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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER**

LEYDI MORALES, 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.

MASTROIANNI FAMILY ENTERPRISES  
LTD., a California corporation; and DOES 1  
through 100, inclusive,

Defendants.

Case No.: 30-2022-01286355-CU-OE-CXC

Honorable Melissa R. McCormick  
Department CX104

**CLASS ACTION**

**DECLARATION OF BRIAN J. ST. JOHN  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT;  
CLASS REPRESENTATIVE  
ENHANCEMENT PAYMENT; AND  
CLASS COUNSEL AWARD**

[Notice of Motion and Motion for Final  
Approval of Class Action Settlement, Class  
Representative Enhancement Payment, and  
Class Counsel Award; Declaration of Class  
Representative (Leydi Morales); Declaration of  
Settlement Administrator (Laura Singh);  
Declaration of Tae Kim, and [Proposed] Final  
Approval Order and Judgment filed  
concurrently herein]

Date: March 13, 2025  
Time: 2:00 p.m.  
Dept.: CX104

Complaint Filed: October 14, 2022  
Trial Date: None

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14 *Attorneys for Defendant*

## **DECLARATION OF BRIAN J. ST. JOHN**

I, Brian J. St. John, hereby declare as follows:

1. I am an attorney duly licensed to practice law before all courts of the State of California and all United States District Courts in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Leydi Morales (“Plaintiff”). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify thereto.

## PRELIMINARY APPROVAL OF SETTLEMENT

2. On October 24, 2024, in Department CX104 of the above-entitled Court, the Honorable Melissa R. McCormick preliminarily approved the Settlement Stipulation of Class Action Settlement Agreement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Mastroianni Family Enterprises, LTD. (“Defendant”) (collectively, the “Parties”). For purposes of the Settlement, the Court conditionally certified the Class, appointed Plaintiff as the representative of the Class (“Class Representative”), and appointed and designated Collins Kim LLP and Lawyers *for* Justice, PC as counsel for the Class (together, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Pendency of Class Action Settlement (“Class Notice”), and adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed CPT Group (“CPT” or “Settlement Administrator”) to serve as the Settlement Administrator for handling the notice and settlement administration process

### WORK PERFORMED BY CLASS COUNSEL

3. Lawyers *for* Justice, PC has been actively engaged in this litigation of this matter from the inception of the above -captioned action, which was commenced by Plaintiff on October 14, 2022, and throughout its pendency. Lawyers *for* Justice, PC has fully and actively participated in the litigation process throughout the pendency of this matter, and since joining forces with and associating the attorneys at Collins Kim LLP as co-counsel, we have worked closely with them to prosecute the matter, and our work with them has been a coordinated and combined effort. Ultimately, Class Counsel's efforts and Plaintiff's efforts have been successful in reaching the Settlement.

4. Before initiating the case, Lawyers *for* Justice, PC conducted extensive investigation and research into 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 class certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, PAGA representative claims, Plaintiff's claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that Plaintiff's claims were well-suited for class action treatment and representative adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees who worked for Defendant within the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses.

5. Collectively, Class Counsel investigated the veracity, strength, and scope of the claims, and worked on preparing the case for class certification and trial, prior to reaching the Settlement. This matter has involved extensive and ongoing investigations, research into legal and factual issues, and formal and informal discovery. Class Counsel obtained information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations. Class Counsel reviewed and analyzed a volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources, researched applicable law, and undertook analyses and calculations of the value of claims, damages, and penalties exposure. Class Counsel also met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery and production of information, documents, and data in the course of litigation and mediation and settlement negotiations, and mediation and settlement negotiations. Other work that Class Counsel has performed includes, and is not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings and motion-related papers; claims assessment and evaluation; and preparing for and attending mediation and settlement negotiations.

6. As outlined herein, the parties have conducted significant investigations, litigation, and discovery in this matter. The volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources provided a critical understanding of the nature of the work performed by putative class members and aggrieved employees, as well as Defendant's operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing liability, damages, and penalties valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Accordingly, sufficient investigation and review of information has taken place in order for the parties to be adequately informed of the nature and extent of the claims, and to enable all parties to fully evaluate the Settlement for its fairness, adequacy, and reasonableness.

