

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Brian J. St. John (SBN 304112)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

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

MIREYA ARTEAGA, 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.

ARCH HEALTH PARTNERS, an unknown
business entity; PACIFIC ACCOUNTABLE
MANAGEMENT, LLC, a California limited
liability company; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 37-2019-00041863-CU-OE-CTL

Honorable Timothy Taylor
Department C-72

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement; Notice
of Motion and Motion for Attorneys' Fees
and Costs, and Enhancement Payment;
Declaration of Class Representative (Mireya
Arteaga); Declaration of Settlement
Administrator (Mary Butler); [Proposed]
Order Granting Final Approval of Class Action
Settlement and Judgment; and [Proposed]
Order Awarding Attorneys' Fees and Costs,
and Enhancement Payment filed concurrently
herewith]

Date: April 21, 2023
Time: 1:00 p.m.
Department: C-72

Complaint Filed: August 9, 2019
FAC Filed: November 17, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, 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 Mireya Arteaga (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On November 18, 2022, in Department C-72 of the above-entitled Court, the Honorable Timothy Taylor preliminarily approved the Joint Stipulation of Class and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendants Arch Health Partners, Inc. and Pacific Accountable Management, LLC (together, “Defendants”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Mireya Arteaga to represent the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator for handling the notice and settlement administration process.

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

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WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers for Justice, PC have been actively engaged in litigating the above-captioned action since prior to its commencement on August 9, 2019.

5. Before initiating the case, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiff 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 non-exempt employees who worked for Defendants, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel investigated the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial prior to reaching the Settlement. The parties conducted significant formal and informal discovery and investigation into the facts of the case, and informally exchanged a large volume of documents, information, and data throughout the course of litigation and in connection with mediation and settlement negotiations. Class Counsel propounded multiple sets of written discovery requests on each of the Defendants (i.e., Plaintiff's Form Interrogatories – General (Set One), Request for Admissions (Set One), Request for Production of Documents (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Special Interrogatories (Set One) on each of the Defendants), served notices of deposition of person most knowledgeable with accompanying requests for productions of documents on each of the Defendants, took the deposition of Defendants' Person Most Knowledgeable designee (Dianne St. John), and prepared for and defended the deposition of Plaintiff. Class Counsel had the opportunity to interview and obtain information from Plaintiff and other putative class members and reviewed and analyzed a large volume of information,

documents, and data obtained from Plaintiff, Defendants, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included, and was not limited to, Plaintiff and other Class Members' employment records, PowerPoint presentations (such as the 2017 annual training presentation, Time and Attendance Presentation, Employee Benefit presentation, HR tasks and intro to Paycom presentation, Intro to Nextgen EPM presentation), Defendants' Employee Handbooks, internal memoranda, job titles and descriptions, policies (such as Defendants' Unlawful Harassment policy, Nondiscrimination policy, Meal and Rest Period policy, Specimen Collection and Labeling policy, and Conflict of Interest Disclosure), acknowledgement forms (such as Plaintiff and other Class Member's Acknowledgement of Receipt of Employee Handbook, Acknowledgement of Standards of Conduct, Acknowledgement of Injury and Illness Prevention Program Information, HIPAA Privacy Education Form, Acknowledgement of Return of Company Property, and Medicare Fraud, Waste, and Abuse Policy Acknowledgment), Personnel Action Forms, offer letters to Plaintiff and other Class Member, sampling of class time and pay data (including, but not limited to, timecards, payroll records, and wage statements), employee separation reports, earnings statements, checks, corrective action forms, order of withholding from earnings, employee check listings, performance reviews, meal and break schedules, confidentiality agreements, and official notices by IWC to be posted for employees, among other information and documents. Class Counsel researched applicable law, developed liability, damages, and penalties valuation models in connection with mediation and settlement negotiations, and met and conferred with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings and the production of information, documents, and data in the course of litigation and mediation and settlement negotiations. Class Counsel also drafted pleadings and the mediation brief, prepared for and attended court proceedings, and prepared for and participated in mediation and settlement negotiations, among other tasks.

