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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA – HALL OF JUSTICE**

BRIANA SANDEZ, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff,

vs.

MINER’S ACE HARDWARE, INC., A
California Corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 56-2022-00567741-CU-OS-VTA

Hon. Charmaine H. Buchner
Department 44

**DECLARATION OF BRIAN J. ST. JOHN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LABOR CODE § 2698, *ET SEQ.*)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS’ FEES AND
COSTS, GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION
COSTS**

Date: June 3, 2026
Time: 1:30 p.m.
Department: 44

Complaint Filed: July 6, 2022
FAC Filed: January 20, 2026
Trial Date: None Set

**DECLARATION OF BRIAN J. ST. JOHN IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL
OF PRIVATE ATTORNEYS GENERAL ACT (CAL. LABOR CODE § 2698, ET SEQ.) SETTLEMENT
AGREEMENT AND AWARD OF ATTORNEYS’ FEES AND COSTS, GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION COSTS**

DECLARATION OF BRIAN J. ST. JOHN

I, Brian J. St. John, 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 Briana Sandez (“Plaintiff”). The facts set forth in this declaration are within my personal knowledge or based on information and belief and, if called as a witness, I could and would competently testify thereto.

LITIGATION AND REPRESENTATIVE AND CLASS ACTION EXPERIENCE

2. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. Lawyers *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

3. Edwin Aiwazian is the 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. Since in or around October of 2008, through his work at Lawyers for Justice, PC, he 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. 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 many 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 sixteen (16) cases in the last decade, and litigated over 1,000 class action or representative action cases.

4. 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

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

10 5. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a
11 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
12 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
13 Georgetown University Law Center in 2010. She is admitted to practice in California (since
14 2010) and in New York (since 2013) and she is also admitted to practice in all U.S. District
15 Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the
16 U.S. Supreme Court. She has taken and defended dozens of depositions and successfully
17 handled motion practice in class action cases regarding discovery (including and not limited to,
18 regarding class contact information), class certification (both contested class certification and
19 stipulated class certification), arbitration agreements, coordination, and intervention. She has
20 successfully handled briefing and oral argument on appeal and obtained notable decisions
21 regarding the Private Attorneys General Act and employer efforts to compel arbitration of
22 PAGA claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7,
23 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017)
24 and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has significant experience with class
25 actions, including and not limited to working on cases to obtain class certification through
26 contested motion practice and working on cases in the post-certification stage (e.g., post-
27 certification discovery, appeal, statistical sampling and pilot study, and trial preparation in
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1 conjunction with co-counsel in a case involving a certified class consisting of approximately
2 2,600 individuals). She has extensive experience with class action and/or representative action
3 settlements, and have handled this process in over five hundred (500) cases. Under her, Edwin
4 Aiwazian, and Arby Aiwazian's supervision, Lawyers for Justice, PC has handled the class
5 certification and court approval process for hundreds of class action and/or representative action
6 matters that have successfully resolved. She is a member of the California Employment Lawyers
7 Association and, on several occasions, has been a speaker regarding topics in wage and hour
8 law at the organization's continuing legal education events.

9 6. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree
10 from the University of California, San Diego in 2010 and earned my Juris Doctor degree from
11 the University of California, Berkeley, School of Law in 2013. I was admitted to practice law
12 in California in 2015. I am admitted to practice before all courts of the State of California and
13 all federal district courts in the State of California. I have worked on many wage and hour class
14 action and PAGA representative matters, and my work has included, *inter alia*, researching and
15 drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing
16 stipulations and settlement agreements, engaging in motion practice, claims evaluation and
17 analysis, and making court appearances. Prior to working at Lawyers for Justice, PC, I spent
18 several years working for a boutique employment and labor law firm representing employers,
19 and, in 2019 and 2020, I was employed as general counsel for a DMHC licensed discount dental
20 plan.

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

22 7. Several attorneys at Lawyers for Justice, PC have been actively engaged in this
23 litigation from the inception of the above-captioned action, which was filed on July 6, 2022.
24 Lawyers for Justice, PC has fully and actively participated in the litigation process throughout
25 the pendency of the litigation. Before initiating the above-captioned litigation, Lawyers for
26 Justice, PC conducted extensive litigation and research into the facts and circumstances
27 underlying the pertinent factual and legal issues and applicable law. This required thorough
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1 discussions and interviews between attorneys at our firm and Plaintiff, and research into the
2 various legal issues involved in the case, namely, the current state of the law as it applied to
3 wage-and-hour enforcement, PAGA, manageability, Plaintiff's allegations, potential defenses,
4 Defendant's business, and its operations and employment policies, practices, and procedures.

5 8. Lawyers for Justice, PC joined forces with counsel Sweeny Law, PC (together,
6 Lawyers for Justice, PC and Sweeny Law, PC are referred to as "Plaintiff's Counsel") to pursue
7 the case in September 2024. The work of the firms has been a coordinated and combined effort.
8 Ultimately, the efforts of Plaintiff and Plaintiff's Counsel have resulted in a settlement recovery.

9 9. After engaging in extensive investigations, formal and informal discovery, highly
10 contested motion practice, and exchange of information, data, and documents, the Parties
11 participated in extensive settlement discussions and negotiations to try to resolve the above-
12 captioned lawsuit. These efforts included participating in a formal mediation on August 2, 2025,
13 conducted by Lynn Frank, Esq., a well-respected mediator experienced in mediating complex
14 labor and employment matters. With the aid of the mediator, the Parties reached the Settlement
15 described herein. In the course of mediation and settlement discussions, the parties discussed all
16 aspects of the case, including the risks and delays of further litigation and proceeding with trial,
17 as well as the law relating to representative PAGA actions, various off-the-clock theories,
18 regular rate theory, meal and rest periods, business expense reimbursement, wage statement
19 penalties, waiting time penalties, prohibitions of political activity, 2810.5 written notices, one
20 days rest, sick time pay, pay for vacation and paid time off, and other wage-and-hour
21 enforcement issues, the evidence produced and analyzed, and the possibility of bifurcation of
22 discovery and/or trial and appeals, among other things, Plaintiff's claims, and Defendant's
23 defenses, as well as facts discovered. During all settlement discussions, the parties conducted
24 their negotiations at arm's length in an adversarial position.