**EXPERIENCE AND ADEQUACY OF  
LAWYERS *for* JUSTICE, PC**

7. 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 attorney of record in dozens of 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. Lawyers *for* Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

8. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a

1 Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive  
2 formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution  
3 as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as  
4 a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a  
5 Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he  
6 studied Legal Writing at Harvard University. From approximately September 2002 to approximately  
7 December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United  
8 States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately  
9 August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court  
10 of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice  
11 law from the California State Bar. Since in or around October of 2008, through his work at Lawyers  
12 *for Justice*, PC, he has almost exclusively focused on the prosecution of consumer and employment  
13 class actions. While employed by Lawyers *for Justice* PC, he has argued over 100 motions, taken or  
14 defended over 150 depositions, prepared dozens of expert witnesses for deposition or trial, and  
15 attended over 175 mediations. Together with other attorneys at the firm, and in some cases in  
16 conjunction with co-counsel, he has successfully litigated cases involving the executive,  
17 administrative, and other overtime exemptions to the State of California and federal overtime  
18 compensation requirements. Under his supervision, Lawyers *for Justice*, PC has successfully obtained  
19 class certification by contested motion practice in approximately 16 cases in the last decade and  
20 litigated over 1,000 class action or representative action cases.

21 9. Arby Aiwarzian is a Member and Shareholder of Lawyers *for Justice*, PC. He received  
22 his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum  
23 laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From  
24 approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable  
25 Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From  
26 approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the  
27 Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was  
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1 admitted to practice law in California in 2010. He is admitted to practice before all courts of the State  
2 of California and all United States District Courts in the State of California. He has worked on many  
3 wage-and-hour class action and representative action cases, taking the lead in taking and defending  
4 depositions, arguing motions, and attending mediations. He has played an integral role in preparing  
5 matters for class certification, including and not limited to, successful certification of a class in *Upson*  
6 *v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus*  
7 *Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban*  
8 *Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens  
9 of class action or representative cases have resulted in settlements that have been granted court  
10 approval, including and not limited to, those listed in paragraph 17 herein. He has handled over one  
11 150 mediations and worked on over 250 class action or representative action cases which have resulted  
12 in settlement.

13 10. Joanna Ghosh is a Senior Member of Lawyers for Justice, PC. She received a Bachelor  
14 of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree  
15 from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University  
16 Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since  
17 2013), and is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy  
18 Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended  
19 dozens of depositions and successfully handled motion practice in class action cases regarding  
20 discovery (including and not limited to, regarding class contact information), class certification (both  
21 contested class certification and stipulated class certification), arbitration agreements, coordination,  
22 and intervention. She has successfully handled briefing and oral argument on appeal and obtained  
23 notable decisions regarding the Private Attorneys General Act and employer efforts to compel  
24 arbitration of PAGA claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal., May 24,  
25 2017) 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied, cert. denied (U.S., Dec. 11, 2017)  
26 and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions,  
27 including and not limited to working on cases to obtain class certification through contested motion  
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1 practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal,  
2 statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case  
3 involving a certified class consisting of approximately 2,600 individuals). She also has extensive  
4 experience with class action and/or representative action settlements, and has handled his process in  
5 over 500 cases. Under Edwin Aiwarzian, Arby Aiwarzian, and my supervision, Lawyers *for* Justice,  
6 PC has handled the class certification and court approval process for hundreds of class action and/or  
7 representative action matters that have successfully resolved. She is a member of the California  
8 Employment Lawyers Association, and, on several occasions, has been a speaker regarding topics in  
9 wage and hour law at the organization's continuing legal education events.

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

21 **EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND**  
22 **REPRESENTATIVE ACTION CASES**

23 12. What follows are just a few examples of the type of results Lawyers *for* Justice, PC  
24 ("LFJ") has achieved on behalf of its clients:

25 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
26 and-hour class action against a major property management company involving allegations of  
27 misclassification of various "manager" positions. On September 20, 2010, the court granted final  
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1 approval of the class action settlement. The Los Angeles County Superior Court Case Number is  
2 BC400414.

3           b)       LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
4 and-hour class action against a national retailer of household items involving allegations of  
5 misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court granted  
6 final approval of the class action settlement. The Los Angeles County Superior Court Case Number  
7 is BC413498.

