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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

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

Plaintiff,

vs.

TVI, INC. D/B/A SAVERS, VALUE
VILLAGE & VILLAGE DES VALEURS, an
unknown business entity; SAVERS, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: BC612403

Honorable Carolyn B. Kuhl
Department SSC12

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Payment; Declaration of Class Counsel
(Matthew Righetti); Declaration of Class
Representative (Bryant Harris); Declaration of
Settlement Administrator (Tina Chiango); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date December 10, 2019
Time 11:00 a.m.
Department: SSC12

Complaint Filed: March 1, 2016
FAC Filed: May 31, 2016
SAC Filed: December 27, 2018
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

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

PRELIMINARY APPROVAL OF SETTLEMENT

2. On July 30, 2019, in Department SSC12 of the above-entitled Court, the Honorable Carolyn B. Kuhl preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release and Amendment No. 1 to the Joint Stipulation of Class Action and PAGA Settlement and Release (collectively "Settlement" or "Settlement Agreement") entered into between Plaintiff and Defendants TVI, Inc. d/b/a Savers, Value Village & Village Des Valeurs and Savers, Inc. ("Defendants"), and provisionally certified the Class for settlement purposes. The Court also preliminarily appointed and designated Lawyers *for* Justice, PC and Righetti Glugoski, P.C. as Class Counsel, Plaintiff Bryant Harris as the Class Representative, and RG/2 Claims Administration LLC ("RG/2 Claims") to serve as the Settlement Administrator for handling the notice and settlement administration process. The Court approved and ordered the mailing of the Notice of Class Action Settlement ("Class Notice") to the Class, preliminarily approved the notice, opt-out, and objection procedures, and ordered their implementation.

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

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WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys and members in our firm have been actively engaged in litigating this matter since the above-captioned action was commenced on March 1, 2016.

5. Lawyers for Justice, PC has actively participated in all phases of the litigation process. Before initiating the action entitled *Bryant Harris v. TVI, Inc. d/b/a Savers, Value Village & Village Des Valeurs, et al.*, Los Angeles County Superior Court Case No. BC612403 (the "Action"), Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff, and research into the various legal issues involved in the Action, namely, the current state of the law as it applied to certification, misclassification theory, meal and rest periods, representative PAGA claims, wage-and-hour enforcement, Plaintiff's claims, and potential defenses. After conducting initial investigation, our firm determined that Plaintiff's claims were well-suited for class-wide and representative adjudication owing to what appeared to be a common course of conduct affecting a similarly-situated group of individuals employed by Defendants in California and classified as "exempt," who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. We have worked closely with our co-counsel, Righetti Glugoski, P.C., throughout the litigation of the Action. Together with our co-counsel, we used the pre-mediation time period to investigate the veracity, strength, and scope of the claims, and also to prepare the Action for class certification and trial. The parties conducted significant investigation into the facts of the case and engaged in extensive formal and informal discovery, and also informally exchanged information and data in preparation for mediation. The parties engaged in a *Belaire-West* notice administration, and Defendants produced the contact information of Class Members who did not opt out during the *Belaire-West* notice administration process. Class Counsel also interviewed and obtained information from Plaintiff and other Class Members, including and not limited to the names of potential witnesses, and reviewed and analyzed a volume of documents and data produced by Defendants and obtained through other sources. The documents and data

1 reviewed and analyzed by Class Counsel included, and were not limited to, Plaintiff and other
2 Class Members' employment records, a detailed sampling of Class Members' time and pay data
3 (including, but not limited to, timesheets, payroll records, and earning statements), job titles and
4 descriptions, corporate policies (including, but not limited to, several iterations of Defendants'
5 Human Resources Policies), and Defendants' operations and employment practices (such as,
6 Defendants' Weekly Manager and Production Schedules, Production Targets, and Production
7 Quota Reports), procedures (such as, Defendants' Time Keeping and Payroll Procedures), and
8 policies (such as, Defendants' Hours of Work, Overtime and Payday policy, Employee Benefits
9 and Awards policy, and Sick Time and Holiday policy), and non-party witness declarations,
10 among other information and documents. Class Counsel served multiple sets of formal written
11 discovery requests and reviewed Defendants' responses and supplemental responses thereto.
12 Class Counsel also worked with Plaintiff to prepare responses and supplemental responses to
13 formal written discovery which were propounded by Defendants. Class Counsel also took three
14 (3) depositions of Defendants' Person Most Knowledgeable designees and prepared for and
15 defended the deposition of Plaintiff. Counsel for the Parties also met and conferred on numerous
16 occasions, e.g., to discuss issues relating to the pleadings, jurisdiction, discovery, *Belair-West*
17 notice administration, motion practice, and the production of documents and data. Class Counsel
18 also engaged in extensive motion practice and prepared for and attended court proceedings,
19 mediation, and settlement negotiations, among other tasks

20 7. As outlined herein, the parties have conducted extensive discovery and
21 investigation during the course of this litigation. Class Counsel analyzed a volume of documents
22 and data either produced by Plaintiff and Defendants or obtained by Class Counsel through other
23 sources. These documents and data provided a critical understanding of the nature of the work
24 performed by the Class Members, as well as Defendants' operations and employment policies,
25 practices, and procedures, and were used in analyzing liability, damages, and valuation issues in
26 connection with all phases of the litigation, and ultimately with the mediation and settlement
27 negotiation process. Class Counsel also performed significant research into the law concerning
28 Defendants' defenses.