25 10. Prior to reaching the Settlement, the parties investigated the veracity, strength, and
26 scope of the PAGA claim and allegations, and were preparing for trial. Plaintiff conducted
27 significant investigation and formal and informal discovery and exchange of information,
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documents, and data regarding the facts of the case, including and not limited to, the review, consideration, and analysis of a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. Plaintiff's Counsel propounded multiple sets of formal written discovery requests onto Defendant (specifically, Requests for Production of Documents (Sets One & Two), Special Interrogatories (Sets One, Two, Three, & Four), and Form Interrogatories – General (Set One)), reviewed Defendant's objections and responses thereto. Additionally, Plaintiff's Counsel noticed the depositions of Defendant's Person Most Knowledgeable designees regarding organizational structure and wage and hour practices and affirmative defenses, along with requests for production of documents. Plaintiff's Counsel also drafted responses to Defendant's Form Interrogatories (Set One), Form Interrogatories—Employment Law (Set One), and Request for Production of Documents (Set One), as well objections to Defendant's Deposition Notice. Additionally, Plaintiff's Counsel prepared for and took the deposition of Defendant's Person Most Knowledgeable Bethany Miner on May 15, 2025, and prepared for and defended the deposition of Briana Sandez on February 12, 2025. The information, documents, and data that were reviewed and analyzed by Plaintiff's Counsel included, and were not limited to, the employment records of Plaintiff, a 20% time and pay data sampling for Aggrieved Employees, Plaintiff's Personnel File and Wage Statements, Defendant's Arbitration Agreement, multiple iterations of Defendant's Handbooks, Meal Period Waivers, Rest Period Acknowledgments, and other documents regarding Defendant's operations and employment practices, policies, and procedures, among other documents. Counsel for the parties undertook significant investigation and evaluation of the PAGA claim and related allegations, including, and not limited to, calculating the potential monetary recovery under PAGA. Other work performed by Plaintiff's Counsel included, but was not limited to: meeting and conferring with Defendant's counsel regarding the pleadings, case management, discovery, arbitration-related issues, mediation, and settlement negotiations, claim preclusion and standing arguments due to the prior *Taylor* settlement, among other issues; case strategy and analysis; researching, drafting, reviewing, and revising pleadings, court filings, motion-

related papers (e.g., with respect to Plaintiff's Consolidated Discovery Motion, Plaintiff's PMK Motion, Plaintiff's Sanctions Motion, Plaintiff's Motion to Hold in Contempt, settlement approval motion papers, and opposing Defendant's MJOP and Defendant's Motion for Reconsideration of the 1/27 Order), briefs for settlement negotiations and mediation, and the settlement agreement; propounding written discovery requests and notices of depositions of Defendant's persons most knowledgeable designees and reviewing Defendant's objections and responses thereto; taking and defending depositions; claims evaluation and analysis; preparing for and participating in settlement negotiations and the mediation; and appearing for court proceedings. Counsel for the parties have further invested time to research the applicable law, which is evolving as it relates to representative PAGA actions, various off-the-clock theories, regular rate theory, meal and rest periods, business expense reimbursement, wage statement penalties, waiting time penalties, prohibitions of political activity, 2810.5 written notices, one days rest, sick time pay, pay for vacation and paid time off, and other wage-and-hour enforcement issues, the evidence produced and analyzed, and the possibility of bifurcation of discovery and/or trial and appeals, among other things, Plaintiff's claims, and Defendant's defenses, as well as facts discovered.

11. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the case. These efforts included participating in a formal mediation session conducted on August 2, 2025, by Lynn Frank, Esq., a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position.

ATTORNEYS' FEES REQUESTED BY PLAINTIFF'S COUNSEL

12. As set forth more fully in the accompanying Motion, Plaintiff's Counsel seek attorneys' fees in the amount of \$200,000.00, which represents approximately forty percent (40%) of the Gross Settlement Amount. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Plaintiff's Counsel, Plaintiff has agreed to a contingency-fee of at

1 least forty percent (40%) of the recovery. The attorneys' fees sought are commensurate with:
2 (1) the risk that Plaintiff's Counsel took in commencing the case; (2) the time, effort, and expense
3 that Plaintiff's Counsel dedicated to the case; (3) the skill and determination that Plaintiff's
4 Counsel has shown; (4) the results that Plaintiff's Counsel has achieved throughout the litigation;
5 (5) value of the settlement that Plaintiff's Counsel has achieved in the case; and (6) the other
6 cases that Plaintiff's Counsel has turned down in order to devote its time and efforts to this case.

7 13. While not necessarily required to be demonstrated because a percentage fee is
8 proper for this settlement, it should be noted that Plaintiff's Counsel have performed many hours
9 of work in connection with prosecuting this matter such that the requested attorneys' fees award
10 is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total
11 of **167.70 hours** performing tasks to obtain a recovery on behalf of Plaintiff, the State of
12 California, and the Aggrieved Employees. Attached hereto as "**EXHIBIT A**" is an Attorney
13 Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys
14 at Lawyers *for* Justice, PC and the time incurred in performing those services. These hours
15 include work done by several attorneys at the firm. Also, separate from the hours referenced
16 herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively
17 engaged in assisting with the prosecution of the case.

