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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE

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

Plaintiff,

vs.

USRG (CALIFORNIA) INC., a California
corporation; U.S. RESIDENTIAL GROUP,
LLC, an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: BC625588

Honorable Robert B. Broadbelt
Department 53

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action and PAGA
Settlement, Attorneys' Fees, Costs, and
Enhancement Payment; Declaration of Class
Representative (Guadalupe Moya);
Declaration of Settlement Administrator
(Cassandra Cita); and [Proposed] Final
Approval Order and Judgment filed
concurrently herewith]

Reservation No.: 409379171477
Date: August 23, 2019
Time: 10:00 a.m.
Department: 53

Complaint Filed: June 30, 2016
FAC Filed: February 20, 2019
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers for Justice, PC, attorneys of record for Guadalupe Moya ("Plaintiff") and the Class. 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 February 15, 2019, in Department 53 of the above-entitled Court, the Honorable Robert B. Broadbelt issued the Order Granting Preliminary Approval of Class Action Settlement ("Preliminary Approval Order"), thereby preliminarily approving the Joint Stipulation of Class Action and PAGA Settlement and Release ("Settlement Agreement," "Settlement," or "Agreement"), and conditionally certifying the Class for settlement purposes. The Court also preliminarily appointed and designated Lawyers for Justice, PC as Class Counsel, Plaintiff Guadalupe Moya as Class Representative, and Simpluris, Inc. ("Simpluris") to serve as Settlement Administrator for handling the notice and settlement administration process. The Court preliminarily approved and ordered the mailing of the Notice of Class Action Settlement ("Class Notice") to the Class Members. The Court adopted 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 and PAGA Settlement, Attorneys' Fees, Costs, and Enhancement Payment ("Motion for Final Approval"), no Class Members have objected to the settlement and release of Released Claims that do not arise under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* for the period from June 30, 2012 through February 15, 2019 ("Class Settlement") or the request for the Attorneys' Fees and Costs, Class Representative Enhancement Payment, 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. I have been actively engaged in in this litigation since the lawsuit was commenced on June 30, 2016, as have several other attorneys and members in our firm.

5. Before initiating the case, 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, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to representative PAGA claims, misclassification theory, meal and rest periods, wage-and-hour enforcement, Plaintiff's claims, and potential defenses. After conducting initial investigation, our firm determined that Plaintiff's claims were well-suited for representative adjudication owing to what appeared to be a common course of conduct affecting a similarly-situated group of salaried on-site employees misclassified as "exempt," including but not limited to "property managers," "assistant property managers," "community managers," "assistant community managers," "maintenance supervisors," "assistant maintenance supervisors," or persons who held similar job titles and/or performed similar job duties, who worked for Defendants USRG (California) Inc. and U.S. Residential Group, LLC (together, "Defendants") within the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Prior to reaching the Settlement, Class Counsel actively litigated the case, investigated the veracity, strength, and scope of the claims, and also prepared the matter for representative adjudication, class certification, and trial. The parties conducted extensive formal and informal discovery and investigation into the facts of the case. Class Counsel propounded multiple sets of written discovery requests in various forms, reviewed Defendants' responses and supplemental responses thereto, and served multiple deposition notices on both Defendants. Class Counsel worked with Plaintiff to provide responses to requests for production of documents that were propounded by Defendants. Class Counsel also prepared for and defended the deposition of Plaintiff Guadalupe Moya and prepared for and took the depositions of Defendants' Person Most Knowledgeable designee over two (2) full days and four (4) non-party

1 witnesses. Class Counsel interviewed and obtained information from Plaintiff and other Class
2 Members, including and not limited to the names of potential witnesses, and reviewed and
3 analyzed thousands of pages of documents and data produced by Defendants and obtained
4 through other sources. The documents and data reviewed and analyzed by Class Counsel
5 included, and were not limited to, Plaintiff and other Class Members' employment records, a
6 detailed sampling of Class Members' time and pay data (including, but not limited to, timecards,
7 payroll records, and wage statements), Defendants' Employee Handbooks and Associate
8 Handbook, agreements, internal memoranda, job titles and descriptions, forms (such as,
9 Defendants' Reimbursement Form and Mileage Reimbursement Form), and Defendants'
10 operations and employment practices (such as, Defendants' Hiring Guide), procedures (such as,
11 Defendants' Payroll Procedures and Rent Deduction through Payroll Procedures), and policies
12 (such as, Defendants' Meal (Lunch) Break and Rest Scheduling Break policy and Break and
13 Overtime policy), among other information and documents. Class Counsel also researched
14 applicable law, developed damages/valuation models, and prepared for and attended court
15 proceedings, including an informal discovery conference, and settlement negotiations. Counsel
16 for the parties also met and conferred on numerous occasions, e.g., to discuss issues relating to
17 the pleadings, motion practice, *ex parte* applications, discovery, and production of documents
18 and data.

