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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE—CIVIL COMPLEX CENTER

NADIA ESTRADA, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

BELSHIRE ENVIRONMENTAL
SERVICES, INC., a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 30-2022-01262282-CU-OE-CXC

Honorable Lon F. Hurwitz
Department CX103

CLASS ACTION

**DECLARATION OF JOANNA GHOSH IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: March 22, 2024
Time: 1:30 p.m.
Dept.: CX103

Complaint Filed: May 31, 2022
Trial Date: Not Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Nadia Estrada (“Plaintiff”) and the Class in the above-captioned 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 November 17, 2023, in Department CX103 of the above-entitled Court, the Honorable Lon F. Hurwitz preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Belshire Environmental Services, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Nadia Estrada to represent the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC and Parker & Minne, LLP as counsel for the Class (together, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Proposed Class Action Settlement (“Class Notice”), approved the notice, opt-out, and objection procedures, and ordered their implementation. The Court-appointed ILYM Group, Inc. (“ILYM” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

WORK PERFORMED BY CLASS COUNSEL

2. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in performing work in this matter since prior to the commencement of the above-captioned action (“Action”) on May 31, 2022. Since joining forces with and associating in Parker & Minne, LLP as co-counsel for Plaintiff in the case, we have worked cooperatively with them to strategize and prosecute the case, and our work with them has been a coordinated and combined effort. Ultimately, Class Counsel’s efforts and the efforts of Plaintiff have been successful in reaching the Settlement.

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

13 4. Collectively, Class Counsel investigated the veracity, strength, and scope of the
14 claims, and were preparing the matter for class certification and trial prior to reaching the
15 Settlement. This matter has involved extensive and ongoing investigations, research into legal and
16 factual issues, informal discovery, and court proceedings. Class Counsel reviewed and analyzed
17 a volume of information, documents, and data obtained from Plaintiff, Defendant, and other
18 sources, researched applicable law, and undertook analyses and calculations of the value of claims,
19 damages, and penalties exposure. Class Counsel also met and conferred with Defendant's counsel
20 on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, court
21 proceedings, informal discovery and production of information, documents, and data in the course
22 of litigation and mediation and settlement negotiations, and mediation and settlement negotiations.
23 Other work that Class Counsel has performed includes, and is not limited to, case strategy and
24 analysis; case management; drafting, reviewing, and revising the pleadings and motion-related
25 papers; claims assessment and evaluation; and preparing for and attending mediation and
26 settlement negotiations.

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1 5. As outlined herein, the parties have conducted significant investigations and
2 discovery. The parties exchanged, reviewed, and analyzed a volume of information, documents,
3 and data obtained from Plaintiff, Defendant, and other sources during the course of litigating the
4 case and in connection with mediation and settlement negotiations, which provided a critical
5 understanding of the nature of the work performed by the Class Members and PAGA Members,
6 as well as Defendant's operations and employment policies, practices, and procedures. The
7 information, data, and documents were used in analyzing liability, damages, penalties, and
8 valuation issues in connection with all phases of the litigation, and ultimately in connection with
9 the mediation and settlement negotiation process. Class Counsel also performed significant
10 research into the applicable law, which is evolving as it relates to off-the-clock theory, meal and
11 rest periods, regular rate, wage-and-hour enforcement, representative PAGA claims,
12 manageability, and class certification, Plaintiff's claims and allegations, and Defendant's defenses
13 thereto, as well as facts discovered. Accordingly, there has been sufficient investigation and
14 review of information in order for the parties to be informed of the nature and extent of the claims
15 and to enable all parties to evaluate the Settlement for its fairness, adequacy, and reasonableness.

16 6. By way of the accompanying Motion for Final Approval, Plaintiff seeks an award
17 of attorneys' fees in the amount of \$250,000.00 to Class Counsel, which is one-third (1/3) of the
18 Gross Settlement Amount of \$750,000.00. Pursuant to the contingency-fee agreement entered
19 into by and between Plaintiff and Lawyers for Justice, PC, Plaintiff has agreed to a contingency
20 fee of at least one-third (1/3) of the recovery.

21 7. The attorneys' fees that are sought are commensurate with: (1) the risk that Class
22 Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel
23 dedicated to the case; (3) the skill and determination that Class Counsel have shown; (4) the results
24 that Class Counsel have achieved throughout the litigation; (5) the value of the settlement that
25 Class Counsel have achieved in the case; and (6) the other cases that Class Counsel have turned
26 down in order to devote their time and efforts to this matter.

