Joanna Ghosh (SBN 272479)
Daniel Bass (SBN 287466)
Brian J. St. John (SBN 304112)
LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

JESSE SNOW, 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.

PLANET ORANGE PROPERTY SERVICES, INC., a California corporation; NATURAL ORANGE, INC., a California corporation; and DOES 1 through 100, inclusive,

Defendants.

Case Nos.: 23CV419785

Honorable Beth McGowen
Department 22

CLASS ACTION

DECLARATION OF DANIEL BASS IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, ATTORNEYS FEES AND COSTS, AND ENHANCEMENT PAYMENT

Date:	November 12, 2026
Time:	1:30 p.m.
Department:	22
Complaint Filed:	July 28, 2023
FAC Filed:	June 20, 2025
Trial Date:	None Set

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

DECLARATION OF DANIEL BASS

I, Daniel Bass, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Jesse Snow ("Plaintiff") and the Class in the above-captioned matter. 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 May 6, 2026, in Department 22 of the above-entitled Court, the Honorable Beth McGowen preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release as modified by Amendment No. 1 to the Joint Stipulation of Class Action and PAGA Settlement and Release (together, "Settlement," "Agreement," or "Settlement Agreement,") entered into by and between Plaintiff and Defendants Planet Orange Property Services, Inc. and Natural Orange, Inc., (together, "Defendants") (together with Plaintiff, the "Parties") and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff as the representative of the Class ("Class Representative"). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class ("Class Counsel").

3. The Court approved and ordered the mailing of the Notice of Class and Representative Action Settlement ("Class Notice"), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed ILYM Group, Inc. ("ILYM") to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys Fees and Costs, and Enhancement Payment ("Motion for Final Approval"), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Attorneys Fees and Costs, Enhancement Payment, and Settlement Administration Costs, or the allocation for the PAGA Amount.

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above captioned action since before it was filed on July 28, 2023.

6. 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 Lawyers *for* Justice, PC and Plaintiff and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative Private Attorneys General Act ("PAGA") claims and penalties, and wage-and-hour law and enforcement, Plaintiff's claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiff 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 employees who worked for Defendants in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing the case for class certification and trial, prior to reaching the Settlement. The Parties exchanged thousands of pages of information, documents, and data obtained from Plaintiff, Defendants, and other sources, including: Plaintiff's employment records, a sampling of Class Members' time data and pay records, Defendants' Employee Handbook, company policy acknowledgements, internal memoranda, Defendants' operations and employment practices, forms, procedures, and policies, among other information and documents. Class Counsel had the opportunity to interview Plaintiff to gather facts and to identify potential witnesses. Class Counsel developed liability, damages, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations, and met

and conferred with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, motion practice, and production of information, documents, and data in the course of litigation and in connection with the mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; legal research; drafting, reviewing, and revising the pleadings, motion-related papers, mediation briefing and supporting materials, and settlement-related papers; and preparing for and attending court proceedings, settlement negotiations, and the mediation, among other tasks.

8. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating this matter, mediation, and extensive settlement negotiations. Class Counsel analyzed thousands of pages of information, documents, and data obtained from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature of the work performed by the Class Members and PAGA Employees, as well as Defendants' organizational structure and their operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing liability, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiations process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest periods, representative PAGA claims and penalties, wage-and-hour enforcement, arbitration agreements, regular rate, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

9. After conducting significant investigation of the facts and law during the prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in a mediation session conducted by Tagore Subramaniam, Esq., a well regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of the mediation and settlement

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

negotiations, the Parties exchanged documents and data, and discussed various aspects of the cases, including and not limited to, the risks and delays of further litigation, the risks and expenses to the Parties of proceeding with class certification, manageability, off-the-clock theory, regular rates of pay, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiff's claims and allegations, and Defendants' defenses thereto, as well as the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication Defendant and its counsel felt strongly about Defendant's ability to avoid class certification prevail on the merits and, while Plaintiff and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately 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 are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of $227,500.00, which is thirty-five percent (35%) of the Total Settlement Amount of $650,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the 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

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this case. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Total Settlement Amount of $650,000.00 (with a Net Settlement Amount of approximately $350,018.12 to be paid to Settlement Class Members and gross Individual Settlement Payments averaging approximately more than $1,598.59, payment of $14,000.00 to PAGA Employees and Individual PAGA Payments averaging approximately $160.92, and payment of $24,000.00 to the State of California)—support the percentage fee sought.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **276.40 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The work performed in this particular matter, the background of Lawyers *for* Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least $850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least $850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

attorneys' fees involved compensation at the rate of $936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of $919.57 per hour; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp*. (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of $855.96 per hour.

