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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

DFT, INC. WAGE AND HOUR CASES

Coordinated Actions:

ERIC BETANCES vs. DFT, INC. D/B/A
CANNON MANAGEMENT

ROXANA VALDEZ vs. DFT, INC. D/B/A
CANNON MANAGEMENT

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO.: JCCP4882

Honorable John Shepard Wiley, Jr.
Department SSC9

Superior Court of California, County of Los
Angeles: BC559751

Complaint Filed: October 6, 2014

Superior Court of California, County of San
Bernardino: CIVDS1605358

Complaint Filed: April 12, 2016

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

[Notice of Motion and Motion for Final Approval
of Class Action Settlement, Attorneys' Fees,
Costs, and Enhancement Payments; Declaration
of Class Counsel (V. Andre Sherman);
Declarations of Class Representatives (Eric
Betances and Roxana Valdez); Declaration of
Settlement Administrator (Elizabeth
Kruckenberg); and [Proposed] Final Approval
Order and Judgment filed concurrently herein]

Date January 18, 2019
Time 11:00 a.m.
Department: SSC9

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Eric Betances and Roxana Valdez ("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 as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On July 6, 2018, in Department SSC9 of the above-entitled Court, the Honorable Lisa H. Cole preliminarily approved the Stipulation of Class Action and PAGA Settlement and Release and Amendment No. 1 to Stipulation of Class Action and PAGA Settlement and Release (together, "Settlement," "Agreement," or "Settlement Agreement") entered into between Plaintiffs and Defendant DFT, Inc. dba Cannon Management ("Defendant"), and provisionally certified the Class for settlement purposes. The Court also preliminarily appointed and designated Lawyers *for* Justice, PC and Girardi & Keese as Class Counsel, Plaintiffs Eric Betances and Roxana Valdez as the Class Representatives, and Phoenix Settlement Administrators ("Phoenix") to serve as the Settlement Administrator for handling the notice and settlement administration process. The Court approved and ordered the mailing of the Notice of Class Action and PAGA Settlement ("Class Notice") to the Class, preliminarily approved the notice, opt-out, and objection procedures, and ordered their implementation.

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

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WORK PERFORMED BY CLASS COUNSEL

4. The above-entitled coordinated action involves two (2) cases: *Eric Betances v. DFT, Inc. d/b/a Cannon Management*, Los Angeles County Superior Court Case No. BC559751 (“*Betances Action*”) and the action entitled *Roxana Valdez v. DFT, Inc. d/b/a Cannon Management*, San Bernardino County Superior Court Case No. CIVDS1605358 (“*Valdez Action*”). I have been actively engaged in litigating this matter since the *Betances Action* was commenced on October 6, 2014, as have several other attorneys and members in our firm.

5. Lawyers for Justice, PC has actively participated in all phases of the litigation process. Before initiating the *Betances Action*, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff Eric Betances, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour enforcement, Plaintiff Eric Betances’ claims, and potential defenses. After conducting initial investigation, our firm determined that Plaintiff Eric Betances’ claims were well-suited for class-wide and representative adjudication owing to what appeared to be a common course of conduct affecting a similarly-situated group of current and former hourly-paid or non-exempt individuals employed by Defendant, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. We have worked closely with our co-counsel, Girardi & Keese, throughout this litigation. Together with our co-counsel, we used the pre-mediation time period to investigate the veracity, strength, and scope of the claims, and also to prepare the matter for class certification, representative adjudication, and trial. The parties conducted extensive formal and informal discovery and investigation into the facts of the cases, and also informally exchanged information and data in preparation for the mediation. Class Counsel propounded multiple sets of written discovery requests in various forms, reviewed Defendant’s responses thereto, noticed the depositions of Defendant’s Person Most Knowledgeable designees, and worked with Plaintiff

Roxana Valdez to provide responses to form interrogatories and requests for production of documents that were propounded by Defendant. Class Counsel prepared for and took the deposition of Defendant's Person Most Knowledgeable designee and prepared for and defended full-day depositions of Plaintiffs Eric Betances and Roxana Valdez. Class Counsel also interviewed and obtained information from Plaintiffs and other Class Members, including and not limited to the names of potential witnesses, and reviewed and analyzed thousands of pages of documents and data produced by Defendant and obtained through other sources. The documents and data reviewed and analyzed by Class Counsel included, and were not limited to, Plaintiffs and other Class Members' employment records, a detailed sampling of Class Members' time and pay data (including, and not limited to, timecards, payroll records, and wage statements), agreements, internal memoranda (including, and not limited to, Defendant's Use of Cell Phones and Personal Digital Assistants (PDA) While Driving memo), forms, job descriptions, and Defendant's operations and employment policies (including, and not limited to, Defendant's Employee Handbook and Defendant's Company Related Driving Policy), practices, and procedures, among other information and documents. Class Counsel also engaged in motion practice, researched applicable law, developed damages/valuation models in preparation of mediation, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, motion practice, discovery, and production of documents and data prior to the mediation. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising pleadings and the mediation brief; preparing and appearing for court proceedings; and preparing for and attending the mediation and settlement negotiations.

7. As outlined herein, the parties have conducted extensive discovery and investigation during the course of this litigation. Class Counsel analyzed a volume of documents and data either produced by Plaintiffs and Defendant or obtained by Class Counsel through other sources. These documents and data provided a critical understanding of the nature of the work performed by the Class Members, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, and valuation issues in

1 connection with all phases of the litigation, and ultimately with the mediation and settlement
2 negotiation process. Class Counsel also performed significant research into the law concerning
3 Defendant's defenses.