8           c)       LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
9 and-hour class action against a national property management company involving allegations of  
10 misclassification of the “Property Manager” position. On May 23, 2012, the court granted final  
11 approval of the class action settlement. The Los Angeles County Superior Court Case Number is  
12 BC430918.

13           d)       LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
14 and-hour class action against a national retailer involving allegations of misclassification of the “Store  
15 Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class certification. On  
16 August 26, 2013, the court granted final approval of the class action settlement. The Los Angeles  
17 County Superior Court Case Number is BC424012.

18           e)       LFJ, in association with co-counsel therein, represented the plaintiff in a wage-  
19 and-hour class and PAGA representative action against a bank, involving allegations of  
20 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court granted  
21 final approval of the class and PAGA representative action settlement. The Kern County Superior  
22 Court Case Number is S-1500-CV-273194-LHB.

23           f)       LFJ, in association with co-counsel therein, represented the plaintiff in a wage-  
24 and-hour class and PAGA representative action against a national wholesale distributor of plumbing  
25 and builder supplies, involving allegations of misclassification of multiple salaried “manager”  
26 positions. On May 22, 2014, the court granted final approval of the class and PAGA representative  
27 action settlement. The Sacramento County Superior Court Case Number is 34-2012-00136285.

1 g) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-  
2 and-hour class action against a multinational corporation that provides global workplace solutions,  
3 involving allegations of misclassification of the “Operations Manager” position. On September 16,  
4 2014, the court granted plaintiff’s motion for class certification. The Los Angeles County Superior  
5 Court Case Number is BC478769.

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

11 i) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-  
12 and-hour class and PAGA representative action involving allegations of misclassification of the  
13 salaried residential “Property Manager” position. On September 17, 2015, the court granted plaintiff’s  
14 motion for class certification. On October 20, 2017, the court granted final approval of the class and  
15 PAGA representative action settlement. The Los Angeles County Superior Court Case Number is  
16 BC474784.

17 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
18 and-hour class and PAGA representative action against a national retailer of upscale hardware and  
19 home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted final  
20 approval of the class and PAGA representative action settlement. The Los Angeles County Superior  
21 Court Case Numbers are BC516795 and JCCP4794, and the Judicial Council Coordination Proceeding  
22 Number is 4794.

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

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1 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
2 and-hour class action against a national retailer of apparel, accessories, and home products, involving  
3 allegations of misclassification of the “Department Manager” position. On August 12, 2016, the court  
4 granted plaintiffs’ motion for class certification in part and certified a class. On August 6, 2019, the  
5 court granted final approval of the class action settlement. The Alameda County Superior Court Case  
6 Number is RG13680477.

7 m) LFJ represented the plaintiff in a PAGA representative action against a real  
8 estate and property management company, on behalf of non-exempt employees. On November 4,  
9 2016, the court granted approval of the PAGA representative action settlement. The Orange County  
10 Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

11 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
12 and-hour class and PAGA representative action against a full-service bank, on behalf of non-exempt  
13 employees. On November 18, 2016, the court granted final approval of the class and PAGA  
14 representative action settlement. The San Francisco County Superior Court Case Number is CJC-13-  
15 004839 and the Judicial Council Coordination Proceeding Number is 4839.

16 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
17 representative action against a foodservice distributor, on behalf of non-exempt employees. On  
18 January 26, 2017, the court granted final approval of the class and PAGA representative action  
19 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

20 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative action,  
21 successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer’s  
22 motion to compel arbitration, which resulted in a published opinion by the California Court of Appeal  
23 in favor of employees. *Roberto Betancourt v. Prudential Overall Supply* (Cal. App. 4th Dist., Mar. 7,  
24 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S. Supreme Court Docket No. 17-254). The  
25 Riverside County Superior Court Case Numbers are RIC1503952 and RICJCCP5046, and the Judicial  
26 Council Coordination Proceeding Number is 5046.

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q) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a consumer packaging company, on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC590429.

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

s) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a lumber and hardware company on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class and PAGA representative action settlement. The Orange County Superior Court Case Number is 30-2014-00747750-CU-OE-CXC.

