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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

GLADYS VILLAGRANA, individually, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiff,

vs.

SHELLA CARE MANAGEMENT SERVICES, LLC, a California limited liability company; and DOES 1 through 100, inclusive,

Defendants.

Case No. CVRI2202930
Consolidated with CVRI2202932

Honorable Harold W. Hopp
Department 1

CLASS ACTION

DECLARATION OF YASMIN HOSSEINI IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND ENHANCEMENT AWARD

Date:	November 23, 2026
Time:	8:30 a.m.
Department:	1
Complaint Filed:	July 14, 2022
Trial Date:	None Set

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DECLARATION OF YASMIN HOSSEINI

I, Yasmin Hosseini, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Gladys Villagrana ("Plaintiff") and the Class in the action entitled *Gladys Villagrana v. Shella Care Management Services, LLC*, Riverside Superior Court, Case No. CVRI2202930 ("PAGA Action"), which is being settled along with *Gladys Villagrana v. Shella Care Management Services, LLC*, Riverside Superior Court, Case No. CVRI2202932 ("Class Action"). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On July 30, 2026, in Department 1 of the above-entitled Court, the Honorable Harold W. Hopp preliminarily approved the Class Action and PAGA Settlement and Release of Claims, Amendment No. 1 to the Class Action and PAGA Settlement and Release of Claims, and Amendment No. 2 to the Class Action and PAGA Settlement and Release of Claims (collectively, "Settlement," "Agreement," or "Settlement Agreement,") entered into between Plaintiff and Defendant Shella Care Management Services, LLC ("Defendant,") (together with Plaintiff referred to as the "Parties") and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Gladys Villagrana as the representative of the Class ("Class Representative"). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class ("Class Counsel").

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement, Exclusion Form, Objection Form, or substantially similar notices ("Class Notice"), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions ("Phoenix") to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Award ("Motion for

Final Approval"), no Participating Class Member has objected to the Class Settlement, the contemplated request for Attorneys' Fees and Costs, the Enhancement Award, the Settlement Administration Costs, or the allocation for the PAGA Penalty Amount.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in this matter since prior to the commencement of the above captioned action, which was commenced by Plaintiff on July 14, 2022, and the Class Action, which was filed on July 14, 2022. On February 9, 2023, the Class Action and PAGA Action (together, the "Actions") were consolidated and the PAGA Action was designated the lead action.

6. Before initiating the cases, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiff and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, meal and rest periods, business expense reimbursements, regular rate, rounding, recordkeeping and wage statement requirements, representative Private Attorneys General Act ("PAGA") claims and penalties, and wage-and-hour law and enforcement, Plaintiff's claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiff were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees who worked for Defendant within the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Class Counsel conducted significant informal discovery and investigation into the facts of the cases, to assess 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 throughout the course of the litigation and in

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connection with the mediation and settlement negotiations. The volume of records and documents that Class Counsel reviewed and analyzed included, but were not limited to: employment records of Plaintiff, a 30% sampling of Plaintiff's personnel records, Defendant's Employee Handbook, company policy acknowledgements (including but not limited to, Safety Training Material, Employee Handbook Confirmation of Receipt), confidentiality acknowledgment, new hire instructions, job descriptions and responsibilities, Defendant's operations and employment practice, policies, and procedures, among other information and documents. Class Counsel had the opportunity to interview and obtain information from Plaintiff and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, 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, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, motion practice, informal discovery, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation briefing and supporting materials, and settlement documents; and preparing for and attending court proceedings, mediation, and 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 volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature of the work performed 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

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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, rounding, regular rate, business expense reimbursements, Plaintiff's 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 this matter, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in a mediation session conducted by Brian Sinclair, Esq. ("Mediator"), a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of the mediation and settlement negotiations, the Parties exchanged documents and data, and discussed various aspects of the cases, including and not limited to, the risks and delays of further litigation, the risks and expenses to the Parties of proceeding with class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, rounding, regular rates of pay, meal and rest periods (including *inter alia*, on premises breaks), business expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiff's claims and allegations, and Defendant's defenses thereto, 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. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class certification prevail on the merits and, while Plaintiff and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the Mediator's evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as the

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costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation.

