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*Attorneys for Plaintiff and the Settlement Class*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SANTA CLARA**

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

Plaintiff,

vs.

CALIFORNIA WATER SERVICE, an  
unknown business entity; and DOES 1  
through 100, inclusive,

Defendants.

Case No.: 21CV376394

Honorable Charles F. Adams  
Department 7

**CLASS ACTION**

**DECLARATION OF JOANNA GHOSH IN  
SUPPORT OF PLAINTIFF'S MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT, ATTORNEYS'  
FEES AND COSTS, AND CLASS  
REPRESENTATIVE ENHANCEMENT  
PAYMENT**

[Plaintiff's Motion for Final Approval of Class  
Action Settlement, Attorneys' Fees and Costs,  
and Class Representative Enhancement  
Payment; Declaration of Class Representative  
(Bryan Hicks); Declaration of Settlement  
Administrator (Kevin Lee); and [Proposed]  
Final Approval Order and Judgment filed  
concurrently herewith]

Date: March 21, 2024  
Time: 1:30 p.m.  
Department: 7

Complaint Filed: February 23, 2021  
FAC Filed: February 24, 2023  
Trial Date: None Set

**DECLARATION OF JOANNA GHOSH**

I, Joanna Ghosh, hereby declare as follows:

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

**PRELIMINARY APPROVAL OF SETTLEMENT**

2. On August 11, 2023, in Department 1 of the above-entitled Court, the Honorable Sunil R. Kulkarni preliminarily approved the Class Action Settlement and Release and Amendment No. 1 to Class Action Settlement and Release (together, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between the Plaintiff and Defendant California Water Service Company (“Defendant”), and conditionally certified the Settlement Class for settlement purposes. The Court preliminarily appointed Plaintiff Bryan Hicks to represent the Class (“Class Representative”). The Court also preliminarily appointed Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), and adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix” or “Settlement Administrator”) to serve as the third-party administrator and handle the notice and settlement administration process.

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

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**WORK PERFORMED BY LAWYERS FOR JUSTICE, PC**

4. Several attorneys at Lawyers for Justice, PC have been actively engaged in litigating the above-captioned action since prior to its commencement on February 23, 2021.

5. 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 our firm and Plaintiff, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to, *inter alia*, class certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement and penalties, Plaintiff's claims and allegations, and potential defenses. After conducting initial investigation, Lawyers for Justice, PC determined that Plaintiff's claims were well-suited for class-wide adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly non-exempt employees of Defendant in the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed expenses.

6. The parties conducted formal discovery and investigated into the facts of the case, to assess the veracity, strength, and scope of the claims, and Class Counsel worked on preparing the case for class certification and trial, prior to reaching the Settlement. The parties exchanged information, documents, and data throughout the course of litigation and in connection with mediation and settlement negotiations. Class Counsel reviewed and analyzed information, documents, and data obtained from Plaintiff, Defendant, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included, and were not limited to, employment records of Plaintiff, a detailed sampling of Settlement Class Members' time and pay data, company policy acknowledgements, internal memoranda, job descriptions, new hire orientation checklists, operations and employment practices, collective bargaining agreement, forms, and operations and employment practices, procedures, and policies (including but not limited to California Water Service Group Policy and Procedure Manual, Business Expense Policy, and Business Code of Conduct Policy), among other information and documents. Class

1 Counsel worked with Plaintiff to object to, respond to, and produce documents responsive to  
2 Defendant's Demand to Produce Documents that had been propounded on Plaintiff. Plaintiff  
3 prepared for and attended a full-day deposition, at which he provided testimony, and Class Counsel  
4 prepared for and defended the deposition of Plaintiff. Class Counsel also met and conferred with  
5 Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case  
6 management, court proceedings, discovery and production of various information, documents, and  
7 data in the course of litigation and mediation and settlement negotiations, and mediation and  
8 settlement negotiations. Other work that Class Counsel performed included, and was not limited  
9 to, case strategy and analysis; drafting, reviewing, and revising the pleadings, the mediation brief,  
10 and settlement-related papers; case management; claims assessment and evaluation; and preparing  
11 for and attending court proceedings and mediation and settlement negotiations, among other tasks.