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

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

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

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1 w) LFJ represented the plaintiff in a PAGA representative action, against the parent  
2 company of several restaurants, on behalf of hourly-paid, non-exempt employees. On October 18,  
3 2017, the court granted approval of the PAGA representative action settlement. The Los Angeles  
4 County Superior Court Case Number is BC569664.

5 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
6 representative action against a manufacturer of plastic containers on behalf of non-exempt employees.  
7 On October 31, 2017, the court granted final approval of the class and PAGA representative action  
8 settlement. The Los Angeles County Superior Court Case Number is BC577233.

9 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
10 and-hour class and PAGA representative action against a bank on behalf of non-exempt employees.  
11 On December 11, 2017, the court granted final approval of the class and PAGA representative action  
12 settlement. The Los Angeles County Superior Court Case Number is BC569646.

13 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
14 and-hour class and PAGA representative action against a property management company on behalf of  
15 hourly-paid and non-exempt employees. On January 4, 2018, the court granted final approval of the  
16 class and PAGA representative action settlement. The Los Angeles County Superior Court Case  
17 Number is JCCP4819, and the Judicial Council Coordination Proceeding Number is 4819.

18 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
19 and-hour class and PAGA representative action against a global provider of flexible office space  
20 solutions. On February 15, 2018, the court granted final approval of the class and PAGA representative  
21 action settlement. The Los Angeles County Superior Court Case Number is BC498401.

22 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-  
23 and-hour class action against a container manufacturer, on behalf of non-exempt employees. On  
24 October 15, 2018, the court granted the plaintiff's motion for class certification. The Tulare County  
25 Superior Court Case Number is VCU264528.

26 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
27 representative action against a behavioral health service provider on behalf of non-exempt employees.

1 On November 13, 2018, the court granted final approval of the class and PAGA representative action  
2 settlement. The Alameda County Superior Court Case Number is RG16811450.

3 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a PAGA  
4 representative action against a global provider of products and services to the energy industry, on  
5 behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court granted approval  
6 of the PAGA representative action settlement. The Kern County Superior Court Case Number is S-  
7 1500-CV-280215-SDC.

8 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-  
9 and-hour class action against a parking company on behalf of non-exempt employees. On September  
10 3, 2019, the court granted the plaintiff's motion for class certification and certified a class. The Santa  
11 Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination  
12 Proceeding Number is 4886.

13 ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-  
14 and-hour class and PAGA representative action against a bank on behalf of non-exempt employees.  
15 On September 27, 2019, the court granted the plaintiffs' motion for class certification in part and  
16 certified a class. The Alameda County Superior Court Case Number is RG15757606 and the Judicial  
17 Council Coordination Proceeding Number is 4921.

18 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
19 and-hour class and PAGA representative action against a national retailer of apparel and fashion  
20 accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted the plaintiffs'  
21 motion for class certification in part and certified a class. On May 14, 2021, the court granted final  
22 approval of the class and PAGA representative action settlement. The Sacramento County Superior  
23 Court Case Number is 34-2015-00175330-CU-OE-GDS.

24 hh) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-  
25 and-hour class and PAGA representative action against a medical equipment supplier on behalf of  
26 non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion for class  
27 certification and certified a class. On November 2, 2023, the court granted final approval of the class  
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1 and PAGA representative action settlement. The San Bernardino County Superior Court Case Number  
2 is CIVDS1505744.

3 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and  
4 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and  
5 argued an appeal with respect to the employer's motion to compel arbitration, resulting in a notable  
6 decision from the California Supreme Court clarifying the law regarding PAGA claims, *ZB, N.A. v.*  
7 *Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval of the PAGA  
8 representative action settlement. The San Diego County Superior Court Case Number is 37-2016-  
9 00005578-CU-OE-CTL.

10 jj) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-  
11 and-hour class and PAGA representative action against a large national drug testing laboratory on  
12 behalf of non-exempt employees. On February 21, 2020, the court granted the plaintiff's motion for  
13 class certification and certified a class. On October 28, 2022, the court granted final approval of the  
14 class and PAGA representative action settlement. The San Diego County Superior Court Case  
15 Number is 37-2018-00019611-CU-OE-CTL.

