

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

MIREYA TORRES, IDREES HOLLIS,
CHRISTOPHER GARCIA, CHUMANI
BROWN, 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;

Plaintiffs,

vs.

WILLIAMS LEA, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 20STCV04508

Honorable Kenneth R. Freeman
Department SSC14

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
COUNSEL'S FEES AND COSTS, AND
ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement, Class
Counsel's Fees and Costs, and Enhancement
Payments; Declaration of Class Representatives
(Mireya Torres, Idrees Hollis, Christopher
Garcia, and Chumani Brown); Declaration of
Settlement Administrator (Jennifer Beliveau);
and [Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: January 18, 2024
Time: 10:00 a.m.
Department: SSC14

Complaint Filed: February 4, 2020
FAC Filed: July 29, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Mireya Torres, Idrees Hollis, Christopher Garcia, and Chumani Brown (together, “Plaintiffs”) and the Class. The facts set forth in this declaration are within my personal knowledge, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On July 24, 2023, in Department SSC14 of the above-entitled Court, the Honorable Kenneth R. Freeman preliminarily approved the First Amended Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiffs and Defendant Williams Lea, Inc. (“Defendant,” together with Plaintiffs referred to as the “Parties”). On July 24, 2023 the Court conditionally certified the Class for settlement purposes, preliminarily appointed Plaintiffs Mireya Torres, Idrees Hollis, Christopher Garcia, and Chumani Brown to represent the Class (together, “Class Representatives”), and preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Simpluris, Inc., (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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

///

WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned putative class action since prior to its commencement on February 4, 2020, as well as Plaintiff Mireya Torres’ representative action under the Private Attorneys General Act (“PAGA”), entitled *Mireya Torres v. Williams Lea, Inc.*, Orange County Superior Court Case No. 30-2020-01149249-CU-OE-CXC, since its commencement on July 16, 2020.

5. 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 our firm and Plaintiff Torres and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour enforcement and penalties, Plaintiffs’ claims and allegations, and potential defenses. After conducting an initial investigation, our firm determined that the claims of Plaintiff Torres were well-suited for class-wide and/or 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 in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial prior to reaching the Settlement. The parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiffs, other Class Members and PAGA Aggrieved Employees, and percipient witnesses, and reviewed and analyzed a large volume of information, data, and documents obtained from Plaintiffs, Defendant, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel

1 included and were not limited to: employment records of Plaintiffs, a detailed sampling of Class
2 Members' time and pay data and records, redacted class list, Employee Handbook, company
3 policy acknowledgments, internal memoranda, job descriptions, new hire orientation checklists,
4 and operations and employment policies, practices, and procedures documents, among other
5 information and documents. Class Counsel developed liability, damages, and penalties valuation
6 models in the course of litigation and in connection with mediation and settlement negotiations,
7 and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues
8 relating to the pleadings, case management, discovery, and the production of information,
9 documents, and data in the course of litigation and in connection with mediation and settlement
10 negotiations. Other work performed by Class Counsel included, and was not limited to, case
11 strategy and analysis; drafting, reviewing, and revising the pleadings, the mediation brief, and
12 settlement documents; drafting and propounding multiple sets of formal written discovery
13 requests on Defendant; reviewing Defendant's responses and objections to written discovery;
14 preparing for and attending court proceedings; and preparing for and participating in mediation
15 and settlement negotiations, among other tasks.