ATTORNEYS' FEES REQUEST BY CLASS COUNSEL

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of $360,500.00, which is thirty-five percent (35%) of the Total Settlement Amount of $1,030,000.00. The Net Settlement Amount will be distributed to the Participating Class Members in accordance with the Settlement. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

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 has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to these cases.

12. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Total Settlement Amount of $1,030,000.00 (with a Net Settlement Amount of approximately at least $457,680.07 to be paid to Participating Class Members (with gross Individual Settlement Payments averaging approximately more than $775.73), payment of $46,250.00 to Aggrieved Employees (with Individual PAGA Payments averaging approximately $77.86) and payment of $138,750.00 to the State of California)—support the percentage fee sought.

13. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified

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under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **272.40 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.

14. 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.

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

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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 PAGA representative actions. Lawyers *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. 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 the 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 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. He was admitted to practice law in California in 2004 and in Washington in 2026. 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, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. 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.

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Together with other attorneys at the firm, and in many 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 Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010 and in Washington in 2026. 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 has 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

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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), New York (since 2013), and Washington (since 2026), and is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, all U.S. District Courts in Washington, the U.S. District Court for the Southern District of New York, the U.S. District Court for the Eastern District of New York, 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. Superior Court* (2019) 8 Cal.5th 175. 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. She has been a speaker regarding topics in wage and hour law at the California Employment Lawyers Association's continuing legal education events.

19. I am a Senior Attorney of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from Pepperdine University School of Law in 2017. I was admitted to practice law in California

in 2019. 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 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 represented filmmakers and talent, negotiating and structuring various types of agreements on their behalf. I am a member of the California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian American Bar Association.

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

20. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to $13,000.00. Lawyers *for* Justice, PC seeks reimbursement of **$8,819.93** 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. The cost savings of $4,180.07 will be part of the Net Settlement Amount, which will be distributed to the Participating Class Members in accordance with the Settlement.

ENHANCEMENT AWARD TO PLAINTIFF

21. In recognition of her efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as her broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 51 of the Settlement Agreement), the Settlement provides for an Enhancement Award, in the amount of up to $7,500.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing her employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that

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would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive $7,500.00 as a reasonable Enhancement Award for her broader waiver and release of claims and services performed in this matter, in addition to her individual settlement payments.

22. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, Class Members, Aggrieved Employees, 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 29th day of October 2026, at Glendale, California.



Yasmin Hosseini

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EXHIBIT 1

GLADYS VILLAGRANA V. SHELLA CARE MANAGEMENT SERVICES, LLC
Riverside County Superior Court, Case No. CVRI2202930 ("PAGA Action")

GLADYS VILLAGRANA V. SHELLA CARE MANAGEMENT SERVICES, LLC
Riverside County Superior Court, Case No. CVRI2202932 ("Class Action")

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS *for* JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Gladys Villagrana ("Plaintiff")	15.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	4.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff's Private Attorneys General Act ("PAGA") Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on July 14, 2022) (PAGA Action)	6.50
Investigate the Merits of Plaintiff's Class Action Claims, Conduct Legal Research and Analysis Regarding Class Action Claims, and Draft, Review, and/or Revise Plaintiff's Class Action Complaint for Damages (filed on July 14, 2022) (Class Action)	7.50
Review Court's Notice of Department Assignment and Notice of Case Management Conference (filed on July 18, 2022) (PAGA Action)	0.20
Review Court's Notice of Department Assignment (filed on July 18, 2022) (Class Action)	0.20

Review Court's Class Action Case Management Order # 1, Minute Order Re: Court Ruling, and Notice of Case Management Conference (filed on July 22, 2022) (Class Action)	0.50
Review Court's Notice of Department Reassignment for All Purposes (filed on August 18, 2022) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on September 6, 2022) (Class Action)	0.90
Review Court's Minute Order Re: Case Management Conference (filed on September 16, 2022) (Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on September 19, 2022) (Class Action)	0.20
Review Defendant Shella Care Management Services, LLC's ("Defendant") Declaration of Lawya Rangel Re: Good Faith Attempt to Meet and Confer Pursuant to Code of Civil Procedure §430.41(a)(2) (served on September 26, 2022) (PAGA Action)	0.30
Review Defendant's Declaration of Lawya Rangel Re: Good Faith Attempt to Meet and Confer Pursuant to Code of Civil Procedure §430.41(a)(2) (served on September 26, 2022) (Class Action)	0.30
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on October 6, 2022) (Class Action)	1.40
Review Court's Order to Continue Case Management Conference (filed on October 13, 2022) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Posting Jury Fees (filed on October 18, 2022) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Posting Jury Fees (filed on October 18, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation to Extend Time for Defendant to Answer or Otherwise Respond to Plaintiff's Complaint; [Proposed] Order (submitted on October 31, 2022) (PAGA Action)	1.30