1 8. The work with our co-counsel has been a coordinated and combined effort. Areas
2 of responsibility were divided between the firms so as to avoid unnecessary duplication of work
3 and effort. Lawyers for Justice, PC had primary responsibility for case management, drafting the
4 pleadings and moving papers, propounding and responding to formal written discovery requests,
5 taking and defending depositions, and communicating with Plaintiff and Class Members.
6 Righetti Glugoski, P.C. actively participated in all stages of the litigation, including interviewing
7 and gathering information from Plaintiff and other Class Members, conducting legal research,
8 reviewing and analyzing documents produced by Defendants, developing case strategy, and
9 preparing for mediation and settlement negotiations. When the abilities of experienced and
10 skilled co-counsel were needed, however, the firms worked together. For example, the review
11 and analysis of a large volume of documents produced by Defendants involved group effort, as
12 well as contacting Class Members, and obtaining information. Both firms worked together to
13 strategize the case and were actively involved in preparing the Action for mediation and
14 settlement negotiations, in reviewing and revising the terms of the Settlement, and in drafting
15 and finalizing the motions for class certification and preliminary approval and final approval of
16 the Settlement.

17 9. After conducting significant investigation of the facts and law during the
18 prosecution of the Action, counsel for the parties engaged in extensive settlement negotiations to
19 try to resolve the entire matter. These efforts included participating in private mediation
20 conducted by Paul Grossman, Esq., a well-regarded mediator who is experienced in mediating
21 complex labor and employment matters. During all settlement discussions, the parties conducted
22 their negotiations at arm's length in an adversarial position. During the mediation, the parties
23 discussed all aspects of the Action, including the risks and delays of further litigation, the risks to
24 the parties of proceeding with class certification, representative adjudication, and/or trial, the law
25 relating to misclassification theory, meal and rest periods, representative PAGA actions, and
26 wage-and-hour enforcement, the evidence produced and analyzed, and the possibility of appeals,
27 among other things. Arriving at a settlement that was acceptable to the parties was not easy.
28 Defendants contended that individualized questions of fact predominate over any common

1 issues, and these issues would pose challenges to certification. Defendants and their counsel felt
2 very strongly about Defendants' ability to prevail on the merits and to obtain a denial of class
3 certification, while Plaintiff and Class Counsel believed that class certification would be
4 obtained and that they would prevail at trial. With the aid of the mediator's evaluation, the
5 parties agreed that the Action was well-suited for settlement given the factual and legal issues
6 relating to Plaintiff's principal claims, as well as the costs and risks to the parties that would
7 attend further litigation. These risks of further litigation include, and are not limited to, a
8 determination that the claims are unsuitable for class treatment and/or representative
9 adjudication, failure to obtain certification, and class de-certification after certification of a class.

10 10. As set forth more fully in the accompanying Motion for Final Approval, Class
11 Counsel seek attorneys' fees in the amount of \$122,500, which is thirty-five percent (35%) of the
12 Maximum Settlement Amount of \$350,000, as set forth in the Settlement Agreement. This
13 amount is commensurate with: (1) the risk that Class Counsel took in commencing the Action;
14 (2) the time, effort, and expense that Class Counsel dedicated to the Action; (3) the skill and
15 determination that Class Counsel have shown; (4) the results that Class Counsel have achieved
16 throughout the litigation; (5) the value of the settlement that Class Counsel have achieved for the
17 Class Members; and (6) the other cases that Class Counsel have turned down in order to devote
18 their time and efforts to this matter.

19 11. I am aware that the common and acceptable rate for contingency representation in
20 wage and hour class action litigation is normally 40% before trial, with the range being from
21 33.3% up to 50%. In this case, Plaintiff has agreed to a contingency fee of at least thirty-five
22 percent (35%) of the recovery.

23 12. While not necessarily required to be demonstrated because the percentage fee that
24 is sought is proper for this settlement, Class Counsel have incurred many hours of work in
25 connection with this matter such that the request for an award of attorneys' fees is also justified
26 under a simple lodestar analysis. Lawyers for Justice, PC has spent a total of **567 hours**, and
27 Righetti Glugoski, P.C. has spent a total of **61.50 hours** performing tasks on behalf of Plaintiff
28 and the Class Members. Collectively, Class Counsel have spent a total of **628.50 hours** to obtain

1 a recovery on behalf of Plaintiff and Class Members. Attached hereto as “EXHIBIT A” is an
2 Attorney Task and Time and Chart that sets forth in detail the breakdown of time for the tasks
3 performed by Class Counsel. The hours attributable to Lawyers for Justice, PC include work
4 done by myself and several of the firm’s other members. We also had litigation support
5 personnel actively engaged in assisting with the prosecution of cases.

6 13. The work performed in the Action, the backgrounds of our firm, as well as the
7 individual backgrounds, training, and experience of the attorneys who worked on this matter, in
8 litigating class actions, and in particular, wage-and-hour matters, support a reasonable hourly
9 rate of compensation at the rate of at least \$500 for work performed by Class Counsel. Lawyers
10 for Justice, PC has been awarded attorneys’ fees, compensating the firm at the rate of at least
11 \$500 per hour for legal services performed, by courts granting final approval in other cases:
12 final approval of the class and representative action settlement in *Seth Swan v. Pace Supply*
13 (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and
14 the award of attorneys’ fees involved a higher hourly rate of \$855.96; final approval of the class
15 and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda
16 County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the
17 award of attorneys’ fees involved a higher hourly rate of \$831.38; approval of the Private
18 Attorneys General Act settlement in *Roberta Robles v. Altamed Health Services Corporation*
19 (Los Angeles County Superior Court Case No. BC639623) was granted on October 31, 2018,
20 and the award of attorneys’ fees involved a higher hourly rate of \$602.22; final approval of the
21 class and representative action settlement in *Luis Carlos Deluna v. Amerit Fleet Solutions, Inc.,*
22 *et al.* (San Bernardino County Superior Court Case No. CIVDS1721564) was granted on
23 October 19, 2018, and the award of attorneys’ fees involved a higher hourly rate of \$671.72;
24 final approval of the class and representative action settlement in *Samuel Guerra, et al v.*
25 *Graphic Packaging International, Inc.* (Sacramento County Superior Court Case No. 34-2016-
26 00203789) was granted on June 5, 2018, and the award of attorneys’ fees involved a higher
27 hourly rate of \$600; final approval of the class and representative action settlement in *Maryjo*
28 *Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No.

