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Attorneys for Plaintiff RIGOBERTO ROJAS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

RIGOBERTO ROJAS, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,
vs.

WEINGART CENTER ASSOCIATION, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 22STCV21995

**DECLARATION OF ELIZABETH
PARKER-FAWLEY, ESQ. IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: September 12, 2025
Time: 10:00 a.m.

Judge: Hon. Elihu M. Berle
Dept.: 6

1 I, Elizabeth Parker-Fawley Esq, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am an attorney-at-law at Lawyers
4 for Justice, PC (hereinafter "Class Counsel"). I am co-counsel of record for Plaintiff RIGOBERTO
5 ROJAS (hereafter "Plaintiff") in this wage and hour class action filed against WEINGART CENTER
6 ASSOCIATION (hereinafter "Defendant").

7 2. This declaration is being submitted in support of Plaintiff's Motion for Final Approval of
8 Class Action and PAGA Settlement.

9 **INTRODUCTION**

10 3. An objective evaluation of the proposed settlement of \$700,000.00 ("Gross Settlement
11 Amount") confirms that the relief negotiated on behalf of the Settlement Class is fair, reasonable, and
12 valuable. The Settlement is a product of informed, adversarial, and non-collusive negotiations, between
13 experienced counsel, and presided over by Louis Marlin, Esq. a wage and hour class action mediator.
14 After deducting any Court-approved Class Counsel Fees Payment and Class Counsel Litigation
15 Expenses, Class Representative Service Payment, Administration Expenses Payment, and the PAGA
16 Penalties, including the payment to the Labor & Workforce Development Agency ("LWDA"), the Net
17 Settlement Amount shall be distributed to the Settlement Class Members based on the number of
18 Workweeks they were employed by the Defendant during the Class Period. ***The Class greeted news***
19 ***of the Settlement with unanimous approval as, at the time of the filing of this motion, all 759 Class***
20 ***Members chose to participate in the Settlement. There are zero opt-outs and zero objections to the***
21 ***approval.***¹ The unanimous approval by the Class evidences the clear fairness and reasonableness of
22 the Settlement.

23 4. The relief offered by the Settlement is immediate and is particularly impressive when
24 viewed against the difficulties encountered by plaintiffs pursuing similar wage and hour cases (see
25 infra). Indeed, by settling now rather than proceeding to trial, the Settlement Class will not have to
26 wait (possibly years) for relief, nor will they have to bear the risks associated with prolonged and
27 uncertain litigation.

28 ¹ As of the filing of this Motion, 0 Notices were deemed undeliverable. Atticus Dec. at ¶ 11.

1 5. As discussed below, the proposed Settlement satisfies all criteria for final settlement
2 approval under California law and falls well within the range of reasonableness. Accordingly, Plaintiff
3 and Class Counsel respectfully request this Court grant final approval of the Agreement and entry of
4 the proposed Final Approval Order and Judgment.

5 **OVERVIEW OF THE LITIGATION**

6 6. Defendant is a nonprofit agency that provides individuals experiencing homelessness
7 with essential tools to stabilize their lives, secure income, and find permanent housing. Defendant is
8 based in Los Angeles County, where Plaintiff worked. Plaintiff worked for Defendant in California
9 from approximately June 2015 to approximately July 2021 as a non-exempt employee, paid on an
10 hourly basis. During his employment, Plaintiff alleges that he was denied legally compliant meal and
11 rest periods, and minimum wages and overtime compensation. Throughout his employment, Plaintiff
12 was subject to Defendant's written policies and procedures.

13 7. Generally, Plaintiff claims that Defendant failed to pay for all time worked, failed to
14 provide compliant meal and rest periods, failed to reimburse for mandatory business expenses, failed to
15 furnish accurate itemized wage statements, and failed to pay all wages timely during employment and
16 upon separation. Defendant denies liability for each of Plaintiff's claims. Further, Defendant asserts that
17 it fully complied with all applicable employment laws and raised several other significant defenses to
18 Plaintiff's claims, including but not limited to, facially compliant meal and rest period policies,
19 compliant wage statements, and that it timely paid all wages due upon separation of employment.

20 8. On July 7, 2022, Plaintiff filed a class action complaint in the Los Angeles County
21 Superior Court, Case No. 22STCV21995 ("Action"). The Action alleged ten causes of action against
22 Defendant for: (1) Violation of California Labor Code §§ 510 and 1198 (Unpaid Overtime); (2)
23 Violation of California Labor Code §§ 226.7 and 512(a) (Unpaid Meal Period Premiums); (3) Violation
24 of California Labor Code § 226.7 (Unpaid Rest Period Premiums); (4) Violation of California Labor
25 Code §§ 1194, 1197, and 1197.1 (Unpaid Minimum Wages); (5) Violation of California Labor Code
26 §§ 201 and 202 (Final Wages Not Timely Paid); (6) Violation of California Labor Code § 204 (Wages
27 Not Timely Paid During Employment); (7) Violation of California Labor Code § 226(a) (Non-
28 Compliant Wage Statements); (8) Violation of California Labor Code § 1174(d) (Failure to Keep

Requisite Payroll Records); (9) Violation of California Labor Code §§ 2800 and 2802 (Unreimbursed Business Expenses); (10) Violation of California Business & Professions Code §§ 17200, *et seq.*

9. On the same day, Plaintiff separately filed a PAGA-only action in Los Angeles County Superior Court, Case. No. 22STCV22027 (“the PAGA Action”). The PAGA Action alleged a single cause of action for civil penalties pursuant to the Private Attorneys General Act of 2004. The PAGA Action seeks civil penalties pursuant to the same alleged violation and same factual theories as outlined in the Class Action.

