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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF STANISLAUS**

ALEXIS SALCIDO-CEJA, 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.

MADRUGA ALVES CAR WASH, INC., a
California corporation; FAST TRACK CAR
WASH, LLC, a California limited liability
company; and DOES 1 through 100, inclusive,

Defendants.

Case No. CV-21-003878

Honorable Stacy Speiller
Department 22

CLASS ACTION

**DECLARATION OF ELIZABETH
PARKER-FAWLEY IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES
AND COSTS AND ENHANCEMENT
PAYMENT**

Date: September 6, 2024
Time: 8:30 a.m.
Department: 22

Complaint Filed: July 23, 2021
FAC Filed: November 7, 2023
Trial Date: None Set

DECLARATION OF ELIZABETH PARKER-FAWLEY

I, Elizabeth Parker-Fawley, 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 Alexis Salcido-Ceja (“Plaintiff”) and the Class in the above-captioned matter. 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 April 19, 2024, in Department 22 of the above-entitled Court, the Honorable Stacy Speiller preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release (“Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendants Madruga Alves Car Wash, Inc. and Fast Track Car Wash, LLC (together, “Defendants”) (collectively with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff as the representative of 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 Court Approved Notice of Class Action Settlement (“Class Notice”), 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 settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Payment (“Motion for Final Approval”), no Settlement Class Members have objected to the Class Settlement or the contemplated request for Attorneys’ Fees and Costs, Enhancement Payment, Settlement Administration Costs, and PAGA Penalties.

WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in this matter since prior to the commencement of Plaintiff’s putative class action (i.e., the above-

captioned action) on July 23, 2021 in the Stanislaus County Superior Court.

5. Before initiating this matter, 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 this matter, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and potential defenses. After conducting an initial investigation, our firm determined that the claims of Plaintiff were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees who worked for Defendants within the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel conducted significant litigation and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing the case for class certification and trial prior to reaching the Agreement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff and percipient witnesses, and reviewed and analyzed a large volume of information, data, and documents obtained from Plaintiff, Defendants, and other sources. On December 2, 2021, Class Counsel propounded multiple sets of written discovery requests on both Defendants (including, but not limited to Form Interrogatories—General (Set One), Special Interrogatories (Sets One and Two), Requests for Production of Documents (Set One), noticed depositions of both Defendants' person(s) most knowledgeable. The large volume of information, documents, and data reviewed and analyzed by Class Counsel included, and was not limited to: Employee Handbook, detailed sampling of Class Member's time and pay data, employment records of Plaintiff, Plaintiff's time and pay data, Plaintiff's earning statements, internal memoranda, job descriptions, company policy

acknowledgements (Agreement and Acknowledgement of Receipt of Alternative Dispute Resolution Policy, Acknowledgement of At-Will Employment, Employee Acknowledgement of Video Surveillance Policy), internal memoranda, operations and employment practices, forms, procedures, and policies (including but not limited to Hazard Communication Training Handbook, Personal Appearance and Attire, Theft, Rewards and Open Door Policy, Window Washing Procedures, Safety at the Car Wash), among other information and documents. Class Counsel also developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations and met and conferred with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation briefs, and settlement documents; preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

7. As outlined herein, the Parties have conducted significant investigation and informal discovery during the course of litigating the case, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendants, and other sources. The information, documents, and data provided a critical understanding of the nature of the work performed by the Class Members and PAGA Group Members, as well as Defendants' operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, regular rate, meal and rest periods, representative PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and Defendants' defenses thereto, as well as facts discovered.

1 8. After conducting significant investigation of the facts and law during the
2 prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to try
3 to resolve the case. These efforts included participating in a formal mediation session conducted
4 on April 26, 2022 by Honorable S. James Otero (Ret.), a well-regarded mediator experienced in
5 handling complex labor and employment matters. During all settlement discussions, the Parties
6 conducted their negotiations at arm's length in an adversarial position. In the course of mediation
7 and settlement discussions, the Parties exchanged information, documents, and data, and discussed
8 various aspects of the case, including and not limited to, the risks and delays of further litigation,
9 the risks and expenses to the Parties of proceeding with class certification and trial, the law relating
10 to class certification, manageability, off-the-clock theory, regular rate, meal and rest periods,
11 representative PAGA claims, and wage-and-hour law and enforcement, as well as the evidence
12 produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement
13 that was acceptable to the Parties was not easy. Defendants contended that individualized
14 questions of fact predominate over any common issues, and these issues would pose challenges to
15 class certification and representative adjudication. Defendants and their counsel felt strongly about
16 Defendants' ability to avoid class certification and prevail on the merits, while Plaintiff and Class
17 Counsel believed that they would be able to obtain class certification and prevail at trial. With the
18 aid of the mediator's evaluation, the Parties ultimately agreed that the cases were well-suited for
19 settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs and
20 risks to the Parties that would attend further litigation. These risks of further litigation include,
21 and are not limited to, a determination that the claims are unsuitable for class treatment and/or
22 representative adjudication, class de-certification after certification of a class, allowing a jury to
23 decide the claims asserted in the case, and the real possibility of no monetary recovery after years
24 of litigation.

