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*Attorneys for Plaintiff and the Class*

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

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

Plaintiff,

vs.

PACE SUPPLY CORP., a California  
corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Case No.: SCV258764

Honorable René Auguste Chouteau  
Department 18

**CLASS ACTION**

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

[Notice of Motion and Motion for Final  
Approval of Class Settlement, Attorneys'  
Fees, Costs, and Service Award; Declaration  
of Class Representative (Seth Swan);  
Declaration of Settlement Administrator  
(Jeremiah Kincannon); and [Proposed] Final  
Approval Order and Judgment filed  
concurrently herewith]

Date: February 6, 2019  
Time: 3:00 p.m.  
Department: 18

Complaint Filed: May 6, 2016  
Trial Date: None Set

**DECLARATION OF EDWIN AIWAZIAN**

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

**APPROVAL OF PAGA SETTLEMENT AND  
PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

2. On April 11, 2018, the parties executed the Class Action and PAGA Settlement Agreement ("Settlement Agreement," "Settlement," or "Agreement"). On September 7, 2018, in Department 18 of the Sonoma County Superior Court, located at 3055 Cleveland Avenue, Santa Rosa, California 95403, the Honorable Patrick M. Broderick approved the settlement and release of the Released Claims which arise under California Labor Code sections 2698, *et seq.* ("PAGA Settlement"), preliminarily approved the settlement and release of the Released Claims which do not arise under California Labor Code sections 2698, *et seq.* ("Class Settlement"), and conditionally certified the proposed Class for settlement purposes. The Court preliminarily appointed and designated Lawyers *for* Justice, PC as Class Counsel, Plaintiff Seth Swan as Class Representative, and Simpluris, Inc. ("Simpluris") as Settlement Administrator for handling the notice and settlement administration process. The Court also approved and ordered the mailing of the Notice of Class Action Settlement ("Notice") and adopted the notice, opt-out, and objection procedures in connection with the Class Settlement.

3. As of the date of filing the accompanying Motion for Final Approval of Class Settlement, Attorneys' Fees, Costs, and Service Award ("Motion for Final Approval"), no Class Members have objected to the Class Settlement or the request for attorneys' fees, reimbursement of litigation costs and expenses, Service Award, or Settlement Administration Expenses.

**WORK PERFORMED BY CLASS COUNSEL**

4. I have been actively engaged in this litigation since the lawsuit was commenced on May 6, 2016, as have several other attorneys and members in our firm.

1           5.       Before initiating this lawsuit, Lawyers for Justice, PC investigated and researched  
2 the facts and circumstances underlying the pertinent factual and legal issues and applicable law.  
3 This required thorough discussions and interviews between attorneys at our firm and Plaintiff  
4 Seth Swan, and research into the various legal issues involved in the case, namely, the current  
5 state of the law as it applied to certification, representative Private Attorneys General Act  
6 ("PAGA") claims, off-the-clock theory, meal and rest periods, wage-and-hour enforcement,  
7 Plaintiff's, and potential defenses. After conducting initial investigation, our firm determined  
8 that Plaintiff's claims were well-suited for class treatment and representative adjudication owing  
9 to what appeared to be a common course of conduct affecting a similarly situated group of  
10 current and former hourly-paid or non-exempt employees who worked for Defendant Pace  
11 Supply Corp. ("Defendant") within the State of California, who were not properly compensated  
12 for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

13           6.       Class Counsel used the pre-mediation time period to investigate the veracity,  
14 strength, and scope of the claims, and also to prepare the matter for class certification and trial.  
15 The parties actively litigated this case, conducted extensive formal and informal discovery and  
16 investigation into the facts of the case, and also informally exchanged information and data in  
17 preparation for mediation. Class Counsel propounded multiple sets of written discovery requests  
18 in various forms, reviewed Defendant's responses and supplemental responses thereto, served  
19 multiple deposition notices, and worked with Plaintiff Seth Swan to respond to requests for  
20 production of documents and form interrogatories that were propounded by Defendant. Class  
21 Counsel prepared for and took depositions of Defendant's Person Most Knowledgeable designee  
22 and prepared for and defended the deposition of Plaintiff Seth Swan. Class Counsel obtained the  
23 contact information of Class Members who worked at the Santa Rosa location. Class Counsel  
24 also interviewed and obtained information from Plaintiff and other Class Members, including  
25 and not limited to the names of potential witnesses, and reviewed and analyzed over fifty-eight  
26 thousand (58,000) pages of documents and data produced by Defendant and obtained through  
27 other sources. The documents and data reviewed and analyzed by Class Counsel included, and  
28 were not limited to, Plaintiff's and other Class Members' employment records, a detailed

1 sampling of Class Members' time and pay data, Defendant's Employee Handbook, agreements  
2 (including, and not limited to, Defendant's Meal Break Waiver Agreement and Arbitration  
3 Agreement), internal memoranda, forms, acknowledgments, and Defendant's operations and  
4 employment policies, practices, and procedures (such as, *inter alia*, Defendant's Personnel Guide  
5 and Human Resources Policies & Procedures Manual), among other information and documents.  
6 Class Counsel engaged in motion practice, researched applicable law, developed  
7 damages/valuation models in preparation for mediation, and prepared for and attended court  
8 proceedings, mediation, and settlement negotiations. Counsel for the parties also met and  
9 conferred on numerous occasions, e.g., to discuss issues relating to motion practice, pleadings,  
10 discovery, mediation, settlement negotiation (including, and not limited to, a lengthy conference  
11 call in which counsel and experts for both parties went over the analytical framework and  
12 calculations), and production of documents and data prior to mediation.

