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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

FELIX GUNAWAN, TAJE FLEMING, TOMA STAVREV, SAIF AHMED, IRWANDIE TIO, XAVIER BROWN, individuals, on behalf of themselves and on behalf of all persons similarly situated and on behalf of the State of California, as a private attorney General,

Plaintiffs,

vs.

TRANSDEV ALTERNATIVE SERVICES, INC., a Corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No.: CGC-22-599234

Honorable Joseph M. Quinn
Department 302

CLASS ACTION

DECLARATION OF BRIAN J. ST. JOHN IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT AND AWARD OF ATTORNEYS' FEES, COSTS AND SERVICE AWARDS

Date:	November 2, 2026
Time:	9:00 a.m.
Department:	302
Complaint Filed:	April 3, 2024
FAC Filed:	July 14, 2025
SAC Filed:	September 19, 2025
Trial Date:	None Set

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DECLARATION OF BRIAN J. ST. JOHN

I, Brian J. St. John, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers for Justice, PC, attorneys of record for Plaintiffs Felix Gunawan ("Plaintiff Gunawan"), Taje Fleming ("Plaintiff Fleming"), Toma Stavrev ("Plaintiff Stavrev"), Saif Ahmed ("Plaintiff Ahmed"), Irwandie Tio ("Plaintiff Tio"), and Xavier Brown ("Plaintiff Brown") (collectively, "Plaintiffs") in the above-captioned action (the "*Gunawan* Action"). Additionally, Lawyers *for* Justice, PC are attorneys of record for Plaintiff Irwandie Tio in the actions entitled Irwandie Tio v. Transdev Alternative Services, Inc., Santa Clara Superior Court Case No. 22CV400827 (the "*Tio* Class Action") and *Irwandie Tio v. Transdev Alternative Services, Inc*., Santa Clara Superior Court Case No. 22CV400828 (the "*Tio* PAGA Action"), and Plaintiff Xavier Brown in the action entitled *Xavier Brown v. Transdev Alternative Services, Inc*., San Francisco Superior Court Case No. CGC23-610067 (the "*Brown* Action") (collectively, the *Gunawan* Action, *Tio* Class Action, *Tio* PAGA Action, and *Brown* Action will be referred to as the "Actions"). 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 thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On March 18, 2026, in Department 302 of the above-entitled Court, the Honorable Joseph M. Quinn preliminarily approved the Class Action and PAGA Settlement Agreement ("Settlement," "Agreement," or "Settlement Agreement,") entered into between Plaintiffs and Defendant Transdev Alternative Services, Inc. ("Defendant") (together with Plaintiffs referred to as the "Parties") and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiffs as the representatives of the Class (together, the "Class Representatives"). The Court also provisionally appointed and designated Lawyers *for* Justice, PC and Blumenthal Nordrehaug Bhowmik De Blouw LLP as counsel for the Class (together, the "Class Counsel"). The Court approved and ordered the mailing of the Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval ("Class Notice"), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed ILYM Group, Inc. ("Phoenix" or "Settlement Administrator") to serve as the third-party settlement administrator and handle the notice and settlement administration

process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement ("Motion for Final Approval"), no Participating Class Member has objected to the Class Settlement, the contemplated request for Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, Class Representative Service Payments, and Administration Expenses Payment, or the allocation for the PAGA Penalties.

WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in the litigation of this matter from the inception of the *Tio* Class Action and *Tio* PAGA Action, which were commenced by Plaintiff Tio on July 19, 2022, and the inception of the *Brown* Action, which was commenced by Plaintiff Brown on March 23, 2023.

5. On June 19, 2025, Lawyers *for* Justice, PC was associated as co-counsel for Plaintiff Gunawan, Plaintiff Fleming, Plaintiff Stavrev, and Plaintiff Ahmed and have worked cooperatively with Blumenthal Nordehaug Bhowmik De Blouw LLP in the *Gunawan* Action, which was initiated by Plaintiff Gunawan on April 3, 2024. On July 9, 2025, Plaintiffs filed a Second Amended Class and Representative Action Complaint in the *Gunawan* Action, thereby adding Plaintiff Tio and Plaintiff Brown as named plaintiffs to the Gunawan Action. Class Counsel have coordinated their efforts to strategize and prosecute the cases. Ultimately, Class Counsel's efforts have been successful in reaching the Settlement.

6. Before initiating the *Tio* Class Action, the *Tio* PAGA Action, and the *Brown* Action, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiff Tio and, later, Plaintiff Brown, and research into the various legal issues involved in the Tio Class Action, Tio PAGA Action, and Brown Action; 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, PAGA representative claims, Plaintiff Tio and Plaintiff Brown's claims and damages, and Defendant's defenses. After conducting initial investigation, our firm determined that Plaintiff Tio and Plaintiff Brown's claims were well-suited for class action treatment owing to what

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appeared to be a common course of conduct affecting a similarly situated group of individuals who are or were previously employed by Defendant and classified as non-exempt employees and worked at least a day at any time during the Class Period, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses.

