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Attorneys for Plaintiffs Tyrone Johnson,
Terrence Kennedy, and
James Walker

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TYRONE JOHNSON, TERRENCE
KENNEDY; 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;

Plaintiffs,

vs.

PARSEC, INC. D/B/A/ OHIO
PARSEC, INC., an Ohio corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No. 2:22-cv-06930-AH-MAR

Honorable Anne Hwang

CLASS ACTION

**DECLARATION OF ELIZABETH
PARKER-FAWLEY IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, CLASS
REPRESENTATIVE SERVICE
PAYMENTS, CLASS COUNSEL FEES
PAYMENT, AND CLASS COUNSEL
LITIGATION EXPENSES PAYMENT**

Date: November 12, 2025
Time: 1:30 PM
Courtroom: 7D

Complaint Filed: August 8, 2022
FAC Filed: November 15, 2024
Trial Date: None Set

DECLARATION OF ELIZABETH PARKER-FAWLEY

I, Elizabeth Parker-Fawley, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers for Justice, PC, attorneys of record for Plaintiffs Tyrone Johnson (“Plaintiff Johnson”), Terrence Kennedy (“Plaintiff Kennedy”), and James Walker (“Plaintiff Walker”) (collectively, “Plaintiffs”). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and if called as a witness, I could and would competently testify thereto.

PROCEDURAL HISTORY

2. On May 23, 2022, Plaintiff Johnson provided written notice by certified mail to the Labor and Workforce Development Agency (“LWDA”) and Defendant Parsec, Inc. d/b/a Ohio Parsec, Inc. (“Defendant,” and together with Plaintiffs, the “Parties”) of his intent to seek civil penalties pursuant to PAGA and of the specific provisions of the California Labor Code that were alleged to be violated (“*Johnson* PAGA Notice”).

3. On June 1, 2022, Plaintiff Kennedy also provided written notice by certified mail to the LWDA and Defendant of the specific provisions of the alleged California Labor Code violations (“*Kennedy* PAGA Notice”).

4. On August 5, 2022, Plaintiffs Johnson and Kennedy filed a Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, et seq. against Defendant in the Superior Court of California, County of Los Angeles, Case No. 22STCV25427 (“PAGA Action”).

5. On August 8, 2022, Plaintiffs Johnson and Kennedy filed a putative wage and hour class action against Defendant in the Superior Court of California, County of Los Angeles, Case No. 22STCV25562 (“Class Action,” and together with the PAGA Action, the “Actions” or “Action”).

6. On September 26, 2022, Defendant removed the Class Action to this Court, and the case is assigned case number 2:22-cv-06930-AH-MAR. (Dkt. No. 1).

1 7. On October 11, 2022, Plaintiffs Johnson and Kennedy propounded
2 Interrogatories (Sets One and Two) and Requests for Production of Documents (Set
3 One) on Defendant.

4 8. On October 26, 2022, Plaintiffs Johnson and Kennedy filed their Motion
5 to Remand Pursuant to 28 U.S.C. § 1447, which the Court denied on December 2,
6 2022. (Dkt. Nos. 17, 28).

7 9. On November 21, 2022, Defendant responded to Plaintiffs' discovery
8 request, and the Parties thereafter met and conferred regarding the sufficiency of the
9 responses and document production.

10 10. On February 28 and March 13, 2023, Class Counsel conducted oral
11 depositions of Defendant's designated persons most knowledgeable pursuant to
12 Federal Rules of Civil Procedure Rule 30(b)(6) regarding Defendant's organizational
13 structure, wage and hour policies and practices, and the job duties performed by Class
14 Members.

15 11. On June 6, 2023, Defendant's counsel conducted the oral deposition of
16 Plaintiff Johnson.

17 12. On June 21, 2023, Plaintiff Walker provided written notice by certified
18 mail to the LWDA and Defendant of the specific provisions of the alleged California
19 Labor Code violations ("*Walker* PAGA Notice").

20 13. On June 29, 2023, the Parties participated in a full-day mediation with
21 Mark Rudy, Esq., a well-respected mediator for complex wage and hour actions.
22 While the Parties continued negotiations regarding the key terms of the Settlement,
23 the mediation resulted in a settlement in principle.

24 14. On May 24, 2024, pursuant to the Class Action and PAGA Settlement
25 Agreement ("*Settlement*" or "*Settlement Agreement*"), the Parties sought to amend
26 the complaint in the PAGA Action in order to seek approval of the Settlement
27 Agreement in a single forum.

28 15. On June 20, 2024, the Parties also filed a Motion for Preliminary

1 Approval of Class Action Settlement and Approval of PAGA Settlement (“Motion for
2 Preliminary Approval”) in the Los Angeles County Superior Court. Pursuant to
3 California Labor Code section 2699(s)(2), Plaintiffs submitted the proposed
4 Settlement Agreement to the LWDA for comment, along with the Motion for
5 Preliminary Approval, on June 21, 2024.

6 16. The Superior Court denied Plaintiffs’ request to amend the PAGA Action
7 complaint. Subsequently, the Parties agreed to amend the complaint in the Class
8 Action and filed a Joint Stipulation to Lift Stay and Grant Leave to File an Amended
9 Complaint on July 24, 2024. (Dkt. No. 50).

10 17. On November 15, 2024, the Court granted the Joint Stipulation to Lift
11 Stay and Grant Leave to File an Amended Complaint, and Plaintiffs filed their First
12 Amended Class Action Complaint for Damages & Enforcement under the Private
13 Attorneys General Act, California Labor Code § 2698, Et Seq. (“Operative
14 Complaint”) in order to consolidate the PAGA Action into the Class Action, as well
15 as add Plaintiff Walker as a named plaintiff, PAGA representative, and putative class
16 representative. (Dkt. Nos. 51, 52).

17 **EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC**

18 18. Since October 2008, Lawyers *for* Justice, PC has almost exclusively
19 focused on the prosecution of consumer and employment class actions, involving
20 wage-and-hour claims, race discrimination, unfair business practices, or consumer
21 fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen
22 employment-related putative class actions in both state and federal courts in the State
23 of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on
24 litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”)
25 representative actions. Lawyers *for* Justice, PC has successfully litigated cases
26 involving the executive, administrative, and other overtime exemptions to the State of
27 California and federal overtime compensation requirements. During a relatively short
28 time, in association with other law firms, Lawyers *for* Justice, PC has recovered

1 millions of dollars on behalf of thousands of individuals in California.