13 7. As outlined herein, the parties have conducted extensive formal and informal  
14 discovery and investigation during the course of this litigation. Class Counsel analyzed a large  
15 volume of documents and data either produced by Defendant or obtained by Class Counsel  
16 through other sources. These documents and data provided a critical understanding of the nature  
17 of the work performed by the Class Members, as well as Defendant's operations and  
18 employment policies, practices, and procedures, and were used in analyzing liability and  
19 damages issues in connection with all phases of the litigation, and ultimately with mediation and  
20 the settlement negotiation process.

21 8. After conducting formal and informal discovery and investigation into the facts of  
22 the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve the  
23 matter. These efforts included participating in a formal, full-day mediation conducted by Mark  
24 S. Rudy, Esq., a well-regarded mediator experienced in mediating complex labor and  
25 employment matters. During all settlement discussions, the parties conducted their negotiations  
26 at arm's length in an adversarial position. Prior to and during mediation, the parties exchanged  
27 class information and data, and engaged in an intensive discussion regarding their evaluations of  
28 the case and various factual aspects of the case, including the risks and delays of further

litigation; the risks to the parties of proceeding with class certification, representative adjudication, and/or trial; the law relating to off-the-clock theory, meal and rest periods, representative PAGA claims, and wage-and-hour enforcement; 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 and its counsel felt very strongly about Defendant's ability to prevail on the merits and to obtain a denial of class certification, while Plaintiff and Class Counsel believed that class certification would be obtained and that they would prevail at trial. After conducting extensive formal and informal discovery and investigation, settlement negotiations, and with the aid of the mediator's evaluation, the parties agreed that this case 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 were unsuitable for class treatment and/or representative adjudication, and failure to obtain certification, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the case, appeals, and the real possibility of no recovery after years of litigation.

9. As set forth more fully in the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$1,750,000, which is thirty-five percent (35%) of the Gross Settlement Fund of \$5,000,000, and \$63,354.90 for reimbursement of litigation costs and expenses. 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-five percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing this case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved for the Class Members; and (6) the other cases that Class Counsel has turned down in order to devote its time and efforts to this matter.

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1           10. I am aware that the common and acceptable rate for contingency representation in  
2 wage-and-hour class action litigation is normally 40% before trial, with the range being from  
3 33.3% up to 50%.

4           11. While not necessarily required to be demonstrated because the percentage fee that  
5 is sought is proper for this settlement, Class Counsel has incurred many hours of work in  
6 connection with this matter such that the request for an award of attorneys' fees is also justified  
7 under a simple lodestar analysis with a multiplier of 1.32. Class Counsel has spent a  
8 considerable number of hours litigating this action and has spent a total of **2,044.50 hours**  
9 performing tasks on behalf of Plaintiff, Class Members, and State of California. Attached hereto  
10 as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the breakdown of  
11 time for the tasks performed by Class Counsel. These hours include work done by myself and  
12 several of the firm's other members. We also had litigation support personnel actively engaged  
13 in assisting with the prosecution of this case.

14           12. The work performed in this particular case, the background of our firm, as well as  
15 the individual backgrounds, training, and experience of the attorneys who worked on this matter,  
16 in litigating complex wage-and-hour class and representative actions, support a reasonable  
17 hourly rate of compensation at the rate of at least \$650 for work performed by Class Counsel.  
18 The rate of at least \$650 per hour has been found to be a reasonable hourly rate of compensation  
19 for work performed by members of Lawyers for Justice, PC, by courts granting final approval in  
20 other cases: final approval of the class and representative action settlement in *Stanley Bland, et*  
21 *al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was  
22 granted on November 21, 2018, and the award of attorneys' fees involved a higher hourly rate of  
23 \$831.38; final approval of the class and representative action settlement in *Ruben Sanchez, et al.*  
24 *v. CalPortland Company, et al.* (Los Angeles County Superior Court Case No. BC590426) was  
25 granted on August 8, 2018, and the award of attorneys' fees involved a higher hourly rate of  
26 \$730.16; final approval of the class and representative action settlement in *Maryjo Ungerbuhler*  
27 *Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was  
28 granted on May 15, 2018, and the award of attorney's fees involved a higher hourly rate of

1 \$780.77; and final approval of the class and representative action settlement in *Demetrius*  
2 *Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-  
3 00175871) was granted on June 30, 2017, and the award of attorneys' fees involved a higher  
4 hourly rate of \$845.64.

5 **ADEQUACY OF LAWYERS for JUSTICE, PC**

6 ***EDUCATION***

7 13. In May of 2004, I graduated from *Pepperdine University School of Law* with a  
8 Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from  
9 the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree  
10 program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles  
11 County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from  
12 the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard*  
13 *University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a  
14 concentration in Natural Sciences from *Pepperdine University*.

15 ***JUDICIAL EXTERNSHIPS***

16 14. From approximately September 2002 to approximately December 2002, I served  
17 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of*  
18 *Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I  
19 served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal*  
20 *for the Second Appellate District*.

21 ***LITIGATION AND CLASS ACTION EXPERIENCE***

22 15. In December of 2004, I obtained a license to practice law from the California  
23 State Bar. From approximately December 2004 to approximately August 2008, I was employed  
24 by *Girardi & Keese*.

25 16. At *Girardi & Keese*, my practice focused on class actions and other complex  
26 cases involving toxic torts and products liability. In addition, I gained substantial experience on  
27 cases involving insurance bad faith, premises liability, and medical negligence. While employed  
28

1 by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150  
2 depositions, and prepared dozens of expert witnesses for deposition or trial.