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8. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel have incurred many hours of work in connection with prosecuting the case, such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **163.90 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart for Lawyers for Justice, PC that sets forth in detail the nature of the legal services provided by attorneys at the firm, and the time incurred in performing those services. The hours attributable to Lawyers for Justice, PC include work done by me and several other attorneys at the firm. Additionally, separate from the hours of work referenced herein and in the attached chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

9. The work performed in this 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 cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate of at least \$800 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 \$800 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; final approval of the class and representative action

1 settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case
2 No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved
3 compensation at the rate of \$831.38 per hour; and final approval of the class and representative
4 action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior
5 Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys'
6 fees involved compensation at the rate of \$845.64 per hour.

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

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

22 11. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice,
23 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
24 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
25 extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute
26 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
27 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October
28 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During

1 the summer of 2000, he studied Legal Writing at Harvard University. From approximately
2 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable
3 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From
4 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the
5 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
6 In December of 2004, he obtained a license to practice law from the California State Bar. Since
7 in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost
8 exclusively focused on the prosecution of consumer and employment class actions. While
9 employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or
10 defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for
11 deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with
12 other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully
13 litigated cases involving the executive, administrative, and other overtime exemptions to the State
14 of California and federal overtime compensation requirements. Under his supervision, Lawyers
15 *for* Justice, PC has successfully obtained class certification by contested motion practice in
16 approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or
17 representative action cases.

18 12. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
19 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
20 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
21 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
22 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
23 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
24 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
25 He was admitted to practice law in California in 2010. He is admitted to practice before all courts
26 of the State of California and all United States District Courts in the State of California. He has
27 worked on many wage-and-hour class action and representative action cases, taking the lead in
28 taking and defending depositions, arguing motions, and attending mediations. He has played an

1 integral role in preparing matters for class certification, including and not limited to, successful
2 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
3 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
4 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
5 RG13680477). Under his supervision, dozens of class action or representative cases have resulted
6 in settlements that have been granted court approval, including and not limited to, those listed in
7 paragraph 15 herein. He has handled over one hundred and fifty (150) mediations and worked on
8 over two hundred and fifty (250) class action or representative action cases which have resulted
9 in settlement.

10 13. Yasmin Hosseini is a Member of Lawyers for Justice, PC. She received her
11 Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned her Juris
12 Doctor degree from Pepperdine University School of Law in 2017. She was admitted to practice
13 law in California in 2019. She is admitted to practice before all courts of the State of California
14 and all federal district courts in the State of California. She has worked on many wage and hour
15 class action and PAGA representative matters, and her work has included, *inter alia*, researching
16 and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing
17 stipulations and settlement agreements, engaging in motion practice, claims evaluation and
18 analysis, and making court appearances. Prior to working at Lawyers for Justice, PC, she
19 represented filmmakers and talent, negotiating and structuring various types of agreements on their
20 behalf. She is a member of the California Employment Lawyers Association, Beverly Hills Bar
21 Association, and Iranian American Bar Association.

22 14. I am a Managing Member of Lawyers for Justice, PC. I received a Bachelor of Arts
23 degree from California State University, Los Angeles in 2006, a Master of Science degree from
24 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University
25 Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since
26 2013) and am admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy
27 Court for the Central District of California, and the U.S. Supreme Court. I have taken and
28 defended dozens of depositions and successfully handled motion practice in class action cases

1 regarding discovery (including and not limited to, regarding class contact information), class
2 certification (both contested class certification and stipulated class certification), arbitration
3 agreements, coordination, and intervention. I have successfully handled briefing and oral
4 argument on appeal and obtained notable decisions regarding the Private Attorneys General Act
5 and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9
6 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied
7 (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). I have significant
8 experience with class actions, including and not limited to working on cases to obtain class
9 certification through contested motion practice and working on cases in the post-certification stage
10 (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation
11 in conjunction with co-counsel in a case involving a certified class consisting of approximately
12 2,600 individuals). I also have extensive experience with class action and/or representative action
13 settlements, and have handled this process in over three hundred (300) cases. Under Edwin
14 Aiwasian, Arby Aiwasian, and my supervision, Lawyers for Justice, PC has handled the class
15 certification and court approval process for hundreds of class action and/or representative action
16 matters that have successfully resolved. I am a member of the California Employment Lawyers
17 Association

18 ***EXAMPLES OF RESULTS IN WAGE AND HOUR CLASS ACTION AND***
19 ***REPRESENTATIVE ACTION CASES***

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

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

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

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

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

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

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

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

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

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

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

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

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1 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
3 involving allegations of misclassification of the “Department Manager” position. On August 12,
4 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class. On
5 August 6, 2019, the court granted final approval of the class action settlement. The Alameda
6 County Superior Court Case Number is RG13680477.

