultants and
- 6 Plaintiffs to perform analyses of liability and exposure;
- 7 • Selecting a mediator and scheduling a mediation date;
- 8 • Preparation of mediation brief, analysis, and damages model in conjunction with
- 9 expert data consultants, for use at the mediation session;
- 10 • Attendance at a full-day mediation session by various attorneys;
- 11 • Extensive negotiation of the PAGA Settlement Agreement involving numerous
- 12 drafts exchanged between counsel for the Parties;
- 13 • Drafting and reviewing the Payment Letter to be sent to by the Settlement
- 14 Administrator to the PAGA Members;
- 15 • Communicating with Plaintiffs who requested updates or other information
- 16 regarding this matter;
- 17 • Requesting bids from third-party settlement administrators for settlement
- 18 administration;
- 19 • Preparing the Motion for Approval of PAGA Settlement and preparation and
- 20 attendance at the Motion for Approval of PAGA Settlement hearing;
- 21 • Preparing the instant Motion for Approval of PAGA Settlement.

22 25. Plaintiffs' Counsel also bears the risk of taking whatever actions are necessary if  
23 Defendants fail to pay. Thus, the Court should find that Plaintiffs' Counsel's hours were necessary  
24 and reasonable to achieve the excellent result. Plaintiffs' Counsel's hourly rates are in line with,  
25 and, in fact, modest, compared with the hourly rates of other counsel in similar actions.

26 26. And, the over 573 hours expended by the lawyers and staff members of Bibiyan  
27 Law Group, P.C., in connection with this Action is only a calculation of efforts made thus far; it  
28 does not include the time that will be spent preparing for and attending the approval hearing,

1 reviewing the Settlement Administrator's final calculations and subsequent coordination with the  
2 Settlement Administrator to ensure payments to PAGA Members are timely distributed. Thus,  
3 Plaintiffs' Counsel requests that the Court find that these hours are reasonable in this litigation.

4 27. The courts are quite liberal in the evidence required to prove an attorney's hours.  
5 Detailed time records are not required. An attorney's testimony alone may suffice.

6 28. Reasonable hours include, in addition to time spent during litigation, the time spent  
7 before the action is filed, including time spent interviewing the clients, investigation of the facts  
8 and the law, and preparing the initial pleadings.

9 29. Here, Plaintiffs' Counsel has established by declaration testimony the over 573  
10 hours spent in this case, which suffices for evidentiary purposes.

11 30. Plaintiffs' Counsel has been representing Plaintiffs for almost two years, while  
12 never receiving any compensation, and expending significant time and resources which could have  
13 been directed towards other cases. In agreeing to litigate this case on a contingent fee basis,  
14 Plaintiffs' Counsel assumed considerable risk given the uncertain outcome of PAGA actions.

15 31. Here, Plaintiff's counsel requests a modest multiplier of 1.51.

16 **Plaintiffs Is Entitled to a Multiplier Based on a Percentage of the Fund**  
17 **to Ensure that the Fee Awarded is Within the Range of Fees Freely Negotiated**  
18 **in the Legal Marketplace in Comparable Litigation**

19 32. Aa multiplier to reach the fees requested by Plaintiffs' Counsel is more than  
20 justified to compensate Plaintiffs' Counsel at a rate reflecting the risk of nonpayment in this  
21 matter, as Plaintiffs' Counsel's representation of Plaintiffs were purely on a contingent basis. As  
22 set forth herein, the risk of nonpayment in this Action was particularly acute, too. This is because  
23 litigating a PAGA representative action through trial takes years and requires the investment of  
24 tens (if not hundreds) of thousands of dollars and thousands of hours of time. Attorneys willing  
25 to undertake this risk deserve a high rate of recovery.

26 33. Moreover, wage-and-hour laws are still developing, and change in the law always  
27 threaten to wipe out the plaintiff's attorney. In fact, numerous appellate decisions and decisions  
28 of both the California and United States Supreme Courts have attacked the validity of PAGA

1 actions directly relevant to this case, which, as set forth herein, could have significantly affected  
2 its value. It is this contingent nature of these cases that justify an award when and if PAGA  
3 Counsel are able to obtain a settlement or verdict, because oftentimes no money is recovered in a  
4 case, including plaintiff's counsel's costs, let alone their time.

5 **This Litigation Precluded Other Employment by Plaintiffs' Counsel**

6 34. I believe a practitioner can only properly litigate so many cases at one time. The  
7 requirements of this case were significant, requiring over 573 hours to be expended to date by  
8 Plaintiffs' Counsel, and another twenty-five (25) to fifty (50) hours conservatively expected to be  
9 expended in the future in connection with approval, settlement administration, answering  
10 questions of PAGA Members, and updates to this Court regarding uncashed checks. Plaintiff's  
11 Counsel was also most definitely precluded from other employment. This factor must also be  
12 considered.