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

27 20. Arby Aiwarzian is a Member and Shareholder of Lawyers for Justice, PC.
28 He received his Bachelor of Arts degree from University of California, Los Angeles

1 and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from
2 Southwestern Law School. From approximately May 2007 to approximately July
3 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the
4 California Court of Appeal for the Second Appellate District. From approximately
5 August 2008 to approximately December 2008, he served as a Judicial Extern to the
6 Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth
7 Circuit. He was admitted to practice law in California in 2010. He is admitted to
8 practice before all courts of the State of California and all United States District Courts
9 in the State of California. He has worked on many wage-and-hour class action and
10 representative action cases, taking the lead in taking and defending depositions,
11 arguing motions, and attending mediations. He has played an integral role in preparing
12 matters for class certification, including and not limited to, successful certification of
13 a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
14 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court
15 Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior
16 Court Case No. RG13680477). Under his supervision, dozens of class action or
17 representative action cases have resulted in settlements that have been granted court
18 approval. He has handled over one hundred and fifty (150) mediations and has worked
19 on over two hundred and fifty (250) class action or representative action cases which
20 have resulted in settlement.

21 21. Joanna Ghosh is a Senior Member of Lawyers for Justice, PC. She
22 received her Bachelor of Arts degree from California State University, Los Angeles
23 in 2006, a Master of Science degree from the London School of Economics in 2007,
24 and a Juris Doctor degree from Georgetown University Law Center in 2010. She is
25 admitted to practice in California (since 2010) and in New York (since 2013) and she
26 is also admitted to practice in all U.S. District Courts in California, the U.S.
27 Bankruptcy Court for the Central District of California, and the U.S. Supreme Court.
28 She has taken and defended dozens of depositions and successfully handled motion

1 practice in class action cases regarding discovery (including and not limited to,
2 regarding class contact information), class certification (both contested class
3 certification and stipulated class certification), arbitration agreements, coordination,
4 and intervention. She has successfully handled briefing and oral argument on appeal
5 and obtained notable decisions regarding the Private Attorneys General Act and
6 employer efforts to compel arbitration of PAGA claims, e.g., *Roberto Betancourt v.*
7 *Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, *cert.*
8 *denied* (Cal., May 24, 2017), *cert. denied* (U.S., Dec. 11, 2017) and *ZB, N.A. v.*
9 *Superior Court* (2019) 8 Cal.5th 175. She has significant experience with class
10 actions, including and not limited to working on cases to obtain class certification
11 through contested motion practice and working on cases in the post-certification stage
12 (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial
13 preparation in conjunction with co-counsel in a case involving a certified class
14 consisting of approximately 2,600 individuals). She also has extensive experience
15 with class action and/or representative action settlements, and has handled this process
16 in over three hundred (300) cases. Under Edwin Aiwazian, Joanna Ghosh, and Arby
17 Aiwazian's supervision, Lawyers for Justice, PC has handled the class certification
18 and court approval process for hundreds of class action and/or representative action
19 matters that have successfully resolved. She is also a member of the California
20 Employment Lawyers Association. .

21 22. I am the Senior Director of Litigation at Lawyers for Justice, PC. In
22 December 2014, I obtained a license to practice law from the California State Bar. I
23 am admitted to practice in all courts in the State of California, as well as the Central,
24 Southern, Northern, and Eastern District Courts of California and the Ninth Circuit
25 Court of Appeal. Since December 2014, I have worked at Lawyers for Justice, PC,
26 and my practice has almost exclusively focused on the prosecution of employment
27 class actions and representative actions, handling cases in all stages of litigation from
28 initial pleadings to assisting with class action trial matters, attending mediations, and

1 preparing class action settlements. In the role of Senior Director of Litigation, I have
2 oversee approximately fifteen to thirty attorneys and law clerks working on hundreds
3 of employment class actions and representative actions and provide internal training
4 for our litigation practice group and post-bar law clerks. I am a member of the
5 California Lawyers Association Labor & Employment Group.

6 **SUMMARY OF WORKED PERFORMED**

7 23. Several attorneys at Lawyers for Justice, PC have been actively
8 performing work in these matters since prior to the commencement of the above-
9 captioned action on August 8, 2022.

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

24 25. Class Counsel has litigated the matters for over three years and was
25 actively preparing the matters for class certification and trial prior to reaching a
26 settlement. The Parties engaged in extensive settlement negotiations and participated
27 in a full-day mediation conducted by Mark Rudy, Esq. (“Mediator”), a well-respected
28 mediator experienced in mediating complex labor and employment matters. At the

1 mediation, the Parties reached a settlement in principle and thereafter continued to
2 negotiate essential terms until a complete agreement was reached. In the course of the
3 litigation and in connection with the mediation and settlement discussions, the Parties
4 exchanged extensive information and engaged in discussions regarding their
5 evaluations of the case and various aspects of the case, including but not limited to,
6 the risks and delays of further litigation, the risks to the Parties of proceeding with
7 class certification and/or representative adjudication, the law relating to off-the-clock
8 theory, meal and rest periods, regular rate of pay, rounding, PAGA representative
9 actions, collective bargaining agreements and their impact on California Labor Code
10 claims, and state wage-and-hour law and enforcement, as well as the evidence
11 produced and analyzed, and the possibility of appeals, among other things. During all
12 settlement discussions, the Parties conducted their negotiations at arm's length in an
13 adversarial position. Arriving at a settlement that was acceptable to all Parties was not
14 easy. Defendant and its counsel felt strongly about their ability to prevail on the merits
15 and at certification, and Plaintiffs and Class Counsel believed that they would be able
16 to obtain class certification and prevail at trial. After conducting investigations, formal
17 and informal discovery, and exchange of information, multiple depositions, and
18 extensive settlement negotiations, the Parties have agreed, with the aid of the
19 Mediator's evaluation, that the matter is well-suited for settlement given the legal
20 issues relating to Plaintiffs' principal claims, as well as the costs and risks to both
21 sides that would attend further litigation. The Settlement is a fair, reasonable, and
22 adequate resolution of the Released Class Claims of Plaintiffs and Class Members,
23 and of the Released PAGA Claims of Plaintiffs, the State of California, and the
24 Aggrieved Employees, against the Released Parties.