10. The Parties scheduled a mediation to proceed on October 20, 2023 with Steven Rottman, Esq.; however, on October 11, 2023, Defendant cancelled the mediation, indicating that it was not prepared to move forward with the mediation as scheduled.

11. The Parties rescheduled mediation to proceed on June 21, 2024 with Mr. Rottman and tried to secure an earlier mediation with a mutually agreeable mediator.

12. The Parties were able to obtain an earlier mediation on April 23, 2024 with Mr. Louis Marlin, Esq.

13. On April 23, 2024, the Parties participated in a full day mediation with wage and hour and PAGA mediator Louis Marlin, Esq. The mediation did not conclude with a settlement, though the Parties continued settlement discussions and subsequently reached a settlement in July 2024, which was then memorialized in the form of a Memorandum of Understanding. Thereafter, the Parties drafted and negotiated a long-form settlement agreement, which is the subject of the instant motion.

14. On March 5, 2025, for purposes of effectuating the settlement, Plaintiff filed a First Amended Complaint adding an additional cause of action for violation of PAGA based on the same violations alleged in the Complaint.

THE SETTLEMENT BEFORE THE COURT

15. Subject to Court approval, Class Counsel shall seek a Class Counsel Fees Payment in the amount of up to 33.33% of the Gross Settlement Amount, estimated to be \$233,310.00. Plaintiff’s counsel is to split the fees as follows: 85% to Lawyers for Justice, PC, 7.5% to the JCL Law Firm, APC, and 7.5% the Zakay Law Group, APLC. Plaintiff has consented to the fee sharing in writing.

1 16. While not necessarily required to be demonstrated because the percentage fee is proper
2 for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the
3 case such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at
4 Lawyers *for* Justice, PC have spent at least **194.70** hours performing tasks and obtaining recovery in
5 this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in
6 detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time
7 incurred by them in performing those services. These hours include work done by several attorneys at
8 Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for*
9 Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this
10 matter.

11 17. The work performed in this particular matter, the background of Lawyers *for* Justice, PC,
12 as well as the individual backgrounds, training, and experience of the attorneys who worked on this
13 matter, in litigating complex wage-and-hour actions, and in particular, employment class action and
14 representative action cases, support a reasonable blended hourly rate of compensation of at least \$850
15 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded
16 attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services performed,
17 by courts granting approval of settlements in other wage-and-hour class action and representative action
18 cases: final approval of the class and representative action settlement in *David Dugan v. TEC*
19 *Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8,
20 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final
21 approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health*
22 *Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award
23 of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final approval of the class
24 and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court
25 Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved
26 compensation at the rate of \$855.96 per hour.

27 18. To date, Class Counsel has borne all the risks and costs of litigation and will not receive
28 any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC has incurred

1 \$28,059.93 in litigation costs and expenses, as reflected in “EXHIBIT B” attached hereto. These
2 expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement
3 Agreement. The \$12,500.00 Mediation Cancellation Fee is included for October 20, 2023 Mediation
4 scheduled with Steven J. Rottman, which was nonrefundable after Defendant unilaterally cancelled past
5 the cancellation deadline. Class Counsel jointly seeks reimbursement of **\$25,000.00** in litigation costs
6 and expenses incurred in this matter, which is the maximum amount allocated under the Settlement
7 Agreement.

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

9 19. As detailed in the Motion for Preliminary Approval, Class Counsel thoroughly
10 investigated the proposed Class Members’ claims, applicable law, and potential defenses. Specifically,
11 Class Counsel assessed the value of the class claims using data and documents provided by Defendant
12 through informal discovery. Class Counsel obtained time and payroll records, policy documents and
13 agreements, as well as data regarding the number of Class Members, and aggregate workweek and pay
14 period data to assess damages before mediation. Class Counsel worked with a third-party data expert to
15 analyze Defendant’s time and payroll data to formulate damage models estimating Defendant’s liability
16 exposure. Class Counsel’s investigation, research, experience, and damage models informed and guided
17 the mediated negotiations that resulted in this settlement. Accordingly, Plaintiff’s Counsel fully
18 understood the strengths and weaknesses of the class claims before the parties reached a settlement.