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

LITIGATION COSTS AND EXPENSES INCURRED BY PLAINTIFF'S COUNSEL

15. The Settlement provides for reimbursement of litigation costs and expenses of up to \$35,000.00. Plaintiff's Counsel seek total reimbursement of \$33,912.17 for litigation costs and expenses incurred in this case, of which Lawyers for Justice, PC incurred \$33,646.12 as reflected in the Case Cost Detail attached hereto as "EXHIBIT B." It should be noted that Plaintiff's Counsel have borne all of the risks and costs of litigation to date and will not receive any compensation until a recovery is obtained in this matter. These costs and expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement. Plaintiff's Counsel engaged in extensive discovery disputes and motion practice during the course of this Action, including but not limited to multiple meet and confer efforts and informal discovery conferences, discovery dispute motions, sanctions motions, contempt motions, along with opposing Defendant's MJOP and Defendant's Motion for Reconsideration of the 1/27 Order.

GENERAL RELEASE FEE TO PLAINTIFF

16. For her broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Section 9(b) of the Settlement Agreement), the Settlement provides a General Release Fee to Plaintiff in the total amount of \$7,500.00 to be paid out of the Gross Settlement Amount, subject to approval by the Court. The requested General Release Fee is fair and appropriate. It is also worth noting that Plaintiff has undertaken significant efforts and work to spearhead the pursuit of this matter. By initiating and pursuing this matter, Plaintiff stepped into the shoes of the State of California and undertook the

responsibilities of serving in a representative capacity. Plaintiff has spent a substantial amount of time and effort discussing her employment with her counsel, gathering and producing relevant documents and information, and providing the facts and evidence necessary to attempt to prove the allegations. For example, Defendant propounded discovery requests on Plaintiff, and Plaintiff spent time reviewing said discovery requests and providing information and documents in response thereto. Plaintiff prepared for and underwent a deposition on February 12, 2025. Plaintiff was available whenever her counsel needed her and actively tried to obtain and provide information that would facilitate the pursuit of the PAGA claim. Accordingly, it is appropriate and just for Plaintiff to receive a General Release Fee, in addition any individual penalties payment she will receive as an aggrieved employee.

17. Plaintiff's Counsel submits that the Settlement fulfills the purpose of the PAGA statute, is within the accepted range of recoveries for this type of litigation, and is fair, reasonable, and adequate given the substantial monetary benefits provided for by the Settlement, the strengths and weaknesses of this case, and the inherent delay, costs, risks, and uncertainty associated with continued litigation.

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

Executed this 11th day of March, 2026, at Glendale, California.



Brian J. St. John

EXHIBIT A

BRIANA SANDEZ V. MINER’S ACE HARDWARE, INC.
Ventura County Superior Court Case No. 56-2022-00567741-CU-OE-VTA (“PAGA Action”)
Ventura County Superior Court Case No. 2023CUOE012391 (“Class Action”)
California Court of Appeal, Second District, Case No. B344680 (“Appellate Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Briana Sandez (“Plaintiff”)	10.50
Investigate, Communicate with, Interview, and/or Review Communication with Aggrieved Employees and/or Percipient Witnesses	5.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding PAGA Claim, and Draft, Review, and/or Revise Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on July 6, 2022) (PAGA Action)	7.50
Review Court’s Notice of Case Assignment and Mandatory Appearance (filed on July 12, 2022) (PAGA Action)	0.20
Review and Analyze Defendant Miner’s Ace Hardware, Inc.’s (“Defendant”) Answer to Unverified PAGA Enforcement Action Complaint (served on August 15, 2022), and Research Affirmative Defenses in Defendant’s Answer (PAGA Action)	1.30
Draft, Review, and/or Revise Plaintiff’s Case Management Statement (filed on June 30, 2023) (PAGA Action)	0.90

Review Defendant's Case Management Statement (served on July 3, 2023) (PAGA Action)	0.20
Review Court's Tentative Ruling Re: Mandatory Appearance CMC/Order to Show Cause Re: Sanctions/Dismissal for Failure to File Proof of Service/Default (issued on July 16, 2023) (PAGA Action)	0.20
Review Court's Minute Order Re: Mandatory Appearance CMC/Order to Show Cause Re: Sanctions/Dismissal for Failure to File Proof of Service/Default (filed on July 17, 2023) (PAGA Action)	0.10
Investigate the Merits of Plaintiff's Class Action Claims, Conduct Legal Research and Analysis Regarding the Claims, and Draft, Review, and/or Revise Plaintiff's Class Action Complaint for Damages (filed on August 8, 2023) (Class Action)	6.50
Review Court's Notice of Case Assignment and Mandatory Appearance (filed on August 9, 2023) (Class Action)	0.20
Review Court's Minute Order Re: Complex/Class Case Designation (filed on August 14, 2023) (Class Action)	0.20
Review Defendant's Substitution of Attorney (served on September 25, 2023) (PAGA Action)	0.10
Draft, Review, and/or Revise Request for Dismissal, Declaration of Won Christina Chang in Support Thereof, and [Proposed] Order Thereon (submitted on October 25, 2023) (Class Action)	1.30
Review Court's Order Re: Request for Dismissal (filed on November 2, 2023) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Dismissal and Proof of Service (filed on November 29, 2023) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Informal Discovery Conference Request (filed on December 8, 2023) (PAGA Action)	1.10
Review Court's Notice of Continuance and Order Denying Request for Informal Discovery Conference/Complex Case Designation/Notice of Rescheduled Hearing (filed on December 11, 2023) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Complex Case Status Report (filed on January 2, 2024) (PAGA Action)	1.60