25 26. Prior to engaging in mediation, Class Counsel conducted significant
26 investigation into the facts of the case and engaged in extensive formal and informal
27 discovery and review and analysis of thousands of pages of documents and data
28 produced by Defendant. The volume of data and documents that Class Counsel

1 reviewed and analyzed included, and was not limited to: Plaintiffs and other Class
2 Members' employment records; a detailed sampling of Class Members' time and pay
3 data (including, but not limited to, timecards, payroll records, and wage statements);
4 Defendant's Employee Handbooks, agreements (such as collective bargaining
5 agreements and Release and Acknowledgment Agreements), internal memoranda, job
6 titles and descriptions, operations and employment practices, forms (such as
7 Defendant's Employee Training Documentation forms), procedures, and policies
8 (such as Defendant's Attendance and Punctuality Policy), among other information
9 and documents. Class Counsel interviewed Plaintiffs and other Class Members to
10 gather facts and identify potential witnesses. Class Counsel served multiple sets of
11 formal written discovery requests and reviewed Defendant's responses thereto. The
12 Parties exchanged FRCP Rule 26(a) Initial Disclosures. Class Counsel also took the
13 depositions of two of Defendant's FRCP Rule 30(b)(6) designees and prepared for
14 and defended the deposition of Plaintiff Johnson. Counsel for the Parties also met and
15 conferred on numerous occasions, e.g., to discuss issues relating to the pleadings,
16 discovery, motion practice, and the production of documents and data. Class Counsel
17 also prepared for and attended court proceedings and settlement negotiations, among
18 other tasks.

19 27. Counsel for the Parties have also invested time researching and
20 investigating the applicable law, which is constantly evolving as it relates to class
21 certification, representative PAGA claims, off-the-clock theory, meal and rest periods,
22 regular rate of pay, rounding, state wage-and-hour law and enforcement, Plaintiffs'
23 claims and damages, and Defendant's defenses thereto, as well as facts discovered.
24 Based on our analysis, I submit that the result achieved in this litigation is fair,
25 adequate, and reasonable.

26 28. As set forth more fully in the accompanying Motion for Attorneys' Fees
27 and Costs, Class Counsel seeks attorneys' fees in the amount of \$1,566,634.30 which
28 is thirty-five percent (35%) of the Gross Settlement Amount of \$4,476,098.00, as

1 provided in the Settlement Agreement. Pursuant to the contingency-fee agreement
2 entered into by and between Plaintiffs and Class Counsel, Plaintiffs have agreed to a
3 contingency fee of at least thirty-five percent (35%) of the recovery.

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

11 30. While not necessarily required to be demonstrated because a percentage
12 fee is proper for this settlement, Class Counsel has incurred many hours of work in
13 connection with this matter such that the request for an award of attorneys' fees is also
14 justified under a lodestar analysis with a multiplier of 4.38. To date, Class Counsel
15 has spent approximately **420.50 hours** performing tasks and obtaining recovery on
16 behalf of Plaintiff and the Class Members. Attached hereto as "**EXHIBIT A**" is an
17 Attorney Task and Time Chart that sets forth in detail the nature of the legal services
18 provided by attorneys at Lawyers for Justice, PC and the time incurred in performing
19 those services. These hours include work done by several attorneys at Lawyers for
20 Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers
21 for Justice, PC had litigation support personnel actively engaged in assisting with the
22 prosecution of this matter. It should be noted that Class Counsel anticipates
23 performing additional services and work in this matter, in the course of the settlement
24 administration process and leading up to the Final Approval Hearing.

25 31. The work performed in this particular matter, the background of Lawyers
26 for Justice, PC, as well as the individual backgrounds, training, and experience of the
27 attorneys who worked on this matter, in litigating complex wage-and-hour cases, and
28 in particular, employment class actions and representative actions, support a

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

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

17 32. Lawyers for Justice, PC has incurred \$39,063.57 in litigation costs and
18 expenses as reflected in the Case Cost Detail attached hereto as "EXHIBIT B." These
19 expenses were reasonable and necessary in the prosecution of this matter and to obtain
20 the Settlement, and they are less than the maximum amount of \$50,000 allocated
21 toward reimbursement of litigation costs and expenses under the Settlement
22 Agreement. The cost savings of \$10,936.43 will remain part of the Net Settlement
23 Amount and distributed to Participating Class Members. It should be noted that Class
24 Counsel has borne all of the risks and costs of litigation and will not receive any
25 compensation until recovery is obtained under the Settlement.

26 33. Class Counsel submits that the Settlement is fair, reasonable, and
27 adequate, and is in the best interest of Plaintiffs, the Class, Aggrieved Employees, and
28 the State of California. Class Counsel further submits that the Settlement is within an

1 acceptable range of recovery for this type of litigation given the strengths and
2 weaknesses of the case, the inherent costs and risks of further litigation, and the costs
3 and risks associated with class certification, representative adjudication, trial, and/or
4 appeals.

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

7 Executed on this 15th day of October 2025, at Glendale, California.

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9 */s/ Elizabeth Parker-Fawley*

10 _____
11 Elizabeth Parker-Fawley
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LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

EXHIBIT A

JOHNSON, ET AL. VS. PARSEC, INC. DBA OHIO PARSEC, INC.
Los Angeles Superior Court Case No. 22STCV25562 (CLASS ACTION)

JOHNSON, ET AL. VS. PARSEC, INC. DBA OHIO PARSEC, INC.
Los Angeles Superior Court Case No. 22STCV25427 (PAGA ACTION)

JOHNSON, ET AL. VS. PARSEC, INC. DBA OHIO PARSEC, INC.
United States District Court, Central District, Court Case No. 2:22-CV-06930-AH-MAR (FEDERAL ACTION)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Tyrone Johnson (“Plaintiff Johnson”) during the Case	50.0
Meet and Communicate with Plaintiff Terrence Kennedy (“Plaintiff Kennedy”) during the Case	46.0
Meet and Communicate with Plaintiff James Walker (“Plaintiff Walker”) during the Case	27.00
Investigate, Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	6.50
Pleadings and Court Filings	
Review First Amended General Order (PAGA Action)	0.10
Investigate the Merits of Plaintiff’s Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiffs’ Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code §2698, Et Seq. (filed on August 5, 2022) (PAGA Action)	2.50

