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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

NATALI AMAYA, individually, and on behalf of
other members of the general public similarly
situated;

Plaintiff,

vs.

LIBERTY RESIDENTIAL SERVICES, INC., a
Pennsylvania corporation; LIBERTY
HEALTHCARE CORPORATION, an unknown
business entity; LIBERTY HEALTHCARE OF
CALIFORNIA, INC., a California corporation
previously identified as fictitious DOE 1; and
DOES 2 through 100, inclusive,

Defendants.

Case No. 37-2022-00014913-CU-OE-CTL
(LEAD CASE)

Consolidated with Case No.: 37-2022-00018859-
CU-OT-CTL (PAGA Action)

**DECLARATION OF BRIAN J. ST. JOHN,
ESQ. IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT AND MOTION FOR CLASS
COUNSEL AWARD AND CLASS
REPRESENTATIVE SERVICE AWARD**

Date: May 29, 2026
Time: 8:30 a.m.

Judge: Hon. Mark T. Cumba
Dept.: C-65

DECLARATION OF BRIAN J. ST. JOHN

I, Brian J. St. John., 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, co-counsel of record for Plaintiff NATALI AMAYA (“Plaintiff”) and the Class in the above-captioned wage and hour class action (“Action”) filed against LIBERTY RESIDENTIAL SERVICES, INC., LIBERTY HEALTHCARE CORPORATION, and LIBERTY HEALTHCARE OF CALIFORNIA, INC. (“Defendants”) 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 thereto.

OVERVIEW OF THE LITIGATION

2. Several attorneys at Lawyers *for* Justice, PC engaged in the litigation of this matter of this matter from the inception of the above-captioned action, which was commenced by Plaintiff on April 21, 2022, and the inception of representative PAGA action, entitled *Natali Amaya v. Liberty Residential Services, Inc.*, San Diego Superior Court Case No. 37-2022-00018859-CU-OE-CTL, which was commenced by Plaintiff on May 18, 2022. Since joining forces with and associating Zakay Law Group, APLC and JCL Law Firm, APC as co-counsel (collectively, Lawyers *for* Justice, PC, Zakay Law Group, APLC and JCL Law Firm, APC are referred to as “Class Counsel”), we have worked closely with them to prosecute the matter, 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.

3. Before initiating the matter, Lawyers *for* Justice, PC conducted extensive investigation and research into the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiff, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, Plaintiff's claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiff were well-suited for class-wide adjudication owing to what

1 appeared to be a common course of conduct affecting a similarly situated group of current and
2 former hourly-paid or non-exempt employees who worked for Defendants in the State of
3 California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant
4 meal and rest periods, and business expenses.

5 4. Collectively, Class Counsel conducted significant litigation and informal discovery
6 and investigation into the facts of the matter, to assess the veracity, strength, and scope of the
7 claims, and were preparing the matter for class certification and trial prior to reaching the
8 Settlement. The Parties exchanged a large volume of information, documents, and data throughout
9 the course of the litigation of the matter and in connection with mediation and settlement
10 negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff
11 and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents
12 obtained from Plaintiff, Defendants, and other sources. Class Counsel also developed liability,
13 damages, violation, and penalties valuation models in the course of litigation and in connection
14 with mediation and settlement negotiations, and met and conferred with Defendants' counsel on
15 numerous occasions, e.g., to discuss issues relating to the pleadings, case management, informal
16 discovery, production of information, documents, and data in the course of litigation and in
17 connection with mediation and settlement negotiations, and settlement. Other work that Class
18 Counsel performed included, and was not limited to, case strategy and analysis; drafting, reviewing,
19 and revising the pleadings and motion-related papers, and settlement-related papers; case
20 management; claims assessment and evaluation; and preparing for and attending court proceedings
21 and mediation and settlement negotiations.

22 5. As outlined herein, the parties have conducted significant investigations and informal
23 discovery during the course of litigating this matter. Class Counsel analyzed a volume of
24 information, documents, and data obtained from Plaintiff, Defendants, and other sources. This
25 information, documents, and data provided a critical understanding of the nature of the work
26 performed by class members and aggrieved employees, as well as Defendants' operations and
27 employment policies, practices, and procedures, and were used in analyzing liability, damages, and
28 penalties valuation issues in connection with all phases of the litigation, and ultimately, in

1 connection with the mediation and settlement negotiation process. Accordingly, sufficient
2 investigation and review of information has taken place in order for the parties to be sufficiently
3 informed of the nature and extent of the claims, and to enable all parties to fully evaluate the
4 settlement for its fairness, adequacy, and reasonableness.