2020582) was granted on May 15, 2018, and the award of attorney's fees involved a higher hourly rate of \$780.77; final approval of the class and representative action settlement in *Rebekah Perez, et al. v. Nestlé USA, Inc., et al.* (Alameda County Superior Court Case No. RG15773654) was granted on August 18, 2017; final approval of the class and representative action settlement in *Elizabeth Ortiz, et al. v. Ghirardelli Chocolate Company* (Alameda County Superior Court Case No. RG15764300) was granted on July 19, 2017, and the award of attorneys' fees involved a higher hourly rate of \$575; final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved a higher hourly rate of \$845.64; final approval of the class and representative action settlement in *Mark Aceves v. Cambro Manufacturing Company* (Orange County Superior Court Case No. 30-2015-00810013-CU-OE-CXC) was granted on April 14, 2017; final approval of the class and representative action settlement in *East West Bank Wage and Hour Cases* (San Francisco County Superior Court Case No. CJC-13-004839) was granted on November 18, 2016; approval of the Private Attorneys General Act settlement in *Tatiana Kemp v. The Irvine Company Apartment Communities, Inc.* (Orange County Superior Court Case No. 30-2015-00775439) was granted on November 4, 2016; final approval of the class and representative action settlement in *Kevin Coonce v. Ferguson Enterprises, Inc.* (Sacramento County Superior Court Case No. 34-2021-00136285) was granted on May 22, 2014, and the award of attorneys' fees involved a higher hourly rate of \$625; and final approval of the class action settlement in *Anthony Powell v. Fairfield Residential Company, LLC* (Alameda County Superior Court Case No. RG12660811) was granted on August 6, 2014.

ADEQUACY OF LAWYERS for JUSTICE, PC

EDUCATION

14. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles

1 County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from
2 the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard*
3 *University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a
4 concentration in Natural Sciences from *Pepperdine University*.

5 **JUDICIAL EXTERNSHIPS**

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

11 **LITIGATION AND CLASS ACTION EXPERIENCE**

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

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

20 18. Since its inception, in or around October of 2008, our firm has almost exclusively
21 focused on the prosecution of consumer and employment class actions, involving wage-and-hour
22 claims, race discrimination, unfair business practices or consumer fraud. Currently, we are the
23 attorneys of record in over a dozen employment-related putative class actions in both state and
24 federal courts in the State of California. Our firm has successfully litigated cases involving the
25 executive, administrative, and other overtime exemptions to the State of California and federal
26 overtime compensation requirements. During this relatively short time, in association with other
27 law firms, we have obtained millions of dollars on behalf of thousands of individuals in
28 California.

EXAMPLES OF CLASS ACTION RESULTS

19. What follows are just a few examples of the type of results we have achieved on behalf of our clients:

a) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class and representative action against a major property management company involving allegations of misclassification of various "manager" positions. On September 20, 2010, the court granted final approval of the class and representative action settlement. The Los Angeles County Superior Court Case Number is BC400414.

b) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class action against a national retailer involving allegations of misclassification of the "Assistant Store Manager" position. On October 28, 2010, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC413498.

c) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class and representative action against a national property management company involving allegations of misclassification of the "Property Manager" position. On May 23, 2012, the court granted final approval of the class and representative action settlement. The Los Angeles County Superior Court Case Number is BC430918.

d) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class action against a national retailer involving allegations of misclassification of the "Store Manager" position. On June 10, 2011, the court granted plaintiffs' motion for class certification. On August 26, 2013, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC424012.

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

1 f) Our firm, in association with other co-counsel, represented the plaintiffs in
2 a wage-and-hour class and representative action against a national wholesale distributor of
3 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
4 “manager” positions. On May 22, 2014, the court granted final approval of the class and
5 representative action settlement. The Sacramento County Superior Court Case Number is 34-
6 2012-00136285.

7 g) Our firm, in association with other co-counsel, represented the plaintiffs in
8 a wage-and-hour class action involving allegations of misclassification of the “Operations
9 Manager” position. On September 16, 2014, the court granted plaintiffs’ motion for class
10 certification. The Los Angeles County Superior Court Case Number is BC478769.

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

16 i) Our firm, in association with other co-counsel, represented the plaintiffs in
17 a wage-and-hour class action involving allegations of misclassification of the salaried residential
18 “Property Manager” position. On September 17, 2015, the court granted plaintiffs’ motion for
19 class certification. The Los Angeles County Superior Court Case Number is BC474784.

20 j) Our firm, in association with other co-counsel, represented the plaintiffs in
21 a wage-and-hour class and representative action against a national retailer of upscale hardware
22 and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted
23 final approval of the class and representative action settlement. The Los Angeles County
24 Superior Court Case Number is JCCP4794.

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

3 l) Our firm, in association with other co-counsel, represented the plaintiffs in
4 a wage-and-hour class action against a national retailer of apparel, accessories, and home
5 products, involving allegations of misclassification of the "Department Manager" position. On
6 August 12, 2016, the court granted plaintiffs' motion for class certification. The Alameda
7 County Superior Court Case Number is RG13680477.

8 m) Our firm represented the plaintiffs in a representative action under the
9 Private Attorneys General Act, against a real estate and property management company, on
10 behalf of non-exempt employees. On November 4, 2016, the Court granted approval of the
11 settlement. The Orange County Superior Court Case Number is 30-2015-00775439-CU-OE-
12 CXC.