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation to Extend Time for Defendant to Answer or Otherwise Respond to Plaintiff's Complaint; [Proposed] Order (submitted on October 31, 2022) (Class Action)	0.80
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 8, 2022) (Class Action)	1.80
Review Court's Order Re: Stipulation to Extend Time for Defendant to Answer or Otherwise Respond to Plaintiff's Complaint (filed on November 8, 2022) (Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on November 17, 2022) (Class Action)	0.20
Review and Analyze Defendant's Answer to Plaintiff's PAGA Complaint, and Research Affirmative Defenses in Defendant's Answer (served on November 30, 2022) (PAGA Action)	1.20
Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint, and Research Affirmative Defenses in Defendant's Answer (served on November 30, 2022) (Class Action)	1.60
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on December 5, 2022) (Class Action)	1.70
Review Court's Notice of Case Reassignment for All Purposes and Notice of Order to Show Cause Hearing (filed on December 16, 2022) (PAGA Action)	0.30
Review Court's Minute Order Re: Case Management Conference and Notice of Order to Show Cause Hearing (filed on December 16, 2022) (Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on December 20, 2022) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on January 5, 2023) (PAGA Action)	0.90
Review Defendant's Case Management Statement (served on January 5, 2023) (PAGA Action)	0.40

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on January 5, 2023) (Class Action)	1.80
Review Declaration of Michael Foster Re: Notice of Order to Show Cause Hearing and Declaration of Lawya Rangel Re: Notice of Order to Show Cause Hearing (served on January 12, 2023) (PAGA Action)	0.40
Review Declaration of Michael Foster Re: Notice of Order to Show Cause Hearing and Declaration of Lawya Rangel Re: Notice of Order to Show Cause Hearing (served on January 12, 2023) (Class Action)	0.40
Review Court's Minute Order Re: Case Management Conference (filed on January 17, 2023) (PAGA Action)	0.20
Review Court's Minute Order Re: Case Management Conference and Minute Order Re: Order to Show Cause Re: Why Case Should Not be Consolidated (filed on January 20, 2023) (PAGA Action)	0.20
Review Court's Minute Order Re: Case Management Conference and Minute Order Re: Order to Show Cause Re: Why Case Should Not be Consolidated (filed on January 20, 2023) (Class Action)	0.20
Review Proposed Order Re: Consolidation (served on February 3, 2023) (PAGA Action)	0.20
Review Court's Order on Case Consolidation (filed on February 9, 2023) (PAGA Action)	0.20
Review Court's Notice of Court's Ruling (filed on February 10, 2023) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on April 5, 2023) (PAGA Action)	1.70
Review Court's Minute Order Re: Case Management Conference (filed on April 19, 2023) (PAGA Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on April 20, 2023) (Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on May 18, 2023) (PAGA Action)	1.70
Review Court's Notice of Department Change for All Purposes (filed on June 1, 2023) (PAGA Action)	0.30
Review Court's Minute Order Re: Case Management Conference (filed on June 2, 2023) (PAGA Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on June 5, 2023) (PAGA 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 June 30, 2023) (PAGA Action)	1.30
Review Court's Order to Continue Case Management Conference (filed on July 14, 2023) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Continue Case Management Conference (filed on July 17, 2023) (PAGA Action)	0.10
Review Court's Notice of Department Reassignment for All Purposes (filed on July 28, 2023) (PAGA Action)	0.30
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on October 3, 2023) (PAGA Action)	1.40
Review Court's Minute Order and Order to Continue Case Management Conference, and Notice of Case Reassignment for All Purposes (filed on October 4, 2023) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Continue Case Management Conference (filed on October 6, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on January 18, 2024) (PAGA Action)	1.40
Review Court's Order to Continue Case Management Conference and Notice of Case Management Conference (filed on January 22, 2024) (PAGA Action)	0.30
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Continue Case Management Conference (filed on February 1, 2024) (PAGA Action)	0.10
Review Court's Minute Order: Hearing Re: Case Management Conference (filed on February 5, 2024) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on March 1, 2024) (PAGA Action)	1.60