EXPERIENCE AND ADEQUACY OF

LAWYERS *for* JUSTICE, PC

14. For over a decade, Lawyers *for* Justice, PC 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, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

15. Edwin Aiwazian is the Chief Executive Officer of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. He was admitted to practice law in California in 2004 and in Washington in 2026. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000 class action or representative action cases.

16. Arby Aiwazian is a Senior Partner of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010 and in Washington 2026. He is admitted to practice before all courts of the State of California and all United States

District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative action cases have resulted in settlements that have been granted court approval. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

17. Joanna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010), New York (since 2013), and Washington (since 2026), and is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, all U.S. District Courts in Washington, the U.S. District Court for the Southern District of New York, the U.S. District Court for the Eastern District of New York, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, Lawyers *for* Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. She has been a speaker regarding topics in wage and hour law at the California Employment Lawyers Association's continuing legal education events.

18. Brian J. St. John is a Member of Lawyers *for* Justice, PC. He received his Bachelor's degree from the University of California, San Diego in 2010 and earned his Juris Doctor degree from the University of California, Berkeley, School of Law in 2013. He was admitted to practice law in California in 2015. He is admitted to practice before all courts of the State of California and all federal district courts in the State of California. He has worked on many wage and hour class action and PAGA representative matters, and his work has included *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation and analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, he spent several years working for a boutique employment and labor law firm representing employers, and, in 2019 and 2020, he was employed as general counsel for a DMHC licensed discount dental plan.

19. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Science degree in Psychology from Missouri State University in 2009, and a Juris Doctor degree from Washington University in St. Louis, School of Law in 2012, where I served as a Senior Editor of the Law Review and as a member of the Note Selection Committee. I am admitted to practice before all courts in the State of California, and all U.S. District Courts in California. From 2014 through and including the present, my practice consisted almost exclusively of complex wage

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

and hour class action and PAGA action matters in California. I have worked at several plaintiffs' side law firms, and started the employment practice at one of them. I have taken and defended dozens of depositions and have successfully handled motion practice in class action and PAGA cases regarding discovery (including and not limited to motions regarding class contact information), class certification (both contested class certification and stipulated class certification), dispositive motions, arbitration agreements, coordination, and intervention. I have successfully handled a complex wage and hour class action and PAGA case at every step prior to trial. I also successfully handled briefing on appeals, including employer efforts to compel arbitration in *Jones v. UPS Supply Chain Solutions, Inc*., California Court of Appeals for the First District, Case No. A160726 (Cal. App. Jul 01, 2021) (unpublished decision). Further, I have extensive experience with settlements of class actions and PAGA actions and have handled and supervised this process in over fifty (50) cases.

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS *FOR* JUSTICE, PC

20. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to $25,000.00. Lawyers *for* Justice, PC seeks reimbursement of **$**15,481.88 in litigation costs and expenses incurred in the matter, as reflected in **"EXHIBIT 2"** attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. The cost savings of $9,518.12 will be part of the Net Settlement Amount, which will be distributed to the Settlement Class Members in accordance with the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

21. In recognition of his efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as his broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 33.c. of the Settlement Agreement), the Settlement provides for an Enhancement Payment, in the amount of up to $10,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

his employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive $10,000.00 as a reasonable Enhancement Payment for his broader waiver and release of claims and services performed in this matter, in addition to his individual settlement payments.

22. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, the Class, PAGA Employees, and the State of California.

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

Executed this 20th day of October 2026, at Glendale, California.



Daniel Bass

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

EXHIBIT 1

JESSE SNOW V. PLANET ORANGE PROPERTY SERVICES, INC., ET AL.
Santa Clara County Superior Court, Case No. 23CV419785

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS *for* JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Jesse Snow ("Plaintiff")	19.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	4.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff's Class Action Claims, Conduct Legal Research and Analysis Regarding Class Action Claims, and Draft, Review, and/or Revise Plaintiff's Class Action Complaint for Damages (filed on July 28, 2023)	7.50
Review Court's Civil Lawsuit Notice (filed on July 28, 2023)	0.10
Review Court's Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadline (filed on August 18, 2023)	0.20
Meet and Confer with Defendants Planet Orange Property Services, Inc. and Natural Orange, Inc.'s (collectively, "Defendants") Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 22, 2023)	1.50
Review Court's Minute Order Re: Case Management Conference (filed on December 7, 2023)	0.20
Review Court's Notice of Further Case Management Conference and Order and Notice of Reassignment of Case (filed on December 15, 2023)	0.30

Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on March 7, 2024)	1.10
Review Court's Notice of Rescheduled Case Management Conference (filed on March 11, 2024)	0.20
Review and Analyze Defendants' Answer to Plaintiff's Class Action Complaint, and Research Affirmative Defenses in Defendants' Answer (served on March 15, 2024)	1.20
Review Court's Order and Notice of Informal Discovery Conference (filed on April 26, 2024)	0.20
Review Court's Order and Notice of Informal Discovery Conference (filed on May 17, 2024)	0.20
Review Court's Order and Notice of Rescheduled Informal Discovery Conference (filed on May 30, 2024)	0.20
Review Court's Order and Notice of Rescheduled Informal Discovery Conference (filed on June 4, 2024)	0.20
Review Court's Order and Notice of Rescheduled Informal Discovery Conference (filed on June 12, 2024)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on June 21, 2024)	1.20
Review Defendants' Joint Informal Discovery Conference Statement Re: Privilege Log Dispute (served on June 26, 2024)	2.50
Draft, Review, and/or Revise Plaintiff's Informal Discovery Conference Brief (served on June 26, 2024)	4.20
Review Court's Notice of Rescheduled Case Management Conference (filed on June 27, 2024)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on October 2, 2024)	0.80
Review Court's Order to Continue Case Management Conference (filed on October 3, 2024)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Continue Case Management Conference (filed on October 15, 2024)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement and Notice of Settlement (filed on January 27, 2025)	0.80

Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 27, 2025)	0.10
Review Court's Notice of Reset Hearing (filed on March 25, 2025)	0.10
Draft, Review, and/or Revise Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, Labor Code § 2698, Et Seq. (filed on June 20, 2025); Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order Granting Plaintiff Leave to File [Proposed] Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (submitted on June 9, 2025)	4.50
Review Court's Order Granting Plaintiff Leave to File [Proposed] Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on June 16, 2025)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Plaintiff Leave to File [Proposed] Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on June 20, 2025)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Further Case Management Conference Statement (filed on July 10, 2025)	0.60
Review and Analyze Defendants' Answer to Plaintiff's First Amended Complaint, and Research Affirmative Defenses in Defendants' Answer (served on July 10, 2025)	1.10
Review Court's Notice of Reset Hearing (filed on July 15, 2025)	0.10
Review Court's Notice of Reset Hearing (filed on September 11, 2025)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Further Case Management Conference Statement (filed on October 16, 2025)	0.50
Review Court's Notice of Reset Hearing (filed on October 22, 2025)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on January 2, 2026)	0.60

Review Court's Notice of Reset Hearing (filed on January 6, 2026)	0.20
Appearances	
Prepare for and Remotely Attend Initial Case Management Conference (December 7, 2023)	2.30
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (May 7, 2026)	0.90
Discovery and Deposition	
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on May 18, 2023)	1.20
Review Defendant Planet Orange Property Services, Inc.'s Form Interrogatories – General (Set One), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Plaintiff (served on December 8, 2023)	0.60
Review Defendant Planet Orange Property Services, Inc.'s Notice of Deposition of Plaintiff (noticed for March 11, 2024) (served on December 8, 2023)	0.30
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Admissions (Set One), and Requests for Production of Documents (Set One) to Defendant Planet Orange Property Services, Inc. (served on December 15, 2023)	4.50
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Admissions (Set One), and Requests for Production of Documents (Set One) to Defendant Natural Orange, Inc. (served on December 15, 2023)	4.10
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Planet Orange Property Services, Inc., and Requests for Production of Documents (noticed for February 28, 2024) (served on December 15, 2023)	1.40
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Natural Orange, Inc., and Requests for Production of Documents (noticed for February 28, 2024) (served on December 15, 2023)	1.10

Review Defendant Planet Orange Property Services, Inc.'s Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (served on February 26, 2024)	0.50
Review Defendant Natural Orange, Inc.'s Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (served on February 26, 2024)	0.50
Research, Draft, Review, and/or Revise Plaintiff's Responses to Defendant Planet Orange Property Services, Inc.'s Form Interrogatories – General (Set One), Request for Admissions (Set One), and Requests for Production of Documents (Set One) (served on March 11, 2024)	9.50
Review Defendant Natural Orange, Inc.'s Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Request for Admissions (Set One), and Requests for Production of Documents (Set One) (served on March 18, 2024)	2.30
Review Defendant Planet Orange Property Services, Inc.'s Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Request for Admissions (Set One), and Requests for Production of Documents (Set One) (served on March 18, 2024)	2.10
Research, Draft, Review, and/or Revise Plaintiff's Supplemental Responses to Defendant Planet Orange Property Services, Inc.'s Form Interrogatories – General, Set One (served on June 26, 2024)	4.50
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff under the Private Attorneys General Act (served on March 28, 2025)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendants' Counsel	23.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources Prior to Mediation	34.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations (submitted on January 15, 2025)	24.50