25 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
26 attorneys' fees in the amount of \$367,500.00, which is 35% of the Maximum Settlement Amount
27 of \$1,050,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff
28 and Class Counsel, Plaintiff has agreed to a contingency fee of at least 35% of the recovery.

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

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **440.60 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this particular matter, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$850 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and 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 compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers for Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has 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, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During

the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he 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, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. For over a decade, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or representative action cases.

15. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, 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. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013), and she is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th 175 (2019). She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and she has handled this process in over three

1 hundred (300) cases. Under her, Edwin Aiwarzian and Arby Aiwarzian, Lawyers *for* Justice, PC
2 has handled the class certification and court approval process for hundreds of class action and/or
3 representative action matters that have successfully resolved. She is a member of the California
4 Employment Lawyers Association.

5 17. I am the Director of Legal Operations at Lawyers for Justice, PC. I earned my
6 Bachelor of Arts in History at Chapman University in 2011 and my Juris Doctor from the UCLA
7 School of Law in 2014. In December 2014, I obtained a license to practice law from the California
8 State Bar. I am admitted to practice in all courts in the State of California, as well as the Central,
9 Southern, Northern, and Eastern District Courts of California and the Ninth Circuit Court of
10 Appeal. Since December 2014, I have worked at Lawyers for Justice, PC, and my practice has
11 almost exclusively focused on the prosecution of employment class actions and representative
12 actions, handling cases in all stages of litigation from initial pleadings to assisting with class action
13 trial matters, attending mediations, and preparing class action settlements. Previously, I was in the
14 role of Manager of Litigation, in which I oversaw approximately twenty-five attorneys working
15 on hundreds of employment class actions and representative actions and provided internal training
16 for our litigation practice group and post-bar law clerks. In my current role, I oversee the legal
17 operations of the firm, review and advise attorneys on work product and practices, provide training,
18 and supervise cases from their inception to final accounting. I am a member of the California
19 Lawyers Association Labor & Employment Group and the California Employment Lawyers
20 Association.

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

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

25 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against a major property management company involving allegations
27 of misclassification of various “manager” positions. On September 20, 2010, the court granted
28

1 final approval of the class action settlement. The Los Angeles County Superior Court Case
2 Number is BC400414.

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

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

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

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

23 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
24 wage-and-hour class and PAGA representative action against a national wholesale distributor of
25 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
26 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
27 representative action settlement. The Sacramento County Superior Court Case Number is 34-
28 2012-00136285.

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

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

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

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

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

27 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class action against a national retailer of apparel, accessories, and home products,

1 involving allegations of misclassification of the “Department Manager” position. On August 12,
2 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class. On
3 August 6, 2019, the court granted final approval of the class action settlement. The Alameda
4 County Superior Court Case Number is RG13680477.

5 m) LFJ represented the plaintiff in a PAGA representative action against a real
6 estate and property management company, on behalf of non-exempt employees. On November 4,
7 2016, the court granted approval of the PAGA representative action settlement. The Orange
8 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

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

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

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

8 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
9 wage-and-hour class and PAGA representative action against a lumber and hardware company on
10 behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class
11 and PAGA representative action settlement. The Orange County Superior Court Case Number is
12 30-2014-00747750-CU-OE-CXC.

13 t) LFJ represented the plaintiff in a wage-and-hour class and PAGA
14 representative action against a property management company, on behalf of non-exempt
15 employees. On June 14, 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 BC586234.

18 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
19 representative action against a food company on behalf of non-exempt employees. On June 30,
20 2017, the court granted final approval of the class and PAGA representative action settlement. The
21 Sacramento County Superior Court Case Number is 34-2015-00175871.

22 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
23 representative action against a chocolate company on behalf of non-exempt employees. On July
24 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
25 The Alameda County Superior Court Case Number is RG15764300.