Review Court's Minute Order Re: CMC: Complex Track (filed on January 11, 2024) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Complex Status Report (filed on March 4, 2024) (PAGA Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Complex Status Report (filed on April 8, 2024) (PAGA Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Complex Status Report (filed on May 14, 2024) (PAGA Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Trial Setting Conference Statement (filed on July 22, 2024) (PAGA Action)	1.60
Review Court's Minute Order Re: CMC Complex Track (filed on August 1, 2024) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Association of Counsel (filed on September 11, 2024) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Request for Informal Discovery Conference (filed on September 23, 2024) (PAGA Action)	0.20
Review Court's Order on Request for Informal Discovery Conference (filed on September 23, 2024) (PAGA Action)	0.20
Review Court's Minute Order Re: Trial Setting Conference (filed on October 7, 2024) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Supplemental Informal Discovery Conference Statement (filed on October 10, 2024) (PAGA Action)	0.20
Review Court's Notice of Continuance of Informal Discovery Conference (filed on October 17, 2024) (PAGA Action)	0.10
Review Court's Notice of Continuance of Trial Setting Conference (filed on October 17, 2024) (PAGA Action)	0.10
Review Court's Minute Order Re: Notice of Continuance of Informal Discovery Conference and Trial Setting Conference (filed on October 24, 2024) (PAGA Action)	0.10

Review Court's Minute Order Re: Informal Discovery Conference (filed on October 25, 2024) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Parties' Stipulation for a Protective Order – Los Angeles County Model Stipulated Protective Order (submitted on January 16, 2025) (PAGA Action)	0.10
Review Court's Notice of Continuance of Trial Setting Conference (filed on January 17, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 21, 2025) (Class Action) (PAGA Action)	0.10
Review Court's Order Re: Parties' Stipulation for a Protective Order – Los Angeles County Model Stipulated Protective Order (filed on January 27, 2025) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Plaintiff's Notice of Ruling from February 11, 2025 Hearing on Plaintiff's Motion to Compel the Deposition of Defendant's Person(s) Most Knowledgeable (filed on February 13, 2025) (PAGA Action)	0.20
Review Defendant's Notice of Appeal (served on March 12, 2025) (Appellate Action) (PAGA Action)	0.10
Review Court's Notice of Filing Notice of Appeal/Cross-Appeal (filed on March 12, 2025) (Appellate Action) (PAGA Action)	0.10
Review Appellant's Notice of Designating Record on Appeal (served on March 25, 2025) (Appellate Action) (PAGA Action)	0.10
Review Court's Notice of Default on Appeal (filed on March 25, 2025) (Appellate Action) (PAGA Action)	0.10
Review Court's Notice of Rescinding Default (filed on March 27, 2025) (Appellate Action) (PAGA Action)	0.10
Review Appellant's Amended Notice Designating Record on Appeal (served on April 1, 2025) (Appellate Action) (PAGA Action)	0.10
Review Defendant's Agreement Re: Deposit in Lieu of Bond (served on April 2, 2025) (PAGA Action)	0.10

Review Court's Notice of Cost of Preparing Clerk's Transcript on Appeal and Notice to Court Reporter to Prepare Transcript (filed on April 9, 2025) (Appellate Action) (PAGA Action)	0.10
Review Defendant's Notice of Deposit in Lieu of Appeal Bond (served on April 15, 2025) (Appellate Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation Re: Mediation; [Proposed] Order (submitted on May 20, 2025) (PAGA Action)	0.20
Review Court's Order Re: Mediation (filed on May 27, 2025) (PAGA Action)	0.20
Meet and Confer with Appellant's Counsel, and Draft, Review, and/or Revise Stipulation for Extension of Time to File Brief (submitted on June 20, 2025) (Appellate Action) (PAGA Action)	0.10
Review Court's Minute Order Re: Notice of Reassignment of Judicial Officer and Change of Hearing Location (filed on June 23, 2025) (PAGA Action)	0.20
Review Defendant's Notice of Settlement of Appeal (served on August 20, 2025) (Appellate Action)	0.20
Review Defendant's Application for Extension of Time (served on September 16, 2025) (Appellate Action)	0.20
Review Defendant's Notice of Settlement of Appeal (served on September 17, 2025) (Appellate Action)	0.20
Review Court's Order Re: Extension and Notice of Settlement of Appeal (served on September 22, 2025) (Appellate Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Report Re: Post Mediation Status Conference and Notice of Settlement (filed on September 23, 2025) (PAGA Action)	0.20
Review Court's Minute Order Re: Post-Mediation Status Conference (filed on September 24, 2025) (PAGA Action)	0.20
Review Court's Notice of Rescheduled Hearing Re: Non-Appearance Case Review Motion for Preliminary Approval of Class Settlement (filed on December 16, 2025) (PAGA Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Report for Non-Appearance Case Review Re: Status of PAGA Settlement Approval Motion (filed on January 16, 2026) (PAGA Action)	0.10
Research, Draft, Review, and/or Revise Plaintiff's First Amended Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on January 20, 2026) (PAGA Action)	0.30
Review Court's Minute Order Re: Non-Appearance Case Review Motion for Preliminary Approval of Class Settlement (filed on January 23, 2026) (PAGA Action)	0.20
Appearances	
Prepare for and Remotely Attend Case Management Conference (January 11, 2024) (PAGA Action)	1.60
Prepare for and Remotely Attend Motion for Judgment on the Pleadings (February 13, 2024) (PAGA Action)	2.60
Prepare for and Remotely Attend Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories Set One Nos. 1 and 2 and Request for Monetary Sanctions (May 23, 2024) (PAGA Action)	0.80
Prepare for and Remotely Attend Case Management Conference (August 1, 2024) (PAGA Action)	1.90
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on November 3, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff	2.90
Draft, Review, and/or Revise 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 (served on September 12, 2023) (PAGA Action)	3.50