19 20. The mediator helped manage the Parties’ expectations and provided a useful, neutral
20 analysis of the issues and risks to both sides. The Parties made substantial progress with the mediator’s
21 assistance. Namely, the Parties exchanged information regarding their respective claims and defenses,
22 including their respective evaluation of the damages. Negotiations continued following a full day of
23 mediation, and the Parties subsequently arrived at a settlement. Once the Parties agreed on a settlement,
24 the Parties engaged in negotiations regarding the written terms of the class action settlement. The
25 complete and final terms of the Parties’ settlement are now set forth in the Agreement. Class Counsel
26 submits that the Settlement constitutes a fair, adequate, and reasonable compromise of the claims at
27 issue.

28 ///

1 21. Class Counsel in this matter has extensive class action experience in multiple fields and
2 has represented tens-of-thousands of persons in class actions. Counsel has previously litigated similar
3 wage and hour class actions involving similar claims. Class Counsel has been approved as class counsel
4 in similar wage and hour class actions throughout the State of California. As such, courts throughout
5 the California have deemed Class Counsel experienced and knowledgeable in this area of law. Class
6 Counsel has concluded the settlement is fair, adequate, and reasonable and in the best interests of the
7 Class.

8 22. Plaintiff, the Settlement Class Members and the PAGA Members are represented by
9 Lawyers *for* Justice, PC, Zakay Law Group, APLC, and the JCL Law Firm, APC. The competency and
10 experience of Zakay Law Group, APLC and JCL Law Firm, APC are attested to in the declarations of
11 Shani O. Zakay, Esq. and Jean Claude Lapuyade, respectively, which have been concurrently filed.

12 23. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
13 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
14 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is
15 attorney of record in dozens of employment-related putative class actions in both state and federal courts
16 in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating
17 complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. The
18 firm has successfully litigated cases involving nearly every aspect of California wage and hour law,
19 including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums
20 wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of
21 business expenses, executive, administrative, and other overtime exemptions to the State of California
22 and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law.
23 Lawyers *for* Justice, PC, sometimes in association with other law firms, has recovered millions of
24 dollars on behalf of thousands of individuals in California.

25 24. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice, PC. He
26 received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris
27 Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal
28 training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of

1 its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono
2 mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation
3 Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal
4 Writing at Harvard University. From approximately September 2002 to approximately December 2002,
5 he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of
6 Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served
7 as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
8 Appellate District. In December of 2004, he obtained a license to practice law from the California State
9 Bar. For over a decade, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused
10 on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice
11 PC, he has argued over 100 motions, taken or defended over 150 depositions, prepared dozens of expert
12 witnesses for deposition or trial, and attended over 175 mediations. Together with other attorneys at the
13 firm, and in many cases in conjunction with co-counsel, he has successfully litigated cases involving
14 the executive, administrative, and other overtime exemptions to the State of California and federal
15 overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully
16 obtained class certification by contested motion practice in approximately sixteen (16) cases in the last
17 decade and litigated over 1,000 class action or representative action cases.

18 25. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his
19 Bachelor of Arts degree from University of California, Los Angeles, and graduated magna cum laude.
20 He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May
21 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of
22 the California Court of Appeal for the Second Appellate District. From approximately August 2008 to
23 approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw
24 of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California
25 in 2010. He is admitted to practice before all courts of the State of California and all United States
26 District Courts in the State of California. He has worked on many wage-and-hour class action and
27 representative action cases, taking the lead in taking and defending depositions, arguing motions, and
28 attending mediations. He has played an integral role in preparing matters for class certification,

1 including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles
2 County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
3 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior
4 Court Case No. RG13680477). Under his supervision, dozens of class action or representative cases
5 have resulted in settlements that have been granted court approval. He has handled over one hundred
6 and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative
7 action cases which have resulted in settlement.

8 26. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a Bachelor
9 of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from
10 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law
11 Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013),
12 and she is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for
13 the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of
14 depositions and successfully handled motion practice in class action cases regarding discovery
15 (including and not limited to, regarding class contact information), class certification (both contested
16 class certification and stipulated class certification), arbitration agreements, coordination, and
17 intervention. She has successfully handled briefing and oral argument on appeal and obtained notable
18 decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration of
19 PAGA claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9
20 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v.*
21 *Superior Court*, (2019) 8 Cal.5th175. She has significant experience with class actions, including and
22 not limited to working on cases to obtain class certification through contested motion practice and
23 working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical
24 sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a
25 certified class consisting of approximately 2,600 individuals). She also has extensive experience with
26 class action and/or representative action settlements, and has handled this process in over 500 cases.
27 Under Edwin Aiwazian, Arby Aiwazian, and her supervision, Lawyers *for* Justice, PC has handled the
28 class certification and court approval process for hundreds of class action and/or representative action

1 matters that have successfully resolved. She is a member of the California Employment Lawyers
2 Association, and, on several occasions, has been a speaker regarding topics in wage and hour law at the
3 organization's continuing legal education events.