26 w) LFJ firm represented the plaintiff in a PAGA representative action, against
27 the parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On
28

1 October 18, 2017, the court granted approval of the PAGA representative action settlement. The
2 Los Angeles County Superior Court Case Number is BC569664.

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

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

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

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

24 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
25 wage-and-hour class action against a container manufacturer, on behalf of non-exempt employees.
26 On October 15, 2018, the court granted the plaintiff's motion for class certification. The Tulare
27 County Superior Court Case Number is VCU264528.
28

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

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

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

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

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

hh) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class and PAGA representative action against a medical equipment supplier on

1 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
2 for class certification and certified a class. The San Bernardino County Superior Court Case
3 Number is CIVDS1505744.

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

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

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

22 ll) LFJ, in association with co-counsel therein, represents the plaintiffs in a
23 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
24 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the
25 court granted in part the plaintiff's motion for class certification and certified a class. The
26 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
27 Judicial Council Coordination Proceeding Number is 4930.
28

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

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

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

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

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

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

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$14,825.23** in litigation costs and expenses incurred in this matter, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement Agreement.

ENHANCEMENT PAYMENT TO PLAINTIFF

20. In recognition of his efforts and work serving as the Class Representative, the Settlement Agreement provides for an Enhancement Payment in the amount of \$7,500.00. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort to produce relevant documents and information and provided facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information that would facilitate the pursuit of the case. Plaintiff spent numerous hours speaking with Class Counsel about his claims, describing his work experiences with Defendants, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff to receive \$7,500.00 an Enhancement Payment for his services in the case, in addition to his Individual Settlement Payment and Individual PAGA Payment.

21. I submit that the Agreement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, Class Members, PAGA Members, 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 14th day of August 2024, at Glendale, California.

Elizabeth Parker-Fawley

EXHIBIT A

SALCIDO-CEJA VS. MADRUGA ALVES CAR WASH
STANISLAUS COUNTY SUPERIOR COURT CASE NO. CV-21-003878
ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality, and Manageability	8.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Alexis Salcido-Ceja's ("Plaintiff") Claims and the Merits of the Claims of the Putative Class Members	7.40
Pre-Notice Investigation of the Merits of Plaintiff's Private Attorneys General Act ("PAGA") Claim on Behalf of the State of California with Respect Plaintiff and the Aggrieved Employees	5.90
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendants Madruga Alves Car Wash, Inc. and Fast Track Car Wash, LLC ("Defendants") with Respect to the Damages Sustained by Plaintiff Salcido-Ceja and the Putative Class Members	6.30
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiff, and the Aggrieved Employees	5.60
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, On-Premises Rest Breaks, Meal and Rest Break, Regular Rate of Pay, IWC Wage Orders, PAGA and Class Certification in California, Including All New and Relevant (DLSE) Materials	12.20
Investigation of Defendants, Their Business Relationships, and the Industry in Which They Operate	3.10
Investigation of Defendants' Organizational, Corporate, and Executive Reporting Structures, as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	4.80

Investigation of Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues, and Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity	3.40
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	3.00
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendants in California During the Relevant Time Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	3.60
Research and Investigation Re: Workforce and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	3.30
Research and Investigation Re: Defendants' Written and Non-Written Policies, Practices, and Procedures Relating to Customer Service, Reporting Time, Timekeeping, Meal/Rest Periods, On-Premises Breaks, Meal/ Rest Premiums, Regular Rate of Pay, Uniforms/Dress Code, Footwear, Use of Personal Cell Phones, Use of Customer and Company Vehicles, and Reimbursement of Business-Related Expenses	20.10
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendants Use to Conduct Everyday Business, Including Timekeeping, Calendar, Inventory, Information and Document Sharing, and Communications , Security, and Surveillance 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	3.20
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	7.10

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	3.90
Meet and Communicate with Plaintiff Throughout the Pendency of the Actions	36.0
Investigate, Meet, Communicate with, and/or Interview the Putative Class Members, Aggrieved Employees, and Percipient Witnesses	8.30
Pleadings and Court Filings	
Research and Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on July 23, 2021)	7.50
Review Court's Notice of Case Assignment and Notice of Case Management Conference (filed on July 23, 2021)	0.10
Review and Analyze Defendants' Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (served on November 5, 2021)	1.80
Review Defendants' Case Management Conference Statement (served on November 12, 2021)	0.20
Draft Plaintiff's Case Management Conference Statement for Francesca Gallardo (filed on November 16, 2021)	0.50
Draft Plaintiff's Case Management Conference Statement for Alexis Salcido-Ceja (filed on November 16, 2021)	0.50
Review Defendants' Notice of Association of Counsel (served on November 22, 2021)	0.20
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement and Stipulation to Continue Case Management Conference (submitted on March 16, 2022)	1.10