7. Collectively, Class Counsel conducted formal and informal discovery and investigation into the facts of the cases, to asses the veracity, strength, and scope of the claims, and were preparing the cases for class certification and trial, prior to reaching the Settlement. The Parties exchanged a volume of information, documents, and data in the course of litigation and in connection to mediation and settlement negotiations. Lawyers *for* Justice, PC propounded multiple sets of written discovery requests on Defendant, (including, but not limited to, Form Interrogatories—General (Set One), Special Interrogatories (Sets One and Two), and Requests for Production of Documents (Sets One)), and served notices of deposition of Defendant's Person Most Knowledgeable designees regarding organizational structure and wage and hour practices, along with requests for production of documents. Class Counsel also reviewed and analyzed Defendant's responses and objections to written discovery requests, as well as documents produced by Defendant in discovery. The information, documents, and data that were reviewed and analyzed included and were not limited to: Plaintiffs' employment records, and Defendant's operations and employment practice, policies, and procedures, among other information and documents. Class Counsel had the opportunity to obtain information from Plaintiffs and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiffs, Defendant, and other sources. Class Counsel developed liability, damages, violation and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion papers, and settlement documents, and preparing for settlement negotiations, among other tasks.

8. As outlined herein, the Parties have conducted significant investigation and informal discovery during the course of litigating this matter, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiffs, Defendant, and other sources that provided a critical understanding of the nature of the work performed

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by the Class Members and Aggrieved Employees, as well as Defendant's organizational structure and their operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing liability, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiations process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest periods, representative PAGA claims and penalties, wage-and-hour enforcement, Plaintiffs' claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

9. After conducting significant investigation of the facts and law during the prosecution of the Actions, counsel for the parties engaged in mediation and extensive settlement negotiations to try to resolve the cases. These efforts included participating in mediation conducted by Paul Grossman, Esq., a well-regarded mediator who is experienced in mediating complex labor and employment matters, on October 23, 2024. During all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and settlement negotiations, the parties discussed and considered all aspects of the case, including the risks and delays of further litigation, class certification, and/or trial, the law relating to, *inter alia*, class certification, off-the-clock theory, meal and rest periods, PAGA representative claims, and wage and-hour enforcement, as well as the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the parties was not easy. After conducting extensive investigations, discovery, and settlement negotiations, and with the aid of the mediator's evaluation, the parties have agreed to resolve the cases given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to both sides that would attend further litigation, and the real possibility of no recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class Counsel seek attorneys' fees in the amount of $666,666.00, which is one-third (1/3) of the Gross Settlement Amount of $2,000,000.00. Pursuant to the contingency-fee agreements entered into by and between Plaintiff Tio, Plaintiff Brown, and Lawyers *for* Justice, PC, Plaintiff Tio and Plaintiff Brown have each agreed to a contingency fee of at least one-third (1/3) of the recovery.

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11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel have shown; (4) the results that Class Counsel have achieved throughout the litigation; (5) the value of the settlement that Class Counsel have achieved in this matter; and (6) the other cases that Class Counsel have turned down in order to devote their time and efforts to these cases. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Gross Settlement Sum of $2,000,000.00 (with a Net Settlement Amount of approximately at least $1,019,383.34 to be paid to Particiapting Class Members (with gross Individual Class Payments averaging approximately more than $372.85), payment of $25,000.00 to Aggrieved Employees (with Individual PAGA Payments averaging approximately $9.80) and payment of $75,000.00 to the State of California).

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel have incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **274.20 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

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 action and representative action cases, support a reasonable blended hourly rate of compensation of at least $850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least $850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action

cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of $936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of $919.57 per hour; 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.

14. Using a blended hourly rate of $850 per hour, Lawyers *for* Justice, PC's base lodestar to date is approximately $233,070.00.

EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC

15. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

16. Edwin Aiwazian is a Chief Executive Officer of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a

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Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000 class action or representative action cases.

17. Arby Aiwazian is a Senior Partner of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial

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Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative action cases have resulted in settlements that have been granted court approval. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

18. Joanna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010), in New York (since 2013), and in Washington (since 2026), and she is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, U.S. District Court for the Western District of Washington, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v.*

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Superior Court (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, Lawyers *for* Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

19. Maria Halwadjian is a Member of Lawyers *for* Justice, PC. She received her Bachelor's degree from the University of California, Santa Barbara in 2019, and earned her Juris Doctor degree from the Southwestern Law School in 2024. She was admitted to practice law in California in November of 2024. From approximately May 2022 to approximately August 2022, she served as a Judicial Extern to the Honorable Andre Birotte Jr. at the United States District Court for the Central District of California. She is admitted to practice before all courts of the State of California and all federal district courts in the State of California. Since joining Lawyers *for* Justice, PC, she has worked on wage and hour class action and PAGA representative matters. Her work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation and analysis, and making court appearances.