Review Court's Notice of Case Assignment Unlimited Civil Case (filed on August 5, 2022) (PAGA Action)	0.10
Investigate the Merits of Plaintiff's Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiffs' Class Action Complaint for Damages (filed on August 8, 2022) (Class Action)	2.70
Review Court's Notice of Case Assignment Unlimited Civil Case (filed on August 8, 2022) (Class Action)	0.10
Review Court's Notice of Case Management Conference (filed on August 8, 2022) (PAGA Action)	0.10
Draft Peremptory Challenge to Judicial Officer (filed on August 15, 2022) (Class Action)	0.10
Review Court's Minute Order regarding Peremptory Challenge (issued August 23, 2022) (Class Action)	0.10
Review Court's Order Regarding Complex Determination (issued August 31, 2022) (Class Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint (served on September 22, 2022), and Research Affirmative Defenses in Defendant's Answer (Class Action)	1.20
Review and Analyze Defendant's Answer to Plaintiff's PAGA Complaint (served on September 22, 2022), and Research Affirmative Defenses in Defendant's Answer (PAGA Action)	1.00
Review Notice of Removal Case (filed on September 22, 2022) (Federal Action)	1.20
Review Declaration of Kishaniah Dhamodaran in Support of Defendant Parsec, Inc. D/B/A Ohio Parsec, Inc.'s Notice of Removal (filed on September 26, 2022) (Federal Action)	0.60
Review Civil Cover Sheet (filed on September 26, 2022) (Federal Action)	0.10
Review Defendant's Certification and Notice of Interested Parties (filed on September 26, 2022) (Federal Action)	0.10

Review Defendant Parsec, Inc. D/B/A Ohio Parsec, Inc.'s Corporate Disclosure Statement (filed on September 26, 2022) (Federal Action)	0.10
Review Court's Notice of Assignment to United States Judges (filed on September 26, 2022) (Federal Action)	0.10
Review Court's Notice to Parties of Court-Directed ADR Program (filed on September 26, 2022) (Federal Action)	0.20
Review Court's Notice to Counsel Re Consent to Proceed Before a United States Magistrate Judge (filed on September 26, 2022) (Federal Action)	0.30
Review Defendant's Notice to Adverse Party and the Superior Court of California of Defendant Parsec, Inc. D/B/A Ohio Parsec, Inc.'s Removal to Federal Court under 28 U.S.C. §§ 1332, 1441, 1446, And 1453 (CAFA) (filed on September 27, 2022) (Class Action)	0.10
Draft Notice of Appearance or Withdrawal of Counsel (Margaux Gundzik) (filed on September 28, 2022) (Federal Action)	0.10
Draft Notice of Appearance or Withdrawal of Counsel (Travis J. Maher) (filed on September 28, 2022) (Federal Action)	0.10
Draft Notice of Appearance or Withdrawal of Counsel (Tara Zabehi) (filed on September 28, 2022) (Federal Action)	0.10
Review Court's Standing Order for Cases Assigned to Judge Dale S. Fischer (filed on September 30, 2022) (Federal Action)	0.50
Review Court's Order Setting Scheduling Conference (filed on September 30, 2022) (Federal Action)	0.40
Meet and Confer with Defense Counsel and Draft and/or Review Joint Rule 16(b)/26(f) Report (filed on October 21, 2022) (Federal Action)	3.50

Review Text Only Entry Regarding Scheduling Order (issued October 25, 2022) (Federal Action)	0.20
Review Court's Order Re: Jury Trial (entered on October 25, 2022) (Federal Action)	0.60
Review Court's Order / Referral to ADR (entered on October 25, 2022) (Federal Action)	0.10
Review Court's Notice to Filer Deficiencies in Electronically Filed Documents (filed on October 28, 2022) (Federal Action)	0.10
Review Court's Order in Response to Notice to Filer of Deficiencies in Filed Document (filed on October 28, 2022) (Federal Action)	0.10
Draft Certification and Notice of Interested Parties (filed on October 28, 2022) (Federal Action)	0.20
Review Court's Text Only Entry (In Chambers) Order Regarding Plaintiffs' Ex Parte Application (issued November 7, 2022) (Federal Action)	0.20
Draft Plaintiff's Case Management Statement (filed on November 14, 2022) (PAGA Action)	0.80
Review Defendant's Case Management Statement (filed on November 16, 2022) (PAGA Action)	0.40
Review and Analyze Defendant's Case Management Statement (filed on November 16, 2022) (Class Action)	0.10
Draft Notice of Plaintiff's Notice of Posting Jury Fees (filed on November 23, 2022) (PAGA Action)	0.10
Meet and Confer with Defense Counsel and Draft and/or Review Stipulated Protective Order (filed on December 1, 2022) (Federal Action)	1.30
Review Court's Text Only Entry (In Chambers) Order Taking Motion Off Calendar and Under Submission (issued December 1, 2022) (Federal Action)	0.10

Review Court's Order Denying Motion to Remand (issued on December 2, 2022) (Federal Action)	0.20
Draft Notice of Ruling (filed on December 6, 2022) (PAGA Action)	0.40
Review and Analyze Defendant's Notice of Status of Removed Case (filed on January 6, 2023) (Class Action)	0.20
Draft Notice of Appearance or Withdrawal of Counsel (Hannah Savaso)(filed on April 10, 2023) (Federal Action)	0.10
Meet and Confer with Defense Counsel and Draft and/or Review Joint Stipulation to Continue All Hearings and Extend Relevant Deadlines Pending Mediation; [Proposed] Order Granting Joint Stipulation to Continue All Hearings and Extend Relevant Deadlines Pending Mediation (filed on April 9, 2023) (Federal Action)	2.30
Review Order Granting Joint Stipulation to Continue All Hearings and Extend Relevant Deadlines Pending Mediation (issued on May 1, 2023) (Federal Action)	0.10
Review Order of the Chief Judge 23-041 (filed on May 19, 2023) (Federal Action)	0.10
Meet and Confer with Defense Counsel and Draft and/or Review Joint Stipulation Regarding Mediation; [Proposed] Order (filed on May 23, 2023) (PAGA Action)	1.00
Draft Notice of Withdrawal of Counsel (filed on June 6, 2023) (Federal Action)	0.10
Review Court's Standing Order for Newly Assigned Civil Cases (issued on July 20, 2023) (Federal Action)	0.10
Review Court's Civil Pretrial Schedule and Trial Order (filed on July 25, 2023) (Federal Action)	0.10
Review Court's Standing Order for Motions for Summary Judgment (filed on July 25, 2023) (Federal Action)	0.10