7 m) LFJ represented the plaintiff in a PAGA representative action against a real
8 estate and property management company, on behalf of non-exempt employees. On November 4,
9 2016, the court granted approval of the PAGA representative action settlement. The Orange
10 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

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

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

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

11 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
12 wage-and-hour class and PAGA representative action against a lumber and hardware company on
13 behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class
14 and PAGA representative action settlement. The Orange County Superior Court Case Number is
15 30-2014-00747750-CU-OE-CXC.

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

21 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
22 representative action against a food company on behalf of non-exempt employees. On June 30,
23 2017, the court granted final approval of the class and PAGA representative action settlement. The
24 Sacramento County Superior Court Case Number is 34-2015-00175871.

25 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
26 representative action against a chocolate company on behalf of non-exempt employees. On July
27 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
28 The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

26 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class action against a container manufacturer, on behalf of non-exempt employees.
28 On October 15, 2018, the court granted the plaintiff's motion for class certification. The Tulare

County Superior Court Case Number is VCU264528.

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

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

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

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

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

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

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

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

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

25 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against manufacturer and supplier of power products and services on
27 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
28 for class certification and certified a class. On August 27, 2021, the court granted final approval

1 of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-
2 00025968-CU-OE-CTL.

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

7 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
8 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the
9 restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July
10 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The
11 Los Angeles County Superior Court Case Number is BC707670.

12 **LITIGATION COSTS AND EXPENSES INCURRED**

13 **BY LAWYERS FOR JUSTICE, PC**

14 16. To date, Class Counsel has borne all of the risks and costs of litigation and will not
15 receive any compensation until recovery is obtained in this matter. Lawyers for Justice, PC seeks
16 reimbursement of **\$16,581.28** in litigation costs and expenses incurred in the Action, as reflected
17 in **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the
18 prosecution of the case and to obtain the Settlement.

19 **CLASS REPRESENTATIVE ENHANCEMENT PAYMENT TO PLAINTIFF**

20 17. In recognition of her efforts and work serving as the Class Representative, the
21 Settlement provides for a Class Representative Enhancement Payment in the amount of \$7,500.00
22 to Plaintiff. The requested enhancement payment is fair and appropriate. Plaintiff spent a
23 considerable amount of time and effort to produce relevant documents and past employment
24 records and to provide the facts and evidence necessary to attempt to prove the allegations.
25 Plaintiff was available whenever Class Counsel needed Plaintiff and actively tried to obtain and
26 provide information that would facilitate the pursuit of the class and PAGA claims. Accordingly,
27 it is appropriate for Plaintiff to receive \$7,500.00 as a reasonable enhancement payment, for her
28 services on behalf of the Class Members, the State of California, and PAGA Members, in addition

1 to her individual settlement payment.

2 18. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
3 Settlement is in the best interests of Plaintiff, other Class Members, the State of California, and
4 PAGA Members.

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

7 Executed on March 8, 2024, in Glendale, California.

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10 Joanna Ghosh
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EXHIBIT A

NADIA ESTRADA V. BELSHIRE ENVIRONMENTAL SERVICES, INC.
Orange County Superior Court Case No. 30-2022-01262282-CU-OE-CXC

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts With a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality, and Manageability	8.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Nadia Estrada’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	7.20
Pre-Lawsuit Investigation of Potential Damages and Statutory Penalties Exposure of Defendant Belshire Environmental Services, Inc. (“Defendant”) With Respect to Plaintiff and the Putative Class Members	8.90
Pre-Notice Investigation of the Merits of Plaintiff’s Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiff and the Aggrieved Employees	7.10
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant With Respect to Plaintiff and the Aggrieved Employees	6.80
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, Regular Rate, IWC Wage Orders, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials	7.50
Investigation of Defendant, Its Licenses and Registrations, Its Contracts, Its Business Relationships, and the Industry in Which It Operates	4.10