13 **Costs Incurred by Plaintiffs' Counsel**

14 35. The Settlement provides for reimbursement of Plaintiffs' Counsel's litigation costs  
15 in an amount up to \$60,000.00. Plaintiffs' Counsel requests only \$20,341.11 in total for costs  
16 incurred. An itemized list of costs incurred is attached as Exhibit 1.

17 I declare under penalty of perjury under the laws of the state of California that the foregoing  
18 is true and correct this March 4, 2026, at Los Angeles, California.

19 */s/ David D. Bibiyan*

20 \_\_\_\_\_  
David D. Bibiyan

# **EXHIBIT 1**



**David D. Bibiyan**

*Attorney at Law*

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February 22, 2026

| DATE       | TYPE                           | PAYABLE TO                                | TOTAL AMOUNT |
|------------|--------------------------------|-------------------------------------------|--------------|
| 2/20/2025  | Expert Data<br>Consultant Fees | Berger Consulting Group, LLC              | \$ 7,810.00  |
| 11/18/2024 | Service of Process             | All-N-One Legal Support                   | \$ 89.72     |
| 11/18/2024 | Service of Process             | All-N-One Legal Support                   | \$ 53.72     |
| 11/18/2024 | Service of Process             | All-N-One Legal Support                   | \$ 89.72     |
| 11/22/2024 | E-Filing                       | All-N-One Legal Support                   | \$ 14.75     |
| 11/22/2024 | E-Filing                       | All-N-One Legal Support                   | \$ 14.75     |
| 11/22/2024 | E-Filing                       | All-N-One Legal Support                   | \$ 14.75     |
| 11/7/2024  | E-Filing                       | All-N-One Legal Support                   | \$ 384.75    |
| 9/3/2024   | Mediation Fees                 | Todd Smith Mediation                      | \$ 9,000.00  |
| 8/30/2024  | LWDA Filing Fee                | Labor and Workforce Development<br>Agency | \$ 75.00     |
| 7/12/2024  | Arbitration Fees               | JAMS, Inc.                                | \$ 400.00    |
| 6/21/2024  | Postage                        | USPS                                      | \$ 0.64      |
|            | Postage                        | USPS                                      | \$ 0.64      |
| 10/3/2022  | E-Filing                       | DDS Legal Support                         | \$ 104.95    |
| 10/3/2022  | E-Filing                       | DDS Legal Support                         | \$ 104.95    |

List of Expenses Items 2024.03.28 - 2/22/2026

|               |                            |                                        |    |           |
|---------------|----------------------------|----------------------------------------|----|-----------|
| 12/23/2022    | Case Document Purchase     | Sacramento Superior Court              | \$ | 2.00      |
| 12/13/2022    | E-Filing                   | All-N-One Legal Support                | \$ | 13.20     |
| 11/8/2022     | Case Document Purchase     | Sacramento Superior Court              | \$ | 5.80      |
| 6/20/2022     | E-Filing                   | All-N-One Legal Support                | \$ | 49.95     |
| 5/19/2022     | E-Filing                   | All-N-One Legal Support                | \$ | 104.95    |
| 5/2/2022      | E-Filing                   | All-N-One Legal Support                | \$ | 49.95     |
| 3/23/2022     | Process Service            | All-N-One Legal Support                | \$ | 53.70     |
| 3/23/2022     | Process Service            | All-N-One Legal Support                | \$ | 89.70     |
| 3/24/2022     | E-Filing                   | All-N-One Legal Support                | \$ | 49.95     |
| 3/10/2022     | E-Filing                   | All-N-One Legal Support                | \$ | 49.95     |
| 12/28/2021    | E-Filing                   | All-N-One Legal Support                | \$ | 1,049.95  |
| 12/28/2021    | E-Filing                   | All-N-One Legal Support                | \$ | 435.00    |
| 12/23/2021    | E-Filing                   | All-N-One Legal Support                | \$ | 49.95     |
| 12/27/2021    | Postage                    | USPS                                   | \$ | 7.58      |
|               | Postage                    | USPA                                   | \$ | 22.74     |
| 12/16/2021    | LWDA Filing Fee            | Labor and Workforce Development Agency | \$ | 75.00     |
|               | Photocopies (367 x \$0.20) | N/A                                    |    |           |
| Various Dates |                            |                                        | \$ | 73.40     |
|               |                            | Total                                  | \$ | 20,341.11 |

## List of Expenses Items 2024.03.28 - 2/22/2026