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

19 9. After conducting significant investigation of the facts and law during the
20 prosecution of the cases, counsel for the parties engaged in extensive settlement negotiations to
21 try to resolve the entire matter. These efforts included participating in private mediation
22 conducted by Deborah Crandall Saxe, Esq., a well-regarded mediator who is experienced in
23 mediating complex labor and employment matters. During all settlement discussions, the parties
24 conducted their negotiations at arm's length in an adversarial position. During the mediation, the
25 parties discussed all aspects of the cases, including the risks and delays of further litigation, the
26 risks to the parties of proceeding with class certification, representative adjudication, and/or trial,
27 the law relating to off-the-clock theory, meal and rest periods, representative PAGA actions, and
28 wage-and-hour enforcement, the evidence produced and analyzed, and the possibility of appeals,

1 among other things. Arriving at a settlement that was acceptable to the parties was not easy.
2 Defendant contended that individualized questions of fact predominate over any common issues,
3 and these issues would pose challenges to certification. Defendant and its counsel felt very
4 strongly about Defendant's ability to prevail on the merits and to obtain a denial of class
5 certification, while Plaintiff and Class Counsel believed that class certification would be
6 obtained and that they would prevail at trial. With the aid of the mediator's evaluation, the
7 parties agreed that the cases were well-suited for settlement given the factual and legal issues
8 relating to Plaintiffs' principal claims, as well as the costs and risks to the parties that would
9 attend further litigation. These risks of further litigation include, and are not limited to, a
10 determination that the claims are unsuitable for class treatment and/or representative
11 adjudication, failure to obtain certification, and class de-certification after certification of a class,
12 and the risks to recovery included, *inter alia*, Defendant's financial condition.

13 10. As set forth more fully in the accompanying Motion for Final Approval, Class
14 Counsel seek attorneys' fees in the amount of \$192,500, which is thirty-five percent (35%) of the
15 Maximum Settlement Amount of \$550,000, as set forth in the Settlement Agreement. This
16 amount is commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2)
17 the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and
18 determination that Class Counsel have shown; (4) the results that Class Counsel have achieved
19 throughout the litigation; (5) the value of the settlement that Class Counsel have achieved for the
20 Class Members; and (6) the other cases that Class Counsel have turned down in order to devote
21 their time and efforts to this matter.

22 11. I am aware that the common and acceptable rate for contingency representation in
23 wage and hour class action litigation is normally 40% before trial, with the range being from
24 33.3% up to 50%. In this case, Plaintiffs have agreed to a contingency fee of at least thirty-five
25 percent (35%) of the recovery.

26 12. While not necessarily required to be demonstrated because the percentage fee that
27 is sought is proper for this settlement, Class Counsel have incurred many hours of work in
28 connection with this matter such that the request for an award of attorneys' fees is also justified

1 under a simple lodestar analysis. Lawyers for Justice, PC has spent a total of **429.35 hours**, and
2 Girardi & Keese has spent a total of **137.55 hours** performing tasks on behalf of Plaintiffs and
3 the Class Members. Collectively, Class Counsel have spent a total of **566.90 hours** to obtain a
4 recovery in the matter. Attached hereto as “**EXHIBIT A**” is an Attorney Task and Time and
5 Chart that sets forth in detail the breakdown of time for the tasks performed by Class Counsel.
6 The hours attributable to Lawyers for Justice, PC include work done by myself and several of the
7 firm’s other members. We also had litigation support personnel actively engaged in assisting
8 with the prosecution of cases.

9 13. The work performed in the cases, the backgrounds of our firm, as well as the
10 individual backgrounds, training, and experience of the attorneys who worked on this matter, in
11 litigating class actions, and in particular, wage-and-hour matters, support a reasonable hourly
12 rate of compensation at the rate of at least \$500 for work performed by Class Counsel. The rate
13 of at least \$500 per hour has been found to be a reasonable rate of compensation for work
14 performed by members of Lawyers for Justice, PC, by courts granting final approval in other
15 cases: final approval of the class and representative action settlement in *Stanley Bland, et al. v.*
16 *Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on
17 November 21, 2018, and the award of attorneys’ fees involved a higher hourly rate of \$831.38;
18 approval of the Private Attorneys General Act settlement in *Roberta Robles v. Altamed Health*
19 *Services Corporation* (Los Angeles County Superior Court Case No. BC639623) was granted on
20 October 31, 2018, and the award of attorneys’ fees involved a higher hourly rate of \$602.22;
21 final approval of the class and representative action settlement in *Patrick Sinay, et al. v.*
22 *Essendant Co., et al.* (Los Angeles County Superior Court Case No. BC651043) was granted on
23 September 28, 2018, and the award of attorneys’ fees involved a higher hourly rate of \$624.81;
24 final approval of the class and representative action settlement in *Ruben Sanchez, et al. v.*
25 *CalPortland Company, et al.* (Los Angeles County Superior Court Case No. BC590426) was
26 granted on August 8, 2018, and the award of attorneys’ fees involved a higher hourly rate of
27 \$730.16; final approval of the class and representative action settlement in *Samuel Guerra, et al*
28 *v. Graphic Packaging International, Inc.* (Sacramento County Superior Court Case No. 34-2016-

00203789) was granted on June 5, 2018, and the award of attorneys' fees involved a higher hourly rate of \$600; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved a higher hourly rate of \$780.77; final approval of the class and representative action settlement in *Renee Rivera, et al. v. Farmers and Merchants Bank of Long Beach* (Los Angeles County Court Case No. BC569646) was granted on December 11, 2017, and the award of attorneys' fees involved a higher hourly rate of \$629.96; final approval of the class and representative action settlement in *Rebekah Perez, et al. v. Nestlé USA, Inc., et al.* (Alameda County Superior Court Case No. RG15773654) was granted on August 18, 2017; final approval of the class and representative action settlement in *Elizabeth Ortiz, et al. v. Ghirardelli Chocolate Company* (Alameda County Superior Court Case No. RG15764300) was granted on July 19, 2017, and the award of attorneys' fees involved a higher hourly rate of \$575; final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved a higher hourly rate of \$845.64; final approval of the class and representative action settlement in *Mark Aceves v. Cambro Manufacturing Company* (Orange County Superior Court Case No. 30-2015-00810013-CU-OE-CXC) was granted on April 14, 2017; final approval of the class and representative action settlement in *East West Bank Wage and Hour Cases* (San Francisco County Superior Court Case No. CJC-13-004839) was granted on November 18, 2016; approval of the Private Attorneys General Act settlement in *Tatiana Kemp v. The Irvine Company Apartment Communities, Inc.* (Orange County Superior Court Case No. 30-2015-00775439) was granted on November 4, 2016; final approval of the class and representative action settlement in *Erick Guzman, et al. v. Banana Republic, LLC* (Los Angeles County Superior Court Case No. BC488069) was granted on August 5, 2016; final approval of the class and representative action settlement in *Restoration Hardware Wage & Hour Cases* (Los Angeles County Superior Court Case No. JCCP4794) was granted on April 28, 2016; final approval of the class and representative action settlement in *Kevin Coonce v. Ferguson*

1 *Enterprises, Inc.* (Sacramento County Superior Court Case No. 34-2021-00136285) was granted
2 on May 22, 2014, and the award of attorneys' fees involved a higher hourly rate of \$625; and
3 final approval of the class action settlement in *Anthony Powell v. Fairfield Residential Company,*
4 *LLC* (Alameda County Superior Court Case No. RG12660811) was granted on August 6, 2014.