3 17. Since its inception, in or around October of 2008, our firm has almost exclusively  
4 focused on the prosecution of consumer and employment class actions, involving wage-and-hour  
5 claims, race discrimination, unfair business practices or consumer fraud. Currently, we are the  
6 attorneys of record in over a dozen employment-related putative class actions in both state and  
7 federal courts in the State of California. Our firm has successfully litigated cases involving,  
8 among other things, the executive, administrative, and other overtime exemptions to the State of  
9 California and federal overtime compensation requirements. During this relatively short time, in  
10 association with other law firms, we have recovered millions of dollars on behalf of thousands of  
11 individuals in California.

12 **EXAMPLES OF CLASS ACTION RESULTS**

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

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

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

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

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1 d) Our firm represented the plaintiffs in a wage-and-hour class action  
2 involving allegations of misclassification of the "Store Manager" position. On June 10, 2011,  
3 the court granted plaintiffs' motion for class certification. On August 26, 2013, the court granted  
4 final approval of the class action settlement. The Los Angeles County Superior Court Case  
5 Number is BC424012.

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

11 f) Our firm represented the plaintiffs in a wage-and-hour class and  
12 representative action against a national wholesale distributor of plumbing and builder supplies,  
13 involving allegations of misclassification of multiple salaried "manager" positions. On May 22,  
14 2014, the court granted final approval of the class and representative action settlement. The  
15 Sacramento County Superior Court Case Number is 34-2012-00136285.

16 g) Our firm represented the plaintiff in a wage-and-hour class action  
17 involving allegations of misclassification of the "Operations Manager" position. On September  
18 16, 2014, the court granted plaintiff's motion for class certification. The Los Angeles County  
19 Superior Court Case Number is BC478769.

20 h) Our firm represented the plaintiff in a wage-and-hour class and  
21 representative action against a national retailer of household items, on behalf of hourly-paid or  
22 non-exempt employees. On May 27, 2015, the court granted final approval of the class and  
23 representative action settlement. The San Francisco County Superior Court Case Number is  
24 CGC-13-532344.

25 i) Our firm represented the plaintiff in a wage-and-hour class action  
26 involving allegations of misclassification of the salaried residential "Property Manager" position.  
27 On September 17, 2015, the court granted plaintiff's motion for class certification. The Los  
28 Angeles County Superior Court Case Number is BC474784.

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

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

11          l)     Our firm, in association with co-counsel, represented the plaintiffs in a  
12 wage-and-hour class action against a national retailer of apparel, accessories, and home products,  
13 involving allegations of misclassification of the "Department Manager" position. On August 12,  
14 2016, the court granted plaintiffs' motion for class certification. The Alameda County Superior  
15 Court Case Number is RG13680477.

16          m)     Our firm represented the plaintiff in a representative action under the  
17 Private Attorneys General Act, against a real estate and property management company, on  
18 behalf of non-exempt employees. On November 4, 2016, the court granted approval of the  
19 Private Attorneys General Act settlement. The Orange County Superior Court Case Number is  
20 30-2015-00775439-CU-OE-CXC.

21          n)     Our firm, in association with co-counsel, represented the plaintiffs in a  
22 wage-and-hour class and representative action against a full-service bank, on behalf of non-  
23 exempt employees. On November 18, 2016, the court granted final approval of the class and  
24 representative action settlement. The San Francisco County Superior Court Case Number is CJC-  
25 13-004839.

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1 o) Our firm represented the plaintiffs in a wage-and-hour class and  
2 representative action against a foodservice distributor, on behalf of non-exempt employees. On  
3 January 26, 2017, the court granted final approval of the class and representative action  
4 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

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

10 q) Our firm represented the plaintiff in a wage-and-hour class and  
11 representative action against a property management company, on behalf of non-exempt  
12 employees. On June 14, 2017, the court granted final approval of the class and representative  
13 action settlement. The Los Angeles County Superior Court Case Number is BC586234.

14 r) Our firm represented the plaintiff in a wage-and-hour class and  
15 representative action against a food company on behalf of non-exempt employees. On June 30,  
16 2017, the court granted final approval of the class and representative action settlement. The  
17 Sacramento County Superior Court Case Number is 34-2015-00175871.

18 s) Our firm represented the plaintiffs in a wage-and-hour class and  
19 representative action against a chocolate company on behalf of non-exempt employees. On July  
20 19, 2017, the court granted final approval of the class and representative action settlement. The  
21 Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

11           19.     Lawyers for Justice, PC has incurred \$63,354.90 in litigation costs and expenses  
12 as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in  
13 the prosecution of this case. It should be noted that Class Counsel has borne all of the risks and  
14 costs of litigation and will not receive any compensation until recovery is obtained by Plaintiff,  
15 the Class, and the State of California.

16                   **SERVICE AWARD TO PLAINTIFF**

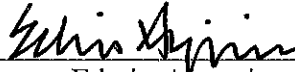
17           20.     In recognition of his efforts and work serving as Class Representative, the  
18 Settlement provides for a Service Award in the amount of \$6,000 to Plaintiff Seth Swan. The  
19 requested Service Award is fair and appropriate. Plaintiff spent a substantial amount of time and  
20 effort in producing relevant documents and past employment records and provided the facts and  
21 evidence necessary to attempt to prove the allegations, including and not limited to, by working  
22 with Class Counsel to provide responses to requests for production of documents and form  
23 interrogatories that were propounded by Defendant and preparing for and attending a full-day  
24 deposition. Plaintiff was available whenever Class Counsel needed him and actively tried to  
25 obtain information that would benefit the Class. Plaintiff spent numerous hours speaking with  
26 Class Counsel about his claims, describing his work experiences with Defendant, and gathering  
27 and reviewing documents. Accordingly, it is appropriate for Plaintiff to receive a reasonable  
28

1 Service Award of \$6,000 to Plaintiff Seth Swan, in addition to his Individual Settlement Share  
2 and PAGA Settlement Share, for his services in the matter.