Review Defendant's Response to Plaintiff's Special Interrogatories (Set One) (served on October 16, 2023) (PAGA Action)	0.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for October 18, 2023) (served on September 12, 2023) (PAGA Action)	1.20
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for October 19, 2023) (served on September 12, 2023) (PAGA Action)	1.30
Review Defendant's Objections to Plaintiff's Notice of Taking Deposition of the Person Most Knowledgeable with Request for Production of Documents (served on October 12, 2023) (PAGA Action)	0.80
Review Defendant's Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (served on December 1, 2023) (PAGA Action)	2.10
Draft, Review, and/or Revise Plaintiff's Special Interrogatories (Set Three) to Defendant (served on May 23, 2024) (PAGA Action)	0.80
Review Defendant's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), and Requests for Production of Documents (Set One) to Plaintiff (served on May 24, 2024) (PAGA Action)	0.90
Review Defendant's Notice of Deposition to Plaintiff Briana Sandez (served on May 24, 2024) (PAGA Action)	0.20
Review and Analyze Documents Produced by Defendant (served on June 25, 2024) (PAGA Action)	1.80
Review Defendant's Response to Plaintiff's Special Interrogatories (Set Three) (served on June 25, 2024) (PAGA Action)	0.20
Review and Analyze Documents Produced by Defendant (served on July 1, 2024) (PAGA Action)	2.10

Draft, Review, and/or Revise Plaintiff's Responses to Defendant's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), and Requests for Production of Documents (Set One) (served on July 2, 2024) (PAGA Action)	8.50
Review Defendant's Re-Notice of Deposition to Plaintiff Briana Sandez (served on October 3, 2024) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Objections to Defendant's Re-Notice of Deposition to Plaintiff Briana Sandez (served on October 11, 2024) (PAGA Action)	0.10
Review Defendant's Re-Notice of Deposition to Plaintiff Briana Sandez Pursuant to Court Order (served on January 30, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's First Amended Notice of Deposition of Person Most Knowledgeable at Defendant (April 9, 2025) (Wage and Hour Practices; noticed for April 9, 2025) (served on March 17, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant (April 10, 2025) (Organizational Structure; noticed for April 10, 2025) (served on March 17, 2025) (PAGA Action)	0.10
Review Defendant's Objections to Plaintiff's First Amended Notice of Taking Deposition of the Person Most Knowledgeable and Requests for Production of Documents (April 10, 2025) (served on April 3, 2025) (PAGA Action)	0.10
Review Defendant's Objections to Plaintiff's First Amended Notice of Taking Deposition of the Person Most Knowledgeable and Requests for Production of Documents (April 9, 2025) (served on April 7, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Special Interrogatories (Set Four) and Requests for Production of Documents (Set Two) to Defendant (served on April 8, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Affirmative Defenses; noticed for May 6, 2025) (served on April 8, 2025) (PAGA Action)	0.10

Review Defendant's Objection to Plaintiff's Notice of Taking Deposition of the Person Most Knowledgeable and Request for Production of Documents (May 6, 2025) (served on May 1, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Third Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for May 15, 2025) (served on May 12, 2025) (PAGA Action)	0.10
Review Defendant's Objection to Plaintiff's Third Amended Notice of Taking Deposition of the Person Most Knowledgeable and Request for Production of Documents (May 15, 2025) (served on May 12, 2025) (PAGA Action)	0.20
Review Transcript of Deposition of Person Most Knowledgeable Bethany Miner (May 15, 2025) (PAGA Action)	2.10
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Under the Private Attorneys General Act (served on April 8, 2022)	4.50
Draft, Review, and/or Revise Additional Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Under the Private Attorneys General Act (served on December 7, 2025)	0.20
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendant's Counsel	14.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation, Research Settlement and Merits-Related Issues, Perform Claim Evaluation and Analyses, and Review Plaintiff's Mediation Brief (submitted on July 31, 2025)	16.50
Draft, Review, Revise, and/or Analyze Memorandum of Understanding – PAGA Settlement (executed on August 2, 2025)	0.40
Draft, Review, Revise, Negotiate, and Finalize Private Attorneys General Act Settlement Agreement and Release (executed on February 16, 2026), and Draft, Review, and/or Revise Cover Letter	0.70

Law and Motion	
Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set One) Nos. 1 and 2 and Request for Monetary Sanctions, Declaration of Won Christina Chang in Support Thereof, Rule 3.1345 Separate Statement in Support Thereof, and [Proposed] Order Thereon (filed on December 18, 2023) (PAGA Action)	6.50
Review and Analyze Defendant's Opposition to Plaintiff's Notice of Motion and Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set One) and Request for Monetary Sanctions, Response to Plaintiff's Separate Statement in Support Thereof, and Declaration of Hannah Sweiss in Support Thereof (served on January 4, 2024) (PAGA Action)	0.90
Draft, Review, and/or Revise Plaintiff's Reply in Support of Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set One) Nos. 1 and 2 and Request for Monetary Sanctions and Supplemental Declaration of Won Christina Chang in Support Thereof (filed on January 10, 2024) (PAGA Action)	2.80
Review and Analyze Defendant's Notice of Motion and Motion for Judgment on the Pleadings, Memorandum of Points and Authorities in Support Thereof, Declaration of Hannah Sweiss in Support Thereof, Request for Judicial Notice in Support Thereof, and [Proposed] Order Thereon (served on January 19, 2024) (PAGA Action)	2.10
Draft, Review, and/or Revise Plaintiff's Opposition to Defendant's Motion for Judgment on the Pleadings, Declaration of Won Christina Chang in Support Thereof, and [Proposed] Order Denying Defendant's Motion for Judgment on the Pleadings (filed on January 30, 2024) (PAGA Action)	14.50
Review and Analyze Defendant's Reply Memorandum of Points and Authorities in Support of its Motion for Judgment on the Pleadings (served on February 5, 2024) (PAGA Action)	0.90
Review Court's Minute Order Re: Motion for Judgment on the Pleadings for Defendant (filed on February 13, 2024) (PAGA Action)	0.20
Review Court's Minute Order Re: Notice of Continuance of Motion to Compel Further Responses to Special Interrogatories, Set 1 and 3 and CMC: Complex Track (filed on March 6, 2024) (PAGA Action)	0.10