12 7. As outlined herein, the parties have conducted formal and informal discovery and  
13 investigation during the course of litigating the case and mediation and settlement negotiations.  
14 Class Counsel analyzed a volume of information, documents, and data obtained from Plaintiff,  
15 Defendant, and other sources, that provided a critical understanding of the nature of the work  
16 performed by Settlement Class Members and Allegedly Aggrieved Employees, as well as  
17 Defendant's operations and employment policies, practices, and procedures, and were used in  
18 analyzing liability, damages, and penalties valuation issues in connection with multiple phases of  
19 the litigation, and ultimately in connection with the mediation and settlement negotiation process.  
20 Class Counsel also performed research regarding applicable law, which is evolving as it relates to  
21 class certification, manageability, off-the-clock theory, meal and rest periods, representative  
22 PAGA claims and penalties, collective bargaining agreements, exemption, pre-emption, wage-  
23 and-hour law and enforcement, Plaintiff's claims and allegations, and Defendant's defenses  
24 thereto, as well as facts discovered. Accordingly, sufficient investigation and review of  
25 information have taken place in order for the parties to be adequately informed of the nature and  
26 extent of the claims, and to enable all parties to fully evaluate the Settlement for its fairness,  
27 adequacy, and reasonableness.

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1           8. After conducting significant investigation of the facts and law during the prosecution  
2 of the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve  
3 the case. These efforts included participating in a formal, full-day mediation conducted by Jeffrey  
4 Krivis, Esq., a well-regarded mediator experienced in mediating complex labor and employment  
5 matters. Prior to and during mediation and settlement discussions, the parties exchanged  
6 information and data, and discussed various aspects of the case, including and not limited to, the  
7 risks and delays of further litigation, the risks to the parties of proceeding with class certification  
8 and trial, the law relating to class certification, manageability, off-the-clock theory, meal and rest  
9 periods, representative PAGA claims, collective bargaining agreements, exemption, pre-emption,  
10 wage-and-hour law and enforcement, as well as the evidence produced and analyzed, and the  
11 possibility of appeals, among other things. During all settlement discussions, the parties  
12 conducted their negotiations at arm's length in an adversarial position. Arriving at a settlement  
13 that was acceptable to the parties was not easy. Defendant and its counsel felt very strongly about  
14 Defendant's ability to prevail on the merits, and to obtain a denial of class certification, while  
15 Plaintiff and Class Counsel believed that class certification would be obtained, and that Plaintiff  
16 would prevail at trial. After conducting formal and informal discovery and investigations and  
17 extensive settlement negotiations, with the aid of the mediator's evaluation, the parties agreed that  
18 the case was well-suited for settlement given the legal issues relating to Plaintiff's principal claims,  
19 as well as the costs and risks to the parties that would attend further litigation. These risks of  
20 further litigation include, and are not limited to, a determination that the claims are unsuitable for  
21 class treatment and/or representative adjudication, class de-certification after certification of a  
22 class, allowing a jury to decide the claims, and the real possibility of no monetary recovery after  
23 years of litigation. The Settlement takes into account the strengths and weaknesses of each side's  
24 position and the uncertainty of how the case might have concluded at certification, trial, and/or  
25 appeals.

26           9. The Settlement Administrator has confirmed that, pursuant to the escalator clause in  
27 Paragraph II.16 of the Settlement Agreement, the Gross Settlement Fund has increased from  
28 \$2,150,000.00 to \$2,315,267.75. By way of the accompanying Motion for Final Approval, Class

1 Counsel seeks attorneys' fees in the amount of \$810,343.71, which is thirty-five percent (35%) of  
2 the escalated Gross Settlement Fund of \$2,315,267.75. Pursuant to the contingency-fee agreement  
3 entered into by and between Plaintiff and Lawyers for Justice, PC, Plaintiff has agreed to a  
4 contingency fee of at least thirty-five percent (35%) of the recovery.

5 10. The attorneys' fees that are sought are commensurate with: (1) the risk that Class  
6 Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel  
7 dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results  
8 that Class Counsel has achieved throughout the litigation of the case; (5) the value of the settlement  
9 that Class Counsel has achieved; and (6) the other cases that Class Counsel has turned down in  
10 order to devote their time and efforts to the case. The nature of the work performed, skill exercised,  
11 and the outcome in this matter support the percentage fee sought and the application of a lodestar  
12 multiplier. This matter involves an outstanding monetary recovery involving an escalated **Gross**  
13 **Settlement Fund of \$2,315,267.75** (with a **Net Settlement Amount of at least \$1,296,090.72 to**  
14 **be paid to Participating Settlement Class Members** with an average payment of approximately  
15 \$1,185.99 per Participating Settlement Class Member, a **payment of \$43,750.00 to Allegedly**  
16 **Aggrieved Employees** with an average payment of \$47.55 per Allegedly Aggrieved Employee,  
17 and **payment of \$131,250.00 to the State of California**)—support the percentage fee sought and  
18 the application of a lodestar multiplier.