3 21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the  
4 Settlement is in the best interests of Plaintiff, the Class, and State of California.

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

7 Executed this 14th day of January 2019, at Glendale, California.

8   
9 \_\_\_\_\_  
10 Edwin Alwazian

# EXHIBIT A

**SWAN V. PACE SUPPLY CORP.**  
**(SONOMA COUNTY SUPERIOR COURT CASE NO. SCV-258764)**  
**ATTORNEY TASK AND TIME CHART**

| TASK                                                                                                                                                                                            | LAWYERS FOR JUSTICE, PC |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                               |                         |
| Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality                                           | 56                      |
| Pre-Lawsuit Investigation of the Merits of Plaintiff Seth Swan Claims and the Merits of the Claims of the Putative Class Members                                                                | 29                      |
| Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Pace Supply Corp. ("Defendant") with Respect to the Damages Sustained by Plaintiff and the Putative Class Members          | 24                      |
| Pre-Lawsuit Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Certification Decisions in California, Including all New Relevant DLSE Materials | 28                      |
| Investigation of Defendant, Defendant's Business Relationships, and the Industry in which Defendant Operates                                                                                    | 26                      |
| Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as It Relate to the Employment and Management of the Putative Class Members              | 32                      |
| Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity                               | 21                      |

|                                                                                                                                                                                                                                                                                                                                                             |    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors                                                                                                         | 19 |
| Research and Investigation Re: Arbitration and Analysis of Enforceability                                                                                                                                                                                                                                                                                   | 19 |
| Research and Investigation Re: Locations Owned, Managed, or Operated by Defendant in California During the Class Period, Including Differences Between the Various Locations to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues                                                                          | 22 |
| Comparative Analysis and Cross-Checking of All Available Job Postings by Defendants in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks                                                                                               | 18 |
| Research and Investigation Re: Staffing Models and Staffing Levels at Defendant's Locations Worked by Putative Class Members Throughout California                                                                                                                                                                                                          | 15 |
| Research and Investigation Re: Defendant's Policies, Practices, and Procedures Relating to Bonuses/Incentive/Shift Differential Pay, Timekeeping, Meal/Rest Breaks, Overtime Compensation, and Reimbursement of Business-Related Expenses                                                                                                                   | 35 |
| Research and Investigation Re: Various Software Programs Defendant Use to Conduct Its Everyday Business, Including Timekeeping Software, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre-/Post-Shift, and Time Worked During Meal Breaks | 42 |
| Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies                                                                                                                                                                                       | 26 |
| Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose                                                                                                                                                                                | 20 |

|                                                                                                                                                                                                                                                            |       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues                                                                                                                                 | 10    |
| Review and Analysis of Defendant's Written Policies, Practices, and Procedures and Related Documents Regarding Timekeeping, Compensation, Scheduling, and Wage-and-Hour Compliance                                                                         | 6     |
| Prepare a Discovery Strategy Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties                                                                                                                | 32    |
| Meet and Communicate with Plaintiff Seth Swan Throughout the Pendency of the Case                                                                                                                                                                          | 28    |
| Meet and Communicate with Putative Class Members                                                                                                                                                                                                           | 74    |
| <b>Pleadings and Court Filings</b>                                                                                                                                                                                                                         |       |
| Research and Draft Plaintiff's Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act of 2004, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on May 6, 2016) | 12.50 |
| Review Court's Notice of Case Assignment and Notice of Case Management Conference (filed on May 6, 2016)                                                                                                                                                   | 0.10  |
| Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (filed on July 22, 2016)                                                                                               | 4.50  |
| Review and Analyze Defendant's Case Management Statement (filed on August 16, 2016)                                                                                                                                                                        | 0.50  |
| Draft Plaintiff's Case Management Statement (filed on August 23, 2016)                                                                                                                                                                                     | 2.50  |
| Review Court's Notice of Mandatory Settlement Conference and Trial Call (filed on September 19, 2016)                                                                                                                                                      | 0.10  |

|                                                                                                                                                                                                                      |      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Review Court's Supplemental Order Re Mandatory Settlement Conference Pursuant to California Rules of Court, Rule 3.1380 (filed on September 19, 2016)                                                                | 0.25 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to File a First Amended Answer; [Proposed] Order (submitted on November 8, 2016)                                                               | 3    |
| Review Court's Notice of Informal Conference & Sanctions (filed on December 1, 2016)                                                                                                                                 | 0.10 |
| Meet and Confer with Defendant's Counsel and Draft Joint Stipulation and [Proposed] Order Following Discovery Conference (submitted on December 29, 2016); Review Court's Order Thereon (entered on January 6, 2017) | 4    |
| Review and Analyze Defendant's First Amended Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (filed on January 11, 2017)                                        | 4.50 |
| Review Court's Notice of Informal Conference & Sanctions (filed on January 11, 2017)                                                                                                                                 | 0.10 |
| Review and Analyze Defendant's Notice of Service of Supplemental Responses to Discovery Requests as to Which Motion to Compel is Pending (filed on February 27, 2017)                                                | 0.25 |
| Review and Analyze Defendant's Further Notice of Service of Additional Supplemental Responses to Discovery Requests as to Which Motion to Compel is Pending (filed on February 28, 2017)                             | 0.25 |
| Meet and Confer with Defense Counsel, and Draft Joint Stipulation and [Proposed] Order Staying Discovery Pending Mediation Set for May 9, 2017 (submitted on March 9, 2017)                                          | 3    |
| Review Court's Order Granting Plaintiff's Consolidated Motion to Compel (filed on May 4, 2017)                                                                                                                       | 0.25 |
| Review Court's Order Staying Discovery Pending Mediation (filed on May 4, 2017)                                                                                                                                      | 0.25 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order Following Mediation and Settlement (submitted on June 30, 2017)                                                           | 2.75 |