5 6. After conducting significant investigation of the facts and law during the prosecution
6 of the actions, counsel for the parties engaged in extensive settlement negotiations to try to resolve
7 the matter. These efforts included participating in a mediation session conducted by David
8 Rotman, Esq., a well-regarded mediator experienced in handling complex labor and employment
9 matters. Following the Parties' agreement to mediate the action, Defendants agreed to informally
10 produce documents and data points subject to the mediation privilege, including but not limited to
11 a sample of class time and payroll records, class statistics and datapoints, as well as written policies,
12 practices, and procedures documents.

13 7. On April 12, 2024, the Parties participated in an all-day mediation presided over by
14 David Rotman, Esq., however the Parties did not reach a settlement at that time. The Parties
15 continued to engage in settlement negotiations with the mediator's assistance. With the aid of the
16 mediator's evaluation, and through their continued settlement negotiation efforts, the Parties
17 ultimately reached a settlement by accepting the mediator's proposal and eventually executed a
18 Memorandum of Understanding. The Parties then negotiated and executed a long-form settlement
19 agreement, which is the subject of the instant motion.

20 **THE SETTLEMENT IS FAIR, REASONABLE AND ADEQUATE**

21 8. As detailed in the motion for preliminary approval, Class Counsel thoroughly
22 investigated the proposed Class Members' claims, applicable law, and potential defenses.
23 Specifically, Class Counsel assessed the value of the class claims using data and documents
24 provided by Defendants in informal discovery. Class Counsel obtained a sample of class time and
25 payroll records, class statistics and datapoints, as well as written policies, practices, and procedures
26 documents. Class Counsel's investigation, research, experience, and damage models informed and
27 guided the mediated negotiations that resulted in this settlement.

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1 9. The Settlement is the product of a mediation session with a respected mediator and
2 negotiations over the terms of the Settlement. The negotiations were adversarial, conducted at
3 arm's length and tempered by the efforts of both sides to serve the interests of their clients.

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

5 10. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
6 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
7 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is
8 attorney of record in dozens of employment-related putative class actions and/or representative
9 actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is
10 comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys
11 General Act ("PAGA") representative actions. Lawyers *for* Justice has successfully litigated cases
12 involving executive, administrative, and other overtime exemptions to the State of California and
13 federal overtime compensation requirements. Lawyers *for* Justice, PC, sometimes in association
14 with other law firms, has recovered millions of dollars on behalf of thousands of individuals in
15 California.

16 11. Edwin Aiwazian is a Managing Member and Shareholder of Lawyers *for* Justice, PC.
17 He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned
18 a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive
19 formal training in dispute resolution and negotiation from the Straus Institute for Dispute
20 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
21 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October
22 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During
23 the summer of 2000, he studied Legal Writing at Harvard University. From approximately
24 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable
25 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From
26 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the
27 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
28 In December of 2004, he obtained a license to practice law from the California State Bar. Since in

1 or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively
2 focused on the prosecution of consumer and employment class actions. While employed by
3 Lawyers *for* Justice PC, he has argued over 100 motions, taken or defended over 150 depositions,
4 prepared dozens of expert witnesses for deposition or trial, and attended over 175 mediations.
5 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has
6 successfully litigated cases involving the executive, administrative, and other overtime exemptions
7 to the State of California and federal overtime compensation requirements. Under his supervision,
8 Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice
9 in approximately 16 cases in the last decade and litigated over 1,000 class action or representative
10 action cases.

11 12. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
12 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
13 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
14 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
15 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
16 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
17 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
18 He was admitted to practice law in California in 2010. He is admitted to practice before all courts
19 of the State of California and all United States District Courts in the State of California. He has
20 worked on many wage-and-hour class action and representative action cases, taking the lead in
21 taking and defending depositions, arguing motions, and attending mediations. He has played an
22 integral role in preparing matters for class certification, including and not limited to, successful
23 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
24 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
25 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
26 RG13680477). Under his supervision, dozens of class action or representative cases have resulted
27 in settlements that have been granted court approval. He has handled over 150 mediations and
28 worked on over 250 class action or representative action cases which have resulted in settlement.