16 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-  
17 and-hour class and PAGA representative action against a national retailer of sportswear, footwear, and  
18 camping equipment on behalf of non-exempt employees. On March 16, 2020, the court granted in  
19 part the plaintiff's motion for class certification and certified a class. The Riverside County Superior  
20 Court Case Numbers are RIC1507504 and RICJCCP4930, and the Judicial Council Coordination  
21 Proceeding Number is 4930.

22 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-  
23 and-hour class action against manufacturer and supplier of power products and services on behalf of  
24 non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion for class  
25 certification and certified a class. On August 27, 2021, the court granted final approval of the class  
26 action settlement. The San Diego County Superior Court Case Number is 37-2015-00025968-CU-  
27 OE-CTL.

mm) LFJ represented the plaintiff in a wage-and-hour class action against a nutritional products manufacturer on behalf of non-exempt production line employees. On December 13, 2021, the court granted the plaintiff's motion for class certification in part and certified a class. On January 16, 2024, the court granted final approval of the class and PAGA representative action settlement. The Solano County Superior Court Case Number is FCS051001.

nn) LFJ represents the plaintiffs in a wage-and-hour class action against a manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The Los Angeles County Superior Court Case Number is BC707670.

oo) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a plastic packaging company on behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs' motion for class certification and certified a class. On November 8, 2021, the court granted approval of the partial settlement of the action. On April 22, 2024, the court granted approval of the PAGA settlement and entered an order dismissing the action. The San Bernardino County Superior Court Case Number is CIVDS1507361.

### **ATTORNEYS' FEES AND COSTS**

13. Class Counsel requests attorneys' fees in the amount of \$453,250.00, which is thirty-five percent (35%) of the Total Settlement Amount of \$1,295,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of forty percent (35%) of the recovery. 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 have shown; (4) the results that Class Counsel have achieved in the litigation; (5) the value of the settlement that Class Counsel have achieved in the case; and (6) the other cases that Class Counsel have turned down in order to devote their time and efforts to this case. *Lawyers for Justice, PC* and Collins Kim



LLP are the only counsel of record for Plaintiff and the Class, and all attorneys' fees awarded in this case will be directed to Lawyers *for* Justice, PC and Collins Kim LLP, to be split as set forth in Section 46(c) of the Settlement Agreement. Other than the division of fees set forth in the Settlement Agreement, there are no other fee splitting or fee sharing agreements with regards to this case.

14. Attorneys at Lawyers *for* Justice, PC have spent a total of **194.90 hours** performing tasks to obtain a recovery on behalf of Plaintiff, the State of California, and the Aggrieved Employees. Attached hereto as "**EXHIBIT A**" 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 in performing those services. These hours include work done by myself and several other attorneys at the firm. Lawyers *for* Justice, PC also had litigation support personnel actively engaged in assisting with the prosecution of the matter. The attorneys identified below have performed work in this matter.

| LAWYERS <i>for</i> JUSTICE, PC Attorney Hours, Rates, and Lodestar |                                 |                             |            |             |       |             |
|--------------------------------------------------------------------|---------------------------------|-----------------------------|------------|-------------|-------|-------------|
| Attorney                                                           | Title                           | Bar No.                     | Admit Year | Hourly Rate | Hours | Lodestar    |
| Edwin Aiwazian                                                     | Managing Attorney & Shareholder | 232943                      | 2004       | \$1,495     | 45.90 | \$68,620.50 |
| Arby Aiwazian                                                      | Shareholder                     | 269827                      | 2010       | \$1,295     | 20.90 | \$27,065.50 |
| Joanna Ghosh                                                       | Managing Attorney               | 272479 (CA);<br>518149 (NY) | 2010       | \$1,295     | 7.80  | \$10,101.00 |
| Melissa LeBlanc-Mansell                                            | Senior Attorney                 | 283080                      | 2012       | \$850       | 16.80 | \$14,280.00 |
| Elizabeth M. R-H Parker-Fawley                                     | Senior Attorney                 | 301592                      | 2014       | \$850       | 6.20  | \$5,270.00  |
| Brian J. St. John                                                  | Senior Attorney                 | 304112                      | 2015       | \$850       | 45.50 | \$38,675.00 |
| Tara Zabehi                                                        | Senior Attorney                 | 314706                      | 2017       | \$850       | 19.80 | \$16,830.00 |

|                 |          |        |      |       |        |              |
|-----------------|----------|--------|------|-------|--------|--------------|
| Arman Marukyan  | Attorney | 327150 | 2019 | \$725 | 1.90   | \$1,377.50   |
| Margaux Gundzik | Attorney | 340116 | 2021 | \$725 | 30.10  | \$21,822.50  |
| <b>Total:</b>   |          |        |      |       | 194.10 | \$204,042.00 |