Investigation of Defendant's Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	3.40
Investigation of Defendant's Executives, Officers, and Leadership With a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, To Evaluate Willfulness and Uniformity	3.30
Analysis of Competitors in Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures With the Policies, Practices, and Procedures of Defendant's Competitors	3.50
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences (If Any) Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	4.20
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	4.50
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other Postings and Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would Be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	4.90
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Safety Protocols, Inspections, Trainings, Emergencies, Reporting and Paperwork, Timekeeping, Meal/Rest Breaks, On-Premises/On-Call Breaks, Meal/Rest Premiums, Overtime Compensation, Regular Rate, Non-Discretionary Bonus/Incentive/Shift Differential Pay, Remote Work, Use of Personal Computing Devices and/or Internet/Data, PPE, Supplies, Uniform, Footwear, and Reimbursement of Business-Related Expenses	12.50

Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Use to Conduct Everyday Business, Including Timekeeping, Calendar, Client Relations Management, Project Management, Information and Document Sharing, Communications, Security, and Surveillance Systems, With a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal and Rest Breaks	3.60
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	7.50
Research and Investigation Re: Post- <i>Duran v. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.10
Meet and/or Communicate With Plaintiff Nadia Estrada	10.50
Investigate, Meet, Communicate With, and/or Conduct Interviews of Putative Class Members and/or Percipient Witnesses	8.50
Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on May 31, 2022)	7.50
Review Court's Minute Order Re: Complex Determination (filed on June 16, 2022)	0.10
Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint and Research Affirmative Defenses in Defendant's Answer (served on July 7, 2022)	1.50
Draft Notice of Association of Counsel (filed on August 31, 2022)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on September 28, 2022)	0.10

Review Court's Notice of Case Reassignment (filed on October 5, 2022)	0.10
Review Court's Minute Order Re: Status Conference (filed on October 11, 2022)	0.10
Review Defendant's Substitution of Attorney (served on May 9, 2023)	0.10
Review Defendant's Notice of Change of Firm Name (served on June 14, 2023)	0.10
Review Defendant's Substitution of Attorney (served on July 17, 2023)	0.10
Review Court's Minute Order Re: Status Conference (filed on July 24, 2023)	0.10
Appearances	
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (July 28, 2023)	0.30
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement (March 22, 224) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Nadia Estrada (served on October 20, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Nadia Estrada (served on November 10, 2021)	3.80
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Nadia Estrada for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on March 23, 2022)	4.50

Meet With, Draft Correspondence to, Review Correspondence from, and Respond to Correspondence from, Defendant's Counsel	9.50
Review Weekly Reports from Settlement Administrator and Monitor Settlement Notice Administration Process	1.50
Law and Motion	
Review Declaration of Lisa Mullins on Behalf of ILYM Group, Inc., 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 Joanna Ghosh in Support Thereof, Declaration of S. Emi Minne in Support Thereof, Declaration of Nadia Estrada in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on June 1, 2023)	3.50
Review and Analyze Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on July 27, 2023)	0.40
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on July 28, 2023)	0.10
Research, Draft, Review, and/or Revise Supplemental Brief in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, Supplemental Declaration of S. Emi Minne in Support Thereof, and Revised [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on August 28, 2023)	0.20
Review and Analyze Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (published on October 6, 2023)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on October 6, 2023)	0.10

Research, Draft, Review, and/or Revise Second Supplemental Declaration of S. Emi Minne in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement and Revised [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 25, 2023)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on November 17, 2023)	0.20
Review Settlement Administrator's Declaration, and Research, Draft, Review, and/or Revise Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Declaration of S. Emi Minne in Support Thereof, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on March 8, 2024) (Anticipated)	4.50
Total Hours:	163.90

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Estrada vs. Belshire Environmental Services, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/20/2021	U.S. Postmaster	Postage	\$7.38
3/23/2022	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
3/23/2022	U.S. Postmaster	Postage	\$16.00
6/1/2022	Legal Document Server, Inc.	Attorney Service	\$110.11
6/1/2022	Orange County Superior Court	Complex Filing Fee	\$1,000.00
6/1/2022	Orange County Superior Court	Complaint Filing Fee	\$435.00
6/3/2022	ProLegal	Attorney Service	\$98.16
6/27/2022	Legal Document Server, Inc.	Attorney Service	\$13.25
6/28/2022	Legal Document Server, Inc.	Attorney Service	\$13.25
8/15/2022	Steven J. Rottman, LLC	Mediation Fee	\$12,500.00
9/1/2022	Legal Document Server, Inc.	Attorney Service	\$14.00
9/28/2022	Legal Document Server, Inc.	Attorney Service	\$24.13
9/28/2022	Orange County Superior Court	Jury Fee	\$150.00
4/6/2023	Berger Consulting Group, LLC	Analysis of Sampling of Time Records	\$2,125.00
Total:			\$16,581.28