Meet and Confer with Defense Counsel and Draft and/or Review Joint Notice of Settlement (filed on August 8, 2023)(Federal Action)	0.30
Meet and Confer with Defense Counsel and Draft and/or Review Joint Notice of Settlement (filed on August 9, 2023) (PAGA Action)	0.50
Review Court's Minute Order Regarding Non-Appearance Case Review Re: Notice of Settlement (filed on August 9, 2023) (PAGA Action)	0.10
Meet and Confer with Defense Counsel and Draft and/or Review Joint Response to Order to Show Cause Re: Dismissal (filed on October 12, 2023) (PAGA Action)	0.50
Draft Notice of Continuance of Order to Show Cause Re: Dismissal filed on October 20, 2023 (PAGA Action)	0.20
Review Court's Scheduling Notice and (In Chambers) Order Directing Counsel to File Joint Status Report re Settlement (issued December 27, 2023) (Federal Action)	0.10
Meet and Confer with Defense Counsel and Draft and/or Review Joint Status Report Re: Settlement (filed on January 3, 2024) (Federal Action)	0.50
Draft Notice of Appearance or Withdrawal of Counsel (Brian St. John) (filed on January 3, 2024) (Federal Action)	0.10
Draft Notice Regarding January 18, 2024, Order to Show Cause Re: Dismissal Hearing (filed on January 22, 2024) (PAGA Action)	0.20
Review Court's Minute Order Regarding Order to Show Cause re: Dismissal (Settlement) (filed on January 18, 2024) (PAGA Action)	0.10
Review Court's Order regarding Order to Show Cause Re: Dismissal (Settlement) (filed on March 14, 2024) (PAGA Action)	0.10

Review Court's Order regarding Order to Show Cause Re: Dismissal (Settlement) (filed on April 26, 2024) (PAGA Action)	0.10
Review Defendant Parsec, Inc. D/B/A Ohio Parsec, Inc.'s Notice of Ruling on Order to Show Cause Re: Dismissal (Settlement) (filed on May 1, 2024) (PAGA Action)	0.30
Draft Plaintiffs' Counsel's Notice of Payment of Sanction (filed on May 10, 2024) (PAGA Action)	0.10
Meet and Confer with Defense Counsel and Draft and/or Review Joint Stipulation and [Proposed] Order Granting Plaintiffs Leave to File a First Amended Class Action Complaint for Damages and Enforcement under the Private Attorneys General Act, California Labor Code §2698, Et Seq. (filed on May 24, 2024) (PAGA Action)	3.40
Review Court's Minute Order regarding Stipulation for Leave to File a First Amended Complaint (issued on June 6, 2024) (PAGA Action)	0.20
Review Court's Minute Order Regarding Order to Show Cause Re: Dismissal (filed on June 24, 2024) (PAGA Action)	0.10
Draft Notice Regarding June 24, 2024, Order to Show Cause Re: Dismissal Hearing (filed on June 25, 2024) (PAGA Action)	0.60
Review Scheduling Notice and (In Chambers) Order Directing Counsel to File a Joint Status Report re: Settlement (issued on July 11, 2024) (Federal Action)	0.10
Draft Notice of Appearance or Withdrawal of Counsel (filed on July 15, 2024) (Federal Action)	0.10
Draft Notice of Appearance or Withdrawal of Counsel (filed on July 15, 2024) (Federal Action)	0.10
Draft Notice of Appearance or Withdrawal of Counsel (filed on July 15, 2024) (Federal Action)	0.10

Meet and Confer with Defense Counsel and Draft and/or Review Joint Report (filed on July 18, 2024) (Federal Action)	0.80
Meet and Confer with Defense Counsel and Draft and/or Review [Proposed] Order Granting Joint Stipulation to Lift Stay and Grant Leave to File an Amended Complaint (filed on July 23, 2024) (Federal Action)	0.10
Review Court's Notice to Filer of Deficiencies in Filed Document (filed on July 24, 2024) (Federal Action)	0.10
Review Order in Response to Notice to Filer of Deficiencies in Filed Document (issued on July 24, 2024) (Federal Action)	0.10
Meet and Confer with Defense Counsel and Draft and/or Review Joint Stipulation to Lift Stay and Grant Leave to File an Amended Complaint; [Proposed] Order Granting Joint Stipulation to Lift Stay and Grant Leave to File an Amended Complaint (filed on July 24, 2024) (Federal Action)	0.40
Draft Notice Regarding August 23, 2024 Order to Show Cause Re: Dismissal (Settlement) Hearing (filed on August 23, 2024) (PAGA Action)	0.30
Review Order re: Joint Stipulation to Lift Stay and Grant Leave to File an Amended Complaint (issued on November 15, 2024) (Federal Action)	0.10
Draft First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code §2698, Et Seq. (filed on November 15, 2024) (Federal Action)	1.10
Review Court's Order of the Chief Judge 24-190 filed on December 6, 2024 (Federal Action)	0.20
Review Court's Standing Order for Civil Cases Assigned to Judge Anne Hwang (filed on December 17, 2024) (Federal Action)	0.50
Review Court's Scheduling Notice Text Only Entry (issued on December 30, 2024) (Federal Action)	0.10

Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on January 2, 2025) (PAGA Action)	0.10
Draft Notice of Change of Address or Other Contact Information (filed on January 17, 2025) (PAGA Action)	0.10
Draft Notice of Change of Attorney Business or Contact Information (filed on January 24, 2025) (Federal Action)	0.10
Meet and Confer with Defense Counsel and Draft and/or Review Joint Statement (filed on January 29, 2025) (Federal Action)	0.50
Draft Plaintiffs' Response to Order to Show Cause Re: Dismissal (filed on February 14, 2025) (PAGA Action)	0.30
Review Court's Minute Order regarding Order to Show Cause re Dismissal (filed on February 19, 2025) (PAGA Action)	0.10
Review Court's Order of Dismissal (filed on February 19, 2025) (PAGA Action)	0.10
Appearances	
Prepare for and Remotely Attend Case Management Conference (December 1, 2022) (PAGA Action)	1.50
Prepare for and Remotely Attend Order to Show Cause regarding Dismissal (October 19, 2023) (PAGA Action)	2.00
Prepare for and Remotely Attend Hearing re: Order to Show Cause re Dismissal (January 18, 2024) (PAGA Action)	1.00
Prepare for and Remotely Attend Hearing re: Order to Show Cause re Dismissal (March 14, 2024) (PAGA Action)	1.00

Prepare for, Travel To/From, and Attend Hearing re: Order to Show Cause re Dismissal and Status Conference (June 24, 2024) (PAGA Action)	1.70
Prepare for and Telephonically Attend Hearing re: Order to Show Cause re Dismissal (August 23, 2024) (PAGA Action)	0.90
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (February 5, 2025) (Federal Action)	7.10
Prepare for and Telephonically Attend Hearing re: Order to Show Cause re Dismissal and Status Conference (June 24, 2024) (PAGA Action)	0.80
Prepare for and Telephonically Attend Hearing re: Order to Show Cause re Dismissal (February 19, 2025) (PAGA Action)	0.90
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Renewed Motion for Preliminary Approval of Class Action Settlement (May 7, 2025) (Federal Action)	6.50
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Awards (November 12, 2025) (Federal Action) (Anticipated)	3.00
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Tyrone Johnson (served on March 29, 2022) (Class Action)	0.30
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Terrence Kennedy (served on April 11, 2022) (Class Action)	0.20