19 7. As outlined herein, the parties have conducted significant investigation during the
20 course of this litigation. Class Counsel analyzed thousands of pages of documents and data
21 either produced by Defendants or obtained by Class Counsel through other sources. These
22 documents and data provided a critical understanding of the nature of the work performed by the
23 Class Members, as well as Defendants' operations and employment policies, practices, and
24 procedures, and were used in analyzing liability, damages, and penalties issues in connection
25 with all phases of the litigation, and ultimately with the settlement negotiation process.

26 8. After conducting informal and formal discovery and investigation into the facts of
27 the action, counsel for the parties engaged in extensive settlement negotiations to try to resolve
28 the matter. During all settlement discussions, the parties conducted their negotiations at arm's

length in an adversarial position. Prior to and during settlement discussions, the parties exchanged information and data, and discussed various aspects of the case, including the risks and delays of further litigation; the risks to the parties of proceeding with representative adjudication, class certification, and trial; the law relating to misclassification theory, meal and rest periods, representative PAGA claims, and wage-and-hour enforcement; the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the parties was not easy. Defendants and their counsel felt very strongly about Defendants' ability to prevail on the merits and defeat class certification, while Plaintiff and Class Counsel believed that class certification would be obtained and that they would prevail at trial. After conducting extensive formal and informal discovery, investigations, and settlement negotiations, the parties agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims were unsuitable for representative adjudication and/or class treatment, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the case, appeals, and the real possibility of no recovery after years of litigation.

9. As set forth more fully in the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$117,800, which is thirty-eight percent (38%) of the Class Settlement Amount of \$310,000, and \$24,459.89 for reimbursement of litigation costs and expenses. The attorneys' fees award sought is commensurate with: (1) the risk that Class Counsel took in commencing this case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved for the Class Members; and (6) the other cases that Class Counsel has turned down in order to devote its time and efforts to this matter.

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

4 11. While not necessarily required to be demonstrated because the percentage fee that
5 is sought is proper for this settlement, Class Counsel has incurred many hours of work in
6 connection with this matter such that the request for attorneys' fees is also justified under a
7 simple lodestar analysis. Class Counsel has spent a considerable number of hours litigating this
8 case and has spent a total of **454.80 hours** performing tasks on behalf of Plaintiff and Class
9 Members. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth
10 in detail the breakdown of time for the tasks performed by Class Counsel. These hours include
11 work done by myself and several of the firm's other members. We also had litigation support
12 personnel actively engaged in assisting with the prosecution of the case.

13 12. The work performed in the cases, the background of our firm, as well as the
14 individual backgrounds, training, and experience of the attorneys who worked on this matter, in
15 litigating complex wage-and-hour class and representative actions, support a reasonable hourly
16 rate of compensation at the rate of at least \$500 for work performed by Class Counsel. Lawyers
17 for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least
18 \$500 per hour for legal services performed, by courts granting final approval in other cases: final
19 approval of the class and representative action settlement in *Seth Swan v. Pace Supply* (Sonoma
20 County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award
21 of attorneys' fees involved a higher hourly rate of \$855.96; final approval of the class and
22 representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda
23 County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the
24 award of attorneys' fees involved a higher hourly rate of \$831.38; approval of the Private
25 Attorneys General Act settlement in *Roberta Robles v. Altamed Health Services Corporation*
26 (Los Angeles County Superior Court Case No. BC639623) was granted on October 31, 2018,
27 and the award of attorneys' fees involved a higher hourly rate of \$602.22; final approval of the
28 class and representative action settlement in *Luis Carlos Deluna v. Amerit Fleet Solutions, Inc.*,

