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Attorneys for Plaintiff CHIDINMA OLISAEMEKA

(Additional Counsel on Next Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

CHIDINMA OLISAEMEKA, individually,
and on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act,

Plaintiffs,

vs.

LYNWOOD HEALTHCARE CENTER, an
unknown business entity; LYNWOOD
POST ACUTE CARE CENTER, an
unknown business entity; AG LYNWOOD,
LLC, a California limited liability company;
and DOES 1 through 100, inclusive,

Defendants.

Lead Case No. 22STCV13175
Consolidated Case No. 22CMCV00121

**DECLARATION OF TARA ZABEHI IN
SUPPORT OF PLAINTIFF'S MOTION TO
APPROVE PAGA SETTLEMENT**

Date: February 26, 2025
Time: 10:00 A.M.

Moving Papers Due by: January 27, 2025
Opposition Dye bu: February 6, 2025
Reply Papers Due bu: February 13, 2025

Judge: Hon. Elaine Lu
Dept: 9

LAWYERS *for* JUSTICE, PC
Arby Aiwazian (SBN 269827)
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DECLARATION OF TARA ZABEHI

I, Tara Zabehe, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Chidinma Olisaemeka (“Plaintiff”). The facts set forth in this declaration are within my personal knowledge or based on information and belief and, if called as a witness, I could and would competently testify thereto.

LITIGATION AND REPRESENTATIVE AND CLASS ACTION EXPERIENCE

2. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is attorney of record in dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions and federal overtime compensation requirements. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

3. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases,

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

11 4. I am an attorney duly licensed to practice before all courts of the State of
12 California and I am an attorney at Lawyers for Justice, PC. In May of 2016, I graduated from
13 Pepperdine University School of Law with a Juris Doctorate degree. I have extensive formal
14 training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as
15 part of its Certificate in Dispute Resolution program. In June of 2013, I obtained a Bachelor of
16 Arts degree in History and graduated with college honors from University of California, Los
17 Angeles. I attended Pepperdine School of Law starting in 2013 and graduated in 2016. From
18 approximately August 2014 to approximately November 2014, I served as a Judicial Extern to
19 the Honorable James Kaddo of the Los Angeles Superior Court. In 2017, I obtained a license to
20 practice law from the California State Bar. Since 2017, I have worked at Lawyers for Justice, PC
21 and my practice has almost exclusively focused on the prosecution of employment class actions
22 and representative actions. At Lawyers for Justice, PC, I have worked on many wage-and-hour
23 class action and representative action cases, taking the lead in taking and defending depositions,
24 arguing motions, attending mediations, and preparing for trial. I have played an integral role in
25 preparing matters for class certification, including and not limited to, successful certification of a
26 class in *Davis v. Superior Med Surgical, Inc.* (San Bernardino County Superior Court Case No.
27 CIVDS1505744), *Tellez v. Harvest Container Co., Inc.* (Tulare County Superior Court Case No.

VCU64528), *Vilitchai v. Ametek Programmable Power, Inc., et al.* (San Diego County Superior Court Case No. 37-2015-00025968-CU-OE-CTL), and *Sanchez, et al. v. Auto-Chlor System of Washington, Inc.* (Los Angeles County Superior Court Case No. BC707670). I have worked on over two hundred fifty (250) class action or representative action cases which have resulted in settlement.

EXAMPLES OF RESULT IN REPRESENTATIVE AND CLASS ACTION CASES

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

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

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

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

d) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national retailer involving allegations of misclassification of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class

1 certification. On August 26, 2013, the court granted final approval of the class action settlement.
2 The Los Angeles County Superior Court Case Number is BC424012.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

23 s) LFJ in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class and PAGA representative action against a lumber and hardware company
25 on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the
26 class and PAGA representative action settlement. The Orange County Superior Court Case
27 Number is 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
3 employees. On June 14, 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 BC586234.

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

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

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

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

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

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

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

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

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

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

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

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

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

hh) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class and PAGA representative action against a medical equipment supplier on behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion for class certification and certified a class. On November 2, 2023, the court granted final approval of the class and PAGA representative action settlement. The San Bernardino County Superior Court Case 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 37-2016-00005578-CU-OE-CTL.