Review Court's Minute Order Re: Case Management Conference (filed on March 14, 2024) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on April 26, 2024) (PAGA Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on June 10, 2024) (PAGA Action)	0.90
Review Court's Minute Order Re: Case Management Conference (filed on June 14, 2024) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 8, 2025) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue January 15, 2025 Case Management Conference; [Proposed] Order (submitted on January 8, 2025) (PAGA Action)	1.40
Review Court's Order to Continue January 15, 2025 Case Management Conference and Notice of Case Management Conference (filed on January 10, 2025) (PAGA Action)	0.30
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue April 15, 2025 Case Management Conference; [Proposed] Order (submitted on April 8, 2025) (PAGA Action)	1.50
Review Court's Order to Continue April 15, 2025 Case Management Conference and Notice of Case Management Conference (filed on April 11, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Continue April 15, 2025 Case Management Conference (filed on April 11, 2025) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue July 23, 2025 Case Management Conference; [Proposed] Order (submitted on July 18, 2025) (PAGA Action)	1.50
Review Court's Minute Order Re: Case Management Conference and Order to Continue July 23, 2025 Case Management Conference (filed on July 23, 2025) (PAGA Action)	0.20

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on October 14, 2025) (PAGA Action)	1.30
Review Court's Minute Order Re: Case Management Conference (filed on October 20, 2025) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on December 5, 2025) (PAGA Action)	1.30
Review Court's Minute Order Re: Case Management Conference (filed on December 11, 2025) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on January 5, 2026) (PAGA Action)	1.40
Review Court's Minute Order Re: Case Management Conference (filed on January 9, 2026) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on January 23, 2026) (PAGA Action)	1.30
Review Court's Minute Order Re: Case Management Conference (filed on January 29, 2026) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on March 2, 2026) (PAGA Action)	1.30
Review Court's Minute Order Re: Case Management Conference (filed on March 17, 2026) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on May 14, 2026) (PAGA Action)	1.30
Review Court's Minute Order Re: Case Management Conference (filed on May 18, 2026) (PAGA Action)	0.10
Appearances	
Prepare for and Remotely Attend Case Management Conference (December 20, 2022) (PAGA Action)	0.50

Prepare for and Remotely Attend Case Management Conference and Order to Show Cause Re: Why Case Should Not Be Consolidated (January 20, 2023) (Class Action & PAGA Action)	2.50
Prepare for and Remotely Attend Further Case Management Conference (July 23, 2025) (PAGA Action)	0.90
Prepare for and Remotely Attend Case Management Conference (October 21, 2025) (PAGA Action)	0.50
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (June 17, 2026) (PAGA Action)	1.60
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 (served on December 2, 2021)	2.10
Draft, Review, and/or Revise Plaintiff's Special Interrogatories (Set One) to Defendant (served on January 20, 2023) (PAGA Action)	1.10
Review Defendant's Responses to Plaintiff's Special Interrogatories (Set One) (served on February 22, 2023) (PAGA Action)	0.60
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff under the Private Attorneys General Act (served on March 24, 2022)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendant's Counsel	16.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	41.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations (submitted on January 25, 2024)	26.50