1 *et al.* (San Bernardino County Superior Court Case No. CIVDS1721564) was granted on
2 October 19, 2018, and the award of attorneys' fees involved a higher hourly rate of \$671.72;
3 final approval of the class and representative action settlement in *Patrick Sinay, et al. v.*
4 *Essendant Co., et al.* (Los Angeles County Superior Court Case No. BC651043) was granted on
5 September 28, 2018, and the award of attorneys' fees involved a higher hourly rate of \$624.81;
6 final approval of the class and representative action settlement in *Samuel Guerra, et al v.*
7 *Graphic Packaging International, Inc.* (Sacramento County Superior Court Case No. 34-2016-
8 00203789) was granted on June 5, 2018, and the award of attorneys' fees involved a higher
9 hourly rate of \$600; final approval of the class and representative action settlement in *Maryjo*
10 *Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No.
11 2020582) was granted on May 15, 2018, and the award of attorney's fees involved a higher
12 hourly rate of \$780.77; final approval of the class and representative action settlement in *Renee*
13 *Rivera, et al. v. Farmers and Merchants Bank of Long Beach* (Los Angeles County Court Case
14 No. BC569646) was granted on December 11, 2017, and the award of attorneys' fees involved a
15 higher hourly rate of \$629.96; final approval of the class and representative action settlement in
16 *Rebekah Perez, et al. v. Nestlé USA, Inc., et al.* (Alameda County Superior Court Case No.
17 RG15773654) was granted on August 18, 2017; final approval of the class and representative
18 action settlement in *Elizabeth Ortiz, et al. v. Ghirardelli Chocolate Company* (Alameda County
19 Superior Court Case No. RG15764300) was granted on July 19, 2017, and the award of
20 attorneys' fees involved a higher hourly rate of \$575; final approval of the class and
21 representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento
22 County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the
23 award of attorneys' fees involved a higher hourly rate of \$845.64; final approval of the class and
24 representative action settlement in *Mark Aceves v. Cambro Manufacturing Company* (Orange
25 County Superior Court Case No. 30-2015-00810013-CU-OE-CXC) was granted on April 14,
26 2017; final approval of the class and representative action settlement in *East West Bank Wage*
27 *and Hour Cases* (San Francisco County Superior Court Case No. CJC-13-004839) was granted
28 on November 18, 2016; approval of the Private Attorneys General Act settlement in *Tatiana*

1 *Kemp v. The Irvine Company Apartment Communities, Inc.* (Orange County Superior Court Case
2 No. 30-2015-00775439) was granted on November 4, 2016; final approval of the class and
3 representative action settlement in *Erick Guzman, et al. v. Banana Republic, LLC* (Los Angeles
4 County Superior Court Case No. BC488069) was granted on August 5, 2016; final approval of
5 the class and representative action settlement in *Restoration Hardware Wage & Hour Cases* (Los
6 Angeles County Superior Court Case No. JCCP4794) was granted on April 28, 2016; final
7 approval of the class and representative action settlement in *Kevin Coonce v. Ferguson*
8 *Enterprises, Inc.* (Sacramento County Superior Court Case No. 34-2021-00136285) was granted
9 on May 22, 2014, and the award of attorneys' fees involved a higher hourly rate of \$625; and
10 final approval of the class action settlement in *Anthony Powell v. Fairfield Residential Company,*
11 *LLC* (Alameda County Superior Court Case No. RG12660811) was granted on August 6, 2014.

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

13 **EDUCATION**

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

22 **JUDICIAL EXTERNSHIPS**

23 14. From approximately September 2002 to approximately December 2002, I served
24 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of*
25 *Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I
26 served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal*
27 *for the Second Appellate District*.

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LITIGATION AND CLASS ACTION EXPERIENCE

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

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

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

EXAMPLES OF CLASS ACTION RESULTS

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

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

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

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

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

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

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

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

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

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

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

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

20 l) Our firm, in association with co-counsel, represented the plaintiffs in a
21 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
22 involving allegations of misclassification of the "Department Manager" position. On August 12,
23 2016, the court granted plaintiffs' motion for class certification. The Alameda County Superior
24 Court Case Number is RG13680477.

25 m) Our firm represented the plaintiff in a representative action under the
26 Private Attorneys General Act, against a real estate and property management company, on
27 behalf of non-exempt employees. On November 4, 2016, the court granted approval of the
28 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 co-counsel, represented the plaintiffs in a
3 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 co-counsel, represented the plaintiffs in a
12 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 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 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 wage-and-hour class action against a container manufacturer, on behalf of non-exempt employees. On October 15, 2018, the court granted the plaintiff's motion for class certification. The Tulare County Superior Court Case Number is VCU264528.

w) Our firm 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

19. Lawyers for Justice, PC has incurred \$24,459.89 in litigation costs and expenses as reflected in "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in the prosecution of the case. It should be noted that Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained by Plaintiff, Participating Class Members, and the State of California.

CLASS REPRESENTATIVE ENHANCEMENT PAYMENT TO PLAINTIFF

20. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for a Class Representative Enhancement Payment in the amount of \$5,000 to Plaintiff Guadalupe Moya. The requested Class Representative Enhancement Payment is fair

1 and appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant
2 documents and past employment records and provided the facts and evidence necessary to
3 attempt to prove the allegations, including and not limited to, by way of appearing for a full-day
4 deposition and providing responses to requests for production of documents that were
5 propounded by Defendants. Plaintiff was available whenever Class Counsel needed her and
6 actively tried to obtain information that would benefit the Class. Plaintiff spent numerous hours
7 speaking with Class Counsel about her claims, describing her work experiences with Defendants,
8 and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Guadalupe
9 Moya to receive a reasonable Class Representative Enhancement Payment in the amount of
10 \$5,000, in addition to her Individual Settlement Payment and share of the Employee PAGA
11 Portion, for her services on behalf of the Class and State of California.