15. The billing rates for each of the attorneys listed above, who worked on this matter, are reasonable and commensurate with the individual backgrounds, training, and experience of the attorneys, in litigating complex wage-and-hour actions, and in particular, employment class actions and representative actions. These rates are the reasonable and usual hourly rates for the referenced attorneys' services in wage and hour class action cases handled by Lawyers *for* Justice, PC, and are commensurate with rates charged in the community by other plaintiffs-side and defense-side attorneys in this practice area.

16. 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 class and PAGA representative actions, support a reasonable blended hourly rate of compensation at the rate of at least **\$850** for work performed by Class Counsel. 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 wage and hour class action and/or representative action settlements in other 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 attorneys' fees involved an hourly rate of \$936.47; 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 an hourly rate of \$919.57; 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 an hourly rate of \$855.96.

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**LITIGATION COSTS AND EXPENSES INCURRED BY  
LAWYERS FOR JUSTICE, PC**

17. To date, Class Counsel have borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in the cases. Lawyers *for* Justice, PC has incurred **\$3,884.04** in litigation costs and expenses incurred in the cases, as reflected in “**EXHIBIT B**” attached hereto and categorized as follows: Filing fees (\$1510.00); Mediation fees (\$1,912.50); Attorney service fees (\$322.57); Courier service fees (\$48.97), Orange County Superior Court document download fees (\$75.00). Notwithstanding, Class Counsel will seek a total of \$22,700.00 for litigation costs incurred as approved in the Court’s October 24, 2024 order granting Plaintiff’s Motion for Preliminary Approval. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

**SERVICE PAYMENTS TO PLAINTIFF**

18. In recognition of her efforts and work expended in the cases and serving as the Class Representative, the Settlement provides for a Class Representative Enhancement Award in the amount of \$7,500 to Plaintiff. The requested service payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in providing relevant documents, past employment records, and the facts and evidence necessary to attempt to prove the allegations in the cases. Plaintiff was available whenever her attorneys needed her and actively tried to obtain and provide information that would facilitate prosecution of the case. Plaintiff spent numerous hours speaking with her attorneys about her claims, describing her work experience with Defendant, and gathering, providing, and reviewing documents. Accordingly, it is appropriate and just for Plaintiff to receive \$7,500.00 as reasonable service payment for her services performed in the case.

19. Class Counsel submits that the Settlement is fair, reasonable, and adequate, and is in the best interest of the Class, PAGA aggrieved employees, and the State of California. Class Counsel further submits that the Settlement is within an acceptable range of recovery for this type of litigation given the strengths and weaknesses of the case, the inherent costs and risks of further litigation, and the costs and risks associated with class certification, representative adjudication, trial, and/or appeals.

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

3 Executed this 19th day of February 2025, at Glendale, California.

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6 Brian J. St. John  
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# **EXHIBIT A**

**LEYDI MORALES V. MASTROIANNI FAMILY ENTERPRISES LTD.**  
**Orange County Superior Court Case No. 30-2022-01286355-CU-OE-CXC**

**ATTORNEY TASK AND TIME CHART**

| TASK                                                                                                                                                                                                                                                                                                                                                                                                                                                           | LAWYERS <i>for</i> JUSTICE, PC |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                                                                                                                                                                                                                                                                                              |                                |
| Meet and Communicate with Plaintiff Leydi Morales (“Plaintiff”) during the Case <ul style="list-style-type: none"> <li>• Edwin Aiwazian – 4.90 hours</li> <li>• Arby Aiwazian – 2.70 hours</li> <li>• Elizabeth M.R-H Parker Fawley – 2.40 hours</li> <li>• Arman Marukyan – 1.80 hours</li> <li>• Tara Zabehe – 7.60 hours</li> <li>• Brian St. John – 11.50 hours</li> <li>• Margaux Gundzik – 4.70 hours</li> <li>• Melissa LeBlanc – 3.80 hours</li> </ul> | 39.40                          |
| Investigate, Meet, Communicate with, and/or Interview Class Members, Aggrieved Employees and Percipient Witnesses <ul style="list-style-type: none"> <li>• Edwin Aiwazian – 10.80 hours</li> <li>• Arby Aiwazian – 8.30 hours</li> </ul>                                                                                                                                                                                                                       | 19.10                          |