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Tyrone Johnson (served on April 21, 2022) (Class Action) (PAGA Action)	1.20
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Terrence Kennedy (served on May 4, 2022) (Class Action) (PAGA Action)	1.30
Draft Plaintiffs Tyrone Johnson and Terrence Kennedy's Initial Disclosures (served on November 14, 2022) (Federal Action)	2.10
Review Defendant's Initial Disclosures (served on November 14, 2022) (Federal Action)	0.80
Draft Plaintiffs' Interrogatories (Set One), Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on October 11, 2022) (Federal Action)	2.50
Draft Plaintiffs' Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable and Requests for Production of Documents (Organizational Structure; November 4, 2022) (served on October 19, 2022) (Federal Action)	1.00
Draft Plaintiffs' Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable and Requests for Production of Documents (Job Duties; November 4, 2022) (served on October 19, 2022) (Federal Action)	1.20
Draft Plaintiffs' Amended Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable and Requests for Production of Documents (Organizational Structure; November 16, 2022) (served on November 3, 2022) (Federal Action)	0.30
Draft Plaintiffs' Amended Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable and Requests for Production of Documents (Job Duties; November 16, 2022) (served on November 3, 2022) (Federal Action)	0.30

Review Defendant Parsec, Inc. D/B/A Ohio Parsec Inc.'s Objections to Plaintiffs' Amended Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable; and Responses to Requests for Production of Documents (November 16, 2022) (served on November 9, 2022) (Federal Action)	0.40
Review Defendant Parsec, Inc. D/B/A Ohio Parsec Inc.'s Objections to Plaintiffs' Amended Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable; and Responses to Requests for Production of Documents (November 17, 2022) (served on November 9, 2022) (Federal Action)	0.60
Review Defendant Parsec, Inc. D/B/A Ohio Parsec Inc.'s Responses to Plaintiffs Tyron Johnson and Terrence Kennedy's Interrogatories, Set One; Defendant Parsec, Inc. D/B/A Ohio Parsec Inc.'s Responses to Plaintiffs Tyron Johnson and Terrence Kennedy's Interrogatories, Set Two; Defendant Parsec, Inc. D/B/A Ohio Parsec Inc.'s Responses to Plaintiffs Tyron Johnson and Terrence Kennedy's Request for Production of Documents, Set One (served on November 21, 2022) (Federal Action)	2.30
Draft Plaintiffs' Amended Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable and Requests for Production of Documents (Organizational Structure; December 14, 2022) (served on November 21, 2022) (Federal Action)	0.20
Draft Plaintiffs' Amended Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable and Requests for Production of Documents (Job Duties; December 15, 2022) (served on November 21, 2022) (Federal Action)	0.20
Review and Analyze Documents Produced by Defendant on November 23, 2022 (Class Action)	4.50
Draft Plaintiffs' Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on November 28, 2022) (PAGA Action)	3.20

Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; February 9, 2023) (served on November 28, 2022) (PAGA Action)	0.80
Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Job Duties; February 10, 2023) (served on November 28, 2022) (PAGA Action)	1.00
Review Defendant Parsec, Inc. D/B/A Ohio Parsec Inc.'s Objections to Plaintiffs' Amended Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable; and Responses to Requests for Production of Documents (December 14, 2022) (served on December 8, 2022) (Federal Action)	0.70
Review Defendant Parsec, Inc. D/B/A Ohio Parsec Inc.'s Objections to Plaintiffs' Amended Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable; and Responses to Requests for Production of Documents (December 15, 2022) (served on December 8, 2022) (Federal Action)	0.80
Draft Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure and Job Duties; February 28, 2023) (served on January 24, 2023) (Federal Action)	0.30
Draft Plaintiffs' Amended Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable and Requests for Production of Documents (March 16, 2023) (served on February 1, 2023) (Federal Action)	0.20
Review Defendant Parsec, Inc. D/B/A Ohio Parsec Inc.'s Objections to Plaintiffs' Amended Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable; and Responses to Requests for Production of Documents (February 28, 2023) (served on February 23, 2023) (Federal Action)	0.50

Prepare for and Take the Deposition of Defendant's 30(b)(6) Designee Jose Huerga on February 28, 2023 and Review Deposition Transcript (Federal Matter)	7.50
Prepare for and Take the Deposition of Defendant's 30(b)(6) Elizabeth Vargas on March 16, 2023 and Review Deposition Transcript (Federal Matter)	12.30
Review Defendant Parsec, Inc. D/B/A Ohio Parsec Inc.'s Objections to Plaintiffs' Amended Rule 30(b)(6) Notice of Taking the Deposition of Defendant's Person(s) Most Knowledgeable; and Responses to Requests for Production of Documents (March 16, 2023) (served on March 10, 2023) (Federal Action)	0.30
Review and Analyze Documents Produced by Defendant on March 17, 2023 (Class Action)	0.10
Review Defendant Parsec, Inc. D/B/A Ohio Parsec Inc.'s Responses to Plaintiffs Tyrone Johnson and Terrence Kennedy's Special Interrogatories, Set One (served on March 17, 2023) (PAGA Action)	0.20
Draft Plaintiffs' Re-Notice of Deposition of Person Most Knowledgeable at Defendant Parsec, Inc., and Request for Production of Documents (August 22, 2023) served on May 30, 2023 (PAGA Action)	0.50
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Erick Darancou (August 21, 2023) (served on June 8, 2023)(PAGA Action)	0.80
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Joan Casarrubia (August 22, 2023) (served on June 8, 2023) (PAGA Action)	0.50
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Anthony Munguia (August 23, 2023) (served on June 8, 2023) (PAGA Action)	0.50
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Eduardo Ballestreros (August 24, 2023) (served on June 8, 2023) (PAGA Action)	0.40
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Marcus Trujillo (August 25, 2023) (served on June 8, 2023) (PAGA Action)	0.30

Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Johnnie Wells (August 28, 2023) (served on June 8, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Laurence Jeffrey (August 29, 2023) (served on June 8, 2023) (PAGA Action)	0.40
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Duton Newton (August 30, 2023) (served on June 8, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Godwin Onyebujor (August 31, 2023) (served on June 8, 2023) (PAGA Action)	0.40
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Anthony Esteves (September 1, 2023) (served on June 8, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Hugo Bejarano (September 5, 2023) (served on June 8, 2023) (PAGA Action)	0.40
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Marquise Moore (September 6, 2023) (served on June 8, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Quentin Turner (September 7, 2023) (served on June 8, 2023) (PAGA Action)	0.40
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Giovanny Pulido (September 8, 2023) (served on June 8, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Vincent Madrigal (September 11, 2023) (served on June 8, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Taevion Wright (September 12, 2023) (served on June 8, 2023) (PAGA Action)	0.30

Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Iszick Renta (September 13, 2023) (served on June 8, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Joshua Hoover (September 14, 2023) (served on June 8, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Jeremy Flores (September 15, 2023) (served on June 8, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Maybelline Leiato (September 18, 2023) (served on June 8, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Marquin Williams (September 25, 2023) (served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Tajma Magee (September 26, 2023) (served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Omar Landeros (September 27, 2023) (served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Michael McClondon (September 28, 2023) (served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Dairold Potts (September 29, 2023) (served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Aryel Silveyra (October 2, 2023) (served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Zory McThomas (October 3, 2023) (served on June 20, 2023) (PAGA Action)	0.30

Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Raymond Garcia (October 4, 2023) (served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Steven Greer (October 5, 2023) (Served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Cristian Raya (October 6, 2023) (Served on June 20, 2023) (PAGA Action)	0.40
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Joseph Wells (October 9, 2023) (Served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Louis Robinson (October 10, 2023) (Served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Robert Watson (October 11, 2023) (Served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Timothy Bell (October 12, 2023) (Served on June 20, 2023) (PAGA Action)	0.30
Notice of Videotape Deposition of Non-Party Witness and Deposition Subpoena for Personal Appearance of Susana Rosas (October 13, 2023) (Served on June 20, 2023) (PAGA Action)	0.40
Prepare for, Travel to/from, and Defend the Deposition of Tyrone Johnson (June 6, 2023) and Review Deposition Transcript with Plaintiff	13.00
Letters and Correspondence	
Draft Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff under the Private Attorneys General Act for Plaintiff Terrence Kennedy (submitted May 23, 2022)	1.20

Draft Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff under the Private Attorneys General Act for Plaintiff Tyrone Johnson (submitted June 1, 2022)	0.80
Draft Correspondence to Defense Counsel Regarding Removal of the Case to Federal Court (dated October 10, 2022) (Federal Action)	1.50
Review Defendant's Meet and Confer Letter (dated October 14, 2022) (Class Action)	0.20
Draft Correspondence to Defense Counsel Regarding Defendant's Responses to Plaintiffs' Discovery (dated December 5, 2022) (Class Action)	4.30
Draft Correspondence to Defense Counsel Regarding Defendant's Responses to Plaintiffs' Discovery (dated March 14, 2023) (Federal Action)	2.10
Draft Meet and Confer Letter to Defense Counsel Regarding Defendant's Responses to Plaintiffs' Interrogatories, Set One (dated March 20, 2023) (PAGA Action)	0.40
Draft Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff under the Private Attorneys General Act for Plaintiff Terrence Kennedy (submitted June 21, 2023)	0.80
Draft and Review Email Correspondences with Defendant's Counsel	12.70
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation (February 23, 2023) (Class Action)	1.50
Review Mediation Confirmation letter and email dated April 6, 2023 (Class Action)	0.10
Review Mediation Data Analysis (June 20, 2023) (Class Action)	1.20

Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages Analysis/Calculations (Drafted on June 22, 2023) (Class Action)	36.00
Attend Mediation Session (Video Conference)(June 29, 2023)	12.00
Review and Analyze Mediator's Proposal	2.30
Engage in Continued Settlement Discussions	2.00
Review, Revise, and Negotiate Class and PAGA Settlement Agreement (fully executed May 30, 2024)	5.40
Review and Revise Class Notice (drafted on December 11, 2024) (Class Action)	1.80
Review Class Notice Packets for Plaintiffs (dated July 25, 2025) (Class Action)	0.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries (Class Action)	3.50
Law and Motion	
Draft Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. § 1447; Memorandum of Points and Authorities in Support Thereof; Declaration of Margaux Gundzik in Support of Plaintiffs' Motion to Remand; [Proposed] Order Granting Plaintiffs' Motion to Remand (filed on October 26, 2022) (Federal Action)	7.20
Draft Plaintiffs' Ex-Parte Application to Continue Plaintiffs' Filing Deadline for Motion for Class Certification; Declaration of Margaux Gundzik in Support of Plaintiffs' Filing Deadline for Motion for Class Certification (filed on October 31, 2022) (Federal Action)	6.70
Review Defendant Parsec, Inc. D/B/A Ohio Parsec, Inc.'s Opposition to Plaintiffs Tyrone Johnson and Terrence Kennedy Ex Parte Application to Continue Plaintiffs' Filing Deadline for Plaintiffs' Motion for	1.10

Class Certification; Declaration of Kishaniah Dhamodaran in Support of Defendant Parsec, Inc. D/B/A Ohio Parsec, Inc.'s Opposition to Plaintiffs Tyrone Johnson and Terrence Kennedy Ex Parte Application to Continue Plaintiffs' Filing Deadline for Plaintiffs' Motion for Class Certification (filed on November 2, 2022) (Federal Action)	
Review Defendant Parsec, Inc. D/B/A Ohio Parsec, Inc.'s Opposition to Plaintiffs Tyrone Johnson and Terrence Kennedy's Motion to Remand Pursuant to 28 U.S.C. §1447; Declaration of Kishaniah Dhamodaran in Support of Defendant Parsec, Inc. D/B/A Ohio Parsec, Inc.'s Opposition to Plaintiffs Tyrone Johnson and Terrence Kennedy's Motion to Remand Pursuant to 28 U.S.C. §1447; Supplemental Declaration of Jessica Fouse in Support of Defendant Parsec, Inc. D/B/A Ohio Parsec, Inc.'s Opposition to Plaintiffs Tyrone Johnson and Terrence Kennedy's Motion to Remand Pursuant to 28 U.S.C. §1447 (filed on November 14, 2022) (Federal Action)	3.20
Draft Reply in Support of Motion for Remand Pursuant to 28 U.S.C. §1447 (filed on November 15, 2022) (Federal Action)	5.20
Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement and Approval of PAGA Settlement; Memorandum of Points and Authorities in Support Thereof; Declaration of James Walker in Support; Declaration of Tyrone Johnson in Support; Declaration of Terrence Kennedy in Support; Declaration of Elizabeth Parker-Fawley in Support; [Proposed] Order Granting Preliminary Approval of Class Action and Approval of PAGA Settlement (filed on June 20, 2024) (PAGA Action)	12.60
Draft Notice of Withdrawal of Motion for Preliminary Approval of Class Action Settlement and Approval of PAGA Settlement filed on July 9, 2024 (PAGA Action)	0.20
Research and Draft Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Approval of PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Elizabeth Parker-Fawley in Support, Declaration of Plaintiff Tyrone Johnson in Support, Declaration of James Walker, Declaration of Plaintiff Terrence Kennedy in Support, and [Proposed] Order Granting	6.50