|                                                                                                                                                                                                                |      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Class Action Settlement (filed on July 19, 2017)                                                                                           | 2    |
| Review Court's Notice of Rescheduled Hearing (filed on August 24, 2018)                                                                                                                                        | 0.10 |
| Review Court's Tentative Ruling on Plaintiff's Motion for Preliminary Approval (issued on September 6, 2018)                                                                                                   | 0.50 |
| Review Court's Order Granting Approval of PAGA Settlement and Preliminary Approval of Class Action Settlement (filed on September 7, 2018); and Prepare Notice of Entry of Order (filed on September 21, 2018) | 1.75 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Modifying Settlement Administration Deadlines and [Proposed] Order Thereon (submitted on October 30, 2018)                               | 3    |
| Review Court's Order Modifying Settlement Administration Deadlines (filed on November 2, 2018); and Prepare Notice of Entry of Order (filed on November 9, 2018)                                               | 0.75 |
| <b>Appearances</b>                                                                                                                                                                                             |      |
| Prepare for and Attend Case Management Conference via CourtCall (August 30, 2016)                                                                                                                              | 1.50 |
| Prepare for and Attend Informal Discovery Conference via CourtCall (December 5, 2016)                                                                                                                          | 3    |
| Prepare for and Attend Hearing on Plaintiff's Motion to Compel re: Special Interrogatories (Set One) via CourtCall (January 6, 2017)                                                                           | 1.50 |
| Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Consolidated Motion to Compel (March 1, 2017)                                                                                                   | 14   |
| Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Award (February 6, 2019) (Anticipated)                | 12   |

| <b>Discovery and Deposition</b>                                                                                                                                                                                                                |       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Seth Swan (served on November 24, 2015)                                                                                                    | 1.50  |
| Draft Follow Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Seth Swan (served on December 28, 2015)                                                                                          | 1.50  |
| Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Seth Swan                                                                                          | 32    |
| Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Document (Set One) to Defendant (served on August 30, 2016)                   | 28    |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (September 26, 2016; Organizational Structure) (served on August 30, 2016)                                           | 6.25  |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (September 27, 2016; Job Duties) (served on August 30, 2016)                                                         | 8     |
| Review and Analyze Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (September 26, 2016; Organizational Structure) (served on September 23, 2016) | 9.50  |
| Review and Analyze Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (September 27, 2016; Job Duties) (served on September 23, 2016)               | 12.75 |
| Review and Analyze Defendant's Requests for Production of Documents (Set One) to Plaintiff (served on September 26, 2016)                                                                                                                      | 6     |

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Draft Plaintiff's Requests for Production of Documents (Set Two) and Special Interrogatories (Set Three) to Defendant (served on October 5, 2016)                                                                                                 | 24    |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (November 3, 2016; Answer) (served on October 5, 2016)                                                                  | 11    |
| Draft Plaintiff's Amended Requests for Production of Documents (Set Two) to Defendant (served on October 11, 2016)                                                                                                                                | 4     |
| Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (November 9, 2016; Answer) (served on October 12, 2016)                                                         | 1.75  |
| Review and Analyze Defendant's Responses to Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), and Special Interrogatories (Set Two) to Defendant (served on October 19, 2016) (served on October 12, 2016) | 14.75 |
| Review and Analyze Defendant's Responses to Plaintiff's Requests for Production of Documents (Set One) (served on October 20, 2016)                                                                                                               | 18    |
| Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Anthony Cardinale (served on October 24, 2016)                                                                                                          | 1.50  |
| Draft Plaintiff's Responses to Defendant's Request for Production of Documents (Set One) (served on October 31, 2016)                                                                                                                             | 24    |
| Review and Analyze Defendant's Objections to Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (November 9, 2016; Answer) (served on November 3, 2016)                  | 15    |
| Review and Analyze Defendant's Responses to Plaintiff's Special Interrogatories (Set Three) (served on November 10, 2016)                                                                                                                         | 24    |

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Review and Analyze Defendant's Form Interrogatories - Employment Law (Set One) to Plaintiff (served on November 11, 2016)                                                                                                 | 4.50  |
| Review and Analyze Defendant's Responses to Plaintiff's Requests for Production of Documents (Set Two) (served on November 15, 2016) (served on February 8, 2017)                                                         | 14.25 |
| Draft Plaintiff's Responses to Defendant's Form Interrogatories - Employment Law (Set One) (served on December 16, 2016)                                                                                                  | 9     |
| Draft Plaintiff's Supplemental Responses to Defendant's Form Interrogatories - Employment Law (Set One) (served on December 16, 2016)                                                                                     | 15.75 |
| Draft Plaintiff's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (January 26, 2017; Organizational Structure) (served on December 20, 2016)                   | 2.25  |
| Draft Plaintiff's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (January 27, 2017; Job Duties) (served on December 20, 2016)                                 | 3.25  |
| Draft Plaintiff's Request for Admissions to Defendant and Form Interrogatories -- General (Set Two) [served on January 7, 2017]                                                                                           | 6.75  |
| Review and Analyze Defendant's Form Interrogatories - Employment Law (Set Two, erroneously named Set One) to Plaintiff (served on January 9, 2017)                                                                        | 4     |
| Draft Plaintiff's Notice of Deposition of Non-Party Witnesses: James Brown, William Hill, Vincent Lam, Shawnte Livingston, Zachary Skilbeck, Robert Somerville, James Thomas, and Ivan Vera (served on January 11, 2017)  | 5     |
| Draft Plaintiff's Deposition Subpoenas for Personal Appearance: James Brown, William Hill, Vincent Lam, Shawnte Livingston, Zachary Skilbeck, Robert Somerville, James Thomas, and Ivan Vera (served on January 11, 2017) | 4.50  |