12 21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
13 Settlement is in the best interests of Plaintiff and the Class.

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

16 Executed this 1st day of August 2019, at Glendale, California.

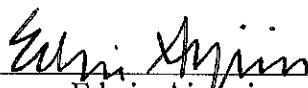
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EXHIBIT A

MOYA V. USRG (CALIFORNIA) INC., ET AL.
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. BC625588)
ATTORNEY TASK AND TIME CHART

TASK		LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence		
Pre-Lawsuit Investigation of the Key Facts with a Focus on the Merits of Plaintiff Guadalupe Moya's ("Plaintiff") Claims and the Merits of the Claims of the Aggrieved Employees, Potential Damages/Civil Penalties Exposure of Defendants USRG (California) Inc. and U.S Residential Group, LLC (together, "Defendants") With Respect to the Damages Sustained by Plaintiff and Aggrieved Employees	8	
Pre-Lawsuit Legal Research and Analysis of Latest Misclassification, Meal and Rest Break, and Representative PAGA Decisions in California, Including all New Relevant DLSE Materials	4.25	
Investigation of Defendants, Defendants' Business Relationships, and the Industry in which Defendants Operate	3	
Investigation of Defendants' Organizational and Corporate Structure, and Executive Reporting Structure as It Related to the Employment and Management of the Putative Class Members	2.50	
Research and Investigation Re: Arbitration and Analysis of Enforceability	4.75	
Research and Investigation Re: Defendants' Policies, Practices, and Procedures Relating to Classifying Employees, Meal/Rest Breaks, Overtime Compensation, and Reimbursement of Business-Related Expenses	11	
Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	2	

Meet and Communicate with Plaintiff Guadalupe Moya Throughout the Pendency of the Case	23.50
Meet and Communicate with Putative Class Members	7
Pleadings and Court Filings	
Research and Draft Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on June 30, 2016)	8
Review Court's Notice of Case Assignment (filed on June 30, 2016)	0.10
Review Court's Notice Regarding Order to Show Cause Hearing (filed on July 7, 2016)	0.10
Review and Analyze Defendants' Answer to Plaintiff's Unverified Complaint Under the Private Attorneys General Act (PAGA), California Labor Code § 2698, Et Seq. and Research Affirmative Defenses in Defendants' Answer (served on August 8, 2016)	4.25
Review Court's Notice of Case Management Conference (filed on August 11, 2016)	0.10
Review and Analyze Defendants' Case Management Statement (served on August 24, 2016)	0.25
Draft Plaintiff's Case Management Statement (filed on August 25, 2016)	0.75
Review Court's Minute Order Regarding Case Management Conference (filed on September 8, 2016)	0.10
Review Defendants' Notice of Ruling at September 8, 2016 Initial Case Management Conference (served on September 13, 2016)	0.25
Meet and Confer with Defendants' Counsel, and Draft Joint Report and Review and Analyze Defendants' Request for Judicial Notice in Support of Joint Report (served on February 7, 2017)	5.25

Review Court's Minute Order Regarding Status Conference (filed on February 15, 2017)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Notice of Settlement (filed on July 6, 2018)	1
Review Court's Notice Re: Continuance of Hearing (filed on July 27, 2018)	0.10
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on September 4, 2018)	0.10
Draft Notice of Entry of Judgment (Notice Re: Continuance of Hearing) (filed on September 5, 2018)	0.25
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Vacate or Continue Final Status Conference and Trial and [Proposed] Order Thereon (submitted on December 4, 2018)	1.50
Review Court's Notice Re: Continuance of Hearing and Order (filed on December 18, 2018)	0.10
Research and Draft Plaintiff's First Amended Class Action Complaint for Damages & Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on February 20, 2019)	5
Review and Analyze Defendants' Answer to Plaintiff's Unverified First Amended Complaint and Research Affirmative Defenses in Defendants' Answer (served on February 21, 2019)	2.25
Appearances	
Prepare for, Travel to/from, and Attend Case Management Conference (September 8, 2016)	2.75
Prepare for, Travel to/from, and Attend Status Conference and Informal Discovery Conference (February 15, 2017)	6.50
Prepare for, Travel to/from, and Attend Hearing on Defendants' <i>Ex-Parte</i> Application for an Order Continuing Trial Date and Dates Contingent Thereon by Stipulation (May 17, 2017)	3