Review Court's Minute Order Re: Notice of Continuance of Motion to Compel Further Responses to Special Interrogatories, Set One Nos 1 and 2 and CMC: Complex Track (filed on April 16, 2024) (PAGA Action)	0.10
Review Court's Minute Order Re: Ruling on Submitted Matter (filed on April 19, 2024) (PAGA Action)	0.40
Review Court's Minute Order Re: Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories Set One Nos 1 and 2 Request for Monetary Sanctions (filed on May 23, 2024) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Consolidated Motion and Consolidated Motion to Compel Defendant to Provide Further Responses to Plaintiff's Written Discovery Requests and Request for Monetary Sanctions, Declaration of Charles Sweeny in Support Thereof, Rule 3.1345 Separate Statement Regarding Plaintiff's Form Interrogatories (Set One), Rule 3.1345 Separate Statement Regarding Plaintiff's Request for Production (Set One), Rule 3.1345 Separate Statement Regarding Plaintiff's Special Interrogatories (Set Two), Rule 3.1345 Separate Statement Regarding Plaintiff's Special Interrogatories (Set Three), and [Proposed] Order Thereon (filed on November 18, 2024) (PAGA Action)	0.50
Review and Analyze Defendant's Opposition to Plaintiff's Notice of Consolidated Motion and Consolidated Motion to Compel Defendant to Provide Further Responses to Plaintiff's Written Discovery Requests and Request for Monetary Sanctions, Declaration of Hannah Sweiss in Support Thereof, Responses to Rule 3.1345 Separate Statement Regarding Plaintiff's Form Interrogatories (Set One), Rule 3.1345 Separate Statement Regarding Plaintiff's Request for Production (Set One), Rule 3.1345 Separate Statement Regarding Plaintiff's Special Interrogatories (Set Two), Rule 3.1345 Separate Statement Regarding Plaintiff's Special Interrogatories (Set Three) (served on December 5, 2024) (PAGA Action)	0.50
Draft, Review, and/or Revise Plaintiff's Reply in Support of Consolidated Motion to Compel Further Responses to Plaintiff's Written Discovery Requests and Declaration of Charles T. Sweeny in Support Thereof (filed on December 12, 2024) (PAGA Action)	0.20
Review and Analyze Defendant's Notice of Motion and Motion to Compel Deposition of Plaintiff, Memorandum of Points and Authorities in Support Thereof, Declaration of Hannah Sweiss in Support Thereof, and [Proposed] Order Thereof (served on December 12, 2024) (PAGA Action)	0.20
Review and Analyze Defendant's Ex Parte Application to Advance Hearing on Defendant's Motion to Compel Plaintiff's Deposition, or in the Alternative, to Continue the Hearing on Plaintiff's Consolidated	0.20

Motion to Compel Further Discovery Responses, Declaration of Hannah Sweiss in Support Thereof, and [Proposed] Order Thereon (served on December 16, 2024) (PAGA Action)	
Review Court's Minute Order Re: Notice of Continuance of Consolidated Motion to Compel Defendant to Provide Further Responses to Plaintiff's Written Discovery Request for Monetary Sanctions (filed on December 16, 2024) (PAGA Action)	0.10
Draft, Review, and/or Revise Declaration of Charles T. Sweeny in Opposition to Defendant's Ex Parte Application for Motion Priority (filed on December 17, 2024) (PAGA Action)	0.20
Review Court's Minute Order Re: Ex Parte Application to Advance Hearing on Defendant's Motion to Compel Plaintiff's Deposition, or in the Alternative, to Continue the Hearing on Plaintiff's Consolidated Motion to Compel Further Discovery Responses (filed on December 17, 2024) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Opposition to Defendant's Motion to Compel Deposition of Plaintiff and Declaration of Charles T. Sweeny in Support Thereof (filed on January 2, 2025) (PAGA Action)	0.20
Review and Analyze Defendant's Reply Memorandum of Points and Authorities in Support of its Motion to Compel Deposition of Plaintiff and Supplemental Declaration of Hannah Sweiss in Support Thereof (served on January 8, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion to Compel Defendant to Produce a Person Most Knowledgeable Witness for Deposition and Request for Monetary Sanctions and Declaration of Charles T. Sweeny in Support Thereof (filed on January 15, 2025) (PAGA Action)	0.10
Review Court's Tentative Ruling Re: Defendant's Motion to Compel Deposition of Plaintiff and Tentative Ruling Re: Plaintiff's Consolidated Motion to Compel Defendant to Provide Further Responses to Plaintiff's Written Discovery Requests and Request for Monetary Sanctions (filed on January 14, 2025) (PAGA Action)	0.40
Review Court's Minute Order Re: Motion to Compel Deposition of Plaintiff and Minute Order Re: Consolidated Motion to Compel Defendant to Provide Further Responses to Plaintiff's Written Discovery Requests and Request for Monetary Sanctions (filed on January 15, 2025) (PAGA Action)	0.20
Review Court's Order Granting Defendant's Motion to Compel Deposition of Plaintiff (filed on January 22, 2025) (PAGA Action)	0.20