Attend Mediation Session (February 1, 2024; Zoom Video Conference) 10:00 am – 5:00 p.m.	10.50
Review and/or Analyze Mediator's Proposal (issued on April 19, 2024; accepted on April 24, 2024)	1.50
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding Re: Class Action and PAGA Settlement (executed on August 14, 2024)	4.10
Draft, Review, Revise, Negotiate, and/or Finalize Class Action and PAGA Settlement and Release of Claims (executed on February 10, 2026) and Draft, Review, and/or Revise Notice of Class Action Settlement	16.50
Draft, Review, Revise, Negotiate, and/or Finalize Amendment No. 1 to the Class Action and PAGA Settlement and Release of Claims (executed on March 24, 2026)	1.80
Draft, Review, Revise, Negotiate, and/or Finalize Amendment No. 2 to the Class Action and PAGA Settlement and Release of Claims (executed on June 18, 2026)	1.10
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	6.50
Law and Motion	
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference and Hearing on Plaintiff's Motion for Preliminary Approval; [Proposed] Order (submitted on October 9, 2024) (PAGA Action)	1.40
Review Court's Order to Continue Case Management Conference and Hearing on Plaintiff's Motion for Preliminary Approval and Notice of Case Management Conference (filed on October 15, 2024) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Continue Case Management Conference and Hearing on Plaintiff's Motion for Preliminary Approval (filed on October 15, 2024) (PAGA Action)	0.10
Review Declaration of Adam C. Reed and Declaration of Lawya Rangel, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Yasmin	21.50

Hosseini in Support Thereof, Compliance Chart in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on April 2, 2026) (PAGA Action)	
Review Declaration of Michael Foster Pursuant to Case Management Order in Support of Motion for Preliminary Approval of Settlement (served on April 9, 2026) (PAGA Action)	0.40
Review Defendant's Notice of Non-Opposition on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (served on June 4, 2026) (PAGA Action)	0.40
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on June 16, 2026) (PAGA Action)	0.40
Review Court's Minute Order Re: Case Management Conference and Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on June 17, 2026) (PAGA Action)	0.20
Review Declaration of Michael Moore on Behalf of Phoenix Class Action Settlement Administration in Support of Preliminary Approval, and Draft, Review, and/or Revise Supplemental Declaration of Yasmin Hosseini in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on June 18, 2026) (PAGA Action)	3.90
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on July 30, 2026) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on August 13, 2026) (PAGA Action)	0.10
Review Declaration of the Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Award; Memorandum of Points and Authorities in Support Thereof, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Final Approval Order and Judgment (PAGA Action)	21.50
Total Hours:	272.40

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Villagrana vs. Shella Care Management Services (PAGA)

Date	Payee	Expense Description	Amount
3/14/2022	U.S. Postmaster	Postage	$8.00
3/24/2022	Labor & Workforce Development Agency	PAGA Filing Fee	$75.00
7/18/2022	Legal Document Server, Inc.	Attorney Service	$45.93
7/18/2022	Riverside Superior Court	Complaint Filing Fee	$450.00
9/6/2022	Legal Document Server, Inc.	Attorney Service	$31.10
9/14/2022	Legal Document Server, Inc.	Attorney Service	$15.55
10/19/2022	Legal Document Server, Inc.	Attorney Service	$25.68
10/19/2022	Riverside Superior Court	Jury Fee	$150.00
1/5/2023	Legal Document Server, Inc.	Attorney Service	$15.55
4/5/2023	Legal Document Server, Inc.	Attorney Service	$15.75
5/22/2023	Legal Document Server, Inc.	Attorney Service	$15.75
6/30/2023	Legal Document Server, Inc.	Attorney Service	$17.75
6/30/2023	Riverside Superior Court	Stipulation & Order Fee	$20.00
7/17/2023	Legal Document Server, Inc.	Attorney Service	$15.75
10/4/2023	Legal Document Server, Inc.	Attorney Service	$17.14
10/4/2023	Riverside Superior Court	Stipulation & Order Fee	$20.00
10/6/2023	Legal Document Server, Inc.	Attorney Service	$15.75
1/19/2024	Legal Document Server, Inc.	Attorney Service	$17.14
1/19/2024	Riverside Superior Court	Stipulation & Order Fee	$20.00
1/23/2024	Legal Document Server, Inc.	Attorney Service	$15.75
2/2/2024	Legal Document Server, Inc.	Attorney Service	$15.75
3/5/2024	Legal Document Server, Inc.	Attorney Service	$15.75
5/7/2024	Legal Document Server, Inc.	Attorney Service	$15.75
6/11/2024	Legal Document Server, Inc.	Attorney Service	$15.75
10/10/2024	Legal Document Server, Inc.	Attorney Service	$35.99
10/10/2024	Riverside Superior Court	Stipulation & Order Fee	$20.00
10/16/2024	Legal Document Server, Inc.	Attorney Service	$17.30
1/9/2025	Legal Document Server, Inc.	Attorney Service	$19.69
1/9/2025	Riverside Superior Court	Stipulation & Order Fee	$20.00
1/28/2025	Legal Document Server, Inc.	Attorney Service	$18.30
4/9/2025	Legal Document Server, Inc.	Attorney Service	$19.69
4/9/2025	Riverside Superior Court	Stipulation & Order Fee	$20.00
4/21/2025	Legal Document Server, Inc.	Attorney Service	$18.30
7/18/2025	Legal Document Server, Inc.	Attorney Service	$12.95
7/23/2025	Legal Document Server, Inc.	Attorney Service	$19.69
7/23/2025	Riverside Superior Court	Stipulation & Order Fee	$20.00
10/15/2025	Legal Document Server, Inc.	Attorney Service	$18.30

