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

SYDNEY BRIEN, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiff,

vs.

MISSION AMBULANCE, INC., a
California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No.: CVRI2203269

Honorable Harold W. Hopp
Department 1

CLASS ACTION

**DECLARATION OF HELENE MAYER IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT AWARD**

Date: December 15, 2025
Time: 8:30 a.m.
Department: 1

Complaint Filed: August 4, 2022
Trial Date: None Set

DECLARATION OF HELENE MAYER

I, Helene Mayer, 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 Sydney Brien (“Plaintiff”) and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On June 30, 2025, in Department 1 of the above-entitled Court, the Honorable Harold W. Hopp preliminarily approved the Class Action and PAGA Settlement and Release of Claims (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Mission Ambulance, Inc., (“Defendant,”) (together with Plaintiff referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Sydney Brien as the representative of the Class (“Class Representative”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement, Attorneys’ Fees and Costs, and Enhancement Award (“Motion for Final Approval”), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Attorneys’ Fees and Costs, Enhancement Award, and Settlement Administration Costs, or the allocation for the PAGA Penalty Amount.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above captioned action entitled *Sydney Brien v. Mission Ambulance, Inc.*, Riverside

1 County Superior Court, Case No. CVRI2203269 (“Action”), which was filed on August 4, 2022,
2 and the representative Private Attorneys General Act (“PAGA”) action entitled *Sydney Brien v.*
3 *Mission Ambulance, Inc.*, Riverside County Superior Court, Case No. CVSW2205165 (“PAGA
4 Action”), which was filed on August 4, 2022, since prior to their commencement (collectively,
5 the Action and PAGA Action are referred to as the “Actions”).

6 6. Before initiating the cases, Lawyers for Justice, PC investigated and researched
7 the facts and circumstances underlying the pertinent factual and legal issues and applicable law.
8 This required thorough discussions and interviews between attorneys at Lawyers for Justice, PC
9 and Plaintiff and research into the various legal issues involved in the cases, namely, the current
10 state of the law as it applied to class certification, representative adjudication, and trial; the law
11 relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense
12 reimbursements, recordkeeping and wage statement requirements, representative Private
13 Attorneys General Act (“PAGA”) claims and penalties, and wage-and-hour law and
14 enforcement, Plaintiff’s claims and allegations, and potential defenses. After conducting an
15 initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiff were well-
16 suited for class-wide and representative adjudication, owing to what appeared to be a common
17 course of conduct affecting a similarly situated group of current and former hourly-paid or non-
18 exempt employees of Defendant employed within the State of California, who were not properly
19 compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business
20 expenses.

21 7. Class Counsel conducted significant informal discovery and investigation into the
22 facts of the cases, to assess the veracity, strength, and scope of the claims, and were preparing
23 the cases for class certification and trial, prior to reaching the Settlement. The Parties exchanged
24 thousands of pages of information, documents, and data throughout the course of the litigation
25 and in connection with the mediation and settlement negotiations. The volume of records and
26 documents that Class Counsel reviewed and analyzed included, and were not limited to: a 1/3
27 sampling of Class Members’ time and payroll data, Plaintiff’s personnel records, Defendant’s
28 Handbooks, earning statements, company policy acknowledgements, job descriptions,

1 Defendant's operations and employment practice, policies, and procedures, among other
2 information and documents. Class Counsel had the opportunity to interview and obtain
3 information from Plaintiff and percipient witnesses, and reviewed and analyzed a volume of
4 information, data, and documents obtained from Plaintiff, Defendant, and other sources. Class
5 Counsel developed liability, damages, violation, and penalties valuation models in the course of
6 litigation and in connection with the mediation and settlement negotiations, and met and
7 conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the
8 pleadings, case management, informal discovery, and the production of information, documents,
9 and data in the course of litigation and in connection with mediation and settlement negotiations,
10 and settlement. Other work performed by Class Counsel included, and was not limited to, case
11 strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, the
12 mediation briefing and supporting materials, and settlement documents; and preparing for and
13 attending court proceedings, mediation, and settlement negotiations, among other tasks.