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

6 ***EDUCATION***

7 14. 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 15. 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 16. 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*.

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

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

15 **EXAMPLES OF CLASS ACTION RESULTS**

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

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

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

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

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

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

16 f) Our firm, in association with other co-counsel, represented the plaintiffs in
17 a wage-and-hour class and representative action against a national wholesale distributor of
18 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
19 "manager" positions. On May 22, 2014, the court granted final approval of the class and
20 representative action settlement. The Sacramento County Superior Court Case Number is 34-
21 2012-00136285.

22 g) Our firm, in association with other co-counsel, represented the plaintiff in
23 a wage-and-hour class action involving allegations of misclassification of the "Operations
24 Manager" position. On September 16, 2014, the court granted plaintiff's motion for class
25 certification. The Los Angeles County Superior Court Case Number is BC478769.

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

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

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

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

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

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

1 30-2015-00775439-CU-OE-CXC.

2 n) Our firm, in association with other co-counsel, represented the plaintiffs in
3 a wage-and-hour class and representative action against a full-service bank, on behalf of non-
4 exempt employees. On November 18, 2016, the court granted final approval of the class and
5 representative action settlement. The San Francisco County Superior Court Case Number is CJC-
6 13-004839.

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

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

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

20 r) Our firm represented the plaintiff in a wage-and-hour class and
21 representative action against a food company on behalf of non-exempt employees. On June 30,
22 2017, the court granted final approval of the class and representative action settlement. The
23 Sacramento County Superior Court Case Number is 34-2015-00175871.

24 s) Our firm represented the plaintiffs in a wage-and-hour class and
25 representative action against a chocolate company on behalf of non-exempt employees. On July
26 19, 2017, the court granted final approval of the class and representative action settlement. The
27 Alameda County Superior Court Case Number is RG15764300.

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

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

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

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

20. Lawyers for Justice, PC has incurred **\$11,931.73** in litigation costs and expenses as reflected in **"EXHIBIT B"** attached hereto. As stated in the Declaration of V. Andre Sherman concurrently filed herewith, Girardi & Keese has incurred **\$12,639.26** in litigation costs and expenses. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement. Class Counsel have borne all the risks and costs of litigation and will not receive any compensation until recovery is obtained by Plaintiffs, Settlement Class Members, PAGA Class Members, and the State of California.

CLASS REPRESENTATIVE ENHANCEMENT PAYMENTS

21. In recognition of their efforts and work serving as Class Representatives, the Settlement provides for Class Representative Enhancement Payments in the amount of \$7,500 to Plaintiff Eric Betances and \$5,000 to Plaintiff Roxana Valdez. The requested Class Representative Enhancement Payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort in producing relevant documents and past employment records and

1 provided the facts and evidence necessary to attempt to prove the allegations, including and not
2 limited to, preparing and appearing for full-day depositions and, with respect to Plaintiff Valdez,
3 working with Class Counsel to provide responses to form interrogatories and requests for
4 production of documents that were propounded by Defendant. Plaintiffs were available
5 whenever Class Counsel needed them and actively tried to obtain information that would benefit
6 the Class. Plaintiffs spent numerous hours speaking with Class Counsel about their claims,
7 describing their work experience with Defendant, and gathering and reviewing documents.
8 Accordingly, it is appropriate for Plaintiffs to each receive reasonable Class Representative
9 Enhancement Payments, in addition to their Individual Settlement Payments and Individual
10 PAGA Payments (if applicable), for their services in the matter.

11 22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
12 Settlement is in the best interests of Plaintiffs, Class Members, and State of California.

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

15 Executed this 26th day of December 2018, at Glendale, California.

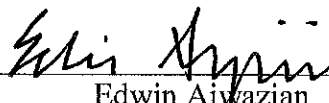
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EXHIBIT A

DFT, INC. WAGE AND HOUR CASES
(LOS ANGELES SUPERIOR COURT CASE No. JCCP4882)
ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC	GIRARDI & KEENE
Investigation and Research / Due Diligence		
Pre-Lawsuit Investigation of the Key Facts with a Focus on 1) Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality; 2) Merits of Plaintiffs Eric Betances and Roxana Valdez's (collectively, "Plaintiffs") Claims and the Merits of the Claims of the Putative Class Members; and 3) Potential Exposure of Defendant DFT, Inc. d/b/a Cannon Management ("Defendant") with Respect to the Penalties/Damages Sustained by Plaintiffs and the Putative Class Members	8	4
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	5.50	2.75
Investigation of Defendant, Defendant's Business Relationships, and the Industry in Which Defendant Operates	3	0
Research and Investigation Re: Defendant's Policies, Practices, and Procedures Relating to Timekeeping, Meal/Rest Breaks, Overtime Compensation, and Reimbursement of Business-Related Expenses	12	5
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	1.50	1
Meet and Communicate with Plaintiff Eric Betances Throughout the Pendency of the Case	19	4.50
Meet and Communicate with Plaintiff Roxana Valdez Throughout the Pendency of the Case	13	11
Meet and Communicate with Putative Class Members, and Draft Declarations	12	7