19 11. While not necessarily required to be demonstrated because the percentage fee is  
20 proper for this settlement, Class Counsel has incurred many hours of work in connection with  
21 prosecuting the case, such that the award of attorneys' fees is also justified under a lodestar  
22 analysis. Attorneys at Lawyers for Justice, PC have spent a total of **528.70 hours** performing tasks  
23 and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and  
24 Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers  
25 for Justice, PC, and the time incurred in performing those services. The hours include work done  
26 by myself and several other attorneys at Lawyers for Justice, PC. Additionally, separate from the  
27 hours of work referenced herein and in the attached chart, Lawyers for Justice, PC had litigation  
28 support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this matter, the background of Lawyers *for* Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate of at least \$825 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 \$825 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. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour.

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

13. 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 is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of

1 compliant wage statements, reimbursement of business expenses, executive, administrative, and  
2 other overtime exemptions to the State of California and federal overtime compensation  
3 requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has  
4 recovered (sometimes in association with other law firms) millions of dollars on behalf of  
5 thousands of individuals in California.

6 14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice,  
7 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and  
8 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has  
9 extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute  
10 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has  
11 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October  
12 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During  
13 the summer of 2000, he studied Legal Writing at Harvard University. From approximately  
14 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable  
15 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From  
16 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the  
17 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.  
18 In December of 2004, he obtained a license to practice law from the California State Bar. Since  
19 in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost  
20 exclusively focused on the prosecution of consumer and employment class actions. While  
21 employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or  
22 defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for  
23 deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with  
24 other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully  
25 litigated cases involving the executive, administrative, and other overtime exemptions to the State  
26 of California and federal overtime compensation requirements. Under his supervision, Lawyers  
27 *for* Justice, PC has successfully obtained class certification by contested motion practice in  
28 approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or

representative action cases.

15. Arby Aiwarzian 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, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative cases have resulted in settlements that have been granted court approval, including and not limited to, those listed in paragraph 18 herein. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

16. Brian J. St. John is a Member of Lawyers *for* Justice, PC. He received his Bachelor's degree from the University of California, San Diego in 2010 and earned his Juris Doctor degree from the University of California, Berkeley, School of Law in 2013. He was admitted to practice law in California in 2015. He is admitted to practice before all courts of the State of California and the Northern and Southern federal district courts in the State of California. He has worked on many wage and hour class action and PAGA representative matters, and his work has included, *inter alia*, researching and drafting pleadings, administrative notice

1 exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging  
2 in motion practice, claims evaluation and analysis, and making court appearances. Prior to  
3 working at Lawyers for Justice, PC, he spent several years working for a boutique employment  
4 and labor law firm representing employers, and, in 2019 and 2020, he was employed as general  
5 counsel for a DMHC licensed discount dental plan. He has successfully overseen the settlement  
6 of dozens of class action and PAGA cases, and supervises a team of attorneys

7 17. I am a Managing Member of Lawyers for Justice, PC. I received a Bachelor of Arts  
8 degree from California State University, Los Angeles in 2006, a Master of Science degree from  
9 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University  
10 Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since  
11 2013) and am admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy  
12 Court for the Central District of California, and the U.S. Supreme Court. I have taken and  
13 defended dozens of depositions and successfully handled motion practice in class action cases  
14 regarding discovery (including and not limited to, regarding class contact information), class  
15 certification (both contested class certification and stipulated class certification), arbitration  
16 agreements, coordination, and intervention. I have successfully handled briefing and oral  
17 argument on appeal and obtained notable decisions regarding the Private Attorneys General Act  
18 and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9  
19 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied  
20 (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). I have significant  
21 experience with class actions, including and not limited to working on cases to obtain class  
22 certification through contested motion practice and working on cases in the post-certification stage  
23 (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation  
24 in conjunction with co-counsel in a case involving a certified class consisting of approximately  
25 2,600 individuals). I also have extensive experience with class action and/or representative action  
26 settlements, and have handled this process in over three hundred (300) cases. Under Edwin  
27 Aiwasian, Arby Aiwasian, and my supervision, Lawyers for Justice, PC has handled the class  
28 certification and court approval process for hundreds of class action and/or representative action

1 matters that have successfully resolved. I am a member of the California Employment Lawyers  
2 Association.