14 8. As outlined herein, the Parties have conducted significant investigation and
15 informal discovery during the course of litigating this matter, mediation, and extensive
16 settlement negotiations. Class Counsel analyzed thousands of pages of information, documents,
17 and data obtained from Plaintiff, Defendant, and other sources that provided a critical
18 understanding of the nature of the work performed by the Class Members and Aggrieved
19 Employees, as well as Defendant's organizational structure and its operations and employment
20 policies, practices, and procedures. The information, documents, and data were used in
21 analyzing liability, damages, penalties, and other valuation issues in connection with all phases
22 of the litigation, and ultimately, in connection with the mediation and settlement negotiations
23 process. Class Counsel also performed significant research into the applicable law, which is
24 evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest
25 periods, representative PAGA claims and penalties, wage-and-hour enforcement, regular rate,
26 Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

27 9. After conducting significant investigation of the facts and law during the
28 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to

try to resolve the cases. These efforts included participating in a mediation session conducted by Eve Wagner, 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. In the course of the mediation and settlement negotiations, the Parties exchanged documents and data, and discussed various aspects of the cases, including and not limited to, the risks and delays of further litigation, the risks and expenses to the Parties of proceeding with class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, regular rates of pay, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class certification and prevail on the merits and, while Plaintiff and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$227,500.00, which is thirty-five percent (35%) of the Total Settlement Fund of \$650,000.00. Pursuant to the contingency fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-

1 five percent (35%) of the recovery.

2 11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
3 took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to
4 the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
5 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
6 has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order
7 to devote its time and efforts to these cases. The nature of the work performed, skill exercised,
8 and the outcome in this matter which involves an outstanding monetary recovery involving an
9 Total Settlement Fund of \$650,000.00 (with a Net Settlement Amount of approximately at least
10 \$319,815.04 to be paid to Participating Class Members (with gross Individual Settlement
11 Payments averaging approximately more than \$698.29), payment of \$18,750.00 to Aggrieved
12 Employees (with Individual PAGA Payment averaging approximately \$49.70) and payment of
13 \$56,250.00 to the State of California)—support the percentage fee sought.

14 12. While not necessarily required to be demonstrated because a percentage fee is
15 proper for this settlement, it should be noted that Class Counsel has incurred many hours of work
16 in connection with prosecuting this matter such that the award of attorneys' fees is also justified
17 under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **287.70**
18 **hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"**
19 is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services
20 provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing
21 those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC.
22 Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had
23 litigation support personnel actively engaged in assisting with the prosecution of this matter.

24 13. The work performed in this particular matter, the background of Lawyers *for*
25 Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who
26 worked on this matter, in litigating complex wage-and-hour actions, and in particular,
27 employment class action and representative action cases, support a reasonable blended hourly
28 rate of compensation of at least \$850 per hour for work performed by Lawyers *for* Justice, PC.

1 Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at
2 least \$850 per hour for legal services performed, by courts granting approval of settlements in
3 other wage-and-hour class action and representative action cases: final approval of the class and
4 representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles
5 Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of
6 attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class
7 and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los
8 Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of
9 attorneys' fees involved compensation at the rate of \$919.57 per hour; final approval of the class
10 and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County
11 Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of
12 attorneys' fees involved compensation at the rate of \$855.96 per hour.

13 **EXPERIENCE AND ADEQUACY OF**
14 **LAWYERS for JUSTICE, PC**

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

1 15. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice,
2 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
3 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
4 extensive formal training in dispute resolution and negotiation from the Straus Institute for
5 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
6 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
7 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
8 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
9 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
10 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
11 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
12 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
13 Appellate District. In December of 2004, he obtained a license to practice law from the
14 California State Bar. Since in or around October of 2008, through his work at Lawyers *for*
15 Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment
16 class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
17 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
18 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.
19 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
20 has successfully litigated cases involving the executive, administrative, and other overtime
21 exemptions to the State of California and federal overtime compensation requirements. Under
22 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
23 contested motion practice in approximately sixteen (16) cases in the last decade, and litigated
24 over 1,000 class action or representative action cases.