Pleadings and Court Filings		
Research and Draft Plaintiff Eric Betances' Class Action Complaint for Damages (filed on October 6, 2014 in the action entitled <i>Eric Betances v. DFT, Inc. d/b/a Cannon Management</i> , Los Angeles County Superior Court Case No. BC559751 ("Betances Action") and Legal Research and Analysis of All Claims Involved	8	0
Review Order re Newly Filed Class Action (filed on November 1, 2014 in the <i>Betances</i> Action)	0.10	0
Review Court's Initial Status Conference Order (filed on November 7, 2014 in the <i>Betances</i> Action)	0.10	0
Draft Notice of Complex Determination and Initial Status Conference (filed on November 18, 2014 in the <i>Betances</i> Action)	0.25	0
Review Defendant's Notice of Appearance (filed on November 20, 2014 in the <i>Betances</i> Action)	0.10	0
Meet and Confer with Defense Counsel and Draft Joint Initial Status Conference Class Action Response Statement (filed on December 23, 2014 in the <i>Betances</i> Action)	2.50	0
Review Order Authorizing E-Service (filed on January 28, 2015 in the <i>Betances</i> Action)	0.10	0
Meet and Confer with Defense Counsel and Draft Joint Report/Stipulation Regarding the Status of Pleadings (submitted on May 17, 2015 in the <i>Betances</i> Action)	1	0
Research and Draft Plaintiff Betances' First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (prepared in the <i>Betances</i> Action)	2.75	0
Research and Draft Plaintiff Betances' Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on June 26, 2015 in the <i>Betances</i> Action)	2	0
Draft Notice of Association of Counsel (filed on July 27, 2015 in the <i>Betances</i> Action)	0.25	0.25

Review and Analyze Defendant's Answer to Plaintiff Eric Betances' Second Amended Complaint for Damages (filed on July 27, 2015 in the <i>Betances</i> Action), and Research Affirmative Defenses in Defendant's Answer	3	0
Meet and Confer with Defense Counsel and Draft Joint Status Conference Statement (filed on August 10, 2015 in the <i>Betances</i> Action)	1.75	0
Review Defendant's Notice of Ruling (filed on August 25, 2015 in the <i>Betances</i> Action)	0.10	0
Research and Draft Plaintiff Valdez's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on April 12, 2016 in the action entitled <i>Roxana Valdez v. DFT, Inc. d/b/a Cannon Management</i> , San Bernardino County Superior Court Case No. CIVDS1605358 ("Valdez Action")), and Legal Research and Analysis of Claim Involved	0	7
Review Court's Notice of Trial Setting Conference and Notice of Case Assignment (served on April 12, 2016 in the <i>Valdez</i> Action)	0	0.10
Meet and Confer with Defense Counsel and Draft Joint Statement Regarding Discovery Dispute and Declaration of D. Elliot Gonzalez in Support of Joint Statement Regarding Discovery Dispute (filed on May 17, 2016 in the <i>Betances</i> Action)	4	0
Review Defendant's Notice of Submission of Petition for Coordination (filed on July 19, 2016 in the <i>Valdez</i> Action and on July 21, 2016 in the <i>Betances</i> Action)	0.25	0.25
Review Defendant's Notice of Judicial Counsel of California Order Assigning Coordination Motion Judge and Setting Date for Hearing (filed on August 8, 2016 in the <i>Betances</i> Action)	0.10	0
Meet and Confer with Defense Counsel and Draft Joint Stipulation and [Proposed] Order to Stay Entire Case Pending Determination on Petition for Coordination (submitted on August 12, 2016 in the <i>Valdez</i> Action)	0	1.50
Meet and Confer with Defense Counsel and Draft Joint Status Conference Statement (filed on August 31, 2016 in the <i>Betances</i> Action)	0.75	0

Meet and Confer with Defense Counsel and Draft Joint Status Report and [Proposed] Order (submitted on September 21, 2016 in the <i>Betances</i> Action)	0.50	0
Review Defendant's Notice of Ruling Regarding DFT, Inc.'s Wage and Hour Cases Ruling Re Petition for Coordination (filed on September 23, 2016 in the <i>Betances</i> Action)	0.25	0.25
Review Defendant's Notice of Order Assigning Coordination Trial Judge (filed on September 27, 2016 in the coordinated action entitled <i>DFT, Inc. Wage and Hour Cases</i> , Los Angeles County Superior Court Case No. JCCP4882 ("JCCP Action") and on September 28, 2016 in the <i>Betances</i> Action and <i>Valdez</i> Action)	0.10	0.10
Review Court's Order on Joint Status Report (filed on September 30, 2016 in the <i>Betances</i> Action)	0.10	0
Review Defendant's Notice of Order Assigning Coordination Trial Judge (filed on October 17, 2016 in the <i>Betances</i> Action, <i>Valdez</i> Action, and JCCP Action)	0.10	0.10
Review Defendant's Notice of Ruling at Trial Setting Conference (filed on October 17, 2016 in the <i>Valdez</i> Action)	0	0.25
Meet and Confer with Defense Counsel and Draft Joint Status Report (filed on October 28, 2016 in the JCCP Action)	1	0
Review Defendant's Notice of Court Order Regarding File&ServeXpress (filed on November 2, 2016 in the JCCP Action)	0.10	0.10
Review Court's Minute Order Regarding Coordinated Case Management Conference (filed on November 4, 2016 in the JCCP Case)	0.10	0
Review Defendant's Notice of Case Management Conference and Deadline to File Joint Statement (filed on November 9, 2016 in the JCCP Action)	0.10	0.10
Draft Plaintiff Valdez's Notice of Association of Counsel (filed on November 16, 2016 in the <i>Valdez</i> Action and JCCP Action)	0.25	0.25