7. The parties have conducted significant formal and informal discovery and investigation during the course of litigating the case and mediation and settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from

1 Plaintiff, Defendants, and/or other sources. The information, documents, and data provided a
2 critical understanding of the nature of the work performed by the Class Members and PAGA
3 Aggrieved Employees, as well as Defendants' operations and employment policies, practices,
4 and procedures, and were used in analyzing liability, damages, and penalties valuation issues in
5 connection with all phases of the litigation, and ultimately, in connection with the mediation and
6 settlement negotiation process. Class Counsel also performed research regarding applicable law
7 which is evolving as it relates to certification, PAGA representative claims, off-the-clock theory,
8 meal and rest periods, wage-and-hour law and enforcement, arbitration and class action waiver
9 agreements, Plaintiff's claims and allegations, and Defendants' defenses thereto, as well as facts
10 discovered.

11 8. After conducting significant investigation of the facts and law during the
12 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
13 try to resolve the entire matter. These efforts included participating in a formal mediation
14 conducted by Mark S. Rudy, Esq., a well-regarded mediator experienced in mediating complex
15 labor and employment matters. During all settlement discussions, the parties conducted their
16 negotiations at arm's length in an adversarial position. In the course of mediation and settlement
17 negotiations, the parties exchanged information and data, and discussed all aspects of the case,
18 including but not limited to the risks and delays of further litigation, the risks to the parties of
19 proceeding with class certification and trial, the law relating to certification, off-the-clock theory,
20 meal and rest periods, representative PAGA claims, and wage-and-hour law and enforcement, the
21 evidence produced and analyzed, the possibility of appeals, and Defendant's financial
22 circumstances, among other things. Arriving at a settlement that was acceptable to the parties
23 was not easy. Defendants and their counsel felt strongly about Defendants' ability to prevail on
24 the merits and to avoid class certification and representative adjudication, while Plaintiff and
25 Class Counsel believed that they would be able to obtain class certification and prevail at trial.
26 With the aid of the mediator's evaluation, the parties ultimately agreed that the case was well-
27 suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as the
28 costs and risks to the parties that would attend further litigation. These risks of further litigation

1 include, and are not limited to, a determination that the claims are unsuitable for class treatment
2 and/or representative adjudication, class de-certification after certification of a class, allowing a
3 jury to decide the claims asserted in the case, and the real possibility of no monetary recovery
4 after years of litigation.

5 9. By way of the accompanying Motion for Fees, Class Counsel seeks attorneys' fees
6 in the amount of \$1,137,500.00, which is thirty-five percent (35%) of the Maximum Settlement
7 Amount of \$3,250,000.00, as set forth in the Settlement Agreement and the Class Notice.
8 Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class
9 Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the
10 recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took
11 in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the
12 case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
13 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
14 has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to
15 devote its time and efforts to this matter.

16 10. I am aware that common and acceptable rates for contingency representation in
17 wage and hour class action litigation are normally in the range from 33.3% up to 50%.

18 11. While not necessarily required to be demonstrated because the percentage fee is
19 proper for this settlement, Class Counsel has incurred many hours of work in connection with
20 prosecuting the case such that the award of attorneys' fees is also justified under a lodestar
21 analysis with a multiplier of 2.45. Attorneys at Lawyers for Justice, PC have spent a total of
22 **663.90 hours** performing tasks and obtaining recovery in this matter. Attached hereto as
23 **"EXHIBIT A"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal
24 services provided by attorneys at Lawyers for Justice, PC and the time incurred in performing
25 those services. These hours include work done by myself and several other attorneys at Lawyers
26 for Justice, PC. Additionally, separate from the hours referenced herein, Lawyers for Justice, PC
27 had litigation support personnel actively engaged in assisting with the prosecution of this matter.

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12. 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 case, in litigating complex wage-and-hour actions, and in particular, employment class and representative actions, support a reasonable blended hourly rate of compensation of at least \$700 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 \$700 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour 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 an hourly rate of \$936.47; 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 an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; 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 an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers*

(Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

13. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

JUDICIAL EXTERNSHIPS

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

LITIGATION AND CLASS ACTION EXPERIENCE

15. In December of 2004, I obtained a license to practice law from the California State Bar. From approximately December 2004 to approximately August 2008, I was employed by *Girardi & Keese*.

16. At *Girardi & Keese*, my practice focused on class actions and other complex cases involving toxic torts and products liability. In addition, I gained substantial experience on cases involving insurance bad faith, premises liability, and medical negligence. While employed by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150 depositions, and prepared dozens of expert witnesses for deposition or trial.