3 **EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND**  
4 **REPRESENTATIVE ACTION CASES**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

26          o)     LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
27 representative action against a foodservice distributor, on behalf of non-exempt employees. On  
28 January 26, 2017, the court granted final approval of the class and PAGA representative action

1 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

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

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

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

19 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
20 wage-and-hour class and PAGA representative action against a lumber and hardware company on  
21 behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class  
22 and PAGA representative action settlement. The Orange County Superior Court Case Number is  
23 30-2014-00747750-CU-OE-CXC.

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

1           u)    LFJ represented the plaintiff in a wage-and-hour class and PAGA  
2 representative action against a food company on behalf of non-exempt employees. On June 30,  
3 2017, the court granted final approval of the class and PAGA representative action settlement. The  
4 Sacramento County Superior Court Case Number is 34-2015-00175871.

5           v)    LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
6 representative action against a chocolate company on behalf of non-exempt employees. On July  
7 19, 2017, the court granted final approval of the class and PAGA representative action settlement.  
8 The Alameda County Superior Court Case Number is RG15764300.

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

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

18           y)    LFJ, in association with co-counsel therein, represented the plaintiffs in a  
19 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt  
20 employees. On December 11, 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 BC569646.

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

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

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

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

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

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

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

1 and the Judicial Council Coordination Proceeding Number is 4921.

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

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

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

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

26 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a  
27 wage-and-hour class and PAGA representative action against a national retailer of sportswear,  
28 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the

1 court granted in part the plaintiff's motion for class certification and certified a class. The  
2 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the  
3 Judicial Council Coordination Proceeding Number is 4930.

4 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
5 wage-and-hour class action against manufacturer and supplier of power products and services on  
6 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion  
7 for class certification and certified a class. On August 27, 2021, the court granted final approval  
8 of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-  
9 00025968-CU-OE-CTL.

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

14 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a  
15 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the  
16 restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July  
17 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The  
18 Los Angeles County Superior Court Case Number is BC707670.

19 **LITIGATION COSTS AND EXPENSES INCURRED BY**

20 **LAWYERS FOR JUSTICE, PC**

21 19. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation and  
22 will not receive any compensation until a recovery is obtained in this matter. Lawyers *for* Justice,  
23 PC seeks reimbursement of **\$13,333.32** in litigation costs and expenses incurred in the case, as  
24 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the  
25 prosecution of the case and to obtain the Settlement.

26 ///

27 ///

28 ///

**CLASS REPRESENTATIVE ENHANCEMENT PAYMENT TO PLAINTIFF**

20. In recognition of his efforts and work expended in the case and serving as the Class Representative, Plaintiff seeks a Class Representative Enhancement Payment in the amount of \$8,000.00. The requested Class Representative Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in providing relevant documents, past employment records, and the facts and evidence necessary to attempt to prove the allegations in the case, including and not limited to, by way of working with Class Counsel to prepare responses to discovery requests that were propounded on him by Defendant, preparing for and attending his deposition, and reviewing his deposition transcript. Plaintiff was available whenever his attorneys needed him and actively tried to obtain and provide information that would facilitate the pursuit of the case. Accordingly, it is appropriate and just for Plaintiff to receive \$8,000.00 as a reasonable Class Representative Enhancement Payment for his services performed in the matter.

21. I submit that the settlement is fair, reasonable, and adequate, and in the best interests of Plaintiff, the Settlement Class Members, Allegedly Aggrieved Employees, and the State of California.

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

Executed this 28th day of February 2024, at Glendale, California.