Preliminary Approval of Class Action Settlement and PAGA Settlement filed on December 16, 2024 (Federal Action)	
Review Court's Civil Minutes of Hearing re: Pretrial Conference; Plaintiff's Motion for Preliminary Approval of Class Action Settlement and Approval of PAGA Settlement filed on February 5, 2025 (Federal Action)	0.10
Review Tentative Order Denying Motion for Preliminary Approval of Class Action Settlement and Approval of PAGA Settlement (issued on February 5, 2025) (Federal Action)	0.50
Review Court's Civil Minutes (In Chambers) Order Denying Motion for Preliminary Approval of Class Action Settlement and Approval of PAGA Settlement filed on February 5, 2025 (Federal Action)	1.60
Research and Draft Plaintiffs' Renewed Motion for Preliminary Approval of Class Action Settlement and Approval of PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Elizabeth Parker-Fawley in Support; Declaration of Adam Y. Siegel in Support; Declaration of Tyrone Johnson In Support; Declaration of Plaintiff Terrence Kennedy in Support; Declaration of James Walker in Support; and [Proposed] Order Granting Preliminary Approval of Class Action Settlement and Approval of PAGA Settlement (filed on April 7, 2025) (Federal Action)	4.60
Review Tentative Order Denying Renewed Motion for Preliminary Approval of Class Action Settlement and Approval of PAGA Settlement (issued on May 7, 2025) (Federal Action)	0.60
Review Court's Minutes of Motion Hearing (issued on May 8, 2025) (Federal Action) Docket #62	0.10
Draft Supplemental Declaration of Elizabeth Parker-Fawley in Support of Plaintiffs' Renewed Motion for Preliminary Approval of Class Action Settlement and Approval of PAGA Settlement; and Review Declaration of Michael Moore on Behalf of Phoenix Class Action Settlement Administration in Support of Preliminary Approval (filed on May 28, 2025) (Federal Action)	4.30
Review (In Chambers) Order Granting Renewed Motion for Preliminary Approval of Class Action Settlement and Approval of PAGA Settlement (issued on June 9, 2025) (Federal Action)	0.20

Review Court's Scheduling Notice Text only entry regarding Pretrial Conference posted on September 9, 2025 (Federal Action) – Docket #65	0.10
Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Awards, Declaration of Elizabeth Parker-Fawley in Support Thereof, and [Proposed] Final Approval Order and Judgment; and Review Declaration of Settlement Administrator in Support Thereof (filed on October 15, 2025)	8.90
Total Hours:	420.50

EXHIBIT B

LAWYERS forJUSTICE, PC CASE COST DETAIL
Johnson, et al. vs. Parsec, Inc. dba Ohio Parsec, Inc.
(PAGA And Class Cases-Costs Combined)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/18/2020	U.S. Postmaster	Postage	\$6.95
2/24/2020	U.S. Postmaster	Postage	\$6.95
8/8/2022	Legal Document Server, Inc.	Attorney Service	\$11.75
8/8/2022	Legal Document Server, Inc.	Filing Fee	\$435.00
8/8/2022	Legal Document Server, Inc.	Attorney Service	\$45.31
8/9/2022	Legal Document Server, Inc.	Attorney Service	\$112.81
8/9/2022	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
8/9/2022	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
8/15/2022	Legal Document Server, Inc.	Attorney Service	\$125.00
8/15/2022	Legal Document Server, Inc.	Attorney Service	\$45.00
8/23/2022	ProLegal	Attorney Service	\$215.07
9/7/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
10/6/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
10/6/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
10/21/2022	Legal Document Server, Inc.	Attorney Service	\$170.00
10/27/2022	Legal Document Server, Inc.	Attorney Service	\$170.00
11/1/2022	Legal Document Server, Inc.	Attorney Service	\$170.00
11/14/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
11/22/2022	Legal Document Server, Inc.	Attorney Service	\$170.00
11/23/2022	Legal Document Server, Inc.	Attorney Service	\$26.08
11/23/2022	Los Angeles Superior Court	Jury Fee	\$150.00
12/1/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
12/6/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
12/6/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
2/28/2023	Coalition Court Reporters	Court Reporter	\$2,338.70
3/16/2023	Coalition Court Reporters	Court Reporter	\$2,014.95
5/2/2023	Mark S. Rudy	Mediation Fee	\$15,000.00
5/23/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
5/23/2023	Legal Document Server, Inc.	Filing Fee	\$20.00
6/6/2023	Veritext, LLC	Court Reporter	\$1,685.35
6/6/2023	Margaux Gundzik	Travel Reimbursement	\$70.37
6/8/2023	ProLegal	Attorney Service	\$3,367.16
6/20/2023	ProLegal	Attorney Service	\$3,387.35
6/21/2023	Mark S. Rudy	Supplemental Mediation Fee	\$6,500.00

LAWYERS forJUSTICE, PC CASE COST DETAIL
Johnson, et al. vs. Parsec, Inc. dba Ohio Parsec, Inc.
(PAGA And Class Cases-Costs Combined)

6/22/2023	General Logistics Systems US, Inc.	Courier Service	\$39.03
8/9/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
10/13/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
10/20/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
1/22/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
12/17/2024	General Logistics Systems US, Inc.	Courier Service	\$26.87
12/31/2024	General Logistics Systems US, Inc.	Courier Service	\$26.87
4/30/2025	Legal Document Server, Inc.	Attorney Service	\$228.50
5/10/2024	Legal Document Server, Inc.	Attorney Service	\$192.55
5/13/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
5/28/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
5/30/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
5/30/2024	Legal Document Server, Inc.	Filing Fee	\$20.00
6/14/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
6/24/2024	Legal Document Server, Inc.	Attorney Service	\$20.32
6/24/2024	Legal Document Server, Inc.	Filing Fee	\$60.00
6/26/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
7/10/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
8/26/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
1/17/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
1/24/2025	Legal Document Server, Inc.	Attorney Service	\$135.00
2/18/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
2/18/2025	Legal Document Server, Inc.	Attorney Service	\$135.00
6/26/2025	Legal Document Server, Inc.	Attorney Service	\$155.00
Total:			\$39,063.57