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17. Since its inception, in or around October of 2008, 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 the attorney of record in well over a dozen 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 to the State of California and federal overtime compensation requirements. During this 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

26 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 PAGA representative action, against a global provider of products and services to the energy
28 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court

1 granted approval of the PAGA representative action settlement. The Kern County Superior Court
2 Case Number is S-1500-CV-280215-SDC.

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

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

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

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

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

1 approval of the PAGA representative action settlement. The San Diego County Superior Court
2 Case Number is 34-2015-00175330.

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

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

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

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

25 **LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL**

26 19. To date, Class Counsel has borne all of the risks and costs of litigation and will not
27 receive any compensation until recovery is obtained in this case. Lawyers for Justice, PC seeks
28 reimbursement of \$19,437.73 in litigation costs and expenses incurred in this matter, as reflected

1 in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the
2 prosecution of the case and to obtain the Settlement.

3 **ENHANCEMENT PAYMENT TO PLAINTIFF**

4 20. In recognition of her efforts and work serving as the Class Representative, the
5 Settlement provides for an Enhancement Payment in the amount of \$12,500.00 to Plaintiff Mireya
6 Arteaga. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a
7 substantial amount of time and effort in producing relevant documents and past employment
8 records and provided the facts and evidence necessary to attempt to prove the allegations,
9 including and not limited to, by way of working with Class Counsel to provide responses to
10 interrogatories and requests for production of documents that were propounded on her by
11 Defendant Arch Health Partners, preparing for and attending deposition, and reviewing her
12 deposition transcript. Plaintiff was available whenever Class Counsel needed her and actively
13 tried to obtain and provide information that would facilitate the pursuit of the class and PAGA
14 claims. Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing
15 her work experience with Defendants, and gathering and reviewing documents. Accordingly, it
16 is appropriate for Plaintiff Mireya Arteaga to receive \$12,500.00 as a reasonable Enhancement
17 Payment for her services on behalf of the Class Members, the State of California, and the PAGA
18 Aggrieved Employees, in addition to her Individual Settlement Payment. It should be noted that,
19 the Joint Stipulation of Class and PAGA Settlement executed on October 20, 2022 (in Section
20 B.12 at Page 4, Line 11 and in Section C.5 at Page 9, Line 6), Plaintiff’s Memorandum of Points
21 and Authorities in Support of the Motion for Preliminary Approval of Class Action Settlement
22 filed on October 21, 2022 (at Page 24, Line 23), and the Declaration of Ovsanna Takvoryan in
23 Support of Plaintiff’s Notice of Motion and Motion for Preliminary Approval of Class Action
24 Settlement filed on October 21, 2022 (in Paragraph 20 at Page 18, Line 15) inadvertently state
25 that Plaintiff will receive an Individual Settlement Payment and Individual PAGA Payment,
26 however, Plaintiff will only be receiving an Individual Settlement Payment.

27 ///

28 ///

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

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

Executed this 7th day of April 2023, at Glendale, California.



Edwin Aiwarzian

EXHIBIT A

MIREYA ARTEAGA V. ARCH HEALTH PARTNERS, INC.
(SAN DIEGO COUNTY SUPERIOR COURT CASE NO. 37-2019-00041863-CU-OE-CTL)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality	12.60
Pre-Lawsuit Investigation of the Merits of Plaintiff Mireya Arteaga (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	10.20
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendants Arch Health Partners and Pacific Accountable Management (together, “Defendants”) with Respect to Plaintiff and the Putative Class Members	11.20
Pre-Notice Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Aggrieved Employees	8.10
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendants with Respect to the Aggrieved Employees	7.50
Legal Research & Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Certification Decisions in California, including all New and Relevant DLSE Materials	8.50
Investigation of Defendants, Defendants’ Business Relationships, and the Industry in which Defendants Operate	4.50