1 13. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
2 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science
3 degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown
4 University Law Center in 2010. She is admitted to practice in California (since 2010) and in New
5 York (since 2013) and is admitted to practice in all U.S. District Courts in California, the U.S.
6 Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken
7 and defended dozens of depositions and successfully handled motion practice in class action cases
8 regarding discovery (including and not limited to, regarding class contact information), class
9 certification (both contested class certification and stipulated class certification), arbitration
10 agreements, coordination, and intervention. She has successfully handled briefing and oral
11 argument on appeal and obtained notable decisions regarding the Private Attorneys General Act
12 and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply* (Cal. Ct.
13 App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec.
14 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has significant experience with
15 class actions, including and not limited to working on cases to obtain class certification through
16 contested motion practice and working on cases in the post-certification stage (e.g., post-
17 certification discovery, appeal, statistical sampling and pilot study, and trial preparation in
18 conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600
19 individuals). She also has extensive experience with class action and/or representative action
20 settlements, and has handled this process in over 500 cases. Under Edwin Aiwazian, Arby
21 Aiwazian, and her supervision, Lawyers *for* Justice, PC has handled the class certification and court
22 approval process for hundreds of class action and/or representative action matters that have
23 successfully resolved. She is a member of the California Employment Lawyers Association and,
24 on several occasions, has been a speaker regarding topics in wage and hour law at the organization's
25 continuing legal education events.

26 14. I am a member of Lawyers *for* Justice, PC. I received my Bachelor's degree from the
27 University of California, San Diego in 2010 and earned my Juris Doctor degree from the University
28 of California, Berkeley, School of Law in 2013. I was admitted to practice law in California in

1 2015. I am admitted to practice before all courts of the State of California and all federal district
2 courts in the State of California. I have worked on many wage and hour class action and PAGA
3 representative matters, and my work has included, *inter alia*, researching and drafting pleadings,
4 administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement
5 agreements, engaging in motion practice, claims evaluation and analysis, and making court
6 appearances. Prior to working at Lawyers *for* Justice, PC, I spent several years working for a
7 boutique employment and labor law firm representing employers, and, in 2019 and 2020, I was
8 employed as general counsel for a DMHC licenses discount dental plan.

9 **EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND**
10 **REPRESENTATIVE ACTION CASES**

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

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

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

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

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

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

11 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
12 wage-and-hour class and PAGA representative action against a national wholesale distributor of
13 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
14 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
15 representative action settlement. The Sacramento County Superior Court Case Number is 34-2012-
16 00136285.

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

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

27 i) LFJ, in association with co-counsel therein, represented the plaintiff in a
28 wage-and-hour class and PAGA representative action involving allegations of misclassification of

1 the salaried residential “Property Manager” position. On September 17, 2015, the court granted
2 plaintiff’s motion for class certification. On October 20, 2017, the court granted final approval of
3 the class and PAGA representative action settlement. The Los Angeles County Superior Court Case
4 Number is BC474784.

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

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

15 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
16 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
17 involving allegations of misclassification of the “Department Manager” position. On August 12,
18 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class. On
19 August 6, 2019, the court granted final approval of the class action settlement. The Alameda County
20 Superior Court Case Number is RG13680477.

21 m) LFJ represented the plaintiff in a PAGA representative action against a real
22 estate and property management company, on behalf of non-exempt employees. On November 4,
23 2016, the court granted approval of the PAGA representative action settlement. The Orange County
24 Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

25 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of non-
27 exempt employees. On November 18, 2016, the court granted final approval of the class and PAGA
28

1 representative action settlement. The San Francisco County Superior Court Case Number is CJC-
2 13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

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

7 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
8 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the
9 employer's motion to compel arbitration, which resulted in a published opinion by the California
10 Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall Supply* (Cal. App.
11 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S. Supreme Court Docket
12 No. 17-254). The Riverside County Superior Court Case Numbers are RIC1503952 and
13 RICJCCP5046, and the Judicial Council Coordination Proceeding Number is 5046.

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

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

24 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
25 wage-and-hour class and PAGA representative action against a lumber and hardware company on
26 behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class
27 and PAGA representative action settlement. The Orange County Superior Court Case Number is
28 30-2014-00747750-CU-OE-CXC.

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

5 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
6 representative action against a food company on behalf of non-exempt employees. On June 30,
7 2017, the court granted final approval of the class and PAGA representative action settlement. The
8 Sacramento County Superior Court Case Number is 34-2015-00175871.