| <b>Pleadings and Court Filings</b>                                                                                                                                                                                                                                                                                                                                                                                                     |      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| <p>Investigate the Merits of Plaintiff's Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff's Class Action Complaint for Damages &amp; Enforcement Under the Private Attorneys General Act, California Labor Code section 2698, et seq. (filed on October 14, 2022)</p> <ul style="list-style-type: none"> <li>• Edwin Aiwazian – 5.20 hours</li> <li>• Elizabeth M.R-H Parker Fawley – 2.90 hours</li> </ul> | 8.10 |
| <p>Review Court's Minute Order Re: Complete Determination (filed on November 9, 2022)</p> <ul style="list-style-type: none"> <li>• Arman Marukyan – 0.10 hours</li> </ul>                                                                                                                                                                                                                                                              | 0.10 |
| <p>Review and Analyze Defendant's Answer to Plaintiff's Unverified Complaint (Related to ROA #2) (served on December 2, 2022), and Research Affirmative Defenses in Defendant's Answer</p> <ul style="list-style-type: none"> <li>• Margaux Gundzik – 3.70 hours</li> </ul>                                                                                                                                                            | 3.70 |
| <p>Draft Plaintiff's Case Management Conference Statement (filed on January 27, 2023)</p> <ul style="list-style-type: none"> <li>• Tara Zabehi – 0.10 hours</li> <li>• Margaux Gundzik – 0.40 hours</li> </ul>                                                                                                                                                                                                                         | 0.50 |
| <p>Review Court's Minute Order Re: Continuance of Status Conference (filed on January 30, 2023)</p> <ul style="list-style-type: none"> <li>• Margaux Gundzik – 0.10 hours</li> </ul>                                                                                                                                                                                                                                                   | 0.10 |
| <p>Draft Notice of Association of Counsel (filed on February 2, 2023)</p> <ul style="list-style-type: none"> <li>• Margaux Gundzik – 0.30 hours</li> </ul>                                                                                                                                                                                                                                                                             | 0.30 |
| <p>Review Plaintiff's Joint Case Management Conference Report (submitted on April 27, 2023)</p> <ul style="list-style-type: none"> <li>• Margaux Gundzik – 0.20 hours</li> </ul>                                                                                                                                                                                                                                                       | 0.20 |

|                                                                                                                             |                                                                                  |      |
|-----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|------|
| Review Court's Minute Order Re: Continuance of Status Conference (filed on May 1, 2023)                                     | <ul style="list-style-type: none"> <li>• Margaux Gundzik – 0.10 hours</li> </ul> | 0.10 |
| Review Plaintiff's Joint Stipulation to Continue Management Conference Statement (filed on June 15, 2023)                   | <ul style="list-style-type: none"> <li>• Margaux Gundzik – 0.40 hours</li> </ul> | 0.40 |
| Review Plaintiff's [Proposed] Order Re: Joint Stipulation to Continue Management Conference Statement (filed June 16, 2023) | <ul style="list-style-type: none"> <li>• Margaux Gundzik – 0.10 hours</li> </ul> | 0.10 |
| Review Court's Order Re: Joint Stipulation to Continue Management Conference Statement (filed on June 20, 2023)             | <ul style="list-style-type: none"> <li>• Margaux Gundzik – 0.10 hours</li> </ul> | 0.10 |
| Review Court's Minute Order Re: Status Conference (filed on August 4, 2023)                                                 | <ul style="list-style-type: none"> <li>• Brian St. John – 0.10 hours</li> </ul>  | 0.10 |
| Review Court's Notice of Case Reassignment (filed on September 5, 2023)                                                     | <ul style="list-style-type: none"> <li>• Brian St. John – 0.10 hours</li> </ul>  | 0.10 |
| Review Court's Minute Order Re: Continuance of Status Conference (filed on September 20, 2023)                              | <ul style="list-style-type: none"> <li>• Brian St. John – 0.10 hours</li> </ul>  | 0.10 |
| Review Court's Minute Order Re: November 17, 2023 Status Conference (filed on October 25, 2023)                             | <ul style="list-style-type: none"> <li>• Brian St. John – 0.10 hours</li> </ul>  | 0.10 |
| Review Defendant's Notice of Change of Address (served on December 22, 2023)                                                |                                                                                  | 0.10 |