Prepare for, Travel to/from, and Attend Hearing on Plaintiff's <i>Ex-Parte</i> Application for an Order Continuing the Filing Deadline for Plaintiff's Opposition to Defendant's Motion for Summary Judgment, and Continuance of the Motion for Summary Judgment Hearing and Trial Date of This Case (December 7, 2017)	5.75
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's <i>Ex-Parte</i> Application for an Order Vacating, or in the Alternative Continuing, the Trial Date and All Trial-Related Hearing Dates and Deadlines (January 2, 2019)	2.25
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (February 15, 2019)	3.50
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment (August 23, 2019) (Anticipated)	5
Discovery and Deposition	
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant USRG (California) Inc. (served on September 8, 2016)	9
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant U.S. Residential Group LLC (served on September 8, 2016)	4.25
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant USRG (California) Inc. and Requests for Production of Documents (October 10, 2016; Organizational Structure) (served on September 8, 2016)	4
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant USRG (California) Inc. and Requests for Production of Documents (October 11, 2016; Job Duties) (served on September 8, 2016)	4.75

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant U.S. Residential Group LLC and Requests for Production of Documents (October 12, 2016; Organizational Structure) (served on September 8, 2016)	4
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant U.S. Residential Group LLC and Requests for Production of Documents (October 13, 2016; Job Duties) (served on September 8, 2016)	4.75
Review and Analyze Defendant USRG (California) Inc.'s Objections to Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (October 10, 2016; Organizational Structure) (served on October 6, 2016)	3
Review and Analyze Defendant USRG (California) Inc.'s Objections to Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (October 11, 2016; Job Duties) (served on October 6, 2016)	5.25
Review and Analyze Defendant U.S. Residential Group LLC's Objections to Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (October 12, 2016; Organizational Structure) (served on October 6, 2016)	2.50
Review and Analyze Defendant U.S. Residential Group LLC's Objections to Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (October 13, 2016; Job Duties) (served on October 6, 2016)	6
Review and Analyze Defendant U.S. Residential Group LLC's Objections to Plaintiff's Form Interrogatories - General (Set One), Objections to Plaintiff's Special Interrogatories (Set One), Objections to Plaintiff's Special Interrogatories (Set Two), and Objections to Plaintiff's Requests for Production of Documents (Set One) (served on October 12, 2016)	9.25
Review and Analyze Defendant USRG (California) Inc.'s Objections to Special Interrogatories (Set One) (served on October 12, 2016)	1.50

Review and Analyze Defendant USRG (California) Inc.'s Response to Plaintiff's Form Interrogatories - General (Set One), Response to Plaintiff's Special Interrogatories (Set Two), and Response to Plaintiff's Requests for Production of Documents (Set One) (served on October 26, 2016)	8.50
Review and Analyze Documents Produced by Defendants, Including Personnel File, Pay Stubs, and Time Records for Plaintiff Guadalupe Moya (USRG-MOYA 000001-0001481) (served on October 26, 2016)	12.25
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (drafted on November 1, 2016)	2.50
Review and Analyze Defendant USRG (California) Inc.'s Request for Production of Documents (Set One) to Plaintiff, Set One (served on November 9, 2016)	2.75
Review and Analyze Defendant USRG (California) Inc.'s Notice of Deposition of Guadalupe Moya (served on November 9, 2016)	0.50
Draft Plaintiff's Objections to Defendant USRG (California) Inc.'s Notice of Deposition of Guadalupe Moya (served on December 19, 2016)	0.75
Draft Plaintiff's Responses to Defendant USRG (California) Inc.'s Request for Production of Documents (Set One) (served on December 20, 2016)	6.50
Review and Analyze Defendant USRG (California) Inc.'s Supplemental Response to Plaintiff's Form Interrogatories - General (Set One) and Supplemental Response to Plaintiff's Requests for Production of Documents (Set One) (served on February 2, 2017)	2
Draft Plaintiff's Re-Notice of Deposition of Person Most Knowledgeable at Defendant USRG (California) Inc. and Requests for Production of Documents (April 12, 2017; Job Duties) (served on March 3, 2017)	0.50
Review and Analyze Defendant USRG (California) Inc.'s Second Notice of Deposition of Guadalupe Moya (served on March 6, 2017)	0.25