Review Court's Minute Order Re: Ruling on Submitted Matter (filed on January 27, 2025) (PAGA Action)	0.20
Review and Analyze Defendant's Memorandum of Points and Authorities in Support of Defendant's Opposition to Plaintiff's Notice of Motion and Motion to Compel Defendant to Produce a Person Most Knowledgeable Witness for Deposition and Request for Monetary Sanctions and Declaration of Hannah Sweiss in Support Thereof (served on January 29, 2025) (PAGA Action)	0.20
Review and Analyze Defendant's Ex Parte Application for an Order to Have Defendant's Motion for Reconsideration Heard Before the Deadline to Comply with the January 27, 2025 Ruling, Declaration of Hannah Sweiss in Support Thereof, and [Proposed] Order Thereon (served on February 4, 2025) (PAGA Action)	0.20
Review and Analyze Defendant's Notice of Motion and Motion for Reconsideration of the Court's January 27, 2025 Ruling on Plaintiff's Consolidated Motion for Discovery Response, Memorandum of Points and Authorities in Support Thereof, Declaration of Hannah Sweiss in Support Thereof, and [Proposed] Order Thereon (served on February 4, 2025) (PAGA Action)	0.50
Draft, Review, and/or Revise Declaration of Charles T. Sweeny in Opposition to Defendant's Ex Parte Application to Excuse Compliance from January 27, 2025 Order (filed on February 4, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Reply in Support of Motion to Compel Defendant to Produce a Person Most Knowledgeable Witness for Deposition and Request for Monetary Sanctions and Reply Declaration of Charles T. Sweeny in Support Thereof (filed on February 4, 2025) (PAGA Action)	0.20
Review Court's Minute Order Re: Ex Parte Application for an Order to Have Defendant's Motion for Reconsideration Heard Before the Deadline to Comply with the January 27, 2025 Ruling (filed on February 5, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's 21-Day Safe Harbor Notice of Motion for Sanctions, Penalties, and an Order of Contempt to be Imposed Against Defendant's Counsel of Record Under California Code of Civil Procedure Sections 1008 and 128.7 (served on February 5, 2025) (PAGA Action)	0.20
Review Defendant's Notice of Entry of Judgment or Order Re: Order Granting Defendant's Motion to Compel Deposition of Plaintiff (served on February 6, 2025) (PAGA Action)	0.10

Review Defendant's Notice of Entry of Judgment or Order and Notice of Ruling on Defendant's Ex Parte Application Heard on February 5, 2025) (served on February 6, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Supplemental Reply in Support of Motion to Compel Defendant to Produce a Person Most Knowledgeable Witness for Deposition and Request for Monetary Sanctions and [Proposed] Order Thereon (submitted on February 10, 2025) (PAGA Action)	0.10
Review Court's Minute Order Re: Motion to Compel Defendant to Produce a Person Most Knowledgeable Witness for Deposition and Request for Monetary Sanctions (filed on February 11, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Opposition to Defendant's Motion for Reconsideration of the Courts January 27, 2025 Ruling on Plaintiff's Consolidated Motion for Discovery Responses and Declaration of Charles T. Sweeny in Support Thereof (filed on February 18, 2025) (PAGA Action)	0.30
Review and Analyze Defendant's Reply Memorandum of Points and Authorities in Support of its Motion for Reconsideration of the Court's January 27, 2025 Ruling on Plaintiff's Consolidated Motion for Discovery Responses (served on February 24, 2025) (PAGA Action)	0.10
Review Court's Tentative Ruling Re: Motion for Reconsideration of the Court's January 27, 2025 Ruling on Plaintiff's Consolidated Motion for Discovery Responses (issued on March 2, 2025) (PAGA Action)	0.20
Review Court's Minute Order Re: Motion for Reconsideration of the Court's January 27, 2025 Ruling on Plaintiff's Consolidated Motion for Discovery Responses (filed on March 3, 2025) (PAGA Action)	0.10
Review Defendant's Notice of Ruling Re: Motion for Reconsideration of the Court's January 27, 2025 Order (served on March 6, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Sanctions Under Code of Civil Procedure Sections 1008 and 128.7, Declaration of Charles T. Sweeny in Support Thereof, and [Proposed] Order Thereon (filed on March 6, 2025) (PAGA Action)	0.40
Review and Analyze Defendant's Report Regarding Status of Court-Ordered Meet and Confer Re: Plaintiff's Motion to Compel Deposition of Defendant's Person Most Knowledgeable (served on March 6, 2025) (PAGA Action)	0.10

Draft, Review, and/or Revise Plaintiff's Report Regarding Status of Court-Ordered Meet and Confer Re: Plaintiff's Motion to Compel Deposition of Defendant's Person Most Knowledgeable (filed on March 6, 2025) (PAGA Action)	0.10
Review Court's Minute Order Re: Motion to Compel Defendant to Produce a Person Most Knowledgeable Witness for Deposition and Request for Monetary Sanctions (filed on March 13, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Ruling from March 13, 2025 Hearing on Plaintiff's Motion to Compel the Deposition of Defendant's Person(s) Most Knowledgeable (filed on March 17, 2025) (PAGA Action)	0.10
Review and Analyze Defendant's Memorandum in Opposition to Plaintiff's Notice of Motion and Motion for Sanctions Under Code of Civil Procedure Sections 1008 and 128.7 and Declaration of Hannah Sweiss in Support Thereof (served on March 24, 2025) (PAGA Action)	0.40
Draft, Review, and/or Revise Plaintiff's Reply in Further Support of Motion for Sanctions Under Code of Civil Procedure Sections 1008 and 128.7 and Declaration of Charles T. Sweeny in Support Thereof (filed on March 28, 2025) (PAGA Action)	0.40
Review Court's Minute Order Re: Motion for Sanctions Under Code of Civil Procedure Sections 1008 and 128.7 (filed on April 7, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Ex Parte Application for an Order Compelling Defendant to Comply with the Court's March 13, 2025 Order and Holding Defendant and its Counsel in Contempt for Violating that Order, Declaration of Charles T. Sweeny in Support Thereof, and [Proposed] Order Thereon (filed on April 7, 2025) (PAGA Action)	0.20
Review Court's Minute Order Re: Ex Parte Application for an Order Compelling Defendant to Comply with the Court's March 13, 2025 Order (filed on April 8, 2025) (PAGA Action)	0.10
Review Court's Minute Order Re: Ruling on Submitted Matter (filed on April 14, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for an Order Holding Defendant and its Counsel in Contempt for Violating the Court's March 13, 2025 Order, Declaration of Charles T. Sweeny in Support Thereof, [Proposed] Order Thereon (filed on April 28, 2025) (PAGA Action)	0.30