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

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

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

20 mm) LFJ, in association with co-counsel therein, represents the plaintiffs in a
21 wage-and-hour class action against manufacturer and supplier of power products and services on
22 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
23 motion for class certification and certified a class. On August 27, 2021, the court granted final
24 approval of the class action settlement. The San Diego County Superior Court Case Number is
25 37-2015-00025968-CU-OE-CTL.

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

oo) 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.

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.

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

6. Lawyers *for* Justice seeks reimbursement of **\$4,271.35** for litigation costs and expenses incurred in the consolidated action. Attached hereto as "**EXHIBIT 1**" is the Case Cost Report for the action *Olisaemeka v. Lynwood Healthcare Center, et al.*, Case No. 22CMCV00121, which is the PAGA action that the Court consolidated with the *Olisaemeka v. Lynwood Healthcare Center, et al.*, Case No. 22STCV13175, Class Action. While the Class Action was ultimately dismissed, prior to its dismissal the Class Action and the PAGA Action were consolidated by the Court and the lead case was the Class Action. Attached hereto as "**EXHIBIT 2**" is the Case Cost Report for the action *Olisaemeka v. Lynwood Healthcare Center, et al.*, Case No. 22STCV13175, the Class Action. It should be noted that Lawyers *for* Justice has borne risks and costs of litigation and will not receive any compensation until a recovery is obtained in this matter. These costs and expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement.

///

ATTORNEYS' FEES REQUESTED BY PLAINTIFF'S COUNSEL

7. As set forth more fully in the accompanying Motion, Plaintiff's Counsel seeks attorneys' fees in the amount of \$68,333.33, which represents approximately one third (1/3) of the Total Settlement Amount. Pursuant to the contingency-fee agreements entered into by and between Plaintiffs and Plaintiff's Counsel, Plaintiffs have agreed to contingency-fees of at least forty-five percent (45%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Plaintiff's Counsel took in commencing the case; (2) the time, effort, and expense that Plaintiff's Counsel dedicated to the case; (3) the skill and determination that Plaintiff's Counsel has shown; (4) the results that Plaintiff's Counsel has achieved throughout the litigation; (5) value of the settlement that Plaintiff's Counsel has achieved in the case; and (6) the other cases that Plaintiff's Counsel has turned down in order to devote its time and efforts to this case.

8. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Plaintiff's Counsel has performed many hours of work in connection with prosecuting this matter such that the requested attorneys' fees award is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **93.50 hours** performing tasks to obtain a recovery on behalf of Plaintiffs, the State of California, and the Aggrieved Employees. Attached hereto as "**EXHIBIT 3**" 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 referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of the case.

9. The work performed in this particular case, 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 class and PAGA representative actions, support a reasonable blended hourly rate of compensation of at least \$850 per hour for work performed by Plaintiff's Counsel. Lawyers *for* Justice, PC has been awarded attorneys' fees,

1 compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts
2 granting approval of wage and hour class action and/or representative action settlements in other
3 cases: final approval of the class and representative action settlement in *David Dugan v. TEC*
4 *Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on
5 July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval
6 of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan*
7 (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award
8 of attorneys' fees involved an hourly rate of \$919.57; final approval of the class and
9 representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior
10 Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees
11 involved an hourly rate of \$855.96.

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

14 Executed this 24th day of December 2024, at Glendale, California.

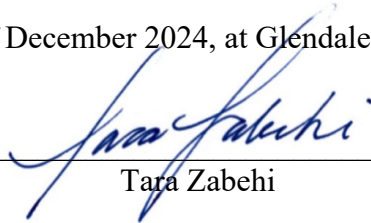
15
16 
17 Tara Zabehi

EXHIBIT 1

LAWYERS for JUSTICE PC CASE COST DETAIL
Olisaemeka vs. Lynwood Healthcare Center (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/4/2022	U.S. Postmaster	Postage	\$24.00
3/4/2022	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
5/9/2022	Legal Document Server, Inc.	Attorney Service	\$44.56
5/9/2022	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
5/10/2022	ProLegal	Attorney Service	\$223.94
6/13/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
6/15/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
1/8/2023	Case Anywhere LLC	Attorney Service	\$135.00
Total:			\$967.90