13 n) Our firm, in association with other co-counsel, represented the plaintiffs in
14 a wage-and-hour class action against a full-service bank, on behalf of non-exempt employees.
15 On November 18, 2016, the court granted final approval of the class action settlement. The San
16 Francisco County Superior Court Case Number is CJC-13-004839.

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

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

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

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

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

13 t) Our firm, in association with other co-counsel, represented the plaintiffs in
14 a wage-and-hour class and representative action against a property management company on
15 behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
16 approval of the class and representative action settlement. The Los Angeles County Superior
17 Court Case Number is JCCP4819.

18 u) Our firm, in association with other co-counsel, represented the plaintiffs in
19 a wage-and-hour class and representative action against a company that operates business
20 centers. On February 15, 2018, the court granted final approval of the class and representative
21 action settlement. The Los Angeles County Superior Court Case Number is BC498401.

22 v) Our firm, in association with co-counsel, represented the plaintiff in a
23 representative action under the Private Attorneys General Act, against a global provider of
24 products and services to the energy industry, on behalf of hourly-paid and non-exempt
25 employees. On November 19, 2018, the Court granted approval of the settlement. The Kern
26 County Superior Court Case Number is S-1500-CV-280215-SDC.

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1 w) Our firm, in association with other co-counsel, represents the plaintiffs in
2 a wage-and-hour class and representative action against a bank on behalf of non-exempt
3 employees. On September 27, 2019, the court granted the plaintiffs' motion for class
4 certification in part and certified a class. The Alameda County Superior Court Case Number is
5 JCCP4921.

6 x) Our firm, in association with other co-counsel, represented the plaintiffs in
7 a wage-and-hour class and representative action against a national retailer of apparel and fashion
8 accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted the
9 plaintiffs' motion for class certification in part and certified a class, the court certified a class.
10 The Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

12 20. Lawyers for Justice, PC has incurred **\$28,918.91** in litigation costs and expenses
13 as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in
14 the prosecution of this matter and to obtain the Settlement. Class Counsel have borne all the
15 risks and costs of litigation and will not receive any compensation until recovery is obtained by
16 Plaintiff and Participating Class Members.

17 **ENHANCEMENT PAYMENT TO PLAINTIFF**

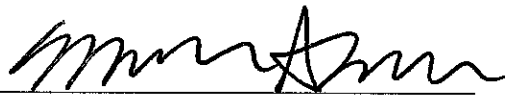
18 21. In recognition of his efforts and work serving as Class Representative, the
19 Settlement provides for an Enhancement Payment in the amount of \$7,500 to Plaintiff Bryant
20 Harris. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial
21 amount of time and effort in producing relevant documents and past employment records and
22 provided the facts and evidence necessary to attempt to prove the allegations, including and not
23 limited to, preparing and appearing for a full-day deposition and working with Class Counsel to
24 provide responses and supplemental responses to formal written discovery requests that were
25 propounded by Defendants. Plaintiff was available whenever Class Counsel needed him and
26 actively tried to obtain information that would benefit the Class. Plaintiff spent numerous hours
27 speaking with Class Counsel about his claims, describing his work experience with Defendants,
28 and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff to receive a

1 reasonable Enhancement Payment, in addition to his Individual Settlement Payment, for his
2 services on behalf of the Class.

3 22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
4 Settlement is in the best interests of Plaintiff and other Class Members.

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

7 Executed this 12th day of November 2019, at Glendale, California.

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Edwin Aiwarzian

EXHIBIT A

HARRIS V. TVI, INC. D/B/A SAVERS, VALUE VILLAGE & VILLAGE DES VALEURS, ET AL.
(LOS ANGELES COUNTY CASE NO. BC612403)
(UNITED STATES DISTRICT COURT, CENTRAL DISTRICT CASE NO 2:16-CV-02530-SJO(AFMX))
ATTORNEY TASK AND TIME CHART

TASK		LAWYERS FOR JUSTICE, P.C.	RICHETH GUGOSKI, P.C.
Investigation and Research / Due Diligence			
Pre-Lawsuit Investigation of the Key Facts with a Focus on (1) Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality; (2) the Merits of the Claims of Plaintiff Bryant Harris and the Putative Class Members; (3) Potential Damages Exposure of Defendants TVI, Inc. d/b/a Value Village & Village Des Valeurs and Savers, Inc. ("Defendants") with Respect to the Damages Sustained by Plaintiff and the Putative Class Members; and (4) Latest Misclassification, Meal and Rest Break, Representative PAGA, and Certification Decisions in California, Including all New Relevant DLSE Materials	13	5	
Investigation of Defendants, Defendants' Business Relationships, and the Industry in which Defendants Operate	7	2	
Investigation of Defendants' Organizational and Corporate Structure, and Executive Reporting Structure as It Relates to the Employment and Management of the Putative Class Members	9	0	
Analysis of Competitors in Various Relevant Geographic Areas within which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendants' Competitors	3	0	
Comparative Analysis and Cross-Checking of All Available Job Postings by Defendants in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Misclassified and/or Performed During Meal or Rest Breaks	11	0	

Research and Investigation Re: Staffing Models and Staffing Levels at Defendants' Locations Worked by Putative Class Members Throughout California	3	0
Research and Investigation Re: Defendants' Policies, Practices, and Procedures Relating to Classification of Employees, Timekeeping, Meal/Rest Breaks, Overtime Compensation, and Reimbursement of Business Related Expenses	15	4
Research and Investigation Re: Post-Duran vs. U.S. Bank Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	9.50	4
Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	2	0
Prepare a Discovery Strategy Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	5	3
Meet and Communicate with Plaintiff Bryant Harris Throughout the Pendency of the Case	24	1.50
Meet and Communicate with Putative Class Members	25	8
Pleadings and Court Filings		
Research and Draft Plaintiff's Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on March 1, 2016)	8	2
Review Court's Initial Status Conference Order (filed on March 11, 2016)	0.10	0
Review Court's Minute Order Regarding Newly Filed Class Action (filed on March 14, 2016)	0.10	0