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Joanna Ghosh

## **EXHIBIT A**

***BRYAN HICKS V. CALIFORNIA WATER SERVICE***  
**Santa Clara Superior Court Case No. 21CV376394**

**ATTORNEY TASK AND TIME CHART**

| <b>TASK</b>                                                                                                                                                                                                                                                                                      | <b>LAWYERS <i>for</i> JUSTICE, PC</b> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                                                                                                                                |                                       |
| Pre-Lawsuit Investigation of the Key Facts With a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality                                                                                                                                            | 11.50                                 |
| Pre-Lawsuit Investigation of the Merits of Plaintiff Bryan Hicks’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members                                                                                                                                               | 9.60                                  |
| Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant California Water Service (“Defendant”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members                                                                                                    | 8.50                                  |
| Pre-Notice Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiff and the Aggrieved Employees                                                                                                            | 7.80                                  |
| Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant With Respect to the Employment of Plaintiff and the Aggrieved Employees                                                                                                                                              | 6.70                                  |
| Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, Wage Orders, Representative PAGA, and Class Certification Decisions in California, Including all New and Relevant Enforcement Guidance and Division of Labor Standard Enforcement (DLSE) Materials | 7.80                                  |

|                                                                                                                                                                                                                                                                                                                      |      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Investigation of Defendant, Its Parent Company (Including, <i>Inter Alia</i> , Governance Documents, Disclosures, and Reports), Its Business Relationships, Its Products, Services, and Programs, and the Industry in Which Defendant Operates                                                                       | 9.50 |
| Investigation of Defendant's Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees                                                                                                                     | 4.10 |
| Investigation Regarding Defendant's Executives, Officers, and Leadership With a Focus on Involvement in Wage-and-Hour Issues to Evaluate Willfulness and Uniformity, and Research and Analysis of Defendant's Past and Recent Litigation History Involving Labor, Wage-and-Hour, and Other Related Employment Issues | 3.90 |
| Analysis of Competitors in Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors                                                                  | 4.50 |
| Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues | 6.40 |
| Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other Postings and Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks     | 6.10 |
| Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members and Aggrieved Employees Worked Throughout California                                                                                                                                     | 5.30 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Scheduling, Operating Requirements, Maintenance, Reports, Timekeeping, Rounding, Meal/Rest Breaks, On-Premises Breaks, Auto-Deduction, Non-Discretionary Bonus/Incentive/Shift Differential Pay, Regular Rate Calculation, Overtime Compensation, Donning and Doffing, PPE, Tools, Supplies, Dress Code, Footwear, Vouchers, Use of Personal Cell Phones, Reimbursement of Business-Related Expenses, and Collective Bargaining Agreements | 24.50 |
| Research and Investigation Re: Software Programs, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Timekeeping, Payroll, Client/Customer Relations Management, Project Management, Maintenance, Resource Management, Communication, Document and Information Sharing, Safety, Surveillance, and Security Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post Shift, and During Meal Breaks   | 5.40  |
| Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Exemption, Pre-Emption, Waiver, and Compliant Policies                                                                                                                                                                                                                                                                                                                                                                 | 8.50  |
| Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose                                                                                                                                                                                                                                                                                                                                                                                  | 5.60  |
| Research and Preliminarily Outline Issues Important to Class Certification and Trial Manageability                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 21.50 |
| Research and Investigation Re: the Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' and Aggrieved Employees' Work                                                                                                                                                                                                                                                                                                                                                                                                        | 6.50  |
| Meet and Communicate with Plaintiff Bryan Hicks During the Case                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 37.50 |
| Investigate, Meet, Communicate With, and/or Conduct Interviews of Putative Class Members, Aggrieved Employees, and Percipient Witnesses                                                                                                                                                                                                                                                                                                                                                                                                                       | 20.50 |

| <b>Pleadings and Court Filings</b>                                                                                                                   |      |
|------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 23, 2021)             | 8.10 |
| Review Court's Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadline (filed on February 23, 2021)                        | 0.20 |
| Review Defendant's Notice of Appearance (filed on May 5, 2021)                                                                                       | 0.10 |
| Draft Plaintiff's Notice of Posting Jury Fees (filed on June 4, 2021)                                                                                | 0.10 |
| Review Defendant's Notice of Appearance (filed on June 8, 2021)                                                                                      | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Initial Case Management Conference Statement (filed on June 10, 2021)                      | 1.80 |
| Review Court's Notice of Further Case Management Conference and Minute Order (filed June 18, 2021)                                                   | 0.10 |
| Review Court's Notice of Rescheduled Case Management Conference (filed September 30, 2021)                                                           | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement and Notice of Settlement (filed on November 12, 2021) | 1.50 |
| Review Court's Notice of Rescheduled Case Management Conference (filed November 16, 2021)                                                            | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on April 14, 2022)                             | 0.60 |
| Review Court's Notice of Rescheduled Case Management Conference (filed April 15, 2022)                                                               | 0.10 |