Review Court's Minute Order Regarding Case Management Conference (entered on December 1, 2016 in the <i>Betances</i> Action and JCCP Action)	0.10	0
Meet and Confer with Defense Counsel and Draft Stipulated [Proposed] Order in Advance of December 13, 2016 Further Status Conference (submitted on December 7, 2016 in the JCCP Action)	2.75	0
Meet and Confer with Defense Counsel and Draft Joint Status Report (filed on December 8, 2016 in the JCCP Action)	1.50	0
Review Defendant's Notice of Continuance of Coordinated Case Management Conference (filed on December 19, 2016 in the JCCP Action)	0.10	0.10
Meet and Confer with Defense Counsel and Draft Joint Stipulation Regarding Coordination and Placing of Docket on Inactive Status; [Proposed] Order Thereon (submitted on January 10, 2017 in the <i>Valdez</i> Action)	1.50	0
Review Court's Order Authorizing Electronic Service (filed on January 17, 2017 in the JCCP Action)	0.10	0.10
Draft Plaintiffs' Case Management Conference Report and Declaration of D. Elliot Gonzalez in Support of Plaintiffs' Case Management Conference Report (filed on February 3, 2017 in the JCCP Action)	3.75	0
Review Defendant's Status Report (filed on February 3, 2017 in the JCCP Action)	0.50	0
Draft Plaintiffs' Notice Regarding Case Management Conference (filed on February 21, 2017 in the JCCP Action)	0.50	0
Meet and Confer with Defense Counsel and Draft Joint Stipulation Re: Briefing Schedule; [Proposed] Order (submitted on March 13, 2017 in the JCCP Action)	1.50	0
Review Court's Order Approving Stipulation Re: Briefing Schedule (filed on March 14, 2017 in the JCCP Action), and Prepare Notice of Entry of Order (filed on March 20, 2017 in the JCCP Action)	0.10	0
Meet and Confer with Defense Counsel and Draft Joint Stipulation Re: Briefing Schedule; [Proposed] Order (submitted on March 24, 2017 in the JCCP Action)	0.50	0

Meet and Confer with Defense Counsel and Draft Stipulation Re: Agreement to Mediate and Stay Proceedings; [Proposed] Order (submitted on May 24, 2017 in the JCCP Action)	1.25	0
Review Court's Order Approving Stipulation Re: Agreement to Mediate and Stay Proceedings (filed on May 26, 2017 in the JCCP Action)	0.10	0
Meet and Confer with Defense Counsel and Draft Stipulation Re: Briefing Schedule; [Proposed] Order (submitted on August 30, 2017 in the JCCP Action)	0.50	0
Review Court's Order Approving Stipulation Re: Briefing Schedule (filed on August 31, 2017 in the JCCP Action), and Prepare Notice of Entry of Judgment or Order (filed on September 7, 2017 in the JCCP Action)	0.10	0
Draft Plaintiffs' Opening Brief Regarding the Appropriate Scope of Pre-Certification and PAGA Discovery and Declaration of D. Elliot Gonzalez in Support Thereof (filed on November 16, 2017 in the JCCP Action)	8.50	2
Draft Plaintiff's Status Conference Report (filed on November 29, 2017 in the <i>Valdez</i> Action)	0.50	0
Review Defendant's Notice Regarding Status of Settlement Negotiations and Request to Stay Proceedings (filed on November 30, 2017 in the JCCP Action)	0.10	0
Draft Notice of Defendant's Failure to File an Opening Brief Regarding the Appropriate Scope of Pre-Certification and PAGA Discovery (filed on November 30, 2017 in the JCCP Action)	0.75	0
Meet and Confer with Defense Counsel and Draft Joint Notice of Class Action Settlement (filed on January 3, 2018 in the JCCP Action)	1	0.25
Meet and Confer with Defense Counsel and Draft Joint Stipulation to Vacate Hearing Regarding the Appropriate Scope of Pre-Certification and PAGA Discovery and to Continue the Case Management Conference (submitted on March 26, 2018 in the JCCP Action)	1.25	0
Review Court's Order Approving Joint Stipulation to Vacate Hearing Regarding the Appropriate Scope of Pre-Certification and PAGA Discovery and to Continue the Case Management Conference (filed on March 28, 2018 in the JCCP Action), and Prepare Notice of Entry of Judgment or Order	0.10	0

Appearances		
Prepare for, Travel to/from, and Attend Further Status Conference in the <i>Betances</i> Action (September 7, 2016)	2.75	0
Prepare for, Travel to/from, and Attend Hearing on Defendant's Petition for Coordination (September 12, 2016)	2	0
Prepare for and Attend Informal Conference Regarding December 6, 2016 Joint Statement via Telephone in the <i>Betances</i> Action (November 8, 2016)	1.50	0
Prepare for and Attend Status Conference re: Consolidation via CourtCall in the <i>Valdez</i> Action (December 14, 2016)	1	0
Prepare for, Travel to/from, and Attend Case Management Conference in the JCCP Action (February 17, 2017)	3	0
Prepare for, Travel to/from, and Attend Status on Coordination Case/Dismissal in the <i>Valdez</i> Action (July 17, 2017)	3.75	0
Prepare for and Attend Informal Conference via Telephone in the JCCP Action (October 3, 2017)	0.75	0
Prepare for and Attend Status Conference via CourtCall in the <i>Valdez</i> Action (December 15, 2017)	1	0
Prepare for, Travel to/from, and Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement in the JCCP Action (June 13, 2018)	2	0
Prepare for and Attend Status Conference via CourtCall in the <i>Valdez</i> Action (June 15, 2018)	0.75	0
Prepare for, Travel to/from, and Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement in the JCCP Action (July 3, 2018)	2	0
Prepare for and Attend Status Conference via CourtCall in the <i>Valdez</i> Action (December 17, 2018)	0.50	0
Prepare for, Travel to/from, and Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payments in the JCCP Action (January 18, 2019) (Anticipated)	3	3

Discovery and Deposition			
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiffs (served on September 12, 2014 and October 29, 2015)	0.50		0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Eric Betances	3		0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Roxana Valdez	1.50		5
Draft Plaintiff Betances' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on July 13, 2015)	12		0
Draft Plaintiff Betances' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (August 11, 2015; Organizational Structure) and Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (August 12, 2015; Job Duties) (served on July 15, 2015)	8.50		0
Review Defendant's Notice of Taking Deposition of Plaintiff Betances and Demand for Production of Documents (served on July 15, 2015), and Draft Plaintiff Betances' Objections to Defendant's Notice of Taking Deposition of Plaintiff and Demand for Production of Documents (served on August 5, 2015)	6		0
Review and Analyze Defendant's Objections to Notice of Taking Deposition of Person Most Knowledgeable at DFT, Inc. d/b/a Cannon Management (August 11, 2015; Organizational Structure) and Objections to Notice of Taking Deposition of Person Most Knowledgeable at DFT, Inc. d/b/a Cannon Management (August 12, 2015; Job Duties) (served on August 7, 2015)	0.50		0
Review and Analyze Defendant's Objections to Plaintiff Betances' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on August 14, 2015)	8.75		0