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

28 ///

1 8. After conducting significant investigation of the facts and law during the
2 prosecution of the cases, counsel for the parties engaged in extensive settlement negotiations to
3 try to resolve the cases. These efforts included participating in a formal, full-day mediation
4 conducted by David Walsh, Esq., a well-regarded mediator experienced in mediating complex
5 labor and employment matters. During all settlement discussions, the parties conducted their
6 negotiations at arm's length in an adversarial position. In the course of mediation and settlement
7 negotiations, the parties exchanged information, documents, and data, and discussed all aspects
8 of the cases, including the risks and delays of further litigation, the risks to the parties of
9 proceeding with class certification and trial, the law relating to class certification, off-the-clock
10 theory, meal and rest periods, representative PAGA claims, and wage-and-hour enforcement, as
11 well as the evidence produced and analyzed, and the possibility of appeals, among other things.
12 Arriving at a settlement that was acceptable to the parties was not easy. Defendant contended
13 that individualized questions of fact predominate over any common issues, and these issues
14 would pose challenges to class certification and representative adjudication. Defendant and its
15 counsel felt strongly about Defendant's ability to prevail on the merits and to avoid class
16 certification and representative adjudication, while Plaintiffs and Class Counsel believed that
17 they would be able to obtain class certification and prevail at trial. With the aid of the mediator's
18 evaluation, the parties ultimately agreed that the cases were well-suited for settlement given the
19 legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the parties that
20 would attend further litigation. These risks of further litigation include, and are not limited to, a
21 determination that the claims are unsuitable for class treatment and/or representative
22 adjudication, class de-certification after certification of a class, allowing a jury to decide the
23 claims asserted in the cases, and the real possibility of no monetary recovery after years of
24 litigation.

25 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
26 attorneys' fees in the amount of \$966,666.67, which is one-third (33.33%) of the Gross
27 Settlement Amount of \$2,900,000.00. Pursuant to the contingency-fee agreement entered into by
28 and between Plaintiffs and Class Counsel, Plaintiffs have each agreed to a contingency fee of at

1 least one-third (33.33%) of the recovery. The attorneys' fees sought are commensurate with:
2 (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense
3 that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel has
4 shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of
5 the settlement that Class Counsel has achieved in the cases; and (6) the other cases that Class
6 Counsel has turned down in order to devote their time and efforts to this matter.

7 10. I am aware that common and acceptable rates for contingency representation in
8 wage and hour class action and representative action litigation are normally in the range of
9 33.3% to 50%.

10 11. While not necessarily required to be demonstrated because the percentage fee is
11 proper for this settlement, Class Counsel has incurred many hours of work in connection with
12 prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar
13 analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **774.50 hours** performing
14 tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney
15 Task and Time Chart that sets forth in detail the nature of the legal services provided by
16 attorneys at Lawyers *for* Justice, PC and the time incurred in performing those services. These
17 hours include work done by myself and several other attorneys at Lawyers *for* Justice, PC. Also,
18 separate from the hours referenced herein, Lawyers *for* Justice, PC had litigation support
19 personnel actively engaged in assisting with the prosecution of this matter.

20 12. The work performed in this particular matter, the background of our firm, as well
21 as the individual backgrounds, training, and experience of the attorneys who worked on this
22 matter, in litigating complex wage-and-hour actions, and in particular, employment class and
23 representative actions, support a reasonable blended hourly rate of compensation of at least \$850
24 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been
25 awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal
26 services performed, by courts granting approval of settlements in other wage-and-hour cases:
27 final approval of the class and representative action settlement in *David Dugan v. TEC*
28 *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; and 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.

ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

13. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have 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, I have previously served as a *pro bono* mediator for the Los Angeles County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

JUDICIAL EXTERNSHIPS

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

LITIGATION AND CLASS ACTION EXPERIENCE

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

///

1 16. At the prominent plaintiff-side law firm, my practice focused on class actions and
2 other complex cases involving toxic torts and products liability. In addition, I gained substantial
3 experience on cases involving insurance bad faith, premises liability, and medical negligence.
4 While employed by the prominent plaintiff-side law firm, I argued approximately 100 motions,
5 took or defended approximately 150 depositions, and prepared dozens of expert witnesses for
6 deposition or trial.

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

16 **EXAMPLES OF RESULTS IN WAGE AND HOUR CLASS ACTION AND**
17 **REPRESENTATIVE ACTION CASES**

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

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

25 b) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against a national retailer of household items involving allegations of
27 misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court
28 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.