|                                                                                                                                                                                                                                                                                                                                                             |      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Review Court's Notice of Rescheduled Case Management Conference (filed August 19, 2022)                                                                                                                                                                                                                                                                     | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on August 19, 2022)                                                                                                                                                                                                                                   | 0.80 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on January 20, 2023)                                                                                                                                                                                                                                  | 0.90 |
| Review Court's Notice of Rescheduled Case Management Conference (filed January 23, 2023)                                                                                                                                                                                                                                                                    | 0.10 |
| Research and Draft Plaintiff's First Amended Class Complaint for Damages and Enforcement under the Private Attorneys General Act Under Cal. Labor Code § 2698 Et Seq. (filed on February 24, 2023); Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint (filed February 3, 2023) | 4.80 |
| Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed February 8, 2023)                                                                                                                                                                                                                                                      | 0.10 |
| Review and Analyze Defendant's Answer to Plaintiff's First Amended Class Action Complaint and Research Affirmative Defenses in Defendant's Answer (filed March 10, 2023)                                                                                                                                                                                    | 1.50 |
| Review Court's Notice of Rescheduled Case Management Conference (filed June 1, 2023)                                                                                                                                                                                                                                                                        | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on August 4, 2023)                                                                                                                                                                                                                                    | 0.80 |
| Review Court's Minute Order Re Vacating Case Management Conference (filed August 11, 2023)                                                                                                                                                                                                                                                                  | 0.10 |
| Review Court's Order and Notice of Reassignment of Case (filed December 29, 2023)                                                                                                                                                                                                                                                                           | 0.10 |

| <b>Appearances</b>                                                                                                                                                                                                  |       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Prepared for and Remotely Appear for Initial Status Conference (June 17, 2021)                                                                                                                                      | 1.30  |
| Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (August 10, 2023)                                                                                 | 1.10  |
| Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Class Representative Enhancement Payment (March 21, 2024) (Anticipated) | 1.50  |
| <b>Discovery and Deposition</b>                                                                                                                                                                                     |       |
| Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Bryan Hicks (served on September 18, 2020)                                                                      | 1.90  |
| Review and Analyze Documents Produced by Defendant in Response to Request for Personnel Files, Pay Stubs, and Time Records for Plaintiff Bryan Hicks (served on October 9, 2020)                                    | 3.50  |
| Review Defendant's Notice of Deposition of Plaintiff Bryan Hicks and Requests for Production of Documents (noticed for January 22, 2022) (served on December 22, 2021)                                              | 0.50  |
| Draft Plaintiff Bryan Hicks's Objections and Responses to Defendant's Demand to Produce Documents and Gather Documents for Production                                                                               | 8.50  |
| Prepare for and Defend the Deposition of Bryan Hicks (January 19, 2022; Zoom Video Conference) and Review Deposition Transcript                                                                                     | 12.50 |
| <b>Letters and Correspondence</b>                                                                                                                                                                                   |       |
| Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Bryan Hicks for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on March 3, 2022) | 4.50  |

|                                                                                                                                                                                                                                                                                            |       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Meet With, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel                                                                                                                                                                                                | 18.50 |
| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                                |       |
| Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation                                                                                                                                                               | 86.50 |
| Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief (submitted on February 16, 2022), Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations | 38.50 |
| Remotely Attend Mediation Session (Zoom Video Conference; February 23, 2022)                                                                                                                                                                                                               | 15.50 |
| Review Mediator's Proposal (issued on February 23, 2022 and accepted on February 24, 2023)                                                                                                                                                                                                 | 2.10  |
| Draft, Review, Revise, Negotiate, and Finalize Confidential Memorandum of Understanding (executed on May 10, 2022)                                                                                                                                                                         | 3.50  |
| Draft, Review, Revise, Negotiate, and Finalize Class Action Settlement and Release (executed on May 4, 2023) and Notice of Class Action Settlement                                                                                                                                         | 22.50 |
| Draft, Review, Revise, Negotiate, and Finalize Amendment No. 1 to Class Action Settlement and Release (executed on August 9, 2023) and Revised Notice of Class Action Settlement                                                                                                           | 2.10  |
| Coordinate Settlement Administration With Settlement Administrator, Ongoing Monitoring of Settlement Administration, Review Weekly Reports, and Respond to Inquiries                                                                                                                       | 7.50  |

| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                                                                                                                                              |        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Brian J. St. John in Support Thereof, Declaration of Bryan Hicks in Support Thereof, and [Proposed] Order Thereon (filed on May 19, 2023)                                                                                                                                                     | 24.50  |
| Review and Analyze Court's Tentative Ruling Re Plaintiff's Motion for Preliminary Approval of Class Action Settlement (issued August 7, 2023)                                                                                                                                                                                                                                                                                                                      | 0.60   |
| Draft Plaintiff's Supplemental Declaration of Brian J. St. John in Support of Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, and [Revised Proposed] Order Thereon (filed on August 10, 2023)                                                                                                                                                                                                                         | 1.80   |
| Review Court's Order Granting Motion for Preliminary Approval of Class Action Settlement and Minute Order Re Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed August 11, 2023)                                                                                                                                                                                                                                                        | 0.20   |
| Review Court's Order and Notice of Rescheduled Hearing Re Final Fairness Hearing (filed on January 16, 2024)                                                                                                                                                                                                                                                                                                                                                       | 0.10   |
| Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Class Representative Enhancement Payment, Declaration of Joanna Ghosh in Support Thereof, Declaration of Bryan Hicks in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on February 28, 2024) (Anticipated) | 25.50  |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                | 528.70 |

## **EXHIBIT B**

# LAWYERS for JUSTICE PC CASE COST DETAIL

## Hicks v. California Water Service

| <u>Date</u>   | <u>Payee</u>                         | <u>Expense Description</u> | <u>Amount</u>      |
|---------------|--------------------------------------|----------------------------|--------------------|
| 9/18/2020     | U.S. Postmaster                      | Postage                    | \$7.00             |
| 2/23/2021     | Legal Document Server, Inc.          | Attorney Service           | \$67.03            |
| 2/23/2021     | Santa Clara County Superior Court    | Complaint Filing Fee       | \$435.00           |
| 2/23/2021     | Santa Clara County Superior Court    | Complex Filing Fee         | \$1,000.00         |
| 4/14/2021     | Legal Document Server, Inc.          | Attorney Service           | \$150.00           |
| 5/4/2021      | Legal Document Server, Inc.          | Attorney Service           | \$16.80            |
| 6/7/2021      | Legal Document Server, Inc.          | Attorney Service           | \$22.05            |
| 6/7/2021      | Santa Clara County Superior Court    | Jury Fee                   | \$150.00           |
| 6/10/2021     | General Logistics Systems, Inc.      | Courier Service            | \$20.28            |
| 6/10/2021     | Legal Document Server, Inc.          | Attorney Service           | \$16.80            |
| 6/11/2021     | CourtCall, LLC                       | Attorney Service           | \$94.00            |
| 7/13/2021     | First Mediation Corporation          | Mediation Fee              | \$9,000.00         |
| 11/12/2021    | Legal Document Server, Inc.          | Attorney Service           | \$16.80            |
| 11/12/2021    | CourtCall, LLC                       | Attorney Service           | \$94.00            |
| 11/12/2021    | General Logistics Systems, Inc.      | Courier Service            | \$16.38            |
| 1/19/2022     | TSG Reporting, Inc.                  | Court Reporter             | \$1,608.50         |
| 3/3/2022      | Labor & Workforce Development Agency | PAGA Filing Fee            | \$75.00            |
| 3/3/2022      | U.S. Postmaster                      | Postage                    | \$9.00             |
| 4/14/2022     | Legal Document Server, Inc.          | Attorney Service           | \$16.80            |
| 4/20/2022     | CourtCall, LLC                       | Attorney Service           | \$94.00            |
| 2/8/2023      | Legal Document Server, Inc.          | Attorney Service           | \$18.90            |
| 2/8/2023      | Santa Clara County Superior Court    | Stipulation & Order Fee    | \$20.00            |
| 2/24/2023     | Legal Document Server, Inc.          | Attorney Service           | \$17.55            |
| 5/19/2023     | Legal Document Server, Inc.          | Attorney Service           | \$21.92            |
| 5/19/2023     | Santa Clara County Superior Court    | Motion Filing Fee          | \$60.00            |
| 5/22/2023     | Legal Document Server, Inc.          | Attorney Service           | \$232.50           |
| 8/4/2023      | Legal Document Server, Inc.          | Attorney Service           | \$17.67            |
| 8/10/2023     | Legal Document Server, Inc.          | Attorney Service           | \$17.67            |
| 8/16/2023     | Legal Document Server, Inc.          | Attorney Service           | \$17.67            |
| <b>Total:</b> |                                      |                            | <b>\$13,333.32</b> |