Draft Plaintiff Betances' Special Interrogatories (Set Three), Special Interrogatories (Set Four), and Requests for Production of Documents (Set Two) (served on September 15, 2015)	1.50	0
Draft Plaintiff Betances' Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (October 27, 2015; Organizational Structure) and Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (October 28, 2015; Job Duties) (served on September 15, 2015)	0.50	0
Draft Plaintiff Betances' Special Interrogatories (Set Five) and Requests for Production of Documents (Set Three) (served on October 21, 2015)	4	0
Draft Plaintiff Betances' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (November 17, 2015; Answer) (served on October 21, 2015)	2	0
Draft Anticipated Deposition Subpoenas and Notices of Videotape Deposition for Non-Party Witnesses	5.75	0
Review and Analyze Defendant's Responses to Plaintiff Betances' Special Interrogatories (Set Five) and Requests for Production of Documents (Set Three) (served on November 24, 2015)	1	0
Review and Analyze Defendant's Responses to Plaintiff Betances' Requests for Production of Documents (Set Two), Special Interrogatories (Set Three), and Special Interrogatories (Set Four), and Supplemental Responses to Plaintiff Betances' Form Interrogatories – General (Set One) (served on November 30, 2015)	6	0
Review and Analyze Defendant's Supplemental Responses to Plaintiff Betances' Requests for Production of Documents (Set Two), Special Interrogatories (Set Three), and Special Interrogatories (Set Four) (served on February 16, 2016)	4	0
Draft Plaintiff Valdez's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on January 30, 2017)	3	0

Draft Plaintiff Valdez's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (March 14, 2017; Organizational Structure) and Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (March 15, 2017; Job Duties) (served on January 30, 2017)	1.50	0
Draft Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (March 29, 2017; Job Duties) and Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (March 30, 2017; Organizational Structure) (served on March 1, 2017)	1	0
Draft Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (May 3, 2017 and May 4, 2017; Job Duties) and Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (May 3, 2017 and May 4, 2017; Organizational Structure) (served on March 22, 2017)	0.50	0
Review and Analyze Defendant's Responses to Plaintiff Valdez's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on March 31, 2017)	5	0
Review and Analyze Defendant's Notice of Taking Deposition of Plaintiff Roxana Valdez and Demand for Production of Documents (served on March 29, 2017); and Draft Plaintiff Valdez's Objections to Defendant's Notice of Taking Deposition of Plaintiff Valdez and Demand for Production of Documents (served on April 7, 2017)	4.50	1
Review and Analyze Defendant's Form Interrogatories – Employment Law and Requests for Production of Documents (Set One) to Plaintiff Valdez (served on March 2, 2017); and Draft Plaintiff Valdez's Responses to Defendant's Requests for Production of Documents (Set One) and Form Interrogatories – Employment Law (Set One) (served on April 10, 2017)	9	2
Review Defendant's Amended Notice of Taking Deposition of Plaintiff Valdez and Demand for Production of Documents (served on April 18, 2017)	0.50	0.50

Draft Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (June 7, 2017 and June 8, 2017; Job Duties) and Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (June 7, 2017 and June 8, 2017; Organizational Structure) (served on April 27, 2017)	0.25	0
Review Defendant's Second Amended Notice of Taking Deposition of Plaintiff Valdez and Demand for Production of Documents (served on July 18, 2017), and Draft Plaintiff Valdez's Objections to Defendant's Second Amended Notice of Taking Deposition of Plaintiff Valdez and Demand for Production of Documents (served on July 25, 2017)	2	0.50
Draft Plaintiffs' Third Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (August 9, 2017 and August 10, 2017; Job Duties) and Third Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (August 9, 2017 and August 10, 2017; Organizational Structure) (served on August 4, 2017)	0.25	0
Review and Analyze Defendant's Third Amended Notice of Taking Deposition of Plaintiff Valdez and Demand for Production of Documents (served on September 20, 2017), and Draft Plaintiff Valdez's Objections to Defendant's Third Amended Notice of Taking Deposition of Plaintiff Valdez and Demand for Production of Documents (served on September 26, 2017)	1.50	0
Draft Plaintiffs' Fourth Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (October 11, 2017 and October 12, 2017; Job Duties) and Fourth Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (October 11, 2017 and October 12, 2017; Organizational Structure) (served on October 2, 2017)	0.25	0
Review and Analyze Documents Produced by Defendant	18	11
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (drafted on December 24, 2015) and Review List of Non-Respondents from <i>Belaire-West</i> Notice and Opt-Out Administration	3	0
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Eric Betances (August 11, 2015; Los Angeles, California), and Review Deposition Transcript	14	0

Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Eric Betances (September 2, 2015; Los Angeles, California), and Review Deposition Transcript	0	6
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Roxana Valdez (August 2, 2017; Los Angeles, California), and Review Deposition Transcript	0	12.50
Prepare for and Take the Deposition of Defendant's Person Most Knowledgeable Peter Densmore (October 11, 2017; Glendale, California), and Review Deposition Transcript	10.50	8
Letters and Correspondence		
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiffs for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on October 6, 2014 and March 8, 2016)	2	0
Draft Correspondence to, and Respond to Correspondence from, Defense Counsel	14	2
Mediation/Settlement		
Review and Analyze Mediation Data and Documents Produced by Defendant (served on June 23, 2017) • Employee Handbooks and Policies • Sampling of Employee Time Data • Sampling of Employee Payroll Data Nos. CANNON010272-11409	11	4.50
Prepare for Mediation, Including Researching Merits of Claims, Drafting the Mediation Brief, Compiling Mediation Exhibits in Support of the Mediation Brief, and Performing Damages Analysis/Calculations (submitted on June 26, 2017)	18	7
Travel to/from and Attend Mediation Session (June 29, 2017; Los Angeles, California)	10	10
Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement and Release, and Draft Notice of Class Action Settlement (executed on May 31, 2018)	9	3.25