Review Court Order Continuing the Case Management Conference (filed on March 21, 2023)	0.10
Draft Plaintiff's Notice of Entry of Judgement or Order Re: Order to Continue Case Management Conference (filed on March 22, 2022)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Case Management Conference (submitted on April 29, 2022)	1.10
Meet and Confer with Defendants' Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (submitted on November 10, 2022)	1.10
Review Court's Minute Order Re: Court's Motion to Dismiss (filed on November 18, 2022)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (submitted on February 21, 2023)	1.10
Meet and Confer with Defendants' Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (submitted on June 16, 2023)	1.10
Review Court's Minute Order Re: Court's Motion to Dismiss (filed on June 23, 2023)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (submitted on October 6, 2023)	1.10
Draft Plaintiff's Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint (filed on October 13, 2023)	1.10
Review Court Order Granting Plaintiff Leave to File First Amended Complaint (filed on October 31, 2023)	0.10
Draft Plaintiff's Notice of Entry of Judgement or Order Re: Order Granting Plaintiff Leave to File First Amended Complaint (filed on October 31, 2023)	0.20

Research and Draft Plaintiff's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorney's General Act (filed on November 7, 2023)	2.80
Review and Analyze Defendants' Answer to Plaintiff's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorney's General Act (submitted on November 17, 2023)	1.50
Meet and Confer with Defendants' Counsel, and Draft Joint Response to Order to Show Cause Re: Dismissal (submitted on February 15, 2024)	1.10
Meet and Confer with Defendants' Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (submitted on April 26, 2024)	1.10
Appearances	
Prepare for and Telephonically Attend Case Management Conference (July 5, 2022)	1.80
Prepare for and Telephonically Attend Case Management Conference (July 5, 2022)	0.50
Prepare for and Telephonically Attend Hearing on Court's Motion to Dismiss (November 18, 2022)	1.0
Prepare for and Telephonically Attend Hearing on Court's Motion to Dismiss (March 3, 2023)	0.80
Prepare for and Telephonically Attend Hearing on Court's Motion to Dismiss (June 23, 2023)	0.80
Prepare for and Telephonically Attend Hearing on Court's Motion to Dismiss (October 13, 2023)	0.50
Prepare for and Telephonically Attend Hearing on Court's Motion to Dismiss (February 23, 2024)	0.50
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (April 19, 2024)	1.40
Prepare for and Telephonically Attend Hearing on Court's Motion to Dismiss (May 3, 2024)	0.50

Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Award (September 6, 2024) (Anticipated)	1.00
Discovery and Deposition	
Draft Letter to Defendant Fast Track Car Wash Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alexis Salcido-Ceja (served on April 28, 2021)	1.70
Review and Analyze Documents Produced by Defendant Fast Track Car Wash in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alexis Salcido-Ceja (served May 18, 2021)	5.10
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two) and Requests for Production of Documents (Set One) to Defendant Madruga Alves Car Wash, Inc. (served on December 2, 2021)	4.30
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two) and Requests for Production of Documents (Set One) to Defendant Fast Track Car Wash, LLC (served on December 2, 2021)	4.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Madruga Alves Car Wash, Inc. and Requests for Production of Documents (January 10, 2022; Organizational Structure) (served on December 2, 2021)	2.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Madruga Alves Car Wash, Inc. and Requests for Production of Documents (January 11, 2022; Job Duties) (served on December 2, 2021)	2.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fast Track Car Wash, LLC and Requests for Production of Documents (January 12, 2022; Organizational Structure) (served on December 2, 2021)	2.20

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Fast Track Car Wash, LLC and Requests for Production of Documents (January 13, 2022; Job Duties) (served on December 2, 2021)	2.20
Letters and Correspondence	
Draft Letter to Defendants Re: Mediation and Informal Discovery (served December 16, 2021)	1.20
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Alexis Salcido-Ceja for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on April 28, 2022)	4.50
Meet with Defendants' Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	17.50
Mediation/Settlement	
Review and Analyze Mediation Data and Documents Produced by Defendants (submitted- on April 5, 2022) ● Plaintiff Pay Stubs ● Plaintiff Timecards ● Employee Handbooks (2018, 2020 & 2021) ● Hazard Communication Training Handbook ● Heat Stress Training ● Lockout/Tagout Training ● Plaintiff Payroll Records ● Plaintiff Time Records ● Sample Payroll Records ● Sample Time Records ● Wage Statements Ex 1-9 ● Slips, Trips & Falls Training Handbook	68.50