4 27. I am the Senior Director of Litigation at Lawyers for Justice, PC. I earned my Bachelor
5 of Arts in History at Chapman University in 2011 and my Juris Doctor from the UCLA School of Law
6 in 2014. In December 2014, I obtained a license to practice law from the California State Bar. I am
7 admitted to practice in all courts in the State of California, as well as the Central, Southern, Northern,
8 and Eastern District Courts of California and the Ninth Circuit Court of Appeal. Since December 2014,
9 I have worked at Lawyers for Justice, PC, and my practice has almost exclusively focused on the
10 prosecution of employment class actions and representative actions, handling cases in all stages of
11 litigation from initial pleadings to assisting with class action trial matters, attending mediations, and
12 preparing class action settlements. I oversee approximately between 15 and 25 attorneys working on
13 hundreds of employment class actions and representative actions. In addition, I review and advise
14 attorneys on work product and practices, provide training, and supervise cases from their inception to
15 final accounting. I am a member of the California Lawyers Association Labor & Employment Group
16 and the California Employment Lawyers Association.

17 28. Here, the Settlement is clearly within the "ballpark" of reasonableness because the
18 Settlement provides a sizeable recovery to the Participating Class Members and need not necessarily
19 obtain 100 percent of the damages sought to be fair, reasonable, and ultimately, meaningful. *Wershba*,
20 91 Cal.App.4th at 250. While the Gross Settlement Amount of \$700,000.00 represents a discount on
21 Defendant's potential exposure if Plaintiff established liability on all claims and was awarded the full
22 amount of the estimated damages at trial, this compromise is reasonable because (1) the formidable
23 defenses raised by Defendant presented a risk that could award significantly less in damages than
24 Plaintiff's estimate and (2) any theoretical post-trial recovery may require many more years of litigation,
25 resulting in added fees and costs without any guarantee of recovery for the Class.

26 29. Clearly the goal of this litigation to obtain redress for the class has been met by this
27 Settlement. Given the amount of the Settlement, the risks of litigation and the arm's length negotiations
28

1 between experienced counsel, the settlement is fair and reasonable, and is therefore entitled to final
2 approval.

3 30. Although Class Counsel believes strongly in Plaintiff's claims, it would be misguided to
4 ignore the asserted defenses. If successful on any one its defenses, Defendant could defend the action
5 or, at least, drastically undercut Plaintiff's claims.

6 31. With respect to the most immediate challenge, i.e., class certification, the risks attendant
7 to the certification of similar wage and hour claims are demonstrated by *Magadia v. Wal-Mart*
8 *Associates, Inc.* (9th Cir. 2021) 999 F.3d 668. There, the Ninth Circuit, vacated reversed and remanded
9 a \$110 million judgement against an employer for, *inter alia*, inaccurately paying overtime, and directed
10 the trial court to enter judgement in favor of the employer. *See also O'Conner v. Uber Technologies,*
11 *Inc.* (9th Cir. 2018) 904 F.3d 1087 (decertification of wage and hour misclassification action); *see also*
12 *Duran v. U.S. Bank National Association* (2014) 59 Cal.4th 1, 31 (reversing a trial verdict in favor
13 plaintiffs in a wage and hour class action)); *Tien v. Tenet Healthcare Corp.* (2012) 209 Cal.App.4th
14 1077, 1088 ("[T]he reason, if any, that employees might not take their breaks were predominantly
15 individualized questions of fact not susceptible to class treatment."); *Ali v. U.S.A. Cab Ltd.* (2009) 176
16 Cal.App.4th 1333, 1341 (affirming denial of certification because employees' declarations attesting to
17 having taken meal and rest breaks demonstrated that individualized inquiries were required to show
18 harm); *Campbell v. Best Buy Stores, L.P.,* (C.D. Cal. 2013) 2013 WL 5302217 at *11-13 (following
19 *Brinker* and denying certification of proposed off-the-clock and rest and meal break classes due to lack
20 of uniform policy); *Brown v. Fed Express Corp.* (C.D. Cal. 2008) 249 F.R.D. 580, 587-88 (denying
21 certification of driver meal and rest period claims based on the predominance of individual issues).
22 Collectively, the examples cited above illustrate the uncertain nature of class litigation. Consequently,
23 uncertainty of obtaining certification through a contested motion is a significant risk factor favoring
24 settlement.

25 32. Although Plaintiff is confident about the strength of his claims, Plaintiff nevertheless
26 recognizes that Defendant has factual and legal defenses that, if successful, would potentially defeat or
27 impair the value of the lawsuit. Legally, the fast-changing landscape of wage and hour litigation can
28 drastically affect the value of Plaintiff's claims.

33. As demonstrated by the decisions in *Magadia*, supra, 999 F.3d 668, *O’Conner v. Uber Technologies* (N.D. Cal. 2018) 82 F.Supp.3d 1133 and *Duran v. U.S. Bank National Assn.* (2014) 59 Cal.4th 1, the complexities and duration of further litigation cannot be overstated. There is little doubt that if Defendant faced a large adverse judgement, Defendant would post a bond and appeal. A post-judgment appeal by Defendant would have required many more years to resolve, assuming the judgment was affirmed. If the judgment was not affirmed in total, then the case could have dragged on for years after the appeal. The benefits of a guaranteed recovery today outweigh an uncertain result three or more years in the future.