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

///

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

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

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

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

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

///

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

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

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

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

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

27 ///

28 ///

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

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

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

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

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

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

28 ///

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

19. 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. Lawyers *for* Justice, PC seeks reimbursement of **\$19,510.47** in litigation costs and expenses incurred in this matter, as reflected in **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

ENHANCEMENT PAYMENTS TO PLAINTIFFS

20. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for Enhancement Payments in the amount of \$12,500.00 each to Plaintiffs Mireya Torres, Idrees Hollis, Christopher Garcia, and Chumani Brown. The requested Enhancement Payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort to produce relevant documents and information, and they provided facts and evidence to support the prosecution of the claims. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would facilitate the pursuit of the cases. Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their work experiences with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs Mireya Torres, Idrees Hollis, Christopher Garcia, and Chumani Brown to receive \$12,500.00 each as reasonable Enhancement Payments, for their services on behalf of the Class Members, PAGA Aggrieved Employees, and the State of California, in addition to their individual settlement payments.

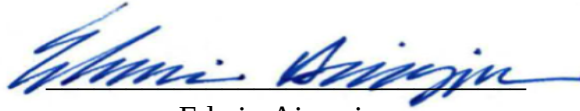
///

///

21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiffs, other Class Members, PAGA 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 18th day of December 2023, at Glendale, California.



Edwin Aiwarzian

EXHIBIT A

MIREYA TORRES, ET AL. V. WILLIAMS LEA, INC.
Los Angeles County Superior Court Case No. 20STCV04508 (“Class Action”)

MIREYA TORRES V. WILLIAMS LEA, INC.
Orange County Superior Court Case No. 30-2020-01149249 (“PAGA Action”)

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	10.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Mireya Torres (“Plaintiff Torres”), Plaintiff Idrees Hollis (“Plaintiff Hollis”), Plaintiff Christopher Garcia (“Plaintiff Garcia”), and Plaintiff Chumani Brown’s (“Plaintiff Brown”) (together, “Plaintiffs”) Claims and the Merits of the Claims of the Putative Class Members	9.50
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Williams Lea, Inc. (“Defendant”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members	9.10
Pre-Lawsuit Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiffs and the Aggrieved Employees	8.20
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Breaks, IWC Wage Orders, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials	8.50

Investigation of Defendant, Its Business Relationships, Clients, Service Offerings, Contracts, and the Industry in which Defendant Operates	5.10
Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	4.50
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	3.60
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	4.10
Research and Investigation Re: Work Site(s), Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	5.80
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other Online Postings 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	13.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	12.50

Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Customer Service, Timekeeping, Scheduling, Attendance, Meetings, Meal/Rest Breaks, On-Premises Breaks, Meal/Rest Premiums, Meal Waivers, Overtime Compensation, Non-Discretionary Bonus/Incentive/Shift Differential Pay, Reporting Time Pay, Dress Code/Work Attire, Footwear, Use of Personal Cell Phones, Use of Personal Vehicles/Mileage/Transportation, and Reimbursement of Business-Related Expenses	18.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant and/or Its Clients Use to Conduct Everyday Business, Including Timekeeping, Client Management, Project Management, Document Management, Information Technology, Communications, 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	4.30
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	7.90
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.80
Research and Preliminarily Outline Briefing Regarding Issues Important to Class Certification and Trial Manageability	36.50
Review and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Class Members' and Aggrieved Employees' Work	11.50
Meet and Communicate with Plaintiff Mireya Torres Throughout the Pendency of the Case	43.50
Meet and Communicate with Plaintiff Idrees Hollis Throughout the Pendency of the Case	38.50
Meet and Communicate with Plaintiff Christopher Garcia Throughout the Pendency of the Case	37.50
Meet and Communicate with Plaintiff Chumani Brown Throughout the Pendency of the Case	39.50