25 16. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He
26 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
27 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
28 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 States Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative action cases have resulted in settlements that have been granted court approval. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

17. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013). She is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th

439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

18. I, Helene Mayer, am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree from University of San Diego in 2017, and I earned my Juris Doctor degree from University of San Diego School of Law in 2020. I was admitted to practice law in California in 2021. I am admitted to practice before all courts of the State of California and all U.S. Federal District Courts in the State of California. I have worked on wage-and-hour class action and PAGA representative cases, and my work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, and making court appearances. Prior to working at Lawyers for Justice, PC, I worked at law firms focused primarily on family law matters, including, *inter alia*, representing clients in divorce, parentage, child custody, and domestic violence restraining order proceedings, researching and drafting pleadings, negotiating and finalizing marital settlement agreements, engaging in motion practice, and making court appearances.

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LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS *for* JUSTICE, PC

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to \$30,000.00. Lawyers *for* Justice, PC seeks reimbursement of **\$13,184.96** in litigation costs and expenses incurred in the matter, as reflected in “**EXHIBIT 2**” attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. The cost savings of \$16,815.04 will be part of the Net Settlement Amount, which will be distributed to the Participating Class Members in accordance with the Settlement.

ENHANCEMENT AWARD TO PLAINTIFF

20. In recognition of her efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as her broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 52 of the Settlement Agreement), the Settlement provides for an Enhancement Award, in the amount of up to \$7,500.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing her employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive \$7,500.00 as a reasonable Enhancement Award for her broader waiver and release of claims and services performed in this matter, in addition to her individual settlement payment(s).

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



Helene Mayer

EXHIBIT 1

SYDNEY BRIEN V. MISSION AMBULANCE, INC.
Riverside County Superior Court Case No. CVRI2203269 (“Class Action”)
Riverside County Superior Court Case No. CVSW2205165 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Sydney Brien (“Plaintiff”)	21.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Claims, Conduct Legal Research and Analysis Regarding All Class Claims, and Draft, Review, and/or Revise Plaintiff’s Class Action Complaint for Damages (filed on August 4, 2022) (Class Action)	7.80
Investigate the Merits of Plaintiff’s PAGA Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on August 4, 2022) (PAGA Action)	7.10
Review Court’s Notice of Case Management Conference, Notice of Department Assignment, and Notice of Case Reassignment for All Purposes (filed on August 5, 2022) (Class Action & PAGA Action)	0.20
Review Court’s Class Action Case Management Order #1 and Minute Order (filed on August 8, 2022) (Class Action)	0.30
Review Defendant Mission Ambulance, Inc.’s (“Defendant”) Notice of Peremptory Challenge and Supporting Declaration of Amy Osborne (served on September 12, 2022) (PAGA Action)	0.20
Review Notice of Court’s Ruling (filed on September 14, 2022) (Class Action & PAGA Action)	0.10
Review Court’s Notice of Case Reassignment for All Purposes (filed on September 20, 2022) (Class Action & PAGA Action)	0.10

Review Defendant's Notice of Peremptory Challenge and Supporting Declaration of Amy Osborne (served on September 19, 2022) (Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference Pending Mediation; [Proposed] Order (submitted on September 27, 2022) (Class Action)	1.10
Review Court's Order to Continue Case Management Conference and Notice of Case Management Conference (filed on September 29, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on September 29, 2022) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on September 30, 2022) (Class Action)	0.10
Review Court's Notice of Department Reassignment for All Purposes (filed on October 11, 2022) (Class Action)	0.10
Review and Analyze Defendant's Answer to Class Action Complaint for Damages (served on October 13, 2022) and Research Affirmative Defenses in Defendant's Answer (Class Action)	1.50
Review and Analyze Defendant's Answer to Complaint for Civil Penalties Pursuant to the Private Attorneys General Act (PAGA) (served on October 13, 2022) and Research Affirmative Defenses in Defendant's Answer (PAGA Action)	1.30
Review Defendant's Notice of Related Case (filed on October 13, 2022) (Class Action & PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on October 26, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on November 10, 2022) (Class Action)	0.90
Review Court's Order to Continue Case Management Conference and Notice of Case Management Conference (filed on November 22, 2022) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on November 23, 2022) (Class Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on January 18, 2023) (Class Action & PAGA Action)	0.90
Review Court's Order to Continue Case Management Conference and Notice of Case Management Conference (filed on January 19, 2023) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on January 19, 2023) (Class Action)	0.10
Review Court's Order to Continue Case Management Conference and Minute Order Re: Joint Stipulation to Continue Case Management Conference (filed on January 27, 2023) (PAGA Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on January 27, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on March 21, 2023) (Class Action)	0.80
Review Court's Order to Continue Case Management Conference and Minute Order Re: Case Management Conference – Complex (filed on March 28, 2023) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on March 28, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement and Notice of Settlement (filed on April 7, 2023) (Class Action & PAGA Action)	0.70
Review Court's Minute Order Re: Case Management Conference (filed on April 26, 2023) (PAGA Action)	0.10
Review Court's Notice of Department Reassignment for All Purposes (filed on May 18, 2023) (Class Action)	0.10
Review Court's Amended Notice of Department Reassignment for All Purposes (filed on June 27, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on July 31, 2023) (Class Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on August 22, 2023) (Class Action)	0.10

Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on August 16, 2023) (PAGA Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on August 28, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on October 19, 2023) (Class Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on October 25, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 14, 2023) (PAGA Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on November 21, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on January 17, 2024) (Class Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on January 23, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on March 13, 2024) (PAGA Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on March 22, 2024) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on April 16, 2024) (Class Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on April 18, 2024) (PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on April 23, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on July 9, 2024) (Class Action & PAGA Action)	0.50

Review Court's Minute Order Re: Case Management Conference (filed on July 22, 2024) (Class Action & PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on September 6, 2024) (PAGA Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on September 20, 2024) (PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on September 23, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on October 8, 2024) (PAGA Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on October 22, 2024) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 20, 2024) (PAGA Action)	0.50
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 22, 2024) (Class Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on December 2, 2024) (Class Action & PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on February 20, 2025) (Class Action & PAGA Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on February 26, 2025) (Class Action & PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on April 17, 2025) (Class Action & PAGA Action)	0.50
Review Court's Minute Order: Case Management Conference – Complex (generated on April 24, 2025) (Class Action & PAGA Action)	0.10

Review Court's Amended Minute Order: Case Management Conference – Complex (generated on April 24, 2025) (Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (generated on June 30, 2025) (Class Action & PAGA Action)	0.10
Appearances	
Prepare for and Remotely Attend Case Management Conference (March 28, 2023) (Class Action)	1.70
Prepare for and Remotely Attend Case Management Conference (April 24, 2025) (Class Action & PAGA Action)	0.50
Prepare for and Remotely Attend Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement and Case Management Conference (June 30, 2025) (Class Action & PAGA Action)	1.50
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sydney Brien	3.90
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (served on May 31, 2022)	4.50
Draft Correspondence to, Meet and Confer with, and/or Respond to Correspondence from, Defendant's Counsel	22.10
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (approximately 5,758 pages), and Other Sources Prior to Mediation	65.50
Prepare for Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Mediation Exhibits in Support of the Mediation Brief, and Performing Damages and Penalties Analyses and Calculations (submitted on October 7, 2022)	36.50
Attend Mediation Session (October 10, 2022; Zoom Video Conference)	14.50

Engage in Additional Settlement Negotiations After Mediation	7.80
Review and Analyze Mediator's Proposal (accepted on March 26, 2023)	1.60
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action/PAGA Settlement (executed June 5, 2023)	4.80
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement and Release of Claims (executed on October 22, 2024), and Draft Notice of Class Action Settlement, Opt-Out Request Form, and Objection Form	16.50
Coordinate Settlement Administration with Settlement Administrator, Review Weekly Reports, and Conduct Ongoing Monitoring of Settlement Administration	7.50
Law and Motion	
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Helene Mayer in Support Thereof, Declaration of Plaintiff Sydney Brien in Support Thereof, Compliance Chart in Support Thereof, Declaration of Denise Islas on Behalf of Simpluris Re: Qualifications and Costs for Settlement Administration, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on May 21, 2025) (Class Action)	21.50
Review Defendant's Declaration of Amy J. Osborne in Support of Plaintiff's Motion for Preliminary Approval of Class Settlement and Declaration of Lyndsay Candelario in Support Thereof (served on May 21, 2025) (Class Action)	0.30
Review Court's Notice of Hearing (filed on June 6, 2025) (Class Action)	0.10
Review Declaration of Adam C. Reed, Executive Director of Riverside Legal Aid, in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on June 27, 2025) (Class Action)	0.20
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (published on June 27, 2025) (Class Action)	0.20
Review Court's Minute Order: Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on June 30, 2025) (Class Action)	0.10

