

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

V. Andre Sherman (SBN 198684)
GIRARDI & KEESE
1126 Wilshire Boulevard
Los Angeles, California 90017
Tel: (213) 977-0211 / Fax: (213) 481-1554

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 V. ANDRE SHERMAN
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 (Edwin Aiwazian);
Declarations of Class Representatives (Eric
Betances and Roxana Valdez); Declaration of
Settlement Administrator (Elizabeth
Kruckenberg); and [Proposed] Final Approval
Order and Judgment filed concurrently herewith]

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

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 16
17
18
19
20
21
22
23
24
25
26
27
28

28

- 1 • *Schramm, Weinstein v. Chase Bank*, United States District Court, Central District of
2 California Case No. CV09-9442-JAK. This is a class action on behalf of
3 approximately twenty thousand (20,000) mortgage holders who were charged an
4 improper rate for their mortgage.
- 5 • *Aguayo, et al. v. Betz Laboratories, Inc., et al.*, Los Angeles County Superior Court
6 Case No. BC123746 and *Addison v. Pacific Gas and Electric, et al.*,
7 Los Angeles County Superior Court Case No. BC158588. Girardi & Keese
8 represented over 600 plaintiffs claiming personal injury due to water contamination
9 caused by the dumping of Chromium VI;
- 10 • *Acosta v. Betz Laboratories, Inc., et al.*, Los Angeles County Superior Court, Case
11 No. BC161669. Girardi & Keese represented 1,000 plaintiffs on claims similar to
12 those in *Aguayo*;
- 13 • *Adams v. Pacific Gas and Electric*, Los Angeles County Superior Court Case No.
14 BC113000. Girardi & Keese represented 650 plaintiffs claiming personal injuries
15 from exposure to Chromium VI;
- 16 • *West, et al. v. LeBoeuf, Lamb, Greene & MacRae, a Partnership, et al.*, Los Angeles
17 Superior Court, Case No. BC133060. Girardi & Keese represented 230 investors in
18 Lloyd's of London who suffered huge monetary losses as individual Underwriters at
19 Lloyd's due to participation in Lloyd's Syndicates which suffered devastating losses
20 from poor investments;
- 21 • *Allegro v. State Farm Automobile Insurance Co.*, Los Angeles County Superior
22 Court, Case No. BC126014. Girardi & Keese represented more than 100 plaintiffs
23 insured by the defendants for earthquake coverage;
- 24 • *Carrillo v. Rent-A-Center, Inc.*, San Diego Superior Court Case No. JCCP 4244. This
25 matter involves representation of a class of consumers who participated in "rent-to-
26 own" programs which allegedly violate portions of the Karmette Rental Purchase Act;

27 ///

28 ///

- 1 • *Gonzales v. Lloyds TSB Bank, plc*, United States District Court, Central District of
2 California Case No. 06-1433 VBF (JTLx). This matter resulted in more than \$17
3 million settlement on behalf of hundreds of Ponzi scheme victims;
- 4 • In *Natural Gas Anti-Trust Cases I, II, III & IV*, San Diego Superior Court Case Nos.
5 JCCP 4221, 4224 and 4226. Girardi & Keese recovered more than \$2 billion on
6 behalf of consumers overcharged for natural gas during the California energy crisis in
7 2000 and 2001 through close work by a committee of firms.

8 4. Girardi & Keese has served as lead, liaison, and executive committee counsel on
9 numerous local and national multi-plaintiff pharmaceutical, business, antitrust, and product
10 defect cases.

11 **WORK PERFORMED BY GIRARDI & KEESE**

12 5. I have been actively engaged in litigating this matter since being associated into
13 the action entitled *Eric Betances v. DFT, Inc. d/b/a Cannon Management*, Los Angeles Superior
14 Court Case No. BC559751 ("*Betances* Action"). Girardi & Keese has fully and actively
15 participated in many aspects of this litigation. The tasks we performed included, and were not
16 limited to, conducting research and investigation; reviewing and analyzing documents produced
17 by Plaintiffs and Defendant DFT, Inc. d/b/a Cannon Management ("Defendant"); interviewing
18 and gathering information from Plaintiffs and other Class Members; preparing for, defending,
19 and taking depositions; preparing for mediation and settlement negotiations, including and not
20 limited to, developing a strategy for settlement negotiations and mediation; negotiating the terms
21 of the Settlement; reviewing and revising the Settlement Agreement; and finalizing the moving
22 and supporting papers for preliminary approval and final approval of the Settlement.

23 6. We have worked closely with our co-counsel, Lawyers *for* Justice, PC throughout
24 this litigation. The work with our co-counsel has been a coordinated and combined effort. Areas
25 of responsibility were divided between the firms so as to avoid unnecessary duplication of work
26 and effort. As an example, Lawyers *for* Justice, PC had primary responsibility for drafting the
27 pleadings in the *Betances* Action, propounding and responding to written discovery requests, and
28 communicating with Plaintiffs, among other work performed. However, when the abilities of

1 experienced and skilled counsel from both firms were needed, we worked together. For
2 example, a large volume of documents and data produced during litigation needed to be
3 reviewed and analyzed in order to find the pertinent documents, information, and data that would
4 be helpful to the cases, class certification, and the value of the claims, and attorneys from both
5 firms were assigned that task to ensure that nothing was missed. Both firms also worked
6 together to take and defend depositions, strategize the cases and were actively involved in
7 preparing the cases for mediation, in reviewing and revising the terms of the Settlement, and in
8 drafting and finalizing the motions for preliminary approval and final approval of the Settlement.