Draft Plaintiff's Objections to Defendant USRG (California) Inc.'s Second Notice of Deposition of Guadalupe Moya (served on March 13, 2017)	0.50
Review and Analyze Defendant USRG (California) Inc.'s Third Notice of Deposition of Guadalupe Moya (served on March 16, 2017)	0.25
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Guadalupe Moya (March 24, 2017; Los Angeles, California) and Review Deposition Transcript	15
Prepare for and Take the Deposition of Person Most Knowledgeable Shellee Rader (April 12, 2017; Glendale, California) and Review Deposition Transcript	15.75
Review and Analyze Defendant USRG (California) Inc.'s Further Supplemental Response to Plaintiff's Form Interrogatories - General (Set One), Further Supplemental Response to Plaintiff's Requests for Production of Documents (Set One), and Supplemental Response to Plaintiff's Special Interrogatories (Set Two) (served on May 3, 2017)	3.75
Draft Plaintiff's Notice of Videotape Deposition of Deborah Frontino (May 22, 2017) (served on May 8, 2017)	0.75
Draft Plaintiff's Notice of Videotape Deposition of Ed Quigley (May 23, 2017) (served on May 8, 2017)	0.50
Draft Plaintiff's Notice of Videotape Deposition of Love Zepeda (May 24, 2017) (served on May 8, 2017)	0.50
Review and Analyze Defendants' Objections to Notice of Videotape Deposition of Deborah Frontino (May 22, 2017) (served on May 17, 2017)	0.50
Review and Analyze Defendants' Objections to Notice of Videotape Deposition of Ed Quigley (May 23, 2017) (served on May 17, 2017)	0.25
Review and Analyze Defendants' Objections to Notice of Videotape Deposition of Love Zepeda (May 24, 2017) (served on May 17, 2017)	0.25

Review and Analyze Defendant USRG (California) Inc.'s Second Supplemental Responses to Requests for Production of Documents (Set One) (served on June 7, 2017)	1
Draft Plaintiff's Re-Notice of Videotape Deposition of Ed Quigley (June 29, 2017) (served on June 9, 2017)	0.25
Review and Analyze Defendant's Declaration of Loyal Proffitt Regarding Organizational Structure (served on June 12, 2017)	0.75
Draft Plaintiff's Re-Notice of Videotape Deposition of Deborah Frontino (July 19, 2017) (served on June 19, 2017)	0.25
Prepare for and Take the Deposition of Non-Party Witness Ed Quigley (June 29, 2017; Glendale, California) and Review Deposition Transcript	6
Prepare for, Travel to/from, and Take the Deposition of Non-Party Witness Deborah Frontino (July 19, 2017; Portland, Oregon) and Review Deposition Transcript	17
Draft Plaintiff's Expert Witness Information and Expert Witness Declaration of D. Elliot Gonzalez (served on August 8, 2017)	4.25
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Cynthia Huizar (served on November 7, 2017)	1.25
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Cynthia Huizar (served on November 28, 2017)	1.75
Draft Plaintiff's Notice of Videotape Deposition of Shellee Rader (February 28, 2018) (served on January 19, 2018)	0.75
Draft Plaintiff's Notice of Videotape Deposition of Anna Guillen (February 27, 2018) (served on February 5, 2018)	0.50

Draft Plaintiff's Notice of Videotape Deposition of Latrice Rivers (February 21, 2018) (served on February 5, 2018)	0.50
Prepare for, Travel to/from, and Defend the Deposition of Non-Party Witness Latrice Rivers (February 21, 2018; Newport Beach, California) and Review Deposition Transcript	12
Prepare for, Travel to/from, and Take the Deposition of Person Most Knowledgeable Shellee Rader (February 28, 2018; Costa Mesa, California) and Review Deposition Transcript	15.50
Draft Plaintiff's Amended Notice of Videotape Deposition of Anna Guillen (March 12, 2018) (served on February 28, 2018)	0.25
Prepare for, Travel to/from, and Take the Deposition of Non-Party Witness Anna Guillen (March 12, 2018; Newport Beach, California) and Review Deposition Transcript	12
Draft Plaintiff's Special Interrogatories (Set Three) to Defendant USRG (California) Inc. (served on March 15, 2018)	2
Draft Plaintiff's Special Interrogatories (Set Three) to Defendant U.S. Residential Group LLC (served on March 15, 2018)	1.25
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Martha Perez (served on March 23, 2018)	0.50
Draft Plaintiff's Special Interrogatories (Set Four) and Requests for Production of Documents (Set Two) to Defendant USRG (California) Inc. (served on March 29, 2018)	4.25
Draft Plaintiff's Special Interrogatories (Set Four) and Requests for Production of Documents (Set Two) to Defendant U.S. Residential Group LLC (served on March 29, 2018)	2.50
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Martha Perez (served on April 13, 2018)	0.75