Draft [Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (submitted on July 11, 2025) (Class Action)	0.50
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on July 18, 2025) (Class Action)	0.10
Review Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on August 5, 2025) (Class Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on July 23, 2025) (Class Action)	0.10
Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Award; Memorandum of Points and Authorities in Support Thereof, Declaration of Helene Mayer in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on November 19, 2025)	20.50
Total Hours:	287.70

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Brien vs. Mission Ambulance, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/20/2022	U.S. Postmaster	Postage	\$7.38
8/5/2022	Legal Document Server, Inc.	Attorney Service	\$113.43
8/5/2022	Riverside Superior Court	Complex Filing Fee	\$1,000.00
8/5/2022	Riverside Superior Court	Complaint Filing Fee	\$450.00
8/16/2022	Riverside Superior Court	Document Download Fee	\$10.00
9/14/2022	Legal Document Server, Inc.	Attorney Service	\$15.55
9/29/2022	Legal Document Server, Inc.	Attorney Service	\$16.90
9/29/2022	Riverside Superior Court	Stipulation & Order Fee	\$20.00
9/30/2022	Legal Document Server, Inc.	Attorney Service	\$25.68
9/30/2022	Riverside Superior Court	Jury Fee	\$150.00
10/7/2022	Legal Document Server, Inc.	Attorney Service	\$15.55
10/7/2022	Signature Resolution LLC	Mediation Fee	\$9,950.00
11/15/2022	Legal Document Server, Inc.	Attorney Service	\$16.90
11/15/2022	Riverside Superior Court	Stipulation & Order Fee	\$20.00
11/16/2022	Legal Document Server, Inc.	Attorney Service	\$15.55
11/28/2022	Legal Document Server, Inc.	Attorney Service	\$31.10
1/18/2023	Legal Document Server, Inc.	Attorney Service	\$16.90
1/18/2023	Riverside Superior Court	Stipulation & Order Fee	\$20.00
1/23/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
3/21/2023	Legal Document Server, Inc.	Attorney Service	\$16.90
3/21/2023	Riverside Superior Court	Stipulation & Order Fee	\$20.00
3/23/2023	General Logistics Systems US, Inc.	Courier Service	\$23.62
4/3/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
4/11/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
8/1/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
10/20/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
1/18/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
1/23/2024	Riverside Superior Court	Document Download Fee	\$1.00
4/17/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
7/15/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
11/25/2024	Legal Document Server, Inc.	Attorney Service	\$17.30
2/20/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
3/7/2025	Riverside Superior Court	Document Download Fee	\$4.00
4/18/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
6/6/2025	Legal Document Server, Inc.	Attorney Service	\$22.47
6/6/2025	Riverside Superior Court	Motion Fee	\$60.00
6/30/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
7/10/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
7/10/2025	Riverside Superior Court	Document Download Fee	\$1.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Brien vs. Mission Ambulance, Inc.

[illegible]

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Brien vs. Mission Ambulance, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/31/2022	U.S. Postmaster	Postage	\$16.00
5/31/2022	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
8/5/2022	Legal Document Server, Inc.	Attorney Service	\$45.93
8/5/2022	Riverside Superior Court	Complaint Filing Fee	\$450.00
9/14/2022	Legal Document Server, Inc.	Attorney Service	\$15.55
1/18/2023	Legal Document Server, Inc.	Attorney Service	\$11.75
1/23/2023	Legal Document Server, Inc.	Attorney Service	\$16.90
1/23/2023	Riverside Superior Court	Stipulation & Order Fee	\$20.00
1/27/2023	Riverside Superior Court	Document Download Fee	\$1.00
1/30/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
4/10/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
8/16/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
8/31/2023	Riverside Superior Court	Document Download Fee	\$1.00
11/15/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
3/14/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
7/15/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
9/9/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
10/9/2024	Legal Document Server, Inc.	Attorney Service	\$17.30
11/25/2024	Legal Document Server, Inc.	Attorney Service	\$17.30
2/20/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
3/7/2025	Riverside Superior Court	Document Download Fee	\$4.00
4/18/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
10/27/2025	Riverside Superior Court	Document Download Fee	\$11.00
Total:			<u>\$849.38</u>