Investigation of Defendants' Licenses and Registrations and Investigation/Citation/Violations Report(s) By Government Entities (Including and Not Limited To, U.S. Attorney's Office)	4.50
Investigation of Defendants' Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	5.70
Investigation of Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity, and Research and Analysis of Defendants' Past and Recent Litigation History and Agency Proceedings History Involving Labor, Wage-and-Hour, and Other Related Employment Issues	4.50
Analysis of Competitors in Various Relevant Geographic Areas within which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendants' Competitors	5.70
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendants (Including, Inter Alia, Cardiology, Care Management, Chronic Care Management, Clinical Pharmacy, Clinical Research, Dermatology, Electrophysiology, ENT, Family Medicine, Gastroenterology, Imaging Services, Internal Medicine, Lab Services, Ophthalmology/Optomety, Orthopedics, Pediatrics, Physical Therapy, Pulmonology, Rheumatology, Skilled Nursing, Sleep Medicine, Sports Medicine, Urgent Care, and Vaccinations) in California During the Class Period and Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	14.80
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Consumer Review Regarding Defendants in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock and/or During Meal or Rest Breaks	8.30
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members Worked Throughout California	5.30

Research and Investigation Re: Defendants' Written and Non-Written Policies, Practices, and Procedures Relating to Opening and Closing Procedures, Pre-Shift and Post-Shift Tasks, Attendance, Training, Meetings, Timekeeping, Rounding, Scheduling, Alternative Workweek Schedules, Patient Care Requirements, Code Red/Backlogs, Meal/Rest Breaks, On-Premises Breaks, Meal/Rest Premiums, Meal Waivers, Non-Discretionary Bonus/Shift Differential/Performance/Referral/Incentive Pay, Overtime Compensation, Reporting Time Pay, Health and Safety, Supplies, PPE, Equipment, Dress Code/Uniform, Use of Personal Cell Phones and Laptops, Use of Personal Vehicle/Gas/Mileage/Travel, Use of Personal Internet Connection, Reimbursement of Business-Related Expenses, and Arbitration Agreements	29.50
Research and Investigation Re: Various Software Programs, Applications, Systems, and Other Technology Defendants Use to Conduct Its Everyday Business, Including Document and Information Management, Communications, Timekeeping, Inventory, Resource Management, Patient Care, Phone/Call Distribution, Scheduling, Surveillance, Controlled Access, and Security Systems with a Focus on What Records (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	5.90
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis Work</i> , Non-Compensable Off-the-Clock Work, Alternative Workweeks Schedules, Exemption, Waiver, Arbitration and Class Action Waiver Agreements, and Compliant Policies	8.20
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, Including Research Regarding Which Experts to Retain and For What Purpose	5.50
Research and Investigation Regarding Impact of COVID-19 Pandemic on Defendants, Their Operations, and Putative Class Members and Aggrieved Employees's Work	7.90
Meet and Communicate with Plaintiff Mireya Arteaga Throughout the Pendency of the Case	86.50
Investigate, Meet and Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	18.50

Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages, and Legal Research and Analysis of All Claims Involved (filed on August 9, 2019)	7.50
Review Court's Notice of Case Assignment and Case Management Conference (filed on August 9, 2019)	0.10
Review and Analyze Defendant Arch Health Partners, Inc.'s Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (filed on September 16, 2019)	1.90
Draft Plaintiff's Notice of Posting Jury Fees (filed on September 30, 2019)	0.20
Review and Analyze Defendant Pacific Accountable Management LLC's Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (filed on October 23, 2019)	1.90
Review and Analyze Defendants' Consolidated First Amended Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (filed on November 14, 2019)	1.70
Review Defendants' Case Management Conference Statement (filed on December 26, 2019)	0.30
Draft Plaintiff's Case Management Conference Statement (filed on December 26, 2019)	1.10
Review Court's Minute Order (filed on January 10, 2020)	0.10
Review Court's Notice of Taking Matter Off Calendar (filed on May 13, 2020)	0.10
Review Court's Notice of Rescheduled Hearing (filed on May 16, 2020)	0.10
Review Court's Notice of Rescheduled Hearing (filed on November 17, 2020)	0.10
Review Defendants' Case Management Conference Statement (filed on January 27, 2021)	0.30