Draft, Review, and/or Revise Supplemental Declaration of Charles T. Sweeny in Support of Plaintiff's Motion for an Order Holding Defendant and its Counsel in Contempt for Violating the Court's March 13, 2025 Order (filed on May 5, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Court's Ruling on Submitted Matter (filed on May 6, 2025) (PAGA Action)	0.10
Review and Analyze Defendant's Memorandum of Points and Authorities in Opposition to Plaintiff's Motion for an Order Holding Defendant and its Counsel in Contempt for Violating the Court's March 13, 2025 Order and Declaration of Hannah Sweiss in Support Thereof (served on May 9, 2025) (PAGA Action)	0.50
Draft, Review, and/or Revise Plaintiff's Reply in Support of Motion for an Order Holding Defendant and its Counsel in Contempt for Violating the Court's March 13, 2025 Order (filed on May 15, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Notice of Withdrawal of Plaintiff's Motion for an Order Holding Defendant and Its Counsel in Contempt for Violating the Court's March 13, 2025 Order (filed on May 21, 2025) (PAGA Action)	0.10
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Approval of Private Attorneys General Act Settlement Agreement and Award of Attorneys' Fees and Costs, General Release Fee, and Settlement Administration Costs; Memorandum of Points and Authorities and Declaration of Brian J. St. John in Support Thereof	4.50
Total Hours:	167.70

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Sandez vs. Miner's Ace Hardware, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/3/2021	U.S. Postmaster	Postage	\$7.38
4/8/2022	U.S. Postmaster	Postage	\$7.53
4/8/2022	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
7/6/2022	Legal Document Server, Inc.	Attorney Service	\$199.36
7/6/2022	Ventura Superior Court	Complaint Filing Fee	\$435.00
7/18/2022	ProLegal	Attorney Service	\$166.60
8/23/2022	Legal Document Server, Inc.	Attorney Service	\$144.95
8/30/2022	Legal Document Server, Inc.	Attorney Service	\$150.00
6/30/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
7/14/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
9/12/2023	General Logistics Systems US, Inc.	Courier Service	\$15.80
12/18/2023	Legal Document Server, Inc.	Attorney Service	\$227.67
12/18/2023	Ventura Superior Court	Motion Fee	\$60.00
1/2/2024	Legal Document Server, Inc.	Attorney Service	\$219.50
1/2/2024	Ventura Superior Court	Complex Filing Fee	\$1,000.00
1/5/2024	CourtCall, LLC	Attorney Service	\$72.00
1/10/2024	Legal Document Server, Inc.	Attorney Service	\$150.00
1/30/2024	Legal Document Server, Inc.	Attorney Service	\$170.00
2/2/2024	CourtCall, LLC	Attorney Service	\$72.00
3/4/2024	Legal Document Server, Inc.	Attorney Service	\$150.00
4/5/2024	CourtCall, LLC	Attorney Service	\$72.00
4/8/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
5/14/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
5/24/2024	General Logistics Systems US, Inc.	Courier Service	\$27.26
6/12/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
7/19/2024	CourtCall, LLC	Attorney Service	\$72.00
7/22/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
9/11/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
11/18/2024	Legal Document Server, Inc.	Attorney Service	\$310.67
11/18/2024	Ventura Superior Court	Motion Fee	\$60.00
12/12/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
12/17/2024	Legal Document Server, Inc.	Attorney Service	\$17.32
1/3/2025	Legal Document Server, Inc.	Attorney Service	\$18.32
1/15/2025	Huseby Global Litigation	Court Reporter	\$835.00
1/16/2025	Legal Document Server, Inc.	Attorney Service	\$22.37
1/16/2025	Ventura Superior Court	Motion Fee	\$60.00
1/22/2025	Legal Document Server, Inc.	Attorney Service	\$19.59
1/22/2025	Ventura Superior Court	Stipulation & Order Fee	\$20.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Sandez vs. Miner's Ace Hardware, Inc. (PAGA)

1/23/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
2/4/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
2/5/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
2/11/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
2/12/2025	Huseby Global Litigation	Court Reporter	\$1,795.00
2/19/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
2/21/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
2/21/2025	Esquire Deposition Solutions, LLC	Court Reporter	\$2,035.00
2/21/2025	Esquire Deposition Solutions, LLC	Court Reporter	\$2,035.00
3/3/2025	Huseby Global Litigation	Court Reporter	\$359.00
3/7/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
3/11/2025	Legal Document Server, Inc.	Attorney Service	\$22.37
3/11/2025	Ventura Superior Court	Motion Fee	\$60.00
3/19/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
3/28/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
4/7/2025	Legal Document Server, Inc.	Attorney Service	\$22.37
4/7/2025	Ventura Superior Court	Motion Fee	\$60.00
4/9/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
4/14/2025	Clerk of the Superior Court	Clerk's Transcript on Appeal Fee	\$641.00
4/29/2025	Elite Litigation Support	Attorney Service	\$190.75
4/29/2025	Legal Document Server, Inc.	Attorney Service	\$22.37
4/29/2025	Ventura Superior Court	Motion Fee	\$60.00
4/30/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
5/6/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
5/7/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
5/15/2025	Esquire Deposition Solutions, LLC	Court Reporter	\$3,485.15
5/15/2025	Esquire Deposition Solutions, LLC	Videography Service	\$1,930.00
5/16/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
5/21/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
5/21/2025	Legal Document Server, Inc.	Attorney Service	\$19.59
5/21/2025	Ventura Superior Court	Stipulation & Order Fee	\$20.00
5/23/2025	Lynn S. Frank	Mediation Fee	\$12,500.00
9/12/2025	CPAnalytics	Data Analysis of Sampling of Time Records	\$2,010.00
9/23/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
Total:			33,646.12