Review and Analyze Defendants' Notice of Removal of Action to the United States District Court for the Central District of California Pursuant to 28 U.S.C. §§1332, 1441(a) and (b) (Diversity), Declaration of Adam Y. Siegel in Support Thereof, Declaration of Theresa Moss in Support Thereof, Corporate Disclosure Statement, Civil Cover Sheet, and Certification and Notice of Interested Entities or Persons (filed in Federal Court on April 13, 2016)	3.50	1.50
Review Court's Notice of Assignment to United States Judges and Notice to Parties of Court-Directed ADR Program (filed in Federal Court on April 13, 2016)	0.10	0
Draft Plaintiff's Notice of Appearance of Counsel (filed in Federal Court on April 13, 2016)	0.25	0
Review Defendants' Notice of Pendency of Other Actions or Proceedings (filed in Federal Court on April 14, 2016)	0.50	0
Review Court's Civil Minutes – General (filed in Federal Court on April 15, 2016)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft Stipulation to Continue Hearing Date on Defendants' Motion to Dismiss the Complaint and to Strike the Class Allegations and [Proposed] Order On Stipulation to Continue Hearing Date on Defendants' Motion to Dismiss the Complaint and to Strike the Class Allegations (filed in Federal Court on April 28, 2016)	1.50	0
Review Court's Order Granting Stipulation to Continue Hearing Date on Defendants' Motion to Dismiss the Complaint and to Strike the Class Allegations (filed in Federal Court on May 3, 2016)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Dismiss the Non-Exempt Putative Class and to Remand the Case to State Court, Declaration of Edwin Aiwezian in Support Thereof, and [Proposed] Order on Joint Stipulation to Dismiss the Non-Exempt Putative Class and to Remand the Case to State Court (filed in Federal Court on May 12, 2016)	1	0
Review Court's Order on Joint Stipulation to Dismiss the Non-Exempt Putative Class and to Remand the Case to State Court and Letter of Remand to State Court (filed in Federal Court on May 16, 2016)	0.10	0

Draft Plaintiff's Notice of Initial Status Conference Order (filed on May 17, 2016)	0.10	0
Review Court's Order for Remand (filed on May 19, 2016)	0.10	0
Draft Plaintiff's Notice of Lodging of United States District Court's Order Approving Joint Stipulation to Dismiss the Non-Exempt Putative Class and to Remand to State Court (filed on May 19, 2016)	0.50	0
Meet and Confer with Defendants' Counsel, and Draft Joint Initial Status Conference Class Action Response Statement (filed on May 20, 2016)	1.75	0
Research and Draft Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on May 31, 2016)	4.50	1
Review and Analyze Defendants' Answer to First Amended Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (served on June 30, 2016)	2.50	0
Review and Analyze Defendants' First Amended Answer to First Amended Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (served on August 3, 2016)	1.50	0
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and Protective Order (submitted on August 24, 2016)	1	0
Review Court's Order on Stipulation and Protective Order (filed on September 2, 2016)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft Joint Status Report (filed on October 18, 2016)	1	0
Review Court's Order Continuing Status Conference (filed on October 28, 2016)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and [Proposed] Order Regarding Motion for Class Certification Deadlines (submitted on November 15, 2016)	1	0

Review Court's Order on Stipulation Regarding Motion for Class Certification Deadlines (filed on November 16, 2016)	0.10	0
Draft Plaintiff's Notice (filed on November 21, 2016)	0.50	0
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on December 2, 2016)	0.50	0
Review Court's Order and Notice of Reassignment (filed on January 25, 2017)	0.10	0
Review Court's Minute Order Regarding Non-Appearence Case Review (filed on February 24, 2017)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft Joint Status Report (filed on March 22, 2017)	1	0
Review Court's Minute Order Regarding Non-Appearence Case Review (filed on March 29, 2017)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft Joint Status Report (filed on June 6, 2017)	1	0
Review Court's Minute Order Regarding Non-Appearence Case Review (filed on September 21, 2017)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Stay Plaintiff's Motion for Class Certification Pending Completion of Private Mediation and [Proposed] Order (submitted on October 17, 2017)	1.50	0
Review Court's Order Granting Joint Stipulation to Stay Plaintiff's Motion for Class Certification Pending Completion of Private Mediation (filed on October 23, 2017)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft Joint Status Report (filed on February 1, 2018)	1	0
Review Court's Minute Order Regarding Status Conference (filed on February 6, 2018)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft Joint Notice of Class Action Settlement (filed on March 22, 2018)	0.50	0

Review Court's Minute Order Regarding Joint Notice of Class Action Settlement (filed on March 29, 2018)	0.10	0
Review Court's Minute Order Regarding Non-Appearence Case Review (filed on April 9, 2018)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft Joint Status Report (filed on July 24, 2018)	1	0
Review Court's Minute Order Regarding Non-Appearence Case Review (filed on July 30, 2018)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft Joint Status Report (filed on December 14, 2018)	1.50	0
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and [Proposed] Order Granting Plaintiff Leave to File a Second Amended Complaint (submitted on December 21, 2018)	1	0
Draft Plaintiff's Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on December 27, 2018)	3	1
Review Court's Case Anywhere Posting Regarding Motion for Preliminary Approval (filed on December 31, 2018)	0.10	0
Draft Plaintiff's Notice Re Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on April 5, 2019)	0.50	0
Review Court's Minute Order Regarding Non-Appearence Case Review (filed on July 29, 2019)	0.10	0
Draft Notice of Entry of Judgment or Order (filed on August 14, 2019)	0.10	0
Appearances		
Prepare for, Travel to/from, and Attend Initial Status Conference (May 24, 2016)	3	0