20. I am a member of Lawyers *for* Justice, PC. I received my Bachelor's degree from the University of California, San Diego in 2010 and earned my Juris Doctor degree from the University of California, Berkeley, School of Law in 2013. I was admitted to practice law in California in 2015. I am admitted to practice before all courts of the State of California and all federal district courts in the State of California. I have worked on many wage and hour class

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action and PAGA representative matters, and my work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation and analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, I spent several years working for a boutique employment and labor law firm representing employers, and, in 2019 and 2020, I was employed as general counsel for a DMHC licensed discount dental plan.

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

21. To date, Class Counsel have borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to $100,000.00. Lawyers *for* Justice, PC seeks reimbursement of **$13,219.43** in litigation costs and expenses incurred in the matter, as reflected in **"EXHIBIT 2"** attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement.

CLASS REPRESENTATIVE SERVICE PAYMENTS TO PLAINTIFFS

22. In recognition of their efforts and work spearheading the prosecution of this matter and serving as the Class Representatives, as well as their broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 6.1(a) of the Settlement Agreement), the Settlement provides for Class Representative Service Payments in the amount of up to $15,000.00 each, to Plaintiffs ($90,000.00 total). Plaintiffs spent a substantial amount of time and effort discussing their employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiffs to receive $15,000.00 each ($90,000.00 total), as a reasonable Class Representative Service Payments for their broader waiver and release of claims and services performed in this matter, in addition to their individual settlement payment(s).

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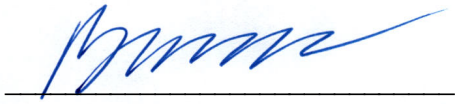
23. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiffs, the Class, and the State of California.

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

Executed this 6th day of October, at Glendale, California.



Brian J. St. John

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EXHIBIT 1

IRWANDIE TIO V. TRANSDEV ALTERNATIVE SERVICES, INC.
Santa Clara County Superior Court Case No. 22CV400827 ("Tio Class Action")
Santa Clara County Superior Court Case No. 22CV400828 ("Tio PAGA Action")/United States District Court, Northern District of California, Case No. 5:22-cv-05065-NC ("Tio Federal PAGA Action")

XAVIER BROWN V. TRANSDEV ALTERNATIVE SERVICES, INC.
San Francisco County Superior Court Case No. CGC-23-610067 ("Brown Action")

FELIX GUNAWAN, ET AL. V. TRANSDEV ALTERNATIVE SERVICES, INC.
San Francisco County Superior Court Case No. CGC-22-599234 ("Gunawan PAGA Action")

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS *for* JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Irwandie Tio ("Plaintiff Tio")	16.50
Meet, Communicate, and/or Review Communication with Plaintiff Xavier Brown ("Plaintiff Brown")	12.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	14.50
Review and Analyze Court Filings in *Felix Gunawan, et al. v. Transdev Alternative Services, Inc.*, San Francisco County Superior Court, Case No. CGC-22-599234 and *Felix Gunawan, et al. v. Transdev Alternative Services, Inc.*, San Francisco County Superior Court, Case No. CGC-23-606561	1.80
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Tio's Class Action Claims, Conduct Legal Research and Analysis Regarding Class Action Claims, and Draft, Review, and/or Revise Plaintiff Tio's Class Action Complaint for Damages (filed on July 19, 2022) (Tio Class Action)	7.50

Review Court's Notice of Rescheduled Case Management Conference (filed on July 19, 2022) (Tio Class Action)	0.20
Investigate the Merits of Plaintiff Tio's Private Attorneys General Act ("PAGA") Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff Tio's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on July 19, 2022) (Tio PAGA Action)	6.90
Review Court's Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadline (filed on July 20, 2022) (Tio Class Action)	0.20
Review Court's Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadline (filed on July 20, 2022) (Tio PAGA Action)	0.20
Review and Analyze Defendant Transdev Alternative Services, Inc.'s ("Defendant") Answer to Plaintiff Tio's PAGA Complaint (served on September 2, 2022), and Research Affirmative Defenses in Defendant's Answer (Tio PAGA Action)	1.10
Review Court's Order of Case Assignment and Order Setting Initial Case Management Conference and ADR Deadlines (filed on September 7, 2022) (Tio Federal PAGA Action)	0.30
Review Defendant's Consent or Declination to Magistrate Judge Jurisdiction (filed on September 21, 2022) (Tio Federal PAGA Action)	0.10
Review Court's Notice Re: Consent or Declination (filed on October 4, 2022) (Tio Federal PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff Tio's Appearance of Counsel (filed on October 6, 2022) (Tio Federal PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff Tio's Appearance of Counsel (filed on October 12, 2022) (Tio Federal PAGA Action)	0.20
Review Defendant's Application for Admission of Brendan A. Melander *Pro Hac Vice* and Proposed Order (Civil Local Rule 11-3) (filed on October 17, 2022) (Tio Federal PAGA Action)	0.10
Review Defendant's Notice to State Court and Adverse Parties of Removal of this Action to Federal Court by Defendant (served on October 17, 2022) (Tio PAGA Action)	0.30