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Villagrana vs. Shella Care Management Services (PAGA)

12/9/2025	Legal Document Server, Inc.	Attorney Service	$18.30
1/8/2026	Legal Document Server, Inc.	Attorney Service	$19.30
1/13/2026	Riverside Superior Court	Document Download Fee	$4.00
1/26/2026	Legal Document Server, Inc.	Attorney Service	$19.30
2/21/2026	Legal Document Server, Inc.	Attorney Service	$13.95
3/6/2026	Legal Document Server, Inc.	Attorney Service	$19.30
4/13/2026	Legal Document Server, Inc.	Attorney Service	$23.47
4/13/2026	Riverside Superior Court	Motion Fee	$60.00
4/29/2026	Legal Document Server, Inc.	Attorney Service	$19.30
5/18/2026	Legal Document Server, Inc.	Attorney Service	$19.30
6/24/2026	Riverside Superior Court	Document Download Fee	$3.00
6/29/2026	Legal Document Server, Inc.	Attorney Service	$19.30
7/16/2026	Legal Document Server, Inc.	Attorney Service	$13.95
7/23/2026	Legal Document Server, Inc.	Attorney Service	$13.95
7/30/2026	Legal Document Server, Inc.	Attorney Service	$13.95
8/7/2026	Riverside Superior Court	Document Download Fee	$12.50
8/17/2026	Legal Document Server, Inc.	Attorney Service	$19.30
		Total:	$1,642.97

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Villagrana vs. Shella Care Management Services

Date	Payee	Expense Description	Amount
8/26/2021	U.S. Postmaster	Postage	$7.00
9/30/2021	U.S. Postmaster	Postage	$7.38
11/8/2021	U.S. Postmaster	Postage	$7.38
7/18/2022	Legal Document Server, Inc.	Attorney Service	$113.43
7/18/2022	Riverside Superior Court	Complex Filing Fee	$1,000.00
7/18/2022	Riverside Superior Court	Complaint Filing Fee	$450.00
8/9/2022	ProLegal	Attorney Service	$191.07
9/6/2022	Legal Document Server, Inc.	Attorney Service	$31.10
9/7/2022	Legal Document Server, Inc.	Attorney Service	$15.55
9/14/2022	Legal Document Server, Inc.	Attorney Service	$15.55
10/6/2022	Legal Document Server, Inc.	Attorney Service	$11.75
10/7/2022	Legal Document Server, Inc.	Attorney Service	$16.90
10/7/2022	Riverside Superior Court	Stipulation & Order Fee	$20.00
10/19/2022	Legal Document Server, Inc.	Attorney Service	$25.68
10/19/2022	Riverside Superior Court	Jury Fee	$150.00
11/7/2022	Legal Document Server, Inc.	Attorney Service	$11.75
11/8/2022	Legal Document Server, Inc.	Attorney Service	$15.55
12/7/2022	Legal Document Server, Inc.	Attorney Service	$15.55
1/5/2023	Legal Document Server, Inc.	Attorney Service	$15.55
4/3/2023	Riverside Superior Court	Document Download Fee	$7.00
8/8/2023	RUTAN & TUCKER, LLP	Mediation Fee	$5,000.00
2/15/2024	Aliza Grossman	Travel Reimbursement	$48.77
		Total:	$7,176.96