Prepare for, Travel to/from, and Attend Initial Status Conference (February 6, 2018)	3.25	0
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (July 11, 2019)	3	0
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Award (December 10, 2019) (Anticipated)	5	0
Discovery and Deposition		
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Bryant Harris (served on June 23, 2015)	0.75	0
Draft Follow-Up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Bryant Harris (served on August 21, 2015)	0.50	0
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Bryant Harris (served on September 3, 2015)	2	0
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Bill Pratt (served on May 9, 2016)	0.50	0
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Briana Shelton (served on May 9, 2016)	0.50	0
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Bill Pratt (served on June 7, 2016)	1	0
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Briana Shelton (served on June 7, 2016)	1.25	0

Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs (served on June 8, 2016)	6.50	0
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Savers, Inc. (served on June 8, 2016)	5	0
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (July 11, 2016; Organizational Structure) (served on June 8, 2016)	3	0
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (July 12, 2016; Job Duties) (served on June 8, 2016)	2	0
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Savers, Inc. and Requests for Production of Documents (July 13, 2016; Organizational Structure) (served on June 8, 2016)	2.50	0
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Savers, Inc. and Requests for Production of Documents (July 14, 2016; Job Duties) (served on June 8, 2016)	2	0
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Michael Murphy (served on June 24, 2016)	0.75	0
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Michael Humphrey (served on July 14, 2016)	0.50	0
Draft Follow-Up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Michael Murphy (served on July 22, 2016)	0.25	0

Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (drafted July 28, 2016)	2	0
Review and Analyze Defendant TVI, Inc.'s Response to Plaintiff's Form Interrogatories - General (Set One), Response to Special Interrogatories (Set One), Response to Special Interrogatories (Set Two), and Response to Requests for Production of Documents (Set One) (served on August 19, 2016)	6	0
Review and Analyze Documents Produced by Defendants (DEF00001-01004) (served on September 15, 2016)	13	0
Draft Plaintiff's Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs (served on October 11, 2016)	5.75	0
Draft Plaintiff's Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant Savers, Inc. (served on October 11, 2016)	2.50	0
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Savers, Inc. and Requests for Production of Documents (November 9, 2016; Affirmative Defenses) (served on October 11, 2016)	2.50	0
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (November 10, 2016; Affirmative Defenses) (served on October 11, 2016)	1.25	0
Review and Analyze Defendants' Special Interrogatories (Set One) and Requests for Production of Documents (Set One) (served on October 20, 2016)	3	0
Review and Analyze Defendants' Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Savers, Inc. and Requests for Production of Documents (November 9, 2016; Affirmative Defenses) (served on November 1, 2016)	3.50	0
Review and Analyze Documents from Plaintiff Bryant Harris (received November 2, 2016)	1.25	0

Review and Analyze Defendant TVI, Inc.'s Response to Special Interrogatories (Set Three) and Response to Requests for Production of Documents (Set Two) (served on November 15, 2016)	3	0
Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (January 11, 2017; Organizational Structure) (served on November 16, 2016)	2.50	0
Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (January 12, 2017; Job Duties) (served on November 16, 2016)	2	0
Review and Analyze Defendants' Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (November 10, 2016; Affirmative Defenses) (served on November 16, 2016)	2	0
Review and Analyze Defendant Savers, LLC's Response to Special Interrogatories (Set Three) and Response to Requests for Production of Documents (Set Two) (served on December 5, 2016)	3.25	0
Draft Plaintiff's Responses to Defendants' Special Interrogatories (Set One) and Responses to Requests for Production of Documents (Set One) (served on December 5, 2016)	4.50	0
Review and Analyze Defendant TVI, Inc.'s Supplemental Response to Plaintiff's Form Interrogatories - General (Set One), Supplemental Response to Special Interrogatories (Set Two), and Supplemental Response to Requests for Production of Documents (Set One) (served on December 16, 2016)	3.50	0
Review and Analyze Defendants' Objections to Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (January 11, 2017; Organizational Structure) (served on January 5, 2017)	2.75	0

Review and Analyze Defendants' Objections to Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (January 12, 2017; Job Duties) (served on January 5, 2017)	1.50	0
Review and Analyze Documents Produced by Defendants (DEF01005-01058) (served on January 10, 2017)	1	0
Prepare for and Defend the Deposition of Persons Most Knowledgeable Theresa Moss and Chad Buscho (January 11, 2017; Glendale, California) and Review Deposition Transcript	10.25	0
Draft Plaintiff's Amended Re-Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (January 11, 2017; Organizational Structure) (served on January 16, 2017)	0.50	0
Draft Plaintiff's Amended Re-Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (January 12, 2017; Job Duties) (served on January 16, 2017)	0.50	0
Review and Analyze Documents Produced by Defendants (DEF01059-01065) (served on January 27, 2017)	0.25	0
Review and Analyze Defendant TVI, Inc.'s Second Supplemental Response to Plaintiff's Form Interrogatories - General (Set One), Second Supplemental Response to Special Interrogatories (Set Two), and Second Supplemental Response to Requests for Production of Documents (Set One) (served on January 30, 2017)	1.75	0
Draft Plaintiff's Supplemental Responses to Defendants' Special Interrogatories (Set One) and Supplemental Responses to Requests for Production of Documents (Set One) (served on February 10, 2017)	7	0