Draft, Review, and/or Revise Plaintiff Tio's Consent or Declination to Magistrate Judge Jurisdiction (filed on October 18, 2022) (Tio Federal PAGA Action)	0.20
Review Court's Order Granting Application for Admission of Attorney *Pro Hac Vice* (Brendan A. Melander) (filed on October 18, 2022) (Tio Federal PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff Tio's ADR Certification by Parties and Counsel (filed on November 16, 2022) (Tio Federal PAGA Action)	0.20
Review Defendant's Notice of Appearance of Tyler Paetkau (served on November 16, 2022) (Tio Class Action)	0.10
Review Defendant's ADR Certification by Parties and Counsel (filed on November 17, 2022) (Tio Federal PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 18, 2022) (Tio Class Action)	1.10
Draft, Review, and/or Revise Plaintiff Tio's Notice of Posting Jury Fees (filed on November 22, 2022) (Tio Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on November 23, 2022) (Tio Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Rule 26(f) Report (filed on November 30, 2022) (Tio Federal PAGA Action)	1.50
Review Court's Notice Continuing Initial Case Management Conference (filed on November 30, 2022) (Tio Federal PAGA Action)	0.10
Review Court's Notice of Further Case Management Conference (filed on December 6, 2022) (Tio Class Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff Tio's Unverified Complaint (served on December 22, 2022), and Research Affirmative Defenses in Defendant's Answer (Tio Class Action)	1.20

Review Defendant's Application for Admission of Benjamin A. McMillen *Pro Hac Vice* and Proposed Order (Civil Local Rule 11-3) (filed on January 10, 2023) (Tio Federal PAGA Action)	0.10
Review Court's Order Granting Application for Admission of Attorney *Pro Hac Vice* (Benjamin A. McMillen) (filed on January 10, 2023) (Tio Federal PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Rule 26(f) Report (filed on January 11, 2023) (Tio Federal PAGA Action)	1.20
Review Court's Case Management Scheduling Order (filed on January 12, 2023) (Tio Federal PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on March 17, 2023) (Tio Class Action)	1.10
Review Court's Minute Order Re: Case Management Conference (filed on March 22, 2023) (Tio Class Action)	0.20
Review Court's Notice of Further Case Management Conference (filed on March 27, 2023) (Tio Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Rule 26(f) Report (filed on May 3, 2023) (Tio Federal PAGA Action)	1.50
Review Court's Notice Re: Case Management Conference (filed on May 4, 2023) (Tio Federal PAGA Action)	0.10
Review Court's Certified Copy of Order to Remand Case to State Court (filed on June 22, 2023) (Tio PAGA Action)	0.20
Review Court's Notice of Further Case Management Conference (filed on June 29, 2023) (Tio PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on July 14, 2023) (Tio Class Action)	0.90

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on July 14, 2023) (Tio PAGA Action)	0.90
Review Court's Minute Order Re: Case Management Conference (filed on July 19, 2023) (Tio Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on July 19, 2023) (Tio PAGA Action)	0.20
Review Court's Notice of Further Case Management Conference (filed on July 25, 2023) (Tio Class Action)	0.20
Review Court's Notice of Further Case Management Conference (filed on July 25, 2023) (Tio PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Consolidate Cases; [Proposed] Order (submitted on October 4, 2023) (Tio Class Action)	1.10
Review Court's Order to Consolidate Cases (filed on October 6, 2023) (Tio Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on October 20, 2023) (Tio Class Action)	0.90
Review Court's Notice of Rescheduled Case Management Conference (filed on October 23, 2023) (Tio Class Action)	0.20
Investigate the Merits of Plaintiff Brown's Private Attorneys General Act ("PAGA") Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff Brown's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on October 30, 2023) (Brown Action)	6.10
Review and Analyze Defendant's Answer to Plaintiff Brown's PAGA Complaint (served on January 10, 2024), and Research Affirmative Defenses in Defendant's Answer (Brown Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on January 19, 2024) (Tio Class Action)	0.90

Review Court's Notice of Rescheduled Case Management Conference (filed on January 22, 2024) (Tio Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Brown's Case Management Statement (filed on March 18, 2024) (Brown Action)	0.70
Draft, Review, and/or Revise Plaintiff Brown's Notice of Posting Jury Fees (served on March 19, 2024) (Brown Action)	0.20
Review Defendant's Case Management Statement and Notice of Related Case (served on March 19, 2024) (Brown Action)	0.30
Review Court's Order Continuing Case Management Conference (filed on March 20, 2024) (Brown Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on March 22, 2024) (Tio Class Action)	0.90
Review Court's Notice of Rescheduled Case Management Conference (filed on March 25, 2024) (Tio Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on August 9, 2024) (Tio Class Action)	1.10
Review Court's Order to Continue Case Management Conference and Notice of Rescheduled Case Management Conference (filed on August 9, 2024) (Tio Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on August 15, 2024) (Tio Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on September 17, 2024) (Brown Action)	1.10
Review Court's Order Continuing Case Management Conference (filed on September 19, 2024) (Brown Action)	0.20

Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on September 24, 2024) (Brown Action)	0.20
Review Defendant's Notice of Change of Handling Attorney (served on November 15, 2024) (Brown Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement and Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on November 19, 2024) (Brown Action)	1.60
Review Court's Order Continuing Case Management Conference (filed on November 21, 2024) (Brown Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement and Notice of Settlement (filed on January 15, 2025) (Tio Class Action)	0.80
Draft, Review, and/or Revise Plaintiff Tio's Notice of Change of Address or Other Contact Information (filed on January 15, 2025) (Tio Class Action)	0.20
Review Court's Notice of Case Management Conference (filed on January 21, 2025) (Tio Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Brown's Notice of Change of Address or Other Contact Information (filed on January 24, 2025) (Brown Action)	0.20
Draft, Review, and/or Revise Plaintiff Tio's Notice of Change of Address or Other Contact Information (filed on January 28, 2025) (Tio PAGA Action)	0.20
Review Court's Order Continuing Case Management Conference (filed on March 5, 2025) (Brown Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on May 19, 2025) (Tio Class Action)	0.90
Review Court's Minute Order Re: Further Case Management Conference (filed on May 29, 2025) (Tio Class Action)	0.10
Review Court's Order to Show Cause Re: Dismissal (CRC 3.1385) (filed on June 18, 2025) (Brown Action)	0.20

Draft, Review, and/or Revise Notice of Association of Counsel (filed on June 20, 2025) (Gunawan PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Further Case Management Conference Statement (filed on September 19, 2025) (Tio Class Action)	0.80
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (CRC 3.1385) (filed on September 22, 2025) (Brown Action)	1.20
Review Court's Notice of Reset Hearing (filed on September 22, 2025) (Tio Class Action)	0.20
Meet and Confer with Other Plaintiffs' Counsel, and Draft, Review, and/or Revise Plaintiffs' Order to Show Cause Statement Re: Dismissal (filed on September 25, 2025) (Gunawan PAGA Action)	0.20
Review Defendant's Notice of Withdrawal of Counsel (served on September 29, 2025) (Gunawan PAGA Action)	0.20
Review Court's Continued Order to Show Cause Re: Dismissal (CRC 3.1385) (filed on September 29, 2025) (Brown Action)	0.20
Review Court's Continued Order to Show Cause Re: Dismissal (CRC 3.1385) (filed on October 9, 2025) (Gunawan PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Further Case Management Conference Statement (filed on November 26, 2025) (Tio Class Action)	0.90
Review Court's Minute Order Re: Further Case Management Conference (filed on December 10, 2025) (Tio Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (Settlement) and Request to Continue Hearing Following Motion for Preliminary Approval Hearing (filed on December 17, 2025) (Brown Action)	1.10
Review Court's Continued Order to Show Cause Re: Dismissal (CRC 3.1385) (filed on December 31, 2025) (Brown Action)	0.20

Review Court's Continued Order to Show Cause Re: Dismissal (CRC 3.1385) (filed on January 14, 2026) (Gunawan PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Further Case Management Conference Statement (filed on February 24, 2026) (Tio Class Action)	0.80
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Further Case Management Conference; [Proposed] Order (submitted on March 4, 2026) (Tio Class Action)	1.10
Review Court's Order to Continue Further Case Management Conference (filed on March 6, 2026) (Tio Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on March 9, 2026) (Tio Class Action)	0.20
Draft, Review, and/or Revise Plaintiffs' Order to Show Cause Statement Re: Dismissal (filed on March 30, 2026) (Gunawan PAGA Action)	0.20
Review Court's Continued Order to Show Cause Re: Dismissal (CRC 3.1385) (filed on April 9, 2026) (Gunawan PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Further Case Management Conference Statement and Request to Continue Case Management Conference (filed on April 13, 2026) (Tio Class Action)	0.80
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Regarding Dismissal (Settlement) and Request to Continue Hearing Following Motion for Final Approval Hearing; [Proposed] Order (submitted on April 13, 2026) (Brown Action)	1.10
Review Defendant's Notice of Disassociation of Counsel (served on April 20, 2026) (Tio Class Action)	0.20
Review Court's Notice of Reset Hearing (filed on April 20, 2026) (Tio Class Action)	0.20
Review Court's Order on Joint Response to Order to Show Cause Regarding Dismissal (Settlement) and Request to Continue Hearing Following Motion for Final Approval Hearing (filed on April 24, 2026) (Brown Action)	0.20