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, and Performing Damages Analysis/Calculations (submitted on April 19, 2022)	39.50
Review and Analyze Defendant's Mediation Brief and Supporting Materials (submitted April 19, 2022)	15.50
Telephonically Attended Mediation Session (April 26, 2022)	16.00
Draft, Review, Revise, Negotiate and Finalize Memorandum of Understanding (fully executed on April 26, 2022)	3.00
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on October 6, 2023) and Draft Exhibits	32.50
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Jeremy Stern in Support Thereof, Declaration of Alexis Salcido-Ceja in Support Thereof, and [Proposed] Order Thereon (filed on March 21, 2024)	17.00
Review Defendants' Notice of Non-Opposition to Plaintiff's Motion for Preliminary Approval of Class Action Settlement (served on March 29, 2024)	0.10
Review Court's Minute Order Re: Motion Other Pre-Disposition (served on April 19, 2024)	0.10
Review Court's Order Granting Preliminary Approval (filed on May 6, 2024)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Preliminary Approval of Class Action Settlement (filed on May 8, 2024)	0.20

Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Settlement, Attorneys' Fees & Costs, and Enhancement Payment, and Declaration of Elizabeth-Parker Fawley in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on August 14, 2024)	20.50
Total Hours:	440.60

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Salcido-Ceja v. Madruga Alves Car Wash, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/28/2021	U.S. Postmaster	Postage	6.96
7/26/2021	Legal Document Server, Inc.	Attorney Service	64.97
7/26/2021	Stanislaus Superior Court	Complaint Filing Fee	435.00
7/26/2021	Stanislaus Superior Court	Complex Filing Fee	1,000.00
9/24/2021	ProLegal	Attorney Service	303.00
11/22/2021	Legal Document Server, Inc.	Attorney Service	29.50
12/3/2021	Legal Document Server, Inc.	Attorney Service	11.00
12/3/2021	General Logistics Systems US, Inc.	Courier Service	51.23
12/6/2021	Legal Document Server, Inc.	Attorney Service	25.75
1/28/2022	Jams, Inc.	Mediation Fee	12,088.60
3/21/2022	Legal Document Server, Inc.	Attorney Service	16.10
3/21/2022	Stanislaus Superior Court	Filing Fee	20.00
3/22/2022	Legal Document Server, Inc.	Attorney Service	14.75
4/28/2022	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
4/28/2022	U.S. Postmaster	Postage	8.96
5/2/2022	Legal Document Server, Inc.	Attorney Service	14.75
5/2/2022	Legal Document Server, Inc.	Attorney Service	14.75
6/30/2022	Stanislaus Superior Court	Motion Fee	96.35
11/10/2022	Stanislaus Superior Court	Motion Fee	96.35
11/14/2022	Legal Document Server, Inc.	Attorney Service	15.50
2/22/2023	Legal Document Server, Inc.	Attorney Service	15.50
3/1/2023	Stanislaus Superior Court	Remote Appearance Fee	30.35
6/16/2023	Legal Document Server, Inc.	Attorney Service	15.70
10/10/2023	Legal Document Server, Inc.	Attorney Service	15.55
10/13/2023	Legal Document Server, Inc.	Attorney Service	15.55
10/17/2023	Legal Document Server, Inc.	Attorney Service	11.95
10/31/2023	Legal Document Server, Inc.	Attorney Service	17.09
10/31/2023	Stanislaus Superior Court	Stipulation & Order Fee	20.00
11/1/2023	Legal Document Server, Inc.	Attorney Service	15.55
11/8/2023	Legal Document Server, Inc.	Attorney Service	15.55
2/12/2024	Stanislaus Superior Court	Remote Appearance Fee	30.35
2/20/2024	Legal Document Server, Inc.	Attorney Service	15.55
3/22/2024	Legal Document Server, Inc.	Attorney Service	19.87
3/22/2024	Stanislaus Superior Court	Motion Fee	60.00
4/5/2024	Stanislaus Superior Court	Remote Appearance Fee	60.70
4/10/2024	Stanislaus Superior Court	Remote Appearance Fee	30.35
4/29/2024	Legal Document Server, Inc.	Attorney Service	15.70
5/6/2024	Legal Document Server, Inc.	Attorney Service	15.70
5/8/2024	Legal Document Server, Inc.	Attorney Service	15.70
Total:			14,825.23