9 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
10 representative action against a chocolate company on behalf of non-exempt employees. On July 19,
11 2017, the court granted final approval of the class and PAGA representative action settlement. The
12 Alameda County Superior Court Case Number is RG15764300.

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

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

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

27 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class and PAGA representative action against a property management company on

1 behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
2 approval of the class and PAGA representative action settlement. The Los Angeles County Superior
3 Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding Number is
4 4819.

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

10 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-
11 and-hour class action against a container manufacturer, on behalf of non-exempt employees. On
12 October 15, 2018, the court granted the plaintiff's motion for class certification. On March 20, 2023,
13 the court granted final approval of the class action settlement. The Tulare County Superior Court
14 Case Number is VCU264528.

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

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

25 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-
26 and-hour class action against a parking company on behalf of non-exempt employees. On
27 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a
28 class. On November 7, 2024, the court granted final approval of the class action settlement. The

1 Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial Council
2 Coordination Proceeding Number is 4886.

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

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

14 hh) LFJ, in association with co-counsel therein, represented the plaintiff in a
15 wage-and-hour class and PAGA representative action against a medical equipment supplier on
16 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
17 for class certification and certified a class. On November 2, 2023, the court granted final approval
18 of the class and PAGA representative action settlement. The San Bernardino County Superior Court
19 Case Number is CIVDS1505744.

20 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
21 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and
22 argued an appeal with respect to the employer's motion to compel arbitration, resulting in a notable
23 decision from the California Supreme Court clarifying the law regarding PAGA claims, *ZB, N.A. v.*
24 *Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval of the
25 PAGA representative action settlement. The San Diego County Superior Court Case Number is 37-
26 2016-00005578-CU-OE-CTL.

27 jj) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-
28 and-hour class and PAGA representative action against a large national drug testing laboratory on

1 behalf of non-exempt employees. On February 21, 2020, the court granted the plaintiff's motion
2 for class certification and certified a class. On October 28, 2022, the court granted final approval
3 of the class and PAGA representative action settlement. The San Diego County Superior Court
4 Case Number is 37-2018-00019611-CU-OE-CTL.

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

11 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
12 wage-and-hour class and PAGA representative action against a plastic packaging company on
13 behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs' motion
14 for class certification and certified a class. On November 8, 2021, the court granted approval of the
15 partial settlement of the action. On April 22, 2024, the court granted approval of the PAGA
16 settlement and entered an order dismissing the action. The San Bernardino County Superior Court
17 Case Number is CIVDS1507361.

18 mm) LFJ in association with co-counsel therein, represented the plaintiffs in a
19 wage-and-hour class action against manufacturer and supplier of power products and services on
20 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
21 for class certification and certified a class. On August 27, 2021, the court granted final approval of
22 the class action settlement. The San Diego County Superior Court Case Number is 37-2015-
23 00025968-CU-OE-CTL.

24 nn) LFJ represented the plaintiff in a wage-and-hour class action against a
25 nutritional products manufacturer on behalf of non-exempt production line employees. On
26 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
27 certified a class. On January 16, 2024, the court granted final approval of the class and PAGA
28 representative action settlement. The Solano County Superior Court Case Number is FCS051001.

oo) LFI 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. On June 2, 2025, the court granted final approval of the class action settlement and entered an order dismissing the action. The Los Angeles County Superior Court Case Number is BC707670.

pp) LFJ represents the plaintiffs in a wage-and-hour class action against a chain of restaurants on behalf of non-exempt employees. On July 22, 2024, the court granted in part the plaintiffs' motion for class certification and certified a class. The San Francisco Superior Court Case Number is CGC-20-582809.

ATTORNEYS' FEES

16. Attorneys at Lawyers *for* Justice, PC have spent a total of **215.60 hours** performing tasks to obtain a recovery on behalf of Plaintiff, Class Members, Aggrieved Employees, and the State of California. Attached hereto as “**EXHIBIT A**” is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred in performing those services. These hours include work done by several attorneys at the firm. Also, separate from the hours references herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of the case.

17. The work performed in this particular matter, the background of Lawyers *for* Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate of at least \$850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and/or 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.