Review and Analyze Defendant USRG (California) Inc.'s Response to Special Interrogatories (Set Three) (served on April 18, 2018)	0.75
Review and Analyze Defendant U.S. Residential Group LLC's Response to Special Interrogatories (Set Three) (served on April 19, 2018)	1
Review and Analyze Defendant USRG (California) Inc.'s Response to Special Interrogatories (Set Four) and Response to Requests for Production of Documents (Set Two) (served on April 30, 2018)	3.75
Review and Analyze Defendant U.S. Residential Group LLC's Response to Special Interrogatories (Set Four) and Response to Requests for Production of Documents (Set Two) (served on April 30, 2018)	4
Letters and Correspondence	
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Guadalupe Moya for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on May 27, 2016)	1.50
Meet with Defendants' Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	20
Settlement	
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on November 29, 2018) and Draft Exhibits	13.75
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	5

Law and Motion	
Review and Analyze Defendants' Notice of <i>Ex Parte</i> Application and <i>Ex Parte</i> Application; Memorandum of Points and Authorities in Support of Defendants' <i>Ex Parte</i> Application for an Order Continuing Trial Date and Dates Contingent Thereon by Stipulation; and Declaration of Carlos Jimenez (served on May 17, 2017)	3
Review Court's Minute Order Regarding <i>Ex Parte</i> Application (filed on May 17, 2017)	0.10
Review Court's Order Granting Defendant's <i>Ex Parte</i> Application for an Order Continuing Trial Date and Dates Contingent Thereon (filed on May 18, 2017)	0.10
Review and Analyze Defendant's Notice of Motion and Motion for Summary Judgment, Memorandum of Points and Authorities in Support Thereof, Separate Statement in Support Thereof, Compendium of Evidence in Support Thereof, and [Proposed] Order Thereon (served on October 25, 2017)	10.50
Draft Plaintiff's <i>Ex Parte</i> Application for an Order Continuing the Filing Deadline for Plaintiff's Opposition to Defendant's Motion for Summary Judgment Hearing and Trial Date of This Case, Declaration of D. Elliot Gonzalez in Support Thereof, and [Proposed] Order Thereon (filed on December 7, 2017)	9
Review Court's Order Granting Plaintiff's <i>Ex Parte</i> Application for an Order Continuing the Filing Deadline for Plaintiff's Opposition to Defendant's Motion for Summary Judgment Hearing and Trial Date of This Case and Minute Order (filed on December 7, 2017)	0.10
Draft Notice of Entry of Judgment or Order (Order Granting Plaintiff's <i>Ex Parte</i> Application for an Order Continuing the Filing Deadline for Plaintiff's Opposition to Defendant's Motion for Summary Judgment Hearing and Trial Date of This Case) (filed on December 15, 2017)	0.25
Draft Plaintiff's Unopposed <i>Ex Parte</i> Application for an Order Vacating, or in the Alternative Continuing, the Trial Date and All Trial-Related Hearing Dates and Deadlines, Declaration of Joanna Ghosh in Support Thereof, [Proposed] Order Thereon (filed on January 2, 2019)	5.50

Review Court's Order Re: Trial Date and All Trial-Related Hearing Dates and Deadlines and Minute Order (filed on January 2, 2019)	0.10
Draft Notice of Entry of Judgment or Order (Order Re: Trial Date and All Trial-Related Hearing Dates and Deadlines) (filed on January 2, 2019)	0.25
Review Defendants' Notice of Taking Summary Judgment Motion Off Calendar (served on July 9, 2018)	0.25
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement, Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Order (filed on January 31, 2019)	15.50
Review Defendants' Notice of Non-Opposition to Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (served on February 7, 2019)	0.25
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement and Minute Order (filed on February 15, 2019)	0.10
Draft Notice of Entry of Judgment or Order (Order Granting Preliminary Approval of Class Action and PAGA Settlement) (filed on February 19, 2019)	0.25
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees, Costs, and Enhancement Payment, Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on August 1, 2019)	17.50
Total Hours:	454.80