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| Review and Analyze Defendant's Notice of Deposition of Seth Swan (served on January 13, 2017)                                                                                                                                                 | 0.75  |
| Draft Plaintiff's Amended Request for Admissions and Form Interrogatories – General (Set Two) to Defendant (served on January 17, 2017)                                                                                                       | 6.25  |
| Review and Analyze Defendant's Objections to Plaintiff's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (January 26, 2017; Organizational Structure) (served on January 18, 2017) | 6.75  |
| Review and Analyze Defendant's Objections to Plaintiff's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (January 27, 2017; Job Duties) (served on January 18, 2017)               | 8.75  |
| Prepare for, Travel to/from, and Defend the Deposition of Person Most Knowledgeable Terry Cheney (January 26, 2017; San Francisco, California) and Review Deposition Transcript                                                               | 15.25 |
| Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Seth Swan (January 26, 2017; San Rafael, California) and Review Deposition Transcript                                                                                     | 16    |
| Prepare for, Travel to/from, and Defend the Deposition of Person Most Knowledgeable Terry Cheney (January 27, 2017; San Francisco, California) and Review Deposition Transcript                                                               | 12    |
| Draft Plaintiff's Objection to Defendant's Notice of Deposition of Seth Swan (served on February 7, 2017)                                                                                                                                     | 1.25  |
| Review and Analyze Defendant's Supplemental Responses to Plaintiff's Form Interrogatories (Set One) (served on February 15, 2017)                                                                                                             | 6.50  |
| Draft Plaintiff's Special Interrogatories (Set Four) to Defendant (served on February 17, 2017)                                                                                                                                               | 6     |
| Review and Analyze Defendant's Responses to Plaintiff's Requests for Admission (Set One) and Form Interrogatory - General (Set Two) No. 17.1 (served on February 22, 2017) (served on February 22, 2017)                                      | 15    |

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| Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Ramon Pacheco (served on February 24, 2017)                                                                         | 1.50   |
| Review and Analyze Defendant's Supplemental Responses to Plaintiff's Special Interrogatories (Set Two) (served on February 26, 2017)                                                                          | 6.75   |
| Review and Analyze Defendant's Supplemental Responses to Plaintiff's Requests for Production of Documents (Set One) (served on February 27, 2017)                                                             | 20     |
| Review and Analyze Defendant's Supplemental Response to Plaintiff's Form Interrogatory - General (Set One) No. 15.1 (served on February 28, 2017)                                                             | 7.50   |
| Review and Analyze Defendant's Form Interrogatories - General (Set One, erroneously labeled Set Three) to Plaintiff (served on March 6, 2017)                                                                 | 4      |
| Draft Follow Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Ramon Pacheco (served on April 18, 2017)                                                                  | 1      |
| Draft Final Follow Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Ramon Pacheco (served on May 3, 2017)                                                               | 0.50   |
| Draft Final Follow Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Ramon Pacheco (served on May 22, 2017)                                                              | 0.50   |
| Review and Analyze Documents Produced by Defendant (PACE0000001-053916)                                                                                                                                       | 436.75 |
| <b>Letters and Correspondence</b>                                                                                                                                                                             |        |
| Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Seth Swan for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on February 25, 2016) | 3.50   |

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Meet with Defendant's Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel                                                                                                                                                                                                                                                                                    | 72    |
| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                                                                                                                                            |       |
| Review and Analyze Mediation Data and Documents Produced by Defendant (PACE053917-058616) (served on March 4, 2016) <ul style="list-style-type: none"> <li>• Employee Handbooks and Policies</li> <li>• Sampling of Employee Time Data</li> <li>• Sampling of Employee Pay Data</li> </ul>                                                                                                             | 78.25 |
| Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages Analysis/Calculations (submitted on May 4, 2017)                                                                                                                                     | 45    |
| Travel to/from and Attend Mediation Session (May 9, 2017; San Francisco, California)                                                                                                                                                                                                                                                                                                                   | 16    |
| Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on April 11, 2018) and Draft Exhibits                                                                                                                                                                                                                                                              | 27    |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                                                                                  |       |
| Draft Plaintiff's Anticipated Motion for Class Certification, Declarations of Proposed Class Counsel Edwin Aiwazian and Arby Aiwazian in Support Thereof, Declaration of Plaintiff Seth Swan in Support Thereof, Compendium of Declarations of Putative Class Members, Proposed Trial Plan and Post-Certification Discovery Plan, Summary of Evidence, and [Proposed] Order Certifying Class (Drafted) | 104   |
| Research and Draft Plaintiff's Notice of Motion and Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set One) Nos. 1 and 2, Declaration of Jill J. Parker in Support Thereof, Rule 3.1345 Separate Statement in Support Thereof, and [Proposed] Order (filed on December 1, 2016)                                                                       | 16    |