EXHIBIT 2

LAWYERS for JUSTICE PC CASE COST DETAIL
Olisaemeka vs. Lynwood Healthcare Center LLC (Consolidated)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/21/2021	U.S. Postmaster	Postage	\$7.38
11/3/2021	U.S. Postmaster	Postage	\$7.58
4/20/2022	Legal Document Server, Inc.	Attorney Service	\$112.06
4/20/2022	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
4/20/2022	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
4/22/2022	Legal Document Server, Inc.	Attorney Service	\$155.00
4/25/2022	ProLegal	Attorney Service	\$414.88
5/18/2022	Legal Document Server, Inc.	Attorney Service	\$30.40
6/10/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
6/27/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
6/27/2022	Los Angeles Superior Court	Document Download Fee	\$7.00
7/14/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
10/7/2022	Case Anywhere LLC	Attorney Service	\$142.80
4/16/2023	Case Anywhere LLC	Attorney Service	\$135.00
7/3/2023	Case Anywhere LLC	Attorney Service	\$135.00
10/5/2023	Case Anywhere LLC	Attorney Service	\$135.00
1/4/2024	Case Anywhere LLC	Attorney Service	\$135.00
4/2/2024	Case Anywhere LLC	Attorney Service	\$135.00
7/2/2024	Case Anywhere LLC	Attorney Service	\$135.00
10/3/2024	Case Anywhere LLC	Attorney Service	\$135.00
Total:			<u>\$3,303.45</u>

EXHIBIT 3

OLISAEMEKA V. LYNWOOD HEALTHCARE CENTER
Los Angeles County Superior Court Case No. 22CMCV00121 (“PAGA ACTION”)

OLISAEMEKA V. LYNWOOD HEALTHCARE CENTER
Los Angeles County Superior Court Case No. Case No. 22STCV13175 (“CLASS ACTION”)

Cases consolidated on October 12, 2022; Lead Case No. 22STCV13175 (“COORDINATED ACTION”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>FOR</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Chidinma Olisaemeka (“Plaintiff”) During the Pendency of the Case	33.00
Investigate, Interview, and/or Communicate with Putative Class Members and/or Percipient Witnesses	5.40
Pleadings and Court Filings	
Draft Plaintiff’s Complaint for Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on April 20, 2022) (Class Action)	5.10
Review Court’s First Amended General Order (filed on April 20, 2022) (Class Action)	0.20
Review Court’s Notice of Case Assignment (filed on April 20, 2022) (Class Action)	0.20
Review Court’s Voluntary Efficient Litigation Stipulation Packet (filed on April 20, 2022) (Class Action)	0.10

Draft Plaintiff's Preemptory Challenge (filed on April 22, 2022) (Class Action)	0.10
Review Court's Minute Order Re: Preemptory Challenge (filed on April 25, 2022) (Class Action)	0.10
Review Court's Minute Order Re: Case Reassignment (filed on May 2, 2022) (Class Action)	0.10
Draft Plaintiff's Complaint for Enforcement Under the Private Attorney's General Act, California Labor Code § 2698, Et. Seq and Legal Research and Analysis of All Claims Involved (filed on May 9, 2022) (PAGA Action)	0.10
Review Court's Notice of Case Assignment (filed on May 9, 2022) (PAGA Action)	0.10
Review Court's Minute Order Regarding Newly Filed Class Action (filed on May 18, 2022) (Class Action)	0.10
Review Court's Initial Status Conference Order (filed on May 18, 2022) (Class Action)	0.10
Review Defendants' Notice of Appearance (served June 10, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Association of Counsel (filed on June 10, 2022) (Class Action)	0.20
Draft Plaintiff's Notice of Association of Counsel (filed on June 13, 2022) (PAGA Action)	0.20
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on July 8, 2022) (PAGA Action)	0.10
Review Court's Initial Status Conference Order (filed on July 13, 2022) (Class Action)	0.20
Review Court's Minute Order Regarding Newly Filed Class Action (filed on July 13, 2022) (Class Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Initial Status Conference Report (submitted on July 15, 2022) (Class Action)	0.80