Draft Plaintiff's Case Management Conference Statement (filed on February 4, 2021)	1.10
Review Court's Notice of Rescheduled Hearing (filed on February 11, 2021)	0.10
Review Court's Minute Order (filed on February 11, 2021)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Class Certification Hearing Date; [Proposed] Order (filed on September 15, 2021)	1.50
Review Court's Order Granting Joint Stipulation to Continue Class Certification Hearing Date (filed on September 16, 2021)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Notice of Settlement and Stipulation to Vacate Motion for Class Certification Deadline; And [Proposed] Order (filed on March 11, 2022)	1.30
Review Court's Order Granting Stipulation to Vacate Motion for Class Certification Deadline (filed on March 15, 2022)	0.10
Review Court's Notice of Hearing (filed on April 15, 2022)	0.10
Review Court's Notice of Rescheduled Hearing (filed on April 15, 2022)	0.10
Review Court's Minute Order (filed on April 15, 2022)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Hearing on Motion for Preliminary Approval of Settlement and Case Management Conference; [Proposed] Order Thereon (filed on July 28, 2022)	0.90
Review Court's Order Denying Joint Stipulation to Continue Hearing on Motion for Preliminary Approval of Settlement and Case Management Conference (filed on July 28, 2022)	0.20
Review Court's Notice of Rescheduled Hearing (filed on August 19, 2022)	0.10

Review Court's Notice of Order to Show Cause Re: Sanctions Pursuant to CCP 177.5 and/or 575 (filed on August 19, 2022)	0.20
Review Court's Minute Order (filed on August 19, 2022)	0.20
Draft Plaintiff's Response to Order to Show Cause Re: Sanctions (filed on September 2, 2022)	0.90
Draft Declaration of Manuel Martinez in Support of Response to Order to Show Cause Re: Sanctions (filed on September 2, 2022)	0.80
Draft Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on November 17, 2022); Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and [Proposed] Order Granting Plaintiff Leave to File First Amended Complaint (filed on September 8, 2022)	5.80
Review Court's Minute Order Re: Order to Show Cause Re: Sanctions (filed on September 9, 2022)	0.10
Review Court's Notice of Rescheduled Hearing (filed on September 9, 2022)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Conference Statement (filed on November 3, 2022)	0.90
Appearances	
Prepare for and Telephonically Attend Case Management Conference (January 10, 2020)	0.90
Prepare for and Telephonically Attend Case Management Conference (February 11, 2021)	1.30
Prepare for and Telephonically Attend Case Management Conference (April 15, 2022)	0.70
Prepare for and Telephonically Attend Case Management Conference (August 19, 2022)	0.80

Prepare for, Travel to/from, and Attend or Telephonically Attend Order to Show Cause Re: Sanctions Hearing (September 9, 2022)	4.50
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (November 18, 2022)	0.80
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement and Plaintiff's Motion for Attorneys' Fees, Costs, and Enhancement Payment (April 21, 2023) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Mireya Arteaga (served on June 3, 2019)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on June 3, 2019)	1.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Mireya Arteaga (served on June 18, 2019)	2.10
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on June 18, 2019)	8.20
Review and Analyze Defendant Arch Health Partners, Inc.'s Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), and Special Interrogatories (Set One) to Plaintiff (served on September 20, 2019)	1.60
Review and Analyze Defendant Arch Health Partners, Inc.'s Notice of Taking the Deposition of Plaintiff and Request for Production of Document (noticed for November 13, 2019) (served on September 20, 2019)	0.90

Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Request for Production of Documents (Set One), and Request for Production of Documents (Set Two) to Defendant Arch Health Partners, Inc (served on September 23, 2019)	8.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Arch Health Partners, Inc., and Requests for Production of Documents (noticed for December 16, 2019; Organizational Structure) (served on September 23, 2019)	3.80
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Arch Health Partners, Inc., and Requests for Production of Documents (noticed for December 17, 2019; Wage and Hour Practices) (served on September 23, 2019)	4.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Arch Health Partners, Inc., and Requests for Production of Documents (noticed December 18, 2019; Affirmative Defenses) (served on September 23, 2019)	5.10
Review and Analyze Defendant Arch Health Partners, Inc.'s Response to Plaintiff's Special Interrogatories (Set One) (served on October 25, 2019)	0.90
Review and Analyze Defendant Arch Health Partners, Inc.'s Amended Notice of Taking the Deposition of Plaintiff and Request for Production of Documents (noticed for December 3, 2019) (served on November 5, 2019)	0.70
Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Request for Production of Documents (Set One), and Request for Production of Documents (Set Two) to Defendant Pacific Accountable Management LLC (served on November 6, 2019)	6.20