Investigate Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	11.30
Meet, Communicate with, and/or Conduct Interviews of Putative Class Members and/or Percipient Witnesses Regarding Class Certification Issues, e.g., Commonality and Manageability of Trial	12.50
Meet, Communicate with, and/or Conduct Interviews of Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses Regarding Liability	13.90
Meet, Communicate with, and/or Conduct Interviews of Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses Regarding Damages and Penalties Exposure	14.50
Pleadings and Court Filings	
Draft Plaintiff Torres' Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 04, 2020) (Class Action)	7.80
Review Court's Notice of Case Assignment (filed on February 04, 2020) (Class Action)	0.10
Review Court's Minute Order and Initial Status Conference Order (Complex Litigation Program) (filed on February 21, 2020) (Class Action)	0.20
Review Court's Minute Order (filed on April 14, 2020) (Class Action)	0.10
Review Defendant's Notice of Appearance (served on June 16, 2020) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Class Action Response Statement (filed on June 19, 2020) (Class Action)	1.70
Review Court's Minute Order and Order Authorizing Electronic Service (filed on June 26, 2020) (Class Action)	0.10
Draft Plaintiff Torres' Notice of Order Authorizing Electronic Service (filed on July 1, 2020) (Class Action)	0.30

Draft Plaintiff Torres' Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on July 17, 2020) (PAGA Action)	6.50
Review and Analyze Defendant's Answer to Complaint for Enforcement and Research Allegations and Affirmative Defenses in Defendant's Answer (served on July 27, 2020) (PAGA Action)	1.70
Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Research Allegations and Affirmative Defenses in Defendant's Answer (served on July 27, 2020) (Class Action)	1.50
Review Court's Minute Order (filed on September 11, 2020) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Further Extend Defendant Williams Lea, Inc.'s Time to File Responsive Pleading to Plaintiff Torres' Complaint; [Proposed] Order (submitted on February 18, 2021) (PAGA Action)	1.80
Review Court's Order Extending Defendant Williams Lea, Inc.'s Time to File Responsive Pleading to Plaintiff Torres' Complaint (filed on February 19, 2021) (PAGA Action)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on February 23, 2021) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Further Extend Defendant Williams Lea, Inc.'s Time to File Responsive Pleading to Plaintiff Torres' Complaint; [Proposed] Order (submitted on July 16, 2021) (PAGA Action)	1.20
Review Court's Order Extending Defendant Williams Lea, Inc.'s Time to File Responsive Pleading to Plaintiff Torres' Complaint (filed on July 22, 2021) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Vacate Motion for Class Certification Deadline; [Proposed] Order (submitted on July 19, 2021) (Class Action)	1.40
Review Court's Order Continuing Motion for Class Certification Deadline (filed on July 26, 2021) (Class Action)	0.10

Draft Plaintiff's Notice of Entry of Judgment or Order (filed July 28, 2021) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Further Extend Defendant Williams Lea, Inc.'s Time to File Responsive Pleading to Plaintiff Torres' Complaint; [Proposed] Order (submitted on September 30, 2021) (PAGA Action)	1.30
Review Court's Order Extending Defendant Williams Lea, Inc.'s Time to File Responsive Pleading to Plaintiff's Complaint (filed on October 13, 2021) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Further Extend Defendant Williams Lea, Inc.'s Time to File Responsive Pleading to Plaintiff Torres' Complaint; [Proposed] Order (submitted on November 15, 2021) (PAGA Action)	1.20
Review Court's Order Extending Defendant Williams Lea, Inc.'s Time to File Responsive Pleading to Plaintiff Torres' Complaint (filed on November 16, 2021) (PAGA Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed July 28, 2021) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Notice of Settlement and Stipulation to Vacate Motion for Class Certification Deadline; [Proposed] Order (submitted on February 8, 2022) (Class Action)	1.20
Review Court's Order Granting Stipulation to Vacate Motion for Class Certification Deadline (filed on February 16, 2022) (Class Action)	0.10
Research and Draft Plaintiff's Notice of Entry of Judgment (filed on February 17, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report (filed on March 16, 2022) (PAGA Action)	1.30
Review Court's Minute Order (filed on March 22, 2022) (PAGA Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Non-Appearence Case Review Re: Filing of Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on May 19, 2022) (Class Action)	1.10
Review Court's Order Continuing Non-Appearence Case Review Re: Filing of Motion for Preliminary Approval (filed on May 20, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report (filed on July 7, 2022) (PAGA Action)	1.10
Review Court's Minute Order (filed on July 12, 2022) (PAGA Action)	0.10
Draft Plaintiffs' First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on July 29, 2022); and Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order Granting Plaintiff Leave to File a First Amended Complaint (submitted on July 19, 2022) (Class Action)	4.50
Review Court's Order Granting Plaintiff Torres' Leave to File a First Amended Complaint (filed on July 20, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Non-Appearence Case Review Re: Filing of Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on July 20, 2022) (Class Action)	1.10
Review Court's Order Continuing Non-Appearence Case Review Re: Filing of Motion for Preliminary Approval (filed on July 20, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Non-Appearence Case Review Re: Filing of Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on August 3, 2022) (Class Action)	1.10