9 7. We reviewed numerous documents either produced by Plaintiffs and Defendant or
10 obtained by Class Counsel through other sources. These documents provided Class Counsel
11 with a critical understanding of the nature of the work performed by Class Members and
12 Defendant's policies and procedures, and were used in analyzing liability and damages in
13 connection with all phases of the litigation, and ultimately with the mediation and settlement
14 negotiation process.

15 8. Girardi & Keese has spent a considerable number of hours litigating the cases.
16 I have reviewed the firm's records reflecting the work performed by me and other lawyers of the
17 firm, and hereby attest that Girardi & Keese has spent a total of **137.55 hours** performing tasks
18 on behalf of Plaintiffs and the Class. These hours include work done by myself and other
19 lawyers of Girardi & Keese. Attached as "**EXHIBIT A**" hereto is an Attorney Task and Time
20 Chart that sets forth in detail the breakdown of time for the requisite tasks performed by Class
21 Counsel.

22 9. The hourly rate of \$800 is commensurate with the background of the firm, as well
23 as the individual backgrounds, training, and experience of the attorneys who worked on this
24 matter, including myself.

25 10. In this instance, based on the hours worked on this matter, and utilizing the hourly
26 rate of \$800, the total lodestar of fees for work performed by Girardi & Keese is **\$110,040**.

27 ///

28 ///

11. Attached hereto as **“EXHIBIT B”** are case cost details reflecting litigation costs and expenses incurred by Girardi & Keese, which reflects that the firm has incurred **\$12,639.26** in litigation costs and expenses in both cases. These expenses were reasonable and necessary in the prosecution of the cases.

12. I submit that the Settlement reached herein is fair, reasonable, and adequate. In addition, the Settlement is in the best interest of Plaintiffs and the other Class Members.

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

Executed on this 26th day of December 2018, at Los Angeles, California.

Anders P.

V. Andre Sherman

EXHIBIT A

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

TASK	LAWYERS for 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 Aiwazian 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 Aiwazian 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 Aiwazian 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

Girardi & Keese
Case Cost Report

Case No: 2015211 Betances v. DFT, Inc. d/b/a Cannon Management

<u>Date</u>	<u>Vendor</u>	<u>VendorName</u>	<u>Amount</u>
6103	Court Reporters		
08/06/2018	3A&BREP	A & B REPORTING, LLC.	789.59
03/08/2016	3VERLOS	VERITEXT	422.95
		Sub-Total for: 6103	<u>\$1,212.54</u>
6113	Mediation Expenses		
06/26/2017	3JAMS#3	JAMS, INC.	2,475.00
		Sub-Total for: 6113	<u>\$2,475.00</u>
6115	Attorney Services		
07/18/2017	3PROCOU	PROLEGAL	26.54
		Sub-Total for: 6115	<u>\$26.54</u>
		Case Total: 2015211	<u><u>\$3,714.08</u></u>

Girardi & Keese

Case Cost Report

Case No: 2016052 Valdez v. DFT, Inc. d/b/a Cannon Management

<u>Date</u>	<u>Vendor</u>	<u>VendorName</u>	<u>Amount</u>
6101	Court Fees		
04/08/2016	3CLERLA	CLERK OF THE COURT	435.00
07/21/2017	3PURLEG	PURE LEGAL, INC.	165.00
		Sub-Total for: 6101	\$600.00
6103	Court Reporters		
01/09/2018	3A&BREP	A & B REPORTING, LLC.	2,947.10
01/09/2018	3A&BREP	A & B REPORTING, LLC.	225.00
		Sub-Total for: 6103	\$3,172.10
6106	Attorney Services		
04/30/2016	3JANJAN	JANNEY & JANNEY ATTORNEY	10.00
05/31/2016	3JANJAN	JANNEY & JANNEY ATTORNEY	10.00
05/31/2016	3JANJAN	JANNEY & JANNEY ATTORNEY	65.00
		Sub-Total for: 6106	\$85.00
6108	Travel / Negotiation Meetings		
08/31/2017	1SHERMA	ANDRÉ SHERMAN	1,237.80
09/30/2017	1SHERMA	ANDRÉ SHERMAN	1,015.18
12/21/2017	1SHERMA	ANDRÉ SHERMAN	299.90
		Sub-Total for: 6108	\$2,552.88
6113	Mediation Expenses		
06/26/2017	3JAMS#3	JAMS, INC.	2,475.00
		Sub-Total for: 6113	\$2,475.00
6115	Delivery		
08/31/2017	NOF	Postage	20.10
11/17/2017	NOF	Postage	20.10
		Sub-Total for: 6115	\$40.20
		Case Total: 2016052	\$8,925.18