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Draft Plaintiff's Amended Notice of Motion and Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set One) Nos. 1 and 2 (filed on December 5, 2016)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 0.50 |
| Research and Draft Plaintiff's Notice of Motion and Consolidated Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set Two), Form Interrogatories (Set One), and Requests for Production (Set One) and Request for Sanctions, Declaration of Jill J. Parker in Support Thereof, Rule 3.1345 Separate Statement in Support of Plaintiff's Motion to Compel Further Responses to Form Interrogatories (Set One), Rule 3.1345 Separate Statement in Support of Plaintiff's Motion to Compel Further Responses to Special Interrogatories (Set Two), Rule 3.1345 Separate Statement in Support of Plaintiff's Motion to Compel Further Responses to Request for Production (Set One), and [Proposed] Order (filed on January 11, 2016) | 27   |
| Draft Plaintiff's Amended Notice of Motion and Consolidated Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set Two), Form Interrogatories (Set One), and Request for Production (Set One) and Request for Sanctions (filed on January 20, 2017)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 0.50 |
| Review and Analyze Defendant's Opposition to Motion to Compel / Notice of Agreement to Serve Supplemental Responses (filed on February 15, 2017)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 0.50 |
| Draft Plaintiff's Reply in Support of Consolidated Motion to Compel, and Supplemental Declaration of Jill J. Parker in Support of Plaintiff's Reply (filed on February 21, 2017)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 5.75 |
| Draft Plaintiff's Summary of Responses to Plaintiff's Proposed Order Granting Plaintiff's Consolidated Motion to Compel Pursuant to Cal. Rule of Court 3.1312(B) (filed on March 9, 2017)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 3.75 |
| Research and Draft Plaintiff's Notice of Motion and Motion for Approval of PAGA Settlement and Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwazian in Support Thereof, Declaration of Seth Swan in Support Thereof, and [Proposed] Order (filed on July 23, 2018)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 46   |

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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Settlement, Attorneys' Fees, Costs, and Service Award, and Declaration of Edwin Aiwezian in Support Thereof, and Revise [Proposed] Final Approval Order and Judgment (filed on January 14, 2019) | 52       |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                                                          | 2,044.50 |

# **EXHIBIT B**

**LAWYERS for JUSTICE PC CASE COST DETAIL**  
**Swan v. PACE Supply Corp.**

| <u>Date</u> | <u>Payee</u>                                       | <u>Expense Description</u> | <u>Amount</u> |
|-------------|----------------------------------------------------|----------------------------|---------------|
| 11/18/2015  | Golden State Overnight                             | Courier Service            | 16.50         |
| 11/23/2015  | FedEx Express                                      | Courier Service            | 25.33         |
| 11/24/2015  | U.S. Postmaster                                    | Postage                    | 6.74          |
| 1/6/2016    | Golden State Overnight                             | Courier Service            | 16.50         |
| 1/20/2016   | FedEx Express                                      | Courier Service            | 26.70         |
| 2/25/2016   | U.S. Postmaster                                    | Postage                    | 13.70         |
| 5/6/2016    | Prolegal                                           | Attorney Service           | 278.40        |
| 5/6/2016    | Superior Court of California, Sonoma County        | Filing Fee                 | 435.00        |
| 6/22/2016   | Prolegal                                           | Attorney Service           | 164.50        |
| 8/23/2016   | Prolegal                                           | Attorney Service           | 114.95        |
| 8/29/2016   | Courtcall, LLC                                     | Attorney Service           | 116.00        |
| 8/30/2016   | Golden State Overnight                             | Courier Service            | 23.01         |
| 9/2/2016    | Golden State Overnight                             | Courier Service            | 16.43         |
| 9/8/2016    | FedEx Express                                      | Courier Service            | 38.33         |
| 9/21/2016   | Golden State Overnight                             | Courier Service            | 55.20         |
| 9/30/2016   | Golden State Overnight                             | Courier Service            | 25.62         |
| 10/5/2016   | Golden State Overnight                             | Courier Service            | 23.01         |
| 10/11/2016  | U.S. Postmaster                                    | Postage                    | 1.78          |
| 10/12/2016  | U.S. Postmaster                                    | Postage                    | 1.99          |
| 10/24/2016  | U.S. Postmaster                                    | Postage                    | 6.47          |
| 10/31/2016  | U.S. Postmaster                                    | Postage                    | 3.46          |
| 11/4/2016   | U.S. Postmaster                                    | Postage                    | 1.09          |
| 11/9/2016   | Kusar Court Reporters & Legal Services, Inc.       | Court Reporter             | 137.50        |
| 11/22/2016  | Golden State Overnight                             | Courier Service            | 16.50         |
| 11/28/2016  | Superior Court of California, County of Sacramento | Filing Fee                 | 20.00         |
| 12/1/2016   | U.S. Postmaster                                    | Postage                    | 6.85          |
| 12/1/2016   | Superior Court of California, Sonoma County        | Filing Fee                 | 90.00         |
| 12/1/2016   | Prolegal                                           | Attorney Service           | 173.20        |
| 12/5/2016   | Prolegal                                           | Attorney Service           | 118.25        |
| 12/7/2016   | Golden State Overnight                             | Courier Service            | 44.03         |
| 12/29/2016  | Prolegal                                           | Attorney Service           | 136.95        |
| 1/5/2017    | Courtcall, LLC                                     | Attorney Service           | 116.00        |
| 1/6/2017    | Golden State Overnight                             | Attorney Service           | 22.91         |
| 1/6/2017    | U.S. Postmaster                                    | Postage                    | 6.45          |
| 1/11/2017   | Prolegal                                           | Attorney Service           | 515.75        |
| 1/11/2017   | Superior Court of California, Sonoma County        | Filing Fee                 | 90.00         |
| 1/12/2017   | Golden State Overnight                             | Courier Service            | 32.86         |
| 1/17/2017   | Golden State Overnight                             | Courier Service            | 16.43         |
| 1/18/2017   | FedEx Express                                      | Courier Service            | 28.01         |
| 1/19/2017   | Prolegal                                           | Attorney Service           | 163.25        |
| 1/25/2017   | Prolegal                                           | Attorney Service           | 1,737.18      |
| 1/26/2017   | Pure Legal, Inc.                                   | Videography Service        | 1,250.00      |
| 1/26/2017   | Kusar Court Reporters & Legal Services, Inc.       | Court Reporter             | 2,228.70      |
| 1/27/2017   | Edwin Aiwarzian                                    | Travel Reimbursement       | 1,651.45      |