Review Defendants' Answer to Plaintiff's Complaint (served on July 15, 2022) (PAGA Action)	1.10
Review Court's Tentative Case Management Order (filed on July 20, 2022) (Class Action)	0.10
Review Court's Case Management Order (filed on July 22, 2022) (Class Action)	0.10
Review Court's Minute Order Re: Initial Status Conference (July 22, 2022) (Class Action)	0.10
Review Court's Order Authorizing Electronic Filing and Service-Case Anywhere LLC (filed on July 22, 2022) (Class Action)	0.10
Review Defendants' Notice of Related Case (served on August 24, 2022) (PAGA Action)	0.10
Review Defendants' Notice of Related Case (served on August 24, 2022) (Class Action)	0.10
Review Court Order Re: Notice of Related Case (filed on August 29, 2022) (PAGA Action)	0.10
Review Court's Initial Status Conference Order (filed on August 29, 2022) (PAGA Action)	0.10
Review Court's Minute Order Non-Appearance Case Review Re: Filing and Serving of Motion to Compel/Responsive Pleading and Notices of Related Case; Court Order Re; Notice of Related Case (filed on August 29, 2022) (Class Action)	0.10
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on September 22, 2022) (PAGA Action)	0.10
Review Defendants' Notice of Court's Order on Notice of Related Case (served on September 30, 2022) (Class Action)	0.20
Review Defendants' Notice of Court's Order on Notice of Related Case (served on September 30, 2022) (PAGA Action)	0.10

Meet and Confer with Defendants' Counsel and Draft Joint Initial Status Conference Statement (filed on October 4, 2022) (PAGA Action)	1.10
Meet and Confer with Defendants' Counsel and Draft Joint Status Conference Statement (filed on October 7, 2022) (Class Action)	0.80
Meet and Confer with Defendants' Counsel and Draft Joint Initial Status Conference Statement (filed on October 10, 2022) (Consolidated Action)	0.20
Review Court's Tentative Case Management Order (filed on October 11, 2022) (PAGA & Class Action)	0.10
Review Court's Case Management Order (filed on October 12, 2022) (PAGA Action)	0.10
Review Court's Minute Order on Status Conference; Notice of Consolidation of Cases (filed on October 12, 2022) (Consolidated Action)	0.10
Review Court's Minute Order Re: Initial Status Conference; Notice of Consolidation of Cases (filed on October 12, 2022) (PAGA Action)	0.10
Review Court's Order Authorizing Electronic Filing and Service- Case Anywhere LLC (filed on October 12, 2022) (PAGA Action)	0.20
Draft Plaintiff's Request for Dismissal of Plaintiff's Class Action, Case No. 22STCV13175; Proposed Order; Declaration of Shani O. Zakay, Esq, in Support Thereof (filed on December 30, 2022) (Consolidated Action)	2.10
Review Defendants' Change of Firm Name (served on January 5, 2023) (Consolidated Action)	0.10
Review Court's Order for Dismissal of Plaintiff's Class Action, Case No. 22STCV13175 (filed on January 12, 2023) (Consolidated Action)	0.20

Review Court's Minute Order Re: Resetting Hearing on Motion to Compel Arbitration (filed on January 13, 2023) (Consolidated Action)	0.10
Review Court's Tentative Case Management Order #2 (filed on January 18, 2023) (Consolidated Action)	0.10
Review Court's Case Management Order #2 (filed on January 19, 2023) (Consolidated Action)	0.10
Review Court's Minute Order Trial Setting Conference; Hearing on Motion to Compel Arbitration (filed on January 19, 2023) (Consolidated Action)	0.10
Review Court's Minute Order Non-Appearance Case Review Re: Filing of Declaration to Unconditionally Grant Motion to Compel Arbitration (filed on February 9, 2023) (Consolidated Action)	0.10
Meet and Confer with Defendants' Counsel and Draft a Joint Status Report Re: Arbitration (submitted on April 6, 2023) (Consolidated Action)	0.90
Review Court's Minute Order Non-Appearance Case Review Re: Identity of Arbitrator and Arbitration Date(s) (filed on April 19, 2023) (Consolidated Action)	0.10
Meet and Confer with Defendants' Counsel and Draft a Joint Status Report Re: Arbitration (submitted on June 20, 2023) (Consolidated Action)	0.30
Review Court's Minute Order Non-Appearance Case Review Re: Identity of Arbitrator and Arbitration Date(s) (filed on June 27, 2023) (Consolidated Action)	0.10
Meet and Confer with Defendants' Counsel and Draft a Joint Status Report Re: Status of Mediation (submitted on September 14, 2023) (Consolidated Action)	0.80
Review Court's Minute Order Non-Appearance Case Review Joint Status Report Re: Status of Mediation (submitted on September 29, 2023) (Consolidated Action)	0.10