34. Plaintiff and Class Counsel recognize the expense and length of a trial against Defendant through possible appeals which could take another three years. In arriving at their informed belief that the present settlement is fair and adequate, Class Counsel accounted for the uncertain outcome and risk inherent in complex actions such as this one. Class Counsel is also mindful of and recognize the inherent problems of proof under, and alleged defenses to, the claims asserted in the litigation. Moreover, post-trial motions and appeals would have been inevitable. Costs would have mounted, and recovery would have been delayed if not denied, thereby reducing the benefits of an ultimate victory. Plaintiff and Class Counsel believe that the Settlement confers substantial monetary and non-monetary benefits upon the Class. Based upon their evaluation, Plaintiff and Class Counsel have determined that the Settlement set forth in the Agreement is in the best interest of the Class, is fair, reasonable, and adequate, and should be granted final approval.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 11th day of July 2025, at Glendale, California.

LAWYERS FOR JUSTICE, PC

By: 
Elizabeth Parker-Fawley
Attorneys for Plaintiff

EXHIBIT A

ROJAS VS. WEINGART CENTER ASSOCIATION
Los Angeles Superior Court Case No. 22STCV21995 (“Class Action”)

ROJAS VS. WEINGART CENTER ASSOCIATION
Los Angeles Superior Court Case No. 22STCV22027 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Rigoberto Rojas (“Plaintiff”) during the Case	15.00
Investigate, Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	3.00
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff’s Class Action Complaint for Damages (filed on July 7, 2022) (Class Action)	7.50
Investigate the Merits of Plaintiff’s Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff’s Complaint for Enforcement Under Private Attorneys General Act, California Labor Code Section 2698 (filed on July 7, 2022) (PAGA Action)	4.50
Review Court’s First Amended General Order (filed on July 7, 2022) (Class Action)	0.10
Review Court’s First Amended General Order (filed on July 7, 2022) (PAGA Action)	0.10
Review Court’s Notice of Case Assignment (filed on July 7, 2022) (Class Action)	0.10

Review Court's Notice of Case Assignment (filed on July 7, 2022) (PAGA Action)	0.10
Review Court's Notice of Case Management Conference (filed on July 15, 2022) (PAGA Action)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on July 20, 2022) (Class Action)	0.10
Review Court's Initial Status Conference Order (Complex Litigation Program) (filed on July 20, 2022) (Class Action)	0.10
Draft Plaintiff's Initial Status Conference Statement (filed on September 27, 2022) (Class Action)	0.80
Draft Plaintiff's Notice of Posting Jury Fees (filed on October 4, 2022) (Class Action)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on October 4, 2022) (Class Action)	0.10
Draft Notice of Court's Minute Order (filed on October 6, 2022) (Class Action)	0.10
Review and Analyze Defendant Weingart Center Association's ("Defendant") Answer to Plaintiff's Complaint (served on October 17, 2022), and Research Affirmative Defenses in Defendant's Answer (PAGA Action)	1.20
Review Defendant's Notice of Appearance (served on October 17, 2022) (Class Action)	0.10
Draft Plaintiff's Case Management Statement (filed on October 19, 2022) (PAGA Action)	0.60
Review Defendant's Case Management Statement (filed on October 20, 2022) (PAGA Action)	0.10
Draft Declaration of Christina Galajan in Response to Order to Show Cause Re: Entry of Default (filed on October 28, 2022) (Class Action)	0.30
Review Court's Minute Order Re: Order to Show Cause re: Entry of Default (filed on October 31, 2022) (Class Action)	0.10

Review Court's Minute Order re: Case Management Conference (filed on November 3, 2022) (PAGA Action)	0.10
Draft Notice of Order to Show Cause re: Entry of Default (filed on November 7, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on November 9, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Status Conference Statement (filed on November 23, 2022) (Class Action)	0.90
Review Court's Minute Order Re: Initial Status Conference (filed on December 1, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Continued Initial Status Conference and Order to Show Cause Re: Defendant's Failure to Appear (filed on December 2, 2022) (Class Action)	0.10
Review Defendant's Declaration of Steven C. Amundson in Support of OSC re Sanctions (served on December 6, 2022) (Class Action)	0.10
Review Court's Minute Order Re: Initial Status Conference; Order to Show Cause RE: Sanctions Against Defendant for Failure to Appear at the 12/01/2022 Initial Status Conference (filed on December 15, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Further Case Management Conference (filed on December 28, 2022) (Class Action)	0.10
Draft Plaintiff's Case Management Statement (filed on January 24, 2023) (PAGA Action)	0.60
Review Defendant's Case Management Statement (served on January 25, 2023) (PAGA Action)	0.10
Review Defendant's Substitution of Attorney (served on January 27, 2023) (PAGA Action)	0.10
Review Defendant's Substitution of Attorney (served on January 27, 2023) (Class Action)	0.10