Review, Revise, Negotiate, and Finalize Amendment No. 1 to Stipulation of Class Action and PAGA Settlement and Release, and Draft Notice of Class Action Settlement (executed on June 22, 2018)	3	1
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	5	0
Law and Motion		
Review and Analyze Defendant's Demurrer to Plaintiff Betances' Complaint, Notice of Lodgment of Federal Authorities, and [Proposed] Order (filed on November 10, 2014 in the <i>Betances</i> Action)	4	0
Review and Analyze Defendant's Demurrer to Plaintiff Betances' First Amended Complaint, Notice of Lodgment of Federal Authorities, and [Proposed] Order (filed on May 20, 2015 in the <i>Betances</i> Action); and Research and Draft Plaintiff Betances' Opposition to Defendant's Demurrer to First Amended Complaint (filed on June 1, 2015 in the <i>Betances</i> Action)	9.25	0
Review Defendant's Reply in Support of Demurrer to Plaintiff Betances' First Amended Complaint (filed on June 5, 2015 in the <i>Betances</i> Action)	1	0
Review Tentative Ruling on Defendant's Demurrer to Plaintiff's First Amended Complaint (issued on June 14, 2015 in the <i>Betances</i> Action)	0.10	0
Review and Analyze Defendant's Motion to Permit Filing of Petition for Coordination, Declaration of Frank M. Liberatore in Support Thereof, and [Proposed] Order (filed on June 13, 2016 in the <i>Valdez</i> Action)	0	2
Review Court's Order Granting Defendant's Motion to Permit Filing of Petition for Coordination (filed on July 12, 2016 in the <i>Valdez</i> Action)	0	0.10
Review and Analyze Defendant's Petition for Coordination and Memorandum in Support and Declaration of Frank M. Liberatore in Support Thereof (filed on July 19, 2016 in the <i>Valdez</i> Action)	0	0.50

Research and Draft Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; Declaration of Edwin Aiwarzian in Support Thereof; Declaration of V. Andre Sherman in Support Thereof; Declaration of Plaintiff Eric Betances in Support Thereof; Declaration of Plaintiff Roxana Valdez in Support Thereof; and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on June 1, 2018 in the JCCP Action)	18	4
Draft Plaintiffs' Notice of Errata to Declaration of V. Andre Sherman in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on June 8, 2018 in the JCCP Action)	0.50	0.50
Research and Draft Plaintiffs' Supplemental Brief in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; Supplemental Declaration of Edwin Aiwarzian in Support Thereof; and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on June 22, 2018 in the JCCP Action)	9	0
Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payments; Declaration of Edwin Aiwarzian in Support Thereof; Declaration of V. Andre Sherman in Support Thereof; [Proposed] Final Approval Order and Judgment (filed on December 26, 2018 in the JCCP Action)	20.50	5.25
Total Hours:	429.35	137.55
Combined Hours:	566.90	

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Betances v. DFT, Inc. d/b/a Cannon Management
DFT, Inc. Wage and Hour Cases

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/15/2014	U.S. Postmaster	Postage	6.49
10/6/2014	ProLegal	Attorney Service	80.55
10/6/2014	Los Angeles Superior Court	Filing Fee	435.00
10/9/2014	ProLegal	Attorney Service	125.03
10/27/2014	U.S. Postmaster	Postage	0.48
11/8/2014	Pure Legal, Inc.	Attorney Service	165.00
11/18/2014	U.S. Postmaster	Postage	1.61
11/18/2014	Los Angeles Superior Court	Complex Fee	1,000.00
12/23/2014	U.S. Postmaster	Postage	0.69
1/7/2015	Edwin Aiwarzian	Travel Reimbursement	10.76
1/23/2015	ProLegal	Attorney Service	29.56
3/17/2015	File & ServeXpress	Attorney Service	35.00
3/18/2015	File & ServeXpress	Attorney Service	6.00
4/1/2015	File & ServeXpress	Attorney Service	6.00
5/1/2015	File & ServeXpress	Attorney Service	6.00
6/1/2015	Golden State Overnight	Courier Service	15.73
6/1/2015	Pure Legal, Inc.	Attorney Service	165.00
6/2/2015	File & ServeXpress	Attorney Service	6.00
6/12/2015	Edwin Aiwarzian	Travel Reimbursement	10.76
6/12/2015	Arby Aiwarzian	Travel Reimbursement	20.76
6/26/2015	Pure Legal, Inc.	Attorney Service	165.00
6/26/2015	File & ServeXpress	Attorney Service	11.00
7/2/2015	File & ServeXpress	Attorney Service	6.00
7/13/2015	File & ServeXpress	Attorney Service	11.00
7/16/2015	Golden State Overnight	Courier Service	11.58
7/20/2015	FedEx Express	Courier Service	21.55
7/24/2015	File & ServeXpress	Attorney Service	11.00
7/27/2015	Pure Legal, Inc.	Attorney Service	165.00
8/2/2015	File & ServeXpress	Attorney Service	6.00
8/5/2015	File & ServeXpress	Attorney Service	11.00
8/10/2015	File & ServeXpress	Attorney Service	11.00
8/10/2015	Pure Legal, Inc.	Attorney Service	165.00
8/11/2015	D. Elliot Gonzalez	Travel Reimbursement	173.01
8/24/2015	D. Elliot Gonzalez	Travel Reimbursement	26.47
8/28/2015	Golden State Overnight	Courier Service	19.92
9/2/2015	File & ServeXpress	Attorney Service	6.00
9/15/2015	File & ServeXpress	Attorney Service	11.00
10/1/2015	File & ServeXpress	Attorney Service	6.00
10/21/2015	File & ServeXpress	Attorney Service	11.00
11/1/2015	File & ServeXpress	Attorney Service	6.00
12/1/2015	File & ServeXpress	Attorney Service	6.00
1/1/2016	File & ServeXpress	Attorney Service	6.00
1/21/2016	U.S. Postmaster	Postage	1.14
2/1/2016	File & ServeXpress	Attorney Service	6.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Betances v. DFT, Inc. d/b/a Cannon Management
DFT, Inc. Wage and Hour Cases