1 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved
2 compensation at the rate of \$936.47 per hour; final approval of the class and representative action
3 settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No.
4 BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation
5 at the rate of \$919.57 per hour; and final approval of the class and representative action settlement
6 in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was
7 granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of
8 \$855.96 per hour.

9 18. Using a blended hourly rate of \$850 per hour for the 215.60 hours of services
10 performed by Lawyers for Justice, PC, Lawyers for Justice, PC's base lodestar to date is
11 approximately \$183,260.00.

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

14 19. To date, Class Counsel have borne all of the risks and costs of litigation and will not
15 receive any compensation until a recovery is obtained in this matter. Lawyers for Justice, PC seeks
16 reimbursement of \$29,044.44 in litigation costs and expenses incurred in the case, as reflected in
17 "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in the prosecution
18 of the matter and to obtain the Settlement and, thus, should be reimbursed.

19 20. I submit that the settlement is fair, reasonable, and adequate, and in the best interests
20 of Plaintiff, the Class, Aggrieved Employees, and the State of California.

21
22 I declare under penalty of perjury under the laws of the State of California that the foregoing
23 is true and correct.

24 Executed this 29th day of April 2026, at Glendale, California.

25 

26 _____
27 Brian J. St. John
28

EXHIBIT A

NATALI AMAYA V. LIBERTY RESIDENTIAL SERVICES, INC., ET AL.

San Diego County Superior Court Case No. 37-2022-00014913-CU-OE-CTL (“Class Action”)/United States District Court for the Southern District of California Case No. 3:22-CV-859-JML (“Federal Action”)

NATALI AMAYA V. LIBERTY RESIDENTIAL SERVICES, INC., ET AL.

San Diego County Superior Court Case No. 37-2022-00018859-CU-OE-CTL (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Natali Amaya (“Plaintiff”)	11.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	8.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Claims, Conduct Legal Research and Analysis Regarding Class Claims, and Draft, Review, and/or Revise Plaintiff’s Class Action Complaint for Damages (filed on April 21, 2022) (Class Action)	7.50
Review Court’s Notice of Case Assignment and Case Management Conference (Civil) (filed on April 22, 2022) (Class Action)	0.30
Draft, Review, and/or Revise Plaintiff’s Peremptory Challenge (filed on April 25, 2022) (Class Action)	0.30
Review Court’s Notice of Case Reassignment and Notice of Hearing (filed on April 26, 2022) (Class Action)	0.20
Investigate the Merits of Plaintiff’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff’s	6.90

Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on May 18, 2022) (PAGA Action)	
Review Court's Notice of Case Assignment and Case Management Conference (filed on May 19, 2022) (PAGA Action)	0.20
Review and Analyze Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Answer to Plaintiff's Class Action Complaint for Damages, and Research Affirmative Defenses in Defendants' Answer (served on June 10, 2022) (Class Action)	1.50
Review Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Notice to Adverse Parties and The Superior Court of Removal of Action (served on June 10, 2022) (Class Action)	0.10
Review and Analyze Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Answer to Plaintiff's Complaint (served on June 10, 2022), and Research Affirmative Defenses (Federal Action)	0.20
Review Defendant Liberty Residential Services, Inc.'s Notice of Party with Financial Interest (Corporate Disclosure Statement) Pursuant to FRCP 7.1 and Local Rule 40.2 (served on June 10, 2022) (Federal Action)	0.20
Review Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Amended Notice to Adverse Parties and The Superior Court of Removal of Action (Amended to Include Federal Conformed Copies) (served on June 13, 2022) (Class Action)	0.80
Review Federal Court's Notice and Order for Early Neutral Evaluation and Case Management Video Conference (filed on June 14, 2022) (Federal Action)	0.20
Review and Analyze Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Answer to Plaintiff's Complaint (served on June 23, 2022) and Research Affirmative Defenses to Defendants' Answer (PAGA Action)	1.30
Review Federal Court's Minute Order of Recusal (filed on June 24, 2022) (Federal Action)	0.30
Review Federal Court's Minute Order of Recusal (filed on June 27, 2022) (Federal Action)	0.30
Review Court's Application and Order Correcting Court Record (filed on June 27, 2022) (Class Action)	0.20