Draft Plaintiff's Supplemental Responses to Defendants' Special Interrogatories (Set One) and Supplemental Responses to Requests for Production of Documents (Set One) (served on March 27, 2017)	3.25	0
Review and Analyze Defendants' Notice of Deposition of Bryant Harris (served on April 10, 2017)	0.50	0
Draft Plaintiff's Amended Re-Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (May 2, 2017; Job Duties) (served on April 25, 2017)	0.50	0
Draft Plaintiff's Amended Re-Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (June 13, 2017; Job Duties) (served on April 25, 2017)	0.50	0
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Bryant Harris (May 1, 2017; Los Angeles, California) and Review Deposition Transcript	10	0
Prepare for and Defend the Deposition of Person Most Knowledgeable Theresa Moss (May 2, 2017; Glendale, California) and Review Deposition Transcript	10.50	0
Review and Analyze Defendants' Objections to Plaintiff's Amended Re-Notice of Deposition of Person Most Knowledgeable at Defendant TVI, Inc. D/B/A/ Savers, Value Village & Village Des Valeurs and Requests for Production of Documents (June 13, 2017; Job Duties) (served on June 8, 2017)	2	0
Prepare for, Travel to/from, and Take the Deposition of Person Most Knowledgeable Chad Buscho (June 13, 2017; Seattle, Washington) and Review Deposition Transcript	15	0
Letters and Correspondence		
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Bryant Harris for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on January 26, 2016)	1.50	0

Meet with Defendants' Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	27	3
Mediation/Settlement		
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages Analysis/Calculations (submitted on January 13, 2018)	24	4
Travel to/from and Attend Mediation Session (January 17, 2018; Los Angeles, California)	10	0
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on January 15, 2019) and Draft Exhibits	14	2.50
Draft, Review, Revise, Negotiate, and Finalize Amendment No.1 Joint Stipulation of Class Action and PAGA Settlement and Release (executed on July 22, 2019) and Draft Exhibits	5	0
Law and Motion		
Review Defendants' Notice of Motion and Motion to Dismiss the Complaint and to Strike the Complaint and to Strike the Class Allegations, Memorandum of Points and Authorities in Support Thereof, Declaration of David P. Zins in Support Thereof, and [Proposed] Order Thereon (filed in Federal Court on April 20, 2016)	2	0
Research and Draft Plaintiff's Notice of Motion and Motion for Class Certification; Memorandum of Points and Authorities in Support Thereof, Declaration of Arya Djafroudi in Support Thereof, Declaration of Edwin Aiwanian in Support Thereof, Declaration of D. Elliot Gonzalez in Support Thereof, Declaration of Matthew Righetti in Support Thereof, Compendium of Declarations of Putative Class Members, Notice of Lodging, Proposed Trial Plan, Notice Pursuant to California Rule of Court 2.551 (B)(3)(A)(iii), and [Proposed] Order Certifying Class (filed on September 19, 2017)	89	12

Draft Plaintiff's Amended Notice Pursuant to California Rule of Court 2.551 (B)(3)(A)(iii) and Amended Notice of Lodging (filed on September 20, 2017)	0.50	0
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Bryant Harris in Support Thereof, and [Proposed] Order (filed on March 29, 2019)	17	3
Review Court's Minute Order Regarding Motion for Preliminary Approval of Class Action Settlement (filed on July 11, 2019)	0.10	0
Draft Plaintiff's Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Edwin Aiwarzian in Support Thereof, and [Revised Proposed] Order Thereon (filed July 24, 2019)	12	0
Review Court's Order Granting Motion for Preliminary Approval of Class Action Settlement (filed on July 30, 2019)	0.10	0
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Settlement, Attorneys' Fees, Costs, and Service Award, Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on November 12, 2019)	22	4
Total Hours:	567	61.50
Total Combined Hours:	628.50	

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Harris vs. TVI, Inc. DBA Savers and Value Village

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
6/23/2015	U.S. Postmaster	Postage	6.74
8/21/2015	U.S. Postmaster	Postage	6.96
1/26/2016	U.S. Postmaster	Postage	14.68
3/1/2016	Los Angeles Superior Court	Filing Fee	435.00
3/1/2016	Los Angeles Superior Court	Complex Fee	1,000.00
3/1/2016	Los Angeles Superior Court	Jury Fee	150.00
3/1/2016	Pure Legal, Inc.	Attorney Service	165.00
3/14/2016	ProLegal	Attorney Service	616.20
4/1/2016	Pure Legal, Inc.	Attorney Service	165.00
4/13/2016	Pacer Service Center	Legal Research Service	3.20
4/14/2016	Pacer Service Center	Legal Research Service	9.30
4/28/2016	Golden State Overnight	Courier Service	31.55
5/3/2016	Golden State Overnight	Courier Service	16.50
5/6/2016	FedEx Express	Courier Service	26.24
5/9/2016	U.S. Postmaster	Postage	6.47
5/11/2016	Golden State Overnight	Courier Service	16.46
5/14/2016	FedEx Express	Courier Service	17.96
5/17/2016	Golden State Overnight	Courier Service	11.22
5/17/2016	ProLegal	Attorney Service	204.25
5/17/2016	Pure Legal, Inc.	Attorney Service	165.00
5/17/2016	U.S. Postmaster	Postage	6.47
5/19/2016	Pure Legal, Inc.	Attorney Service	165.00
5/24/2016	Romina Keshishyan	Travel Reimbursement	31.20
5/31/2016	Pure Legal, Inc.	Attorney Service	155.00
6/6/2016	Golden State Overnight	Courier Service	16.50
6/8/2016	Golden State Overnight	Courier Service	16.46
6/23/2016	FedEx Express	Courier Service	26.37
6/24/2016	U.S. Postmaster	Postage	6.47
7/8/2016	Golden State Overnight	Courier Service	27.85
7/22/2016	U.S. Postmaster	Postage	6.68
10/24/2016	Golden State Overnight	Courier Service	23.01
11/1/2016	FedEx Express	Courier Service	38.33
11/4/2016	ILYM Group, Inc.	Notice Mailing	200.49
11/15/2016	Los Angeles Superior Court	Filing Fee	20.00
11/15/2016	ProLegal	Attorney Service	107.94
11/16/2016	U.S. Postmaster	Postage	1.99
12/2/2016	Pure Legal, Inc.	Attorney Service	140.00
12/5/2016	U.S. Postmaster	Postage	6.45
1/12/2017	Kusar Court Reporters & Legal Services, Inc.	Court Reporter	247.50
1/12/2017	Pure Legal, Inc.	Videography Service	1,000.00
1/16/2017	Case Anywhere LLC	Attorney Service	101.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Harris vs. TVI, Inc. DBA Savers and Value Village