Review Court's Order Continuing Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval (filed on August 15, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report (filed on October 7, 2022) (PAGA Action)	1.10
Review Court's Notice of Case Reassignment (filed on October 5, 2022) (PAGA Action)	0.10
Review Court's Minute Order (filed on October 18, 2022) (PAGA Action)	0.10
Review Court's Notice Re: Continuance of Hearing and Order (filed on December 6, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report (filed on January 13, 2022) (PAGA Action)	1.10
Review Court's Minute Order (filed on January 17, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiffs' Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on June 6, 2023) (Class Action)	1.30
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report (filed on July 5, 2022) (PAGA Action)	1.10
Review Court's Minute Order (filed on July 6, 2023) (Class Action)	0.10
Draft Plaintiffs' Notice Regarding July 6, 2023 Minute Order (filed July 7, 2023) (Class Action)	0.10
Appearances	
Prepare for and Remotely Attend Initial Status Conference (June 26, 2020) (Class Action)	1.10
Prepare for Case Review/Hearing Re: Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (July 6, 2023) (Class Action)	2.50

Prepare for and Remotely Attend Case Management Conference (July 12, 2023) (Class Action)	0.80
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Class Counsel's Fees and Costs, and Enhancement Payments (January 18, 2024) (Class Action) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Mireya Torres (served on December 19, 2019)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Mireya Torres (served on January 14, 2020)	5.10
Review Defendant's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), and Requests for Production of Documents to Plaintiff Torres (Set One) (served on September 22, 2020)	0.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Chumani Brown (served on September 24, 2020)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Idrees Hollis (served on December 1, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Christopher Garcia (served on December 10, 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 Chumani Brown (served on January 21, 2022)	2.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Christopher Garcia (served on February 1, 2021)	3.10

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Idrees Hollis (served on February 1, 2021)	2.10
Draft Plaintiffs' Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Requests for Production of Documents (Set One) to Defendant (served on January 6, 2022)	6.50
Review and Analyze Defendant's Responses to Requests for Production of Documents (Set One), Special Interrogatories (Set One), and Special Interrogatories (Set Two) and Research Objections in Defendants' Responses (served on March 14, 2022)	4.30
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Mireya Torres for Penalties Under California Labor Code Section 2698, <i>Et Seq.</i> (served on May 12, 2020) (PAGA Action)	4.50
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Idrees Hollis for Penalties Under California Labor Code Section 2698, <i>Et Seq.</i> (served on March 16, 2022) (Class Action)	4.50
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Christopher Garcia for Penalties Under California Labor Code Section 2698, <i>Et Seq.</i> (served on March 16, 2022) (Class Action)	4.50
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Chumani Brown for Penalties Under California Labor Code Section 2698, <i>Et Seq.</i> (served on March 16, 2022) (Class Action)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	25.50