Review Court's Minute Order re: Case Management Conference (filed on February 9, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Stipulation to Continue Status Conference; and [Proposed] Order (submitted on March 3, 2023) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Stipulation to Continue Status Conference; and [Proposed] Order (submitted on March 3, 2023) (PAGA Action)	1.10
Review Court's Order to Continue Status Conference (filed on March 7, 2023) (Class Action)	0.10
Draft Plaintiff's Notice of Entry of Judgement or Order re: Order to Continue Status Conference (filed on March 7, 2023) (Class Action)	0.10
Review Court's Order to Continue Status Conference (filed on March 15, 2023) (PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on March 15, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Stipulation to Continue Status Conference; [Proposed] Order (submitted on October 30, 2023) (Class Action)	1.10
Review Denied Joint Stipulation to Continue Status Conference (filed on October 30, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Status Conference (filed on November 14, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on November 20, 2023) (PAGA Action)	1.10
Review Court Order to Continue Case Management Conference (filed on November 27, 2023) (PAGA Action)	0.10

Review Court's Minute Order Re: Case Management Conference (filed on November 27, 2023) (PAGA Action)	0.10
Draft Notice of Entry re: Order Continuing Case Management Conference (filed on November 29, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Status Conference Statement (filed on November 30, 2023) (Class Action)	0.90
Review Court's Minute Order Re: Status Conference (filed on December 8, 2023) (Class Action)	0.10
Reviewed and Analyze Defendant's Answer to Plaintiff's Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on January 8, 2024) (Class Action)	1.50
Reviewed Defendant's Notice of Errata (served on January 11, 2024) (Class Action)	0.10
Meet And Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Stipulation to Continue Plaintiff's Motion for Class Certification Deadline; [Proposed] Order (submitted on March 4, 2024) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Status Conference Statement (filed on March 7, 2024) (Class Action)	0.90
Review Court's Minute Order Re: Status Conference (filed on March 14, 2024) (Class Action)	0.10
Review Defendant's Notice of Change of Address (served on March 25, 2024) (Class Action)	0.10
Review Defendant's Notice of Change of Address (served on March 25, 2024) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Notice of Settlement and Stipulation Vacating Motion for Class Certification Filing Deadline and Associated Dates; [Proposed] Order (submitted on July 8, 2024) (Class Action)	0.90

Review Court's Minute Order Re: Post-Mediation Status Conference (filed on July 19, 2024) (Class Action)	0.10
Review Court's Order Re: Joint Notice of Settlement and Stipulation Vacating Motion For Class Certification Filing Deadline and Associated Dates (filed on July 31, 2024) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order Re: Order Vacating Motion for Class Certification (filed on August 1, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel and Draft, Review, and Revise Joint Notice of Settlement and Stipulation Vacating Filing Deadline and Associated Date; and [Proposed] Order Thereon (submitted on August 5, 2024) (PAGA Action)	0.90
Draft Plaintiff's Case Management Statement (filed on August 5, 2024) (PAGA Action)	0.60
Review Court Order re: Joint Notice of Settlement and Stipulation Vacating Filing Deadlines and Associated Date (filed on August 13, 2024) (PAGA Action)	0.10
Review Court's Minute Order Re: Joint Notice of Settlement and Stipulation Vacating Filing Deadlines and Associated Date (filed on August 13, 2024) (PAGA Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on August 14, 2025) (PAGA Action)	0.10
Draft Plaintiff's Notice of Association of Counsel (filed on August 26, 2024) (Class Action)	0.10
Draft Plaintiff's Notice of Association of Counsel (filed on August 26, 2024) (PAGA Action)	0.10
Review and/or Revise Plaintiff's Post-Mediation Status Conference Statement (filed on September 24, 2024) (Class Action)	0.10
Review Declaration of Jaclyn Joyce, Esq., Re: Order to Show Cause re: Dismissal (served on September 24, 2024) (Class Action)	0.10

Review Court's Minute Order Re: Post-Mediation Status Conference; Order to Show Cause Re: Dismissal (Settlement) (filed on October 2, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation and [Proposed] Order to Continue Plaintiff's Filing Deadline for Motion for Preliminary Approval (submitted on November 12, 2024) (Class Action)	0.10
Review Court's Order Re: Stipulation and Order to Continue Plaintiff's Filing Deadline for Motion for Preliminary Approval (filed on November 14, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation and [Proposed] Order to Continue Hearing on Motion for Preliminary Approval and Corresponding Filing Deadline (submitted on December 16, 2024) (Class Action)	0.10
Review Court's Order Re: Stipulation and Order to Continue Hearing on Motion for Preliminary Approval and Corresponding Filing Deadline (filed on December 17, 2024) (Class Action)	0.10
Draft Notice of Change of Address or Other Contact Information (filed on January 17, 2025) (PAGA Action)	0.10
Review Defendant's Case Management Statement (served on January 27, 2025) (PAGA Action)	0.10
Draft, Review, and Revise Plaintiff's Case Management Statement (filed on January 27, 2025) (PAGA Action)	0.10
Review Court's Minute Order Re: Status Conference (filed on February 11, 2025) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation and [Proposed] Order for Leave to File First Amended Complaint (submitted on March 3, 2025) (Class Action)	0.10
Review Court's Order Re: Stipulation and Order for Leave to File First Amended Complaint (filed on March 5, 2025) (Class Action)	0.10