Review Court's Continued Order to Show Cause Re: Dismissal (CRC 3.1385) (filed on April 29, 2026) (Brown Action)	0.20
Appearances	
Prepare for and Remotely Attend Case Management Conference (November 23, 2022) (Tio Class Action)	1.10
Prepare for and Remotely Attend Case Management Conference (March 22, 2023) (Tio Class Action)	2.10
Prepare for and Remotely Attend Case Management Conference (July 19, 2023) (Tio Class Action & Tio PAGA Action)	1.10
Prepare for and Remotely Attend Case Management Conference (May 21, 2025) (Tio Class Action)	0.70
Prepare for and Remotely Attend Hearing on Plaintiffs' *Ex Parte* Application for Leave to File Second Amended Class and Representative Action Complaint (July 16, 2025) (Gunawan PAGA Action)	1.10
Prepare for and Remotely Attend Case Management Conference (December 10, 2025) (Tio Class Action)	0.50
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Settlement (March 18, 2026) (Gunawan PAGA Action)	1.20
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Irwandie Tio (served on February 16, 2022)	1.70
Draft, Review, and/or Revise Plaintiff Tio's Initial Disclosures (served on January 20, 2023) (Tio Federal PAGA Action)	4.10
Review and Analyze Defendant's Initial Disclosure Statement (served on January 20, 2023) (Tio Federal PAGA Action)	0.40
Draft, Review, and/or Revise Plaintiff Tio's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for August 10, 2023) (served on July 3, 2023) (Tio PAGA Action)	1.20

Draft, Review, and/or Revise Plaintiff Tio's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for August 11, 2023) (served on July 3, 2023) (Tio PAGA Action)	1.40
Draft, Review, and/or Revise Plaintiff Tio's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on July 3, 2023) (Tio PAGA Action)	4.50
Draft, Review, and/or Revise Plaintiff Tio's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for November 28, 2023) (served on October 18, 2023) (Tio Class Action)	1.10
Draft, Review, and/or Revise Plaintiff Tio's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for November 29, 2023) (served on October 18, 2023) (Tio Class Action)	1.30
Draft, Review, and/or Revise Plaintiff Tio's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on October 18, 2023) (Tio Class Action)	4.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Xavier Brown (served on October 31, 2023)	2.10
Review and Analyze Defendant's Responses to Plaintiff Tio's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on January 12, 2024) (Tio Class Action)	2.20
Draft, Review, and/or Revise Plaintiff Brown's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for March 12, 2024) (served on February 8, 2024) (Brown Action)	1.10
Draft, Review, and/or Revise Plaintiff Brown's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for March 13, 2024) (served on February 8, 2024) (Brown Action)	1.30

Draft, Review, and/or Revise Plaintiff Brown's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on February 8, 2024) (Brown Action)	4.10
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Irwandie Tio under the Private Attorneys General Act (served on April 20, 2022)	4.50
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Xavier Brown under the Private Attorneys General Act (served on March 23, 2023)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendant's Counsel	12.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Other Plaintiffs' Counsel	5.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to Mediation, Research Settlement and Merits-Related Issues, Perform Claims Evaluation and Analyses, and Review Plaintiffs' Mediation Brief (submitted on October 16, 2024)	35.50
Attend Mediation Session (October 23, 2024; via Zoom Video Conference)	15.50
Review and/or Analyze Mediator's Proposal (issued on October 23, 2024)	0.80
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding Re: Class Action and PAGA Settlement (executed on January 24, 2025)	2.50
Engage in Additional Settlement-Related Discussions (June 2025)	4.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on August 14, 2025), and Draft, Review, and/or Revise Court-Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	4.10

Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	4.50
Law and Motion	
Review Defendant's Notice of Removal by Defendant, Civil Cover Sheet, Corporate Disclosure Statement, and Certification of Interested Entities or Persons (filed on September 6, 2022) (Tio Federal PAGA Action)	1.90
Research, Draft, Review, and/or Revise Plaintiff Tio's Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. § 1447; Memorandum of Points and Authorities in Support Thereof, Declaration of Arman Marukyan in Support Thereof, and [Proposed] Order Granting Plaintiff's Motion to Remand Pursuant to 28 U.S.C. § 1447 (filed on May 18, 2023) (Tio Federal PAGA Action)	10.50
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Motion and Stipulation to Extend Time to Respond to Plaintiff Tio's Motion to Remand and [Proposed] Order Granting Extension of Time (filed on May 30, 2023) (Tio Federal PAGA Action)	1.50
Review Court's Order Granting Extension of Time to Respond to Plaintiff Tio's Motion to Remand (filed on May 31, 2023) (Tio Federal PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation to Remand Action to State Court and [Proposed] Order to Remand Case to State Court (submitted on June 14, 2023) (Tio Federal PAGA Action)	1.40
Review Court's Order to Remand Case to State Court and Clerk's Letter of Remand (filed on June 16, 2023) (Tio Federal PAGA Action)	0.20
Review and Analyze Defendant's Notice of Motion and Motion by Defendant Transdev Alternative Services, Inc. to Stay Action; Memorandum of Points and Authorities, Index of Evidence in Support Thereof, Declaration of Tyler Paetkau in Support Thereof, and Proposed Order (served on November 17, 2023) (Tio Class Action)	2.10
Review and Analyze Defendant's Notice of Hearing on Motion by Defendant Transdev Alternative Services, Inc. to Stay Action (served on November 27, 2023) (Tio Class Action)	0.20