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant (in excess of 37,316 pages), and Other Sources Prior to Mediation (Class Action)	105.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, Performing Damages and Penalties Analysis and Calculations, and Preparing PowerPoint Presentation (submitted on September 16, 2021) (Class Action)	41.50
Attend Mediation Session (September 16, 2021; Zoom Video Conference) (Class Action)	13.50
Additional Settlement Negotiations and Discussions with Mediator and Defendant's Counsel (September 28, 2021 - November 16, 2021)	12.50
Review and Analyze Mediator's Proposal (issued November 16, 2021; accepted December 16, 2023)	3.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement (executed on August 3, 2022) and Notice of Class Action Settlement (Class Action)	17.50
Draft, Review, Revise, Negotiate, and Finalize First Amended Joint Stipulation of Class Action and PAGA Settlement (executed on June 28, 2023) and Notice of Class Action Settlement (Class Action)	3.50
Law and Motion	
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Ovsanna Takvoryan in Support Thereof, Declaration of Chumani Brown in Support Thereof, Declaration of Christopher Garcia in Support Thereof, Declaration of Idrees Hollis in Support Thereof, Declaration of Mireya Torres in Support Thereof, and [Proposed] Order Thereon (filed on September 22, 2022) (Class Action)	20.50
Review and Analyze Court's Order and Checklist for Preliminary Approval of Class Action Settlement (filed on January 23, 2023) (Class Action)	0.70

Research and Draft Plaintiffs' Supplemental Brief in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, Declaration of Yasmin Hosseini in Support Thereof, Supplemental Declaration of Chumani Brown in Support Thereof, Supplemental Declaration of Christopher Garcia in Support Thereof, Supplemental Declaration of Idrees Hollis in Support Thereof, Supplemental Declaration of Mireya Torres in Support Thereof, Declaration of Shaun J. Voigt Re: Plaintiffs' Motion for Preliminary Approval, and [Revised Proposed] Order Thereof (filed on June 28, 2023) (Class Action)	14.50
Review Court's Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on July 24, 2023)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Class Counsel's Fees and Costs, and Enhancement Payments, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (Class Action) (filed on December 18, 2023) (Anticipated)	23.50
Total Hours:	774.50

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Torres v. Williams Lea, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/19/2019	U.S. Postmaster	Postage	6.85
2/4/2020	Los Angeles Superior Court	Complaint Filing Fee	435.00
2/4/2020	Los Angeles Superior Court	Complex Fee	1,000.00
2/13/2020	Legal Document Server, Inc.	Attorney Service	110.00
4/25/2020	FedEx Express	Courier Service	16.37
6/18/2020	CourtCall LLC	Attorney Service	94.00
6/18/2020	Legal Document Server, Inc.	Attorney Service	110.00
6/19/2020	General Logisitcs Systems US, Inc.	Courier Service	34.70
6/19/2020	Legal Document Server, Inc.	Attorney Service	110.00
7/1/2020	General Logisitcs Systems US, Inc.	Courier Service	27.93
7/1/2020	Legal Document Server, Inc.	Attorney Service	175.00
8/27/2020	General Logisitcs Systems US, Inc.	Courier Service	16.07
9/24/2020	U.S. Postmaster	Postage	7.00
11/24/2020	U.S. Postmaster	Postage	7.00
12/31/2020	U.S. Postmaster	Postage	7.00
2/24/2021	U.S. Postmaster	Postage	7.00
7/19/2021	Legal Document Server, Inc.	Attorney Service	175.70
7/19/2021	Los Angeles Superior Court	Stipulation Fee	20.00
7/29/2021	Legal Document Server, Inc.	Attorney Service	175.00
9/3/2021	Paul Hastings LLP	Mediation Fee	12,500.00
10/5/2021	Case Anywhere LLC	Attorney Service	132.00
12/1/2021	U.S. Postmaster	Postage	7.33
12/10/2021	U.S. Postmaster	Postage	7.38
1/5/2022	Case Anywhere LLC	Attorney Service	120.00
1/6/2022	General Logisitcs Systems US, Inc.	Courier Service	21.17
2/8/2022	Legal Document Server, Inc.	Attorney Service	16.15
2/8/2022	Los Angeles Superior Court	Stipulation Fee	20.00
2/17/2022	Legal Document Server, Inc.	Attorney Service	15.20
2/17/2022	Los Angeles Superior Court	Document Download Fee	5.00
4/9/2022	Case Anywhere LLC	Attorney Service	132.00
5/2/2022	Los Angeles Superior Court	Document Download Fee	5.00
5/19/2022	Legal Document Server, Inc.	Attorney Service	16.55
5/19/2022	Los Angeles Superior Court	Stipulation Fee	20.00
7/7/2022	Case Anywhere LLC	Attorney Service	126.00
7/20/2022	Legal Document Server, Inc.	Attorney Service	34.60
7/20/2022	Legal Document Server, Inc.	Stipulation Fee	40.00
8/1/2022	Legal Document Server, Inc.	Attorney Service	15.95
8/4/2022	Legal Document Server, Inc.	Attorney Service	17.30
8/4/2022	Los Angeles Superior Court	Stipulation Fee	20.00
9/22/2022	Legal Document Server, Inc.	Attorney Service	20.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Torres v. Williams Lea, Inc.