Draft, Review, and/or Revise Plaintiff's First Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on March 5, 2025) (Class Action)	0.10
Draft, Review, and Revise Request for Dismissal (filed on March 6, 2025) (PAGA Action)	0.10
Appearances	
Prepare for and Telephonically Attend Initial Status Conference (October 4, 2022) (Class Action)	0.80
Prepare for and Telephonically Attend Order to Show Cause RE: Default Judgement Hearing (October 31, 2022) (Class Action)	1.40
Prepare for and Telephonically Attend Case Management Conference (November 3, 2022) (PAGA Action)	2.40
Prepare for and Telephonically Attend Initial Status Conference (December 1, 2022) (Class Action)	1.10
Prepare for and Telephonically Attend Initial Status Conference (December 15, 2022) (Class Action)	1.00
Prepare for and Telephonically Attend Case Management Conference (February 9, 2023) (PAGA Action)	2.60
Prepare for and Telephonically Attend Status Conference (November 14, 2023) (Class Action)	0.70
Prepare for and Telephonically Attend Status Conference (December 8, 2023) (Class Action)	0.80
Prepare for and Telephonically Attend Further Status Conference (March 14, 2024) (Class Action)	0.70
Prepare for and Telephonically Attend Motion for Preliminary Approval (February 11, 2025) (Class Action)	0.50
Prepare for and Telephonically Attend Motion for Preliminary Approval (May 8, 2025) (Class Action)	0.50

Prepare for and Telephonically Attend Motion for Preliminary Approval (May 8, 2025) (Class Action)(Anticipated)	0.50
Discovery and Deposition	
Review Materials and Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rigoberto Rojas (served on July 23, 2021)	1.00
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rigoberto Rojas (served on August 31, 2021)	0.20
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rigoberto Rojas (served on November 10, 2021)	0.20
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rigoberto Rojas (served on November 24, 2021)	0.20
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rigoberto Rojas. (Served on November 17, 2021)	3.50
Letters and Correspondence	
Review Materials and Draft Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff Rigoberto Rojas under the Private Attorneys General Act (served on April 20, 2022)	3.50
Review Materials and Draft Mediation Information Letter to Defendant (November 1, 2022)	1.00
Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	10.00
Mediation/Settlement	

Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	58.10
Prepare for October 20, 2023 Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting, Reviewing, and Revising the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages Analysis/Calculations	13.50
Prepare for April 23, 2024 Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting, Reviewing, and Revising the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages Analysis/Calculations (submitted on April 15, 2024)	18.20
Attend Mediation Session (April 23, 2024; via Video Conference)	7.00
Review and Analyze Mediator's Proposal (accepted on April 25, 2024)	1.40
Review, Revise, Negotiate, and Finalize Memorandum of Understanding—Class Action and PAGA Settlement (executed on July 24, 2024)	3.20
Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement and Class Notice (executed on December 30, 2024),	0.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	0.20
Law and Motion	
Draft, Review, and Revise Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement, Memorandum of Points and Authorities in Support Thereof, Declaration of Shani O. Zakay in Support Thereof; Declaration of Ryan Slinger in Support of Thereof, Declaration of Jean-Claude Lapuyade in support of Thereof, Declaration of Christopher Longley, on Behalf of Atticus Administration	1.80

LLC, in support Thereof, Declaration of Rigoberto Rojas in support Thereof, and [Proposed] Order Thereon (filed on December 31, 2024)	
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on February 11, 2025) (Class Action)	0.10
Review and Draft Declaration of Yasmin Hosseini in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, Declaration of Jaclyn Joyce in Support thereof, and Declaration of Bryn Bridley on Analysis of the Class Data and the Escalator Clause of the Settlement Agreement (filed on April 10, 2025)	1.30
Review Court's Minute Order re: Hearing on Motion for Preliminary Approval of Settlement (filed May 8, 2025) (Class Action)	0.10
Review Supplemental Declaration of Jacklyn Joyce in support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, and [Proposed] Order Granting Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement. (submitted on May 14, 2025)	0.10
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement (filed on May 15, 2025) (Class Action)	0.10
Review Second Supplemental Declaration of Jaclyn Joyce in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, and Draft, Review, and Revise [Proposed] Amended Order Thereon (submitted on June 5, 2025) (Class Action)	0.10
Review Court's Amended Order Granting Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement (filed on June 9, 2025) (Class Action)	0.10
Draft, Review and Revise Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Memorandum of Points and Authorities in Support Thereof, Declaration of Shani O. Zakay in Support Thereof; Declaration of Elizabeth Parker-Fawley in Support of Thereof, Declaration of Jean-Claude Lapuyade in support of Thereof, Declaration of Christopher Longley, on Behalf of Atticus	4.50

Administration LLC, in support Thereof, Declaration of Rigoberto Rojas in support Thereof, and [Proposed] Order Thereon (filed on July 11, 2025)	
Total Hours:	194.70