Meet and Confer with Defendants' Counsel and Draft Non-Appearance Case Review Joint Status Report Re: Status of Mediation (submitted on January 16, 2024) (Consolidated Action)	0.70
Review Court's Minute Order Non-Appearance Case Review Joint Status Report Re: Status of Mediation (submitted on January 22, 2024) (Consolidated Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Stipulation and [Proposed] Order to Continue Non-Appearance Case Review (filed on March 26, 2024) (Consolidated Action)	0.60
Review Court's Order to Continue Non-Appearance Case Review (filed on April 10, 2024) (Consolidated Action)	0.20
Review Court's Minute Order (filed on May 24, 2024) (Consolidated Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Statement Regarding Non-Appearance Case Review (submitted on September 11, 2024) (Consolidated Action)	0.90
Review Court's Minute Order Non-Appearance Case Review Re: Identity of Arbitrator and Arbitration Date(s) (filed on September 19, 2024) (Consolidated Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Statement Regarding Non-Appearance Case Review Re: Identity of Arbitrator and Arbitration Date(s) (filed on November 19, 2024) (Consolidated Action)	1.10
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on December 20, 2024) (Consolidated Action)	0.10
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Chidinma Olisaemeka (served on September 21, 2021)	1.80

Draft Follow up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Chidinma Olisaemeka (served on November 3, 2021)	1.10
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Chidinma Olisaemeka for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on March 4, 2022) (Class Action)	3.20
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	14.70
Mediation/Settlement	
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed on July 2, 2024)	0.80
Draft, Review, Revise, Negotiate, and Finalize Private Attorneys General Act Settlement (executed on November 14, 2024)	2.60
Law and Motion	
Review and Analyze Defendants' Notice of Petition and Petition of Defendants to Compel Plaintiff to Arbitrate her Individual PAGA Claims and Dismiss her Collective/Representative Claims; Memorandum of Points and Authorities; Declaration of Jonathan Ta in Support Thereof; Declaration of James S. Cooper in Support Thereof; (Proposed) Order (served on August 22, 2022) (PAGA Action)	1.70
Review and Analyze Defendants' Notice of Petition and Petition of Defendants to Compel Arbitration, Dismiss Class Action Claims, and to Stay Further Proceedings Pending Binding Arbitration, Memorandum of Points and Authorities; Declaration of Jonathan Ta in Support Thereof; Declaration of James S. Cooper in Support Thereof; (Proposed) Order (served on August 22, 2022) (Consolidated Action)	1.40

Draft, Review, and/or Revise Plaintiff's Opposition to Defendants/Petitioners' Petition to Compel Plaintiff to Arbitrate her Individual PAGA Claims and Dismiss her Collective/Representative Claims (filed on December 29, 2022) (Consolidated Action)	0.20
Draft, Review, and/or Revise Plaintiff's Request for Judicial Notice in Support of Plaintiff's Opposition to Defendants/Petitioner's Petition to Compel Plaintiff to Arbitrate her Individual PAGA Claims and Dismiss her Collective/Representative Claims (filed on December 29, 2022) (Consolidated Action)	0.10
Review Defendants' Objections to Request for Judicial Notice in Opposition to Defendants' Petition to Compel Plaintiff to Arbitrate her Individual PAGA Claims and Dismiss her Collective/Representative and Class Claims (served on January 5, 2023) (Consolidated Action)	0.10
Review Reply of Defendants in Support of its Petition to Compel Plaintiff to Arbitrate her Individual PAGA Claims and Dismiss her Collective/Representative and Class Claims (served on January 5, 2023) (Consolidated Action)	0.30
Review Court's Tentative Ruling Re: Motion to Compel Arbitration (filed on January 17, 2023) (Consolidated Action)	0.30
Review Court's Final Ruling/Order Re: Motion to Compel Arbitration (filed on January 19, 2023) (Consolidated Action)	0.30
Review Defendants' Supplemental Declaration of Jonathan Ta in Support of Petitioners' Petition to Compel Plaintiff to Arbitrate her Individual PAGA Claim and Dismiss her Collective Action Claims, and to Stay Further Proceedings Pending Binding Arbitration (served on February 2, 2023) (Class Action)	0.10
Draft, Review, and/or Revise Plaintiff's Motion for Approval of Private Attorneys General Act (Labor Code section 2698, Et Seq.) Settlement Agreement and Award of Attorneys' Fees, Litigation Costs, General Release Gee, and Settlement Administration Costs, and Declaration of Tara Zabehi in Support Thereof, and [Proposed] Order and Judgement (filed on December 24, 2024) (Anticipated)	4.20

Total Hours:	93.50
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