1/27/2017	Kusar Court Reporters & Legal Services, Inc.	Court Reporter	1,955.25
2/2/2017	Pure Legal, Inc.	Attorney Service	130.00
3/22/2017	Pure Legal, Inc.	Attorney Service	160.00
4/14/2017	Case Anywhere LLC	Attorney Service	170.00
5/1/2017	Romina Keshishyan	Travel Reimbursement	131.20
5/2/2017	Edwin Alwazian	Travel Reimbursement	490.56
5/2/2017	Pure Legal, Inc.	Videography Service	925.00
5/3/2017	Bryant Harris	Travel Reimbursement	55.08
5/13/2017	FedEx Express	Courier Service	28.29
5/22/2017	A & B Reporting, LLC	Court Reporter	2,324.20
6/6/2017	Pure Legal, Inc.	Attorney Service	160.00
6/13/2017	A & B Reporting, LLC	Videography Service	1,106.00
6/13/2017	A & B Reporting, LLC	Court Reporter	2,338.30
6/13/2017	Romina Keshishyan	Travel Reimbursement	2,442.33
7/5/2017	Case Anywhere LLC	Attorney Service	140.00
9/19/2017	Golden State Overnight	Courier Service	21.05
9/19/2017	Los Angeles Superior Court	Filing Fee	60.00
9/20/2017	Pure Legal, Inc.	Attorney Service	165.00
10/3/2017	Case Anywhere LLC	Attorney Service	200.00
12/8/2017	Paul Hastings LLP	Mediation Fee	6,000.00
1/5/2018	Case Anywhere LLC	Attorney Service	120.00
1/16/2018	Pure Legal, Inc.	Attorney Service	45.45
1/17/2018	Edwin Aiwazian	Travel Reimbursement	60.47
1/17/2018	Arby Aiwazian	Travel Reimbursement	188.76
2/6/2018	D. Elliot Gonzalez	Travel Reimbursement	15.00
2/12/2018	Lexis Nexis CourtLink, Inc.	Legal Research Service	175.00
2/16/2018	Lexis Nexis CourtLink, Inc.	Legal Research Service	8.38
3/22/2018	ProLegal	Attorney Service	105.94
4/11/2018	Case Anywhere LLC	Attorney Service	130.00
4/27/2018	Lexis Nexis CourtLink, Inc.	Legal Research Service	175.00
5/18/2018	Lexis Nexis CourtLink, Inc.	Legal Research Service	175.00
6/14/2018	Coalition Court Reporters	Court Reporter	450.00
7/9/2018	Case Anywhere LLC	Attorney Service	120.00
7/24/2018	Pure Legal, Inc.	Attorney Service	195.90
7/25/2018	Lexis Nexis CourtLink, Inc.	Legal Research Service	175.00
9/25/2018	Lexis Nexis CourtLink, Inc.	Legal Research Service	175.00
10/1/2018	Lexis Nexis CourtLink, Inc.	Legal Research Service	16.46
10/14/2018	Case Anywhere LLC	Attorney Service	125.00
10/25/2018	Lexis Nexis CourtLink, Inc.	Legal Research Service	2.01
12/14/2018	Pure Legal, Inc.	Attorney Service	195.90
12/21/2018	Los Angeles Superior Court	Filing Fee	20.00
12/21/2018	ProLegal	Attorney Service	121.65

LAWYERS for JUSTICE PC CASE COST DETAIL
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1/9/2019	Case Anywhere LLC	Attorney Service	120.00
1/31/2019	Lexis Nexis CourtLink, Inc.	Legal Research Service	20.24
3/29/2019	Los Angeles Superior Court	Filing Fee	60.00
3/29/2019	ProLegal	Attorney Service	154.51
3/31/2019	Lexis Nexis CourtLink, Inc.	Legal Research Service	21.48
4/5/2019	Pure Legal, Inc.	Attorney Service	195.90
4/12/2019	Case Anywhere LLC	Attorney Service	145.00
4/30/2019	Lexis Nexis CourtLink, Inc.	Legal Research Service	3.20
5/31/2019	Lexis Nexis CourtLink, Inc.	Legal Research Service	9.51
6/30/2019	Lexis Nexis CourtLink, Inc.	Legal Research Service	8.10
7/10/2019	Los Angeles Superior Court	Document Download Fee	17.40
7/10/2019	Case Anywhere LLC	Attorney Service	125.00
7/11/2019	Danielle Chang	Travel Reimbursement	32.07
7/22/2019	Los Angeles Superior Court	Document Download Fee	2.00
7/24/2019	Pure Legal, Inc.	Attorney Service	214.20
7/31/2019	Lexis Nexis CourtLink, Inc.	Legal Research Service	20.67
8/14/2019	Pure Legal, Inc.	Attorney Service	199.50
10/2/2019	Case Anywhere LLC	Attorney Service	145.00
11/12/2019	Los Angeles Superior Court	Filing Fee	60.00
11/12/2019	ProLegal	Attorney Service	154.51
Total:			28,918.91