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Rojas vs. Weingart Center Association

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/23/2021	U.S. Postmaster	Postage	\$7.00
8/31/2021	U.S. Postmaster	Postage	\$7.38
11/10/2021	U.S. Postmaster	Postage	\$7.58
11/24/2021	U.S. Postmaster	Postage	\$7.58
7/8/2022	Legal Document Server, Inc.	Attorney Service	\$112.81
7/8/2022	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
7/8/2022	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
7/20/2022	ProLegal	Attorney Service	\$113.91
8/23/2022	Legal Document Server, Inc.	Attorney Service	\$120.95
9/28/2022	Legal Document Server, Inc.	Attorney Service	\$140.95
10/4/2022	Legal Document Server, Inc.	Attorney Service	\$151.08
10/4/2022	Los Angeles Superior Court	Jury Fee	\$150.00
10/6/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
10/7/2022	Legal Document Server, Inc.	Attorney Service	\$125.00
10/28/2022	Legal Document Server, Inc.	Attorney Service	\$31.90
10/31/2022	Legal Document Server, Inc.	Attorney Service	\$250.00
11/8/2022	Legal Document Server, Inc.	Attorney Service	\$140.95
11/28/2022	Legal Document Server, Inc.	Attorney Service	\$140.95
12/5/2022	Legal Document Server, Inc.	Attorney Service	\$281.90
12/14/2022	Los Angeles Superior Court	Document Download Fee	\$4.00
12/28/2022	Los Angeles Superior Court	Document Download Fee	\$2.00
12/29/2022	Legal Document Server, Inc.	Attorney Service	\$140.95
3/3/2023	CourtCall, LLC	Attorney Service	\$151.65
3/4/2023	Steven J. Rottman, LLC	Mediation Cancellation Fee	\$12,500.00
3/6/2023	Legal Document Server, Inc.	Attorney Service	\$17.30
3/6/2023	Legal Document Server, Inc.	Attorney Service	\$125.00
3/6/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
3/8/2023	Legal Document Server, Inc.	Attorney Service	\$140.95
6/2/2023	Case Anywhere LLC	Attorney Service	\$141.00
9/4/2023	Case Anywhere LLC	Attorney Service	\$135.00
10/12/2023	Los Angeles Superior Court	Document Download Fee	\$5.00
10/30/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
10/30/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
11/15/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
11/30/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
12/7/2023	Case Anywhere LLC	Attorney Service	\$159.00
12/11/2023	Los Angeles Superior Court	Document Download Fee	\$6.00
12/13/2023	Los Angeles Superior Court	Document Download Fee	\$22.00
12/19/2023	Los Angeles Superior Court	Document Download Fee	\$2.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Rojas vs. Weingart Center Association

12/20/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
12/22/2023	Los Angeles Superior Court	Document Download Fee	\$4.00
1/2/2024	Los Angeles Superior Court	Document Download Fee	\$3.00
1/4/2024	Los Angeles Superior Court	Document Download Fee	\$5.40
3/5/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
3/5/2024	Case Anywhere LLC	Attorney Service	\$147.00
3/5/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
3/8/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
4/8/2024	Louis Marlin Mediations, LLC	Mediation Fee	\$9,000.00
5/29/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
6/5/2024	Case Anywhere LLC	Attorney Service	\$165.00
7/9/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
7/9/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
7/31/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
8/1/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
8/26/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
9/5/2024	Case Anywhere LLC	Attorney Service	\$165.00
12/6/2024	Case Anywhere LLC	Attorney Service	\$135.00
3/5/2025	Case Anywhere LLC	Attorney Service	\$135.00
4/4/2025	Case Anywhere LLC	Attorney Service	\$45.00
5/2/2025	Case Anywhere LLC	Attorney Service	\$45.00
6/2/2025	Case Anywhere LLC	Attorney Service	\$45.00
6/4/2025	Los Angeles Superior Court	Document Download Fee	\$5.40
Total:			<u>\$26,954.36</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Rojas vs. Weingart Center Association (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/20/2022	U.S. Postmaster	Postage	\$8.00
4/20/2022	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
7/8/2022	Legal Document Server, Inc.	Attorney Service	\$45.31
7/8/2022	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
7/14/2022	ProLegal	Attorney Service	\$71.16
8/23/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
10/19/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
11/10/2022	Legal Document Server, Inc.	Attorney Service	\$26.08
11/10/2022	Los Angeles Superior Court	Jury Fee	\$150.00
1/24/2023	Legal Document Server, Inc.	Attorney Service	\$15.95
3/3/2023	Legal Document Server, Inc.	Attorney Service	\$17.30
3/3/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
11/20/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
11/20/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
11/29/2023	Legal Document Server, Inc.	Attorney Service	\$28.10
7/10/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
7/10/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
8/5/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
8/6/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
8/6/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
8/14/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
8/27/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
1/21/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
6/26/2025	Los Angeles Superior Court	Document Download Fee	\$2.00
Total:			<u>\$1,105.57</u>