3/1/2016	File & ServeXpress	Attorney Service	6.00
4/2/2016	File & ServeXpress	Attorney Service	6.00
4/30/2016	File & ServeXpress	Attorney Service	5.00
5/2/2016	File & ServeXpress	Attorney Service	11.00
5/13/2016	File & ServeXpress	Attorney Service	11.00
5/17/2016	Pure Legal, Inc.	Attorney Service	235.00
5/23/2016	D. Elliot Gonzalez	Travel Reimbursement	23.32
6/1/2016	File & ServeXpress	Attorney Service	6.00
6/4/2016	File & ServeXpress	Attorney Service	5.00
7/3/2016	File & ServeXpress	Attorney Service	11.00
7/27/2016	U.S. Postmaster	Postage	6.80
8/2/2016	ProLegal, Inc.	Attorney Service	202.24
8/2/2016	File & ServeXpress	Attorney Service	6.00
8/6/2016	File & ServeXpress	Attorney Service	5.00
8/31/2016	File & ServeXpress	Attorney Service	11.00
8/31/2016	Pure Legal, Inc.	Attorney Service	165.00
9/3/2016	File & ServeXpress	Attorney Service	11.00
9/7/2016	D. Elliot Gonzalez	Travel Reimbursement	20.64
9/21/2016	File & ServeXpress	Attorney Service	11.00
9/21/2016	Pure Legal, Inc.	Attorney Service	148.00
10/3/2016	File & ServeXpress	Attorney Service	11.00
11/4/2016	File & ServeXpress	Attorney Service	22.00
11/8/2016	TollFreeConference.com	Attorney Service	3.32
11/16/2016	File & ServeXpress	Attorney Service	11.00
12/7/2016	Los Angeles Superior Court	Filing Fee	20.00
12/8/2016	ProLegal, Inc.	Attorney Service	115.14
2/2/2017	File & ServeXpress	Attorney Service	11.00
2/3/2017	File & ServeXpress	Attorney Service	11.00
2/17/2017	D. Elliot Gonzalez	Travel Reimbursement	2.00
2/21/2017	File & ServeXpress	Attorney Service	11.00
3/1/2017	File & ServeXpress	Attorney Service	22.00
3/2/2017	Golden State Overnight	Courier Service	11.27
3/13/2017	Los Angeles Superior Court	Filing Fee	20.00
3/13/2017	File & ServeXpress	Attorney Service	11.00
3/13/2017	Pure Legal, Inc.	Attorney Service	150.00
3/20/2017	File & ServeXpress	Attorney Service	11.00
3/20/2017	Pure Legal, Inc.	Attorney Service	165.00
3/22/2017	File & ServeXpress	Attorney Service	11.00
3/24/2017	Golden State Overnight	Courier Service	11.27
4/1/2017	File & ServeXpress	Attorney Service	11.00
4/7/2017	File & ServeXpress	Attorney Service	11.00
4/10/2017	File & ServeXpress	Attorney Service	11.00
4/10/2017	Golden State Overnight	Courier Service	15.18
4/27/2017	File & ServeXpress	Attorney Service	11.00
5/3/2017	Golden State Overnight	Courier Service	11.32

LAWYERS for JUSTICE PC CASE COST DETAIL
Betances v. DFT, Inc. d/b/a Cannon Management
DFT, Inc. Wage and Hour Cases

5/5/2017	FedEx Express	Courier Service	19.09
5/11/2017	CPT Group, Inc.	Attorney Service	125.00
6/1/2017	File & ServeXpress	Attorney Service	11.00
6/26/2017	Golden State Overnight	Courier Service	39.65
6/30/2017	Edwin Aiwarzian	Travel Reimbursement	153.73
8/4/2017	File & ServeXpress	Attorney Service	11.00
8/9/2017	Pure Legal, Inc.	Videography Service	325.00
8/30/2017	Los Angeles Superior Court	Filing Fee	20.00
8/30/2017	Pure Legal, Inc.	Attorney Service	165.00
8/30/2017	File & ServeXpress	Attorney Service	11.00
9/25/2017	Golden State Overnight	Courier Service	35.91
9/26/2017	ProLegal, Inc.	Attorney Service	53.32
10/2/2017	ProLegal, Inc.	Attorney Service	87.82
10/11/2017	Edwin Aiwarzian	Travel Reimbursement	36.90
10/11/2017	Pure Legal, Inc.	Videography Service	962.50
10/11/2017	Arby Aiwarzian	Travel Reimbursement	116.36
11/16/2017	File & ServeXpress	Attorney Service	11.00
11/16/2017	Pure Legal, Inc.	Attorney Service	180.00
11/29/2017	File & ServeXpress	Attorney Service	11.00
11/30/2017	Pure Legal, Inc.	Attorney Service	166.80
12/11/2017	CourtCall, LLC	Attorney Service	86.00
1/3/2018	Pure Legal, Inc.	Attorney Service	166.20
1/3/2018	File & ServeXpress	Attorney Service	11.00
3/23/2018	File & ServeXpress	Attorney Service	11.00
3/26/2018	Los Angeles Superior Court	Filing Fee	20.00
3/26/2018	Pure Legal, Inc.	Attorney Service	167.10
4/6/2018	Pure Legal, Inc.	Attorney Service	182.40
6/1/2018	Pure Legal, Inc.	Attorney Service	203.90
6/1/2018	Los Angeles Superior Court	Filing Fee	60.00
6/8/2018	Pure Legal, Inc.	Attorney Service	197.40
6/13/2018	Danielle Chang	Travel Reimbursement	17.48
6/22/2018	Pure Legal, Inc.	Attorney Service	204.75
12/26/2018	Los Angeles Superior Court	Filing Fee	60.00
12/26/2018	Pure Legal, Inc.	Attorney Service	195.00
	LFJ (In-House)	Photocopies (13,110 @ \$0.15 per page)	1,966.50
		Total:	10,697.40

LAWYERS for JUSTICE PC CASE COST DETAIL
Valdez v. DFT, Inc. d/b/a Cannon Management

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/16/2016	ProLegal, Inc.	Attorney Service	179.74
12/8/2016	CourtCall, LLC	Attorney Service	86.00
1/17/2017	CourtCall, LLC	Attorney Service	86.00
2/3/2017	Pure Legal, Inc.	Attorney Service	130.00
2/21/2017	ProLegal, Inc.	Attorney Service	164.74
8/2/2017	Pure Legal, Inc.	Attorney Service	82.40
9/7/2017	Pure Legal, Inc.	Attorney Service	160.00
11/29/2017	ProLegal, Inc.	Attorney Service	143.45
6/14/2018	CourtCall, LLC	Attorney Service	116.00
6/22/2018	CourtCall, LLC	Attorney Service	86.00
Total:			1,234.33