**LAWYERS for JUSTICE PC CASE COST DETAIL**  
**Swan v. PACE Supply Corp.**

|           |                                                |                           |           |
|-----------|------------------------------------------------|---------------------------|-----------|
| 1/27/2017 | Maryam Jafari                                  | Travel Reimbursement      | 741.21    |
| 1/27/2017 | Pure Legal, Inc.                               | Videography Service       | 1,037.50  |
| 1/27/2017 | Kusar Court Reporters & Legal Services, Inc.   | Court Reporter            | 1,923.63  |
| 1/30/2017 | Golden State Overnight                         | Courier Service           | 71.63     |
| 2/1/2017  | Pure Legal, Inc.                               | Notice Mailing            | 338.00    |
| 2/1/2017  | Golden State Overnight                         | Courier Service           | 11.22     |
| 2/3/2017  | Golden State Overnight                         | Courier Service           | 42.24     |
| 2/8/2017  | Jill Parker                                    | Travel Reimbursement      | 1,822.12  |
| 2/13/2017 | U.S. Postmaster                                | Postage                   | 2.03      |
| 2/16/2017 | Golden State Overnight                         | Courier Service           | 23.01     |
| 2/17/2017 | Golden State Overnight                         | Courier Service           | 16.50     |
| 2/21/2017 | Prolegal                                       | Attorney Service          | 129.95    |
| 2/21/2017 | Golden State Overnight                         | Courier Service           | 39.51     |
| 2/22/2017 | Golden State Overnight                         | Courier Service           | 16.50     |
| 2/23/2017 | Anne M. Vignati                                | Court Reporter            | 644.14    |
| 2/23/2017 | FedEx Express                                  | Courier Service           | 28.29     |
| 2/24/2017 | Golden State Overnight                         | Courier Service           | 16.50     |
| 2/24/2017 | U.S. Postmaster                                | Postage                   | 6.59      |
| 2/28/2017 | Courtcall, LLC                                 | Travel Reimbursement      | 116.00    |
| 3/1/2017  | Jill Parker                                    | Travel Reimbursement      | 687.33    |
| 3/2/2017  | Golden State Overnight                         | Courier Service           | 16.58     |
| 3/7/2017  | Drogin, Kakigi, & Associates                   | Damages Consulting Expert | 10,425.00 |
| 3/7/2017  | Golden State Overnight                         | Courier Service           | 37.30     |
| 3/7/2017  | Mark S. Rudy                                   | Mediation Fee             | 6,500.00  |
| 3/8/2017  | Golden State Overnight                         | Courier Service           | 16.58     |
| 3/9/2017  | Prolegal                                       | Attorney Service          | 118.25    |
| 3/10/2017 | Golden State Overnight                         | Courier Service           | 16.58     |
| 3/22/2017 | Becki Peterson                                 | Court Reporter            | 60.00     |
| 4/18/2017 | U.S. Postmaster                                | Postage                   | 6.80      |
| 4/25/2017 | Mark S. Rudy                                   | Mediation Fee             | 7,000.00  |
| 5/3/2017  | U.S. Postmaster                                | Postage                   | 7.16      |
| 5/4/2017  | Edwin Alwazian                                 | Travel Reimbursement      | 316.33    |
| 5/5/2017  | Golden State Overnight                         | Courier Service           | 50.26     |
| 5/9/2017  | Jill Parker                                    | Travel Reimbursement      | 650.33    |
| 5/9/2017  | Drogin, Kakigi, & Associates                   | Damages Consulting Expert | 7,612.50  |
| 5/9/2017  | Edwin Alwazian                                 | Travel Reimbursement      | 1,971.01  |
| 5/22/2017 | U.S. Postmaster                                | Postage                   | 7.01      |
| 5/25/2017 | Golden State Overnight                         | Courier Service           | 16.65     |
| 6/6/2017  | Drogin, Kakigi, & Associates                   | Damages Consulting Expert | 6,487.50  |
| 8/2/2017  | One Legal                                      | Attorney Service          | 76.90     |
| 7/23/2018 | Superior Court of California, County of Sonoma | Filing Fee                | 90.00     |
| 7/23/2018 | Prolegal                                       | Attorney Service          | 350.95    |
| 8/30/2018 | Courtcall, LLC                                 | Attorney Service          | 86.00     |
| 9/18/2018 | Prolegal                                       | Attorney Service          | 139.95    |
| 9/20/2018 | U.S. Postmaster                                | Postage                   | 1.63      |

**LAWYERS for JUSTICE PC CASE COST DETAIL**  
**Swan v. PACE Supply Corp.**

|            |                                                |                                         |                         |
|------------|------------------------------------------------|-----------------------------------------|-------------------------|
| 9/21/2018  | Prolegal                                       | Attorney Service                        | 114.95                  |
| 10/30/2018 | Prolegal                                       | Attorney Service                        | 117.45                  |
| 10/30/2018 | Superior Court of California, County of Sonoma | Filing Fee                              | 20.00                   |
| 11/7/2018  | Prolegal                                       | Attorney Service                        | 113.95                  |
| 11/9/2018  | Prolegal                                       | Attorney Service                        | 114.95                  |
| 1/14/2019  | Prolegal                                       | Attorney Service                        | 350.95                  |
| 1/14/2019  | Superior Court of California, County of Sonoma | Filing Fee                              | 90.00                   |
|            | LFJ (In-House)                                 | Photocopies ( 17,630 @ \$0.15 per page) | <u>2,644.50</u>         |
|            |                                                | <b>Total:</b>                           | <b><u>63,354.90</u></b> |