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Moya vs. USRG (California), Inc., et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
05/27/16	U. S. Postmaster	Postage	13.15
06/30/16	Pure Legal, Inc.	Attorney Service	155.00
06/30/16	Los Angeles Superior Court	Filing Fee	435.00
06/30/16	Los Angeles Superior Court	Jury Fee	150.00
08/22/16	Pure Legal, Inc.	Attorney Service	150.00
08/25/16	Pure Legal, Inc.	Attorney Service	125.00
09/08/16	Arby Aiwazian	Travel Reimbursement	24.20
11/09/16	Golden State Overnight	Courier Service	15.05
11/17/16	FedEx Express	Courier Service	18.27
12/19/16	Golden State Overnight	Courier Service	22.34
12/20/16	Golden State Overnight	Courier Service	22.34
12/21/16	U. S. Postmaster	Postage	3.14
02/07/17	Pure Legal, Inc.	Attorney Service	135.00
02/07/17	U. S. Postmaster	Postage	3.22
02/15/17	Coalition Court Reporters	Court Reporter	87.00
02/15/17	Romina Keshishyan	Travel Reimbursement	27.35
03/03/17	U. S. Postmaster	Postage	3.64
03/13/17	Golden State Overnight	Courier Service	22.54
03/24/17	A & B Reporting, LLC	Videography Service	270.00
03/24/17	A & B Reporting, LLC	Court Reporter	1,119.25
03/24/17	Romina Keshishyan	Travel Reimbursement	73.10
04/12/17	Pure Legal, Inc.	Videography Service	1,400.50
04/12/17	Kusar Legal Services, Inc.	Court Reporter	2,098.10
05/08/17	Golden State Overnight	Courier Service	22.64
05/18/17	Romina Keshishyan	Travel Reimbursement	38.06
06/29/17	Arby Aiwazian	Travel Reimbursement	66.55
06/29/17	Pure Legal, Inc.	Videography Service	587.50
06/29/17	A & B Reporting, LLC	Court Reporter	966.55
06/29/17	Romina Keshishyan	Travel Reimbursement	20.04
07/19/17	Esquire Deposition Solution, LLC	Videography Service	812.50
07/19/17	Esquire Deposition Solution, LLC	Court Reporter	1,523.20
07/21/17	Tiffany Hyun	Travel Reimbursement	1,504.99
08/08/17	Golden State Overnight	Courier Service	22.54
10/25/17	Los Angeles Superior Court	Document Download Fee	21.80
11/07/17	U. S. Postmaster	Postage	19.77
12/06/17	Golden State Overnight	Courier Service	64.42
12/06/17	Pure Legal, Inc.	Attorney Service	154.20
12/07/17	D. Elliot Gonzalez	Travel Reimbursement	18.00
12/14/17	Golden State Overnight	Courier Service	28.18
12/15/17	Pure Legal, Inc.	Attorney Service	165.75
01/19/18	Golden State Overnight	Courier Service	34.21
02/05/18	Golden State Overnight	Courier Service	58.55

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Moya vs. USRG (California), Inc., et al.

02/21/18	Pure Legal, Inc.	Videography Service	925.00
02/21/18	Ben Haber	Travel Reimbursement	85.69
02/21/18	A & B Reporting, LLC	Court Reporter	1,267.00
02/28/18	Pure Legal, Inc.	Videography Service	1,075.00
02/28/18	Golden State Overnight	Courler Service	34.44
02/28/18	Esquire Deposition Solution, LLC	Court Reporter	1,610.75
02/28/18	Ben Haber	Travel Reimbursement	52.14
03/12/18	Pure Legal, Inc.	Videography Service	962.50
03/12/18	A & B Reporting, LLC	Court Reporter	1,157.40
03/12/18	Ben Haber	Travel Reimbursement	89.23
03/19/18	Batza & Associates, Inc.	Investigative Service	1,773.30
03/23/18	U. S. Postmaster	Postage	13.40
03/29/18	ProLegal	Attorney Service	159.14
05/21/18	U. S. Postmaster	Postage	1.63
07/06/18	Pure Legal, Inc.	Attorney Service	195.90
09/05/18	Pure Legal, Inc.	Attorney Service	196.80
10/09/18	Pure Legal, Inc.	Attorney Service	195.60
12/04/18	Los Angeles Superior Court	Filing Fee	20.00
12/04/18	Pure Legal, Inc.	Attorney Service	196.50
12/31/18	Los Angeles Superior Court	Filing Fee	60.00
12/31/18	Golden State Overnight	Courier Service	32.18
12/31/18	ProLegal	Attorney Service	114.76
01/02/19	ProLegal	Attorney Service	64.10
01/02/19	Danielle Chang	Travel Reimbursement	15.56
02/11/19	One Legal, LLC	Attorney Service	13.64
02/15/19	Danielle Chang	Travel Reimbursement	19.09
02/19/19	ProLegal	Attorney Service	28.65
02/20/19	One Legal, LLC	Attorney Service	9.95
02/26/19	One Legal, LLC	Attorney Service	13.64
08/01/19	Los Angeles Superior Court	Filing Fee	60.00
08/01/19	ProLegal	Attorney Service	114.76
	LFJ (In-House)	Photocopies (9,330 @ \$0.15 per page)	1,399.50
		Total:	24,459.89