Attend Mediation Session (January 21, 2025; Zoom Video Conference)	16.50
Review and/or Analyze Mediator's Proposal (issued on January 21, 2025; accepted on January 22, 2025)	1.30
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding Re: Class Action and PAGA Settlement (executed on April 7, 2025)	4.50
Draft, Review, Revise, Negotiate, and/or Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on November 6, 2025) and Draft, Review, and/or Revise Notice of Class and Representative Action Settlement	16.50
Meet and Confer with Defendants' Counsel, and Draft, Review, Revise, Negotiate, and/or Finalize Amendment No. 1 to the Joint Stipulation of Class Action and PAGA Settlement and Release (executed on June 4, 2026)	0.90
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	6.50
Law and Motion	
Review and Analyze Defendants' Motion for Judgment on the Pleadings (served on June 17, 2024)	2.50
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Stipulation to Continue Motion for Judgment on the Pleadings; [Proposed] Order (submitted on November 19, 2024)	1.10
Review Court's Order to Continue Motion for Judgment on the Pleadings (filed on November 20, 2024)	0.20
Review Defendants' Notice of Withdrawal of Motion for Judgment on the Pleadings (served on March 28, 2025)	0.10
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Ryan Slinger in Support Thereof, Declaration of Plaintiff in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on April 15, 2026)	19.50

Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on May 5, 2026)	0.40
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement and Minute Order Re: Further Case Management Conference (filed on May 7, 2026)	0.20
Draft, Review, and/or Revise Declaration of Harris Koepenick in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement and [Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on May 22, 2026)	4.50
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on May 26, 2026)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on June 5, 2026)	0.10
Draft, Review, and/or Revise Supplemental Declaration of Harris Koepenick in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on June 10, 2026)	0.30
Review Declaration of the Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Service Payments; Memorandum of Points and Authorities in Support Thereof, Declaration of Daniel Bass in Support Thereof, and [Proposed] Final Approval Order and Judgment	22.50
Total Hours:	276.40

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Snow vs. Planet Orange Property Services, Inc., et al.

Date	Payee	Expense Description	Amount
3/31/2023	U.S. Postmaster	Postage	$8.37
4/19/2023	U.S. Postmaster	Postage	$9.00
5/12/2023	U.S. Postmaster	Postage	$8.13
7/28/2023	Legal Document Server, Inc.	Attorney Service	$117.48
7/28/2023	Santa Clara Superior Court	Complex Filing Fee	$1,000.00
7/28/2023	Santa Clara Superior Court	Complaint Filing Fee	$435.00
8/7/2023	ProLegal	Attorney Service	$330.50
8/30/2023	Legal Document Server, Inc.	Attorney Service	$17.67
8/31/2023	Legal Document Server, Inc.	Attorney Service	$17.67
11/22/2023	Legal Document Server, Inc.	Attorney Service	$17.67
3/7/2024	Legal Document Server, Inc.	Attorney Service	$17.67
6/21/2024	Legal Document Server, Inc.	Attorney Service	$17.75
6/26/2024	Legal Document Server, Inc.	Attorney Service	$17.75
8/9/2024	Momentum ADR	Mediation Fee	$8,500.00
10/2/2024	Legal Document Server, Inc.	Attorney Service	$19.14
10/2/2024	Santa Clara Superior Court	Stipulation & Order Fee	$20.00
10/15/2024	Legal Document Server, Inc.	Attorney Service	$11.95
10/21/2024	Legal Document Server, Inc.	Attorney Service	$17.75
1/27/2025	Legal Document Server, Inc.	Attorney Service	$20.20
2/13/2025	CPAnalytics	Data Analysis	$4,080.00
3/28/2025	U.S. Postmaster	Postage	$9.92
3/28/2025	Labor & Workforce Development Agency	PAGA Filing Fee	$75.00
6/10/2025	Legal Document Server, Inc.	Attorney Service	$22.33
6/10/2025	Santa Clara Superior Court	Stipulation & Order Fee	$20.00
6/24/2025	Legal Document Server, Inc.	Attorney Service	$20.94
6/30/2025	Legal Document Server, Inc.	Attorney Service	$20.94
7/10/2025	Legal Document Server, Inc.	Attorney Service	$20.94
10/16/2025	Legal Document Server, Inc.	Attorney Service	$20.94
1/2/2026	Legal Document Server, Inc.	Attorney Service	$21.94
4/16/2026	Legal Document Server, Inc.	Attorney Service	$264.41
4/16/2026	Santa Clara Superior Court	Motion Fee	$60.00
5/26/2026	Legal Document Server, Inc.	Attorney Service	$196.94
6/5/2026	Legal Document Server, Inc.	Attorney Service	$21.94
6/10/2026	Legal Document Server, Inc.	Attorney Service	$21.94
		Total:	$15,481.88