9/22/2022	Los Angeles Superior Court	Motion Fee	60.00
9/26/2022	Legal Document Server, Inc.	Attorney Service	186.50
10/9/2022	Case Anywhere LLC	Attorney Service	192.00
12/7/2022	Los Angeles Superior Court	Document Download Fee	2.00
1/9/2023	Case Anywhere LLC	Attorney Service	120.00
4/16/2023	Case Anywhere LLC	Attorney Service	120.00
6/6/2023	Legal Document Server, Inc.	Attorney Service	17.54
6/6/2023	Los Angeles Superior Court	Stipulation Fee	20.00
6/29/2023	Legal Document Server, Inc.	Attorney Service	16.15
7/3/2023	Case Anywhere LLC	Attorney Service	132.00
7/7/2023	Legal Document Server, Inc.	Attorney Service	16.15
7/14/2023	Legal Document Server, Inc.	Attorney Service	161.15
7/31/2023	Legal Document Server, Inc.	Attorney Service	16.15
10/5/2023	Case Anywhere LLC	Attorney Service	126.00
Total:			<u>17,011.89</u>

LAWYERS for JUSTICE PC CASE COST DETAIL
Torres v. Williams Lea, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/12/2020	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
5/12/2020	U.S. Postmaster	Postage	14.60
7/17/2020	Legal Document Server, Inc.	Attorney Service	63.48
7/17/2020	Orange County Superior Court	Complaint Fee	435.00
7/17/2020	Orange County Superior Court	Complex Fee	1,000.00
7/20/2020	Legal Document Server, Inc.	Attorney Service	13.25
7/28/2020	Legal Document Server, Inc.	Attorney Service	110.00
9/1/2020	Legal Document Server, Inc.	Attorney Service	13.25
10/7/2020	Case Anywhere LLC	Attorney Service	118.80
1/8/2021	Case Anywhere LLC	Attorney Service	120.00
2/23/2021	Legal Document Server, Inc.	Attorney Service	18.50
2/23/2021	Orange County Superior Court	Jury Fee	150.00
4/3/2021	Case Anywhere LLC	Attorney Service	120.00
7/2/2021	Case Anywhere LLC	Attorney Service	120.00
11/18/2021	Legal Document Server, Inc.	Attorney Service	13.25
3/16/2022	Legal Document Server, Inc.	Attorney Service	13.25
3/22/2022	Orange County Superior Court	Document Download Fee	7.50
7/7/2022	Legal Document Server, Inc.	Attorney Service	14.00
7/13/2022	Orange County Superior Court	Document Download Fee	7.50
10/7/2022	Legal Document Server, Inc.	Attorney Service	14.00
10/19/2022	Orange County Superior Court	Document Download Fee	7.50
1/13/2023	Legal Document Server, Inc.	Attorney Service	14.00
1/18/2023	Orange County Superior Court	Document Download Fee	7.50
2/28/2023	Legal Document Server, Inc.	Attorney Service	14.00
7/5/2023	Legal Document Server, Inc.	Attorney Service	14.20
Total:			<u>2,498.58</u>