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Pacific Accountable Management, LLC, and Requests for Production of Documents (noticed for January 27, 2020; Organizational Structure) (served on November 6, 2019)	2.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Pacific Accountable Management, LLC, and Requests for Production of Documents (noticed for January 28, 2020; Wage and Hour Practices) (served on November 6, 2019)	2.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Pacific Accountable Management, LLC, and Requests for Production of Documents (noticed for January 29, 2020; Affirmative Defenses) (served on November 6, 2019)	2.90
Draft Plaintiff's Objections to Defendant Arch Health Partners Inc.'s Amended Notice of Taking the Deposition of Plaintiff and Request for Production of Document (December 3, 2019) (served on December 1, 2019)	15.90
Draft Plaintiff's Responses to Defendant Arch Health Partners Inc.'s Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), and Special Interrogatories (Set One) (served on December 4, 2019)	9.20
Review and Analyze Defendants' Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Arch Health Partners Inc., and Requests for Production of Documents (Organizational Structure) (served on December 6, 2019)	0.90
Review and Analyze Defendants' Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Arch Health Partners Inc., and Requests for Production of Documents (Wage and Hour Practices) (served on December 6, 2019)	1.40
Review and Analyze Defendants' Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Arch Health Partners Inc., and Requests for Production of Documents (Affirmative Defenses) (served on December 6, 2019)	0.50

Review and Analyze Defendant Pacific Accountable Management LLC's Objections to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Request for Production of Documents (Set One) (served on December 10, 2019)	4.30
Review and Analyze Defendant Arch Health Partners, Inc.'s Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Request for Production of Documents (Set One) (served on December 10, 2019)	6.10
Review and Analyze Documents Produced by Defendant (Bates No. AHP 000001-000230) (served on December 17, 2019)	5.80
Review and Analyze Defendants' Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Pacific Accountable Management, LLC, and Requests for Production of Documents (Organizational Structure) (served on January 17, 2020)	0.80
Review and Analyze Defendants' Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Pacific Accountable Management, LLC, and Requests for Production of Documents (Wage and Hour Practices) (served on January 17, 2020)	1.10
Review and Analyze Defendants' Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Pacific Accountable Management, LLC, and Requests for Production of Documents (Affirmative Defenses) (served on January 17, 2020)	0.30
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (drafted on February 5, 2020)	1.20
Review and Analyze Defendant Arch Health Partners, Inc.'s Second Amended Notice of Taking Deposition of Plaintiff and Request for Production of Documents (October 9, 2020) (served on September 28, 2020)	0.90

Draft Plaintiff's Objections to Defendant Arch Health Partners, Inc.'s Second Amended Notice of Taking Deposition of Plaintiff and Request for Production of Documents (October 9, 2020) (served on October 1, 2020)	3.20
Prepare for and Defend the Deposition of Plaintiff Mireya Arteaga (October 9, 2020; Zoom Video Conference), and Review Deposition Transcript	14.50
Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Arch Health Partners, Inc., and Requests for Production of Documents (noticed for January 29, 2021; Organizational Structure) (served on December 29, 2020)	2.20
Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Pacific Accountable Management LLC, and Requests for Production of Documents (noticed for January 29, 2021; Organizational Structure) (served on December 29, 2020)	1.90
Review Defendants' Objections to Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Arch Health Partners, Inc., and Requests for Production of Documents (Organizational Structure) (served on January 22, 2021)	2.80
Review Defendants' Objections to Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Pacific Accountable Management LLC, and Requests for Production of Documents (Organizational Structure) (served on January 22, 2021)	1.90
Review and Analyze Documents Produced by Defendants (Bates No. AHP 000231-000644) (served on January 28, 2021)	7.50
Prepare for and Take the Deposition of Defendants' Person Most Knowledgeable Dianne St. John (January 29, 2021; Zoom Video Conference) and Review Deposition Transcript	16.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 17, 2021)	1.90

Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 8, 2021)	1.10
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on January 4, 2022)	2.70
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Mireya Arteaga for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on April 29, 2022)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	20.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources Prior to Mediation • Employee Handbooks and Employment and Operations Policies, Practices, and Procedures Documents • Sampling of Employee Time Data • Sampling of Employee Pay Data • PPP Loan and Financial Information	48.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, Preparing PowerPoint Presentation, and Performing Damages and Penalties Analysis and Calculations (submitted on February 9, 2022)	34.50
Attend Mediation Session (February 15, 2022; Zoom Video Conference)	14.50

Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding (executed March 9, 2022)	2.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class and PAGA Settlement (executed on October 20, 2022) and Notice of Class Action Settlement	20.50
Review and Monitor Notice Administration Process and Settlement Administrator's Weekly Reports	7.50
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Ovsanna Takvoryan in Support Thereof, Declaration of Mireya Arteaga in Support Thereof, and [Proposed] Order Thereon (filed on October 21, 2022)	18.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on November 18, 2022)	0.50
Review Court's Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement and Minute Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on November 18, 2022)	0.30
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, Plaintiff's Motion for Attorneys' Fees and Costs, and Enhancement Payment, Declaration of Edwin Aiwasian in Support Thereof, [Proposed] Order Granting Final Approval Order of Class Action Settlement and Judgment, and [Proposed] Order Awarding Attorneys' Fees and Costs, and Enhancement Payment (filed on April 7, 2023) (Anticipated)	19.50
Total Hours:	663.90

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Arteaga v. Arch Health Partners

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
6/3/2019	U.S. Postmaster	Postage	13.36
8/12/2019	One Legal	Attorney Service	57.31
8/12/2019	San Diego County Superior Court	Court Filing Fee	435.00
8/12/2019	San Diego County Superior Court	Complex Filing Fee	1,000.00
8/15/2019	Legal Document Server, Inc.	Attorney Service	240.00
9/17/2019	One Legal	Attorney Service	9.95
9/18/2019	General Logistics Systems US, Inc.	Courier Service	15.43
9/18/2019	One Legal	Attorney Service	9.95
9/23/2019	FedEx Express	Courier Service	21.57
9/24/2019	General Logistics Systems US, Inc.	Courier Service	11.95
9/25/2019	General Logistics Systems US, Inc.	Courier Service	14.68
9/25/2019	One Legal	Attorney Service	9.95
10/2/2019	One Legal	Attorney Service	17.90
10/2/2019	San Diego County Superior Court	Jury Fee	150.00
10/16/2019	FedEx Express	Courier Service	24.49
10/18/2019	Legal Document Server, Inc.	Attorney Service	110.00
10/23/2019	Legal Document Server, Inc.	Attorney Service	110.00
11/6/2019	General Logistics Systems US, Inc.	Courier Service	13.63
12/2/2019	Legal Document Server, Inc.	Attorney Service	185.00
12/27/2019	One Legal	Attorney Service	9.95
1/3/2020	CourtCall, LLC	Attorney Service	94.00
1/28/2020	General Logistics Systems US, Inc.	Courier Service	12.20
10/1/2020	General Logistics Systems US, Inc.	Courier Service	20.97
10/9/2020	Daniel Kramer	Travel Reimbursement	503.94
10/9/2020	Esquire Deposition Solutions, LLC	Court Reporter Cancellation	855.00
10/9/2020	Esquire Deposition Solutions, LLC	Videography Service Cancellation	190.00
12/29/2020	General Logistics Systems US, Inc.	Courier Service	14.48
1/29/2021	Esquire Deposition Solutions, LLC	Court Reporter	3,684.55
1/29/2021	Esquire Deposition Solutions, LLC	Videography Service	950.00
2/4/2021	General Logistics Systems US, Inc.	Courier Service	12.69
2/4/2021	One Legal	Attorney Service	12.00
2/5/2021	CourtCall, LLC	Attorney Service	94.00
9/20/2021	One Legal	Attorney Service	12.94
9/20/2021	San Diego County Superior Court	Filing Fee	20.00
10/12/2021	Mark S. Rudy	Mediation Fee	10,000.00
2/10/2022	FedEx Express	Courier Service	83.15
3/18/2022	Legal Document Server, Inc.	Attorney Service	15.35
3/18/2022	San Diego County Superior Court	Filing Fee	20.00
8/18/2022	Legal Document Server, Inc.	Attorney Service	16.10
8/18/2022	San Diego County Superior Court	Filing Fee	20.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Arteaga v. Arch Health Partners

9/7/2022	Legal Document Server, Inc.	Attorney Service	14.75
9/23/2022	San Diego County Superior Court	Document Download Fee	1.00
10/25/2022	Legal Document Server, Inc.	Attorney Service	228.50
10/26/2022	One Legal	Attorney Service	14.64
10/26/2022	San Diego County Superior Court	Filing Fee	60.00
11/3/2022	Legal Document Server, Inc.	Attorney Service	14.75
12/9/2022	San Diego County Superior Court	Document Download Fee	12.60
Total:			19,437.73