Review Defendant's Notice of Withdrawal of Motion to Stay Action by Defendant Transdev Alternative Services, Inc. (served on March 13, 2024) (Tio Class Action)	0.30
Review Court's Minute Order Re: Motion to Stay (filed on March 27, 2024) (Tio Class Action)	0.30
Meet and Confer with Other Plaintiffs' Counsel, and Research, Draft, Review, and/or Revise Plaintiffs' Second Amended Class and Representative Action Complaint (filed on September 19, 2025); Draft, Review, and/or Revise Plaintiffs' *Ex Parte* Application for Leave to File Second Amended Class and Representative Action Complaint and Declaration of Melissa A. LeBlanc-Mansell in Support Thereof (filed on July 15, 2025) (Gunawan PAGA Action)	3.10
Meet and Confer with Other Plaintiffs' Counsel, and Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Leave to File Second Amended Complaint, Declaration of Ani Menedjian in Support Thereof, and [Proposed] Order Granting Plaintiffs' Motion for Leave to File Second Amended Complaint (filed on August 22, 2025)(Gunawan PAGA Action)	2.80
Review Court's Order Granting Plaintiffs' Motion for Leave to File Second Amended Complaint (filed on September 16, 2025) (Gunawan PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Plaintiffs' Motion for Leave to File Second Amended Complaint (filed on September 18, 2025) (Gunawan PAGA Action)	0.10
Review Declaration of Settlement Administrator, Declaration of Kyle Nordrehaug, Declaration of Plaintiff Felix Gunawan, Declaration of Plaintiff Saif Ahmed, Declaration of Plaintiff Taje Fleming, Declaration of Plaintiff Toma Stavrev, and Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Unopposed Motion for Preliminary Approval of Class Settlement, and Memorandum of Points and Authorities in Support Thereof (filed on November 12, 2025) (Gunawan PAGA Action)	1.10
Draft, Review, and/or Revise Declaration of Yasmin Hosseini in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, Declaration of Irwandie Tio in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, and Declaration of Xavier Brown in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on November 17, 2025) (Gunawan PAGA Action)	3.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on December 15, 2025) (Gunawan PAGA Action)	0.20

Review Court's Order After Hearing (filed on December 16, 2025) (Gunawan PAGA Action)	0.20
Review Supplemental Declaration of Settlement Administrator, Supplemental Declaration of Kyle Nordrehaug, Supplemental Memorandum in Support of Plaintiffs' Motion for Preliminary Approval of Class Settlement, and [Revised Proposed] Preliminary Approval Order (filed on February 17, 2026) (Gunawan PAGA Action)	0.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on March 3, 2026) (Gunawan PAGA Action)	0.20
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on March 17, 2026) (Gunawan PAGA Action)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Settlement and Order After Hearing (filed on March 18, 2026) (Gunawan PAGA Action)	0.20
Research, Draft, Review, and/or Revise Declaration of Brian J. St. John in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Award of Attorneys' Fees, Costs and Service Awards (Gunawan PAGA Action)	2.80
Total Hours:	274.20

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Tio vs. Transdev Alternative Services Inc.