Review Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Notice of Change of Address (served on June 29, 2022) (Federal Action)	0.10
Review Federal Court's Order Vacating Early Neutral Evaluation and Case Management Conference (filed on July 19, 2022) (Federal Action)	0.20
Review Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Substitution of Attorney (Civil) (served on August 12, 2022) (Class Action)	0.20
Review Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Substitution of Attorney (Civil) (served on August 12, 2022) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on October 6, 2022) (PAGA Action)	0.90
Review Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Case Management Statement (served on October 17, 2022) (PAGA Action)	0.30
Review Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Notice of Posting of Jury Fee Deposit (served on October 20, 2022) (Class Action)	0.10
Review Court's Minute Order, Notice of Hearing, and Notice of Case Reassignment (filed on October 21, 2022) (PAGA Action)	0.30
Meet and Confer with Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Consolidate Case Number 37-2022-00014913-CU-OE CTL and 37-2022-00018859-CU-OE-CTL; [Proposed] Order Thereon (submitted on October 19, 2022) (Class Action)	1.60
Review Court's Order to Consolidate Case Number 37-2022-00014913-CU-OE CTL and 37-2022-00018859-CU-OE-CTL (filed on October 24, 2022) (Class Action)	0.20
Review Court's Notice of Hearing (Filed on October 26, 2022) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on November 7, 2022) (Class Action)	0.10

Review Court's Notice of Rescheduled Hearing (filed on April 26, 2023) (Class Action)	0.10
Meet and Confer with Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on July 20, 2023) (Class Action)	1.30
Review Court's Order to Continue Case Management Conference (filed on July 21, 2023) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on July 25, 2023) (Class Action)	0.90
Review Court's Notice of Rescheduled Hearing (filed on July 25, 2023) (Class Action)	0.10
Review Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Substitution of Attorney – Civil (served on September 21, 2023) (Class & PAGA Action)	0.20
Review Court's Notice of Case Reassignment (filed on October 21, 2023) (Class Action)	0.20
Review Court's Notice of Case Reassignment (filed on October 21, 2023) (PAGA Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on April 19, 2024) (Class Action)	0.10
Review Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Notice of Continued Case Management Conference (served on April 22, 2024) (Class Action)	0.10
Draft, Review, and/or Revise Notice of Association of Counsel (filed on August 27, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Case Management Conference Statement (filed on September 26, 2024) (Class Action)	0.20
Meet and Confer with Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Counsel, and Draft, Review, and/or Revise Stipulation and [Proposed] Order to Continue Status Conference (submitted on September 26, 2024) (Class Action)	0.20
Review Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Case Management Statement (served on September 30, 2024) (Class Action)	0.20
Review Court's Order to Continue Status Conference (filed on October 2, 2024) (Class Action)	0.10

Draft, Review, and/or Revise Plaintiff's First Amended Class Action Complaint for Damages (filed on December 17, 2024); Meet and Confer with Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Counsel, and Draft, Review, and/or Revise Stipulation and [Proposed] Order for Leave to File First Amended Complaint (submitted on December 6, 2024) (Class Action)	0.50
Review Court's Order Granting Leave to File First Amended Complaint (filed on December 10, 2024) (Class Action)	0.10
Review and Analyze Defendants Liberty Residential Services, Inc., Liberty Healthcare Corporation, and Liberty Healthcare of California, Inc.'s (collectively, "Defendants") Answer to Plaintiff's First Amended Class Action Complaint for Damages, and Research Affirmative Defenses in Defendants' Answer (served on January 22, 2025) (Class Action)	0.30
Draft, Review, and/or Revise Plaintiff's Notice of Change of Address or Other Contact Information (filed on February 25, 2025) (Class Action)	0.10
Review Defendants' Case Management Statement (served on March 12, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on March 13, 2025) (Class Action)	0.10
Review Court's Minute Order Re: Status Conference (filed on March 28, 2025) (Class Action)	0.10
Review Court's Notice of Case Reassignment (filed on May 9, 2025) (Class Action)	0.10
Appearances	
Prepare for and Remotely Attend Case Management Conference (October 21, 2022) (PAGA Action)	2.10
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Natali Amaya (served on September 7, 2021)	1.90
Draft Follow Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Natali Amaya (served on November 5, 2021)	1.80