Date	Payee	Expense Description	Amount
10/20/2021	U.S. Postmaster	Postage	$7.38
2/8/2022	U.S. Postmaster	Postage	$7.50
7/19/2022	Legal Document Server, Inc.	Attorney Service	$114.41
7/19/2022	Santa Clara Superior Court	Complex Filing Fee	$1,000.00
7/19/2022	Santa Clara Superior Court	Complaint Filing Fee	$435.00
9/14/2022	Legal Document Server, Inc.	Attorney Service	$35.10
11/18/2022	Legal Document Server, Inc.	Attorney Service	$17.55
12/8/2022	General Logistics Systems US, Inc.	Courier Service	$23.42
1/23/2023	Legal Document Server, Inc.	Attorney Service	$27.68
1/23/2023	Santa Clara Superior Court	Jury Fee	$150.00
3/17/2023	Legal Document Server, Inc.	Attorney Service	$17.55
7/14/2023	Legal Document Server, Inc.	Attorney Service	$17.75
10/19/2023	General Logistics Systems US, Inc.	Courier Service	$23.89
10/23/2023	One Legal	Attorney Service	$19.22
1/19/2024	Legal Document Server, Inc.	Attorney Service	$17.67
3/22/2024	Legal Document Server, Inc.	Attorney Service	$17.67
8/9/2024	Legal Document Server, Inc.	Attorney Service	$19.14
8/9/2024	Santa Clara Superior Court	Stipulation & Order Fee	$20.00
8/15/2024	Legal Document Server, Inc.	Attorney Service	$17.75
9/20/2024	PAUL HASTINGS LLP	Mediation Fee	$7,200.00
1/29/2025	Legal Document Server, Inc.	Attorney Service	$20.20
5/19/2025	Legal Document Server, Inc.	Attorney Service	$20.94
6/19/2025	PAUL HASTINGS LLP	Supplemental Mediation Fee	$776.00
7/15/2025	Legal Document Server, Inc.	Attorney Service	$236.22
7/15/2025	San Francisco Superior Court	Motion Fee	$60.00
7/17/2025	CourtCall, LLC	Attorney Service	$72.00
8/25/2025	File & ServeXpress	Attorney Service	$71.33
8/25/2025	San Francisco Superior Court	Motion Fee	$60.00
9/19/2025	Legal Document Server, Inc.	Attorney Service	$20.94
10/20/2025	Legal Document Server, Inc.	Attorney Service	$38.85
10/23/2025	Legal Document Server, Inc.	Attorney Service	$7.60
11/18/2025	Legal Document Server, Inc.	Attorney Service	$20.55
11/26/2025	Legal Document Server, Inc.	Attorney Service	$20.94
2/24/2026	Legal Document Server, Inc.	Attorney Service	$21.94
3/5/2026	Legal Document Server, Inc.	Attorney Service	$23.33
3/5/2026	Santa Clara Superior Court	Stipulation & Order Fee	$20.00
3/9/2026	Legal Document Server, Inc.	Attorney Service	$21.94
4/13/2026	Legal Document Server, Inc.	Attorney Service	$21.94
		Total:	$10,723.40

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Tio vs. Transdev Alternative Services Inc. (PAGA)

Date	Payee	Expense Description	Amount
4/20/2022	U.S. Postmaster	Postage	$16.00
4/20/2022	Labor & Workforce Development Agency	PAGA Filing Fee	$75.00
7/19/2022	Legal Document Server, Inc.	Attorney Service	$46.91
7/19/2022	Santa Clara Superior Court	Complaint Filing Fee	$435.00
8/4/2022	ProLegal	Attorney Service	$165.57
8/23/2022	Labor & Workforce Development Agency	PAGA Filing Fee	$75.00
9/14/2022	Legal Document Server, Inc.	Attorney Service	$17.55
7/3/2023	FedEx Express	Courier Service	$82.37
7/3/2023	General Logistics Systems US, Inc.	Courier Service	$45.72
7/14/2023	Legal Document Server, Inc.	Attorney Service	$17.75
1/29/2025	Legal Document Server, Inc.	Attorney Service	$20.20
		Total:	$997.07

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Brown vs. Transdev Alternative Services, Inc. (PAGA)

Date	Payee	Expense Description	Amount
12/22/2022	U.S. Postmaster	Postage	$15.70
3/23/2023	U.S. Postmaster	Postage	$16.68
3/23/2023	Labor & Workforce Development Agency	PAGA Filing Fee	$75.00
10/31/2023	Legal Document Server, Inc.	Attorney Service	$42.18
10/31/2023	San Francisco Superior Court	Complaint Filing Fee	$435.00
11/15/2023	Legal Document Server, Inc.	Attorney Service	$32.30
12/11/2023	ProLegal	Attorney Service	$235.72
12/13/2023	Legal Document Server, Inc.	Attorney Service	$16.15
1/11/2024	Legal Document Server, Inc.	Attorney Service	$11.95
2/9/2024	General Logistics Systems US, Inc.	Courier Service	$27.69
3/18/2024	Legal Document Server, Inc.	Attorney Service	$11.95
3/19/2024	Legal Document Server, Inc.	Attorney Service	$22.38
3/19/2024	San Francisco Superior Court	Jury Fee	$150.00
9/17/2024	San Francisco Superior Court	Stipulation & Order Fee	$20.00
9/24/2024	File & ServeXpress	Attorney Service	$23.70
11/19/2024	File & ServeXpress	Attorney Service	$11.85
12/2/2024	San Francisco Superior Court	Stipulation & Order Fee	$20.00
1/24/2025	File & ServeXpress	Attorney Service	$11.85
9/22/2025	Legal Document Server, Inc.	Attorney Service	$151.75
12/30/2025	File & ServeXpress	Attorney Service	$84.66
1/6/2026	San Francisco Superior Court	Stipulation & Order Fee	$20.00
4/13/2026	File & ServeXpress	Attorney Service	$42.45
4/22/2026	San Francisco Superior Court	Stipulation & Order Fee	$20.00
		Total:	$1,498.96