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Natali Amaya (served on November 15, 2021 and April 15, 2022)	6.50
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff under the Private Attorneys General Act (served on March 11, 2022)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendants' Counsel	14.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources Prior to Mediation	42.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages, and Penalties Analyses and Calculations (submitted on April 5, 2024)	34.50
Attend Mediation Session (April 12, 2024; via Zoom Video Conference)	16.50
	1.80
Draft, Review, Revise, and/or Analyze Confidential Memorandum of Understanding Re: Class Action/PAGA Settlement (fully executed on August 2, 2024)	4.10
Draft, Review, Revise, Negotiate, and Finalize Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims (executed on June 17, 2025), and Draft, Review, and/or Revise Court Approved Notice of Pendency of Class and Representative Action Settlement and Final Hearing Date	1.50
	0.30
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration and Review Weekly Reports, and Respond to Inquiries	3.50

Law and Motion	
Review Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Notice of Removal of Action Under 28 U.S.C. § 1441(b) Diversity, Civil Cover Sheet, and Exhibits Thereto (served on June 10, 2022) (Federal Action)	2.10
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. § 1447 and Memorandum of Points and Authorities in Support Thereof (filed on July 8, 2022) (Federal Action)	18.50
Review and Analyze Defendants Liberty Residential Services, Inc. and Liberty Healthcare Corporation's Response/Non-Opposition to Plaintiff Motion to Remand and Declaration of Camille Tanner (served on July 18, 2022) (Federal Action)	0.50
Review Court's Order on Motion to Remand (filed on July 20, 2022) (Federal Action)	0.20
Review Plaintiff's Notice of Motion for Preliminary Approval of Class Action and PAGA Settlement, Memorandum of Points and Authorities, Declaration of Settlement Administrator, Declaration of Jean-Claude Lapuyade, Declaration of Shani O. Zakay, Declaration of Plaintiff Natali Amaya, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement, and Research, Draft, Review, and/or Revise Declaration of Joanna Ghosh in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on July 21, 2025) (Class Action)	3.10
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (published on August 14, 2025) (Class Action)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on August 15, 2025) (Class Action)	0.20
Draft, Review, and/or Revise [Proposed] Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (submitted on August 19, 2025) (Class Action)	0.10
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on October 30, 2025) (Class Action)	0.20

Research, Draft, Review, and/or Revise Declaration of Brian J. St. John in Support of Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement (Class Action)	3.80
Total Hours:	215.60

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Amaya vs. Liberty Residential Services, Inc., et al. (Class)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/7/2021	U.S. Postmaster	Postage	\$7.38
11/5/2021	U.S. Postmaster	Postage	\$7.58
4/22/2022	Legal Document Server, Inc.	Attorney Service	\$110.86
4/22/2022	San Diego Superior Court	Complex Filing Fee	\$1,000.00
4/22/2022	San Diego Superior Court	Complaint Filing Fee	\$435.00
5/9/2022	ProLegal	Attorney Service	\$156.97
5/9/2022	One Legal	Attorney Service	\$12.87
5/17/2022	Legal Document Server, Inc.	Attorney Service	\$43.36
5/23/2022	ProLegal	Attorney Service	\$133.56
6/2/2022	Legal Document Server, Inc.	Attorney Service	\$14.00
6/10/2022	Legal Document Server, Inc.	Attorney Service	\$14.00
7/11/2022	Legal Document Server, Inc.	Attorney Service	\$195.00
11/1/2022	Legal Document Server, Inc.	Attorney Service	\$16.10
11/1/2022	San Diego Superior Court	Stipulation & Order Fee	\$20.00
11/7/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
7/26/2023	Legal Document Server, Inc.	Attorney Service	\$14.95
7/26/2023	First Mediation Corporation	Mediation Fee	\$10,000.00
3/25/2024	David A. Rotman	Mediation Fee	\$13,250.00
4/12/2024	Morgan Barney	Travel Reimbursement	\$24.57
4/26/2024	Codici	Data Analysis of Sampling of Time Records	\$2,900.00
6/17/2024	One Legal	Attorney Service	\$13.33
10/11/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
2/25/2025	Legal Document Server, Inc.	Attorney Service	\$16.70
2/27/2025	Legal Document Server, Inc.	Attorney Service	\$16.70
Total:			<u>\$28,433.38</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Amaya vs. Liberty Residential Services, Inc., et al. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/11/2022	U.S. Postmaster	Postage	\$16.00
3/11/2022	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
5/19/2022	Legal Document Server, Inc.	Attorney Service	\$43.36
5/19/2022	San Diego Superior Court	Complaint Filing Fee	\$435.00
6/20/2022	Legal Document Server, Inc.	Attorney Service	\$14.00
10/6/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
2/26/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
		Total:	<u>\$611.06</u>