|                                                                                                                                                                                                                                                                              |      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| <ul style="list-style-type: none"> <li>• Brian St. John – 0.10 hours</li> </ul>                                                                                                                                                                                              |      |
| <p>Review Court’s Tentative Ruling Re: Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on January 24, 2024)</p> <ul style="list-style-type: none"> <li>• Joanna Ghosh – 0.10 hours</li> <li>• Brian St. John – 0.40 hours</li> </ul> | 0.50 |
| <p>Review Court’s Minute Order Re: Motion for Approval of Class Settlement (filed on January 25, 2024)</p> <ul style="list-style-type: none"> <li>• Joanna Ghosh – 0.10 hours</li> <li>• Brian St. John – 0.30 hours</li> </ul>                                              | 0.40 |
| <p>Review Plaintiff’s Notice of Change of Address or Other Contact Information (filed on May 29, 2024)</p> <ul style="list-style-type: none"> <li>• Brian St. John – 0.10 hours</li> </ul>                                                                                   | 0.10 |
| <p>Review Court’s Tentative Ruling Re: Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on May 30, 2024)</p> <ul style="list-style-type: none"> <li>• Joanna Ghosh – 0.10 hours</li> <li>• Brian St. John – 0.20 hours</li> </ul>     | 0.30 |
| <p>Review Court’s Minute Order Re: Motion for Approval of Class Settlement (filed on May 30, 2024)</p> <ul style="list-style-type: none"> <li>• Joanna Ghosh – 0.10 hours</li> <li>• Brian St. John – 0.20 hours</li> </ul>                                                  | 0.30 |
| <p>Review Court’s Tentative Ruling Re: Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on October 24, 2024)</p> <ul style="list-style-type: none"> <li>• Joanna Ghosh – 0.10 hours</li> <li>• Brian St. John – 0.10 hours</li> </ul> | 0.20 |

|                                                                                                                                                                                                                                |      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Review Court's Minute Order Re: Motion for Approval of Class Settlement (filed on October 28, 2024)                                                                                                                            | 0.20 |
| <ul style="list-style-type: none"> <li>Joanna Ghosh – 0.10 hours</li> <li>Brian St. John – 0.10 hours</li> </ul>                                                                                                               |      |
| <b>Appearances</b>                                                                                                                                                                                                             |      |
| Prepare for and Remotely Attend Status Conference (August 4, 2023)                                                                                                                                                             | 1.10 |
| <ul style="list-style-type: none"> <li>Tara Zabehi – 1.10 hours</li> </ul>                                                                                                                                                     |      |
| <b>Discovery and Deposition</b>                                                                                                                                                                                                |      |
| Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Leydi Morales (served on May 24, 2022)                                                                                     | 1.90 |
| <ul style="list-style-type: none"> <li>Edwin Aiwazian – 1.90 hours</li> </ul>                                                                                                                                                  |      |
| Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Leydi Morales (served on June 6, 2022)                                             | 6.80 |
| <ul style="list-style-type: none"> <li>Edwin Aiwazian – 3.10 hours</li> <li>Tara Zabehi – 1.90 hours</li> <li>Margaux Gundzik – 1.80 hours</li> </ul>                                                                          |      |
| Draft Plaintiff's Meet and Confer Letter Re: Defendant's Answer to Plaintiff's Complaint (served on December 7, 2022)                                                                                                          | 1.20 |
| <ul style="list-style-type: none"> <li>Margaux Gundzik – 1.20 hours</li> </ul>                                                                                                                                                 |      |
| 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 (served on December 9, 2022) | 7.70 |
| <ul style="list-style-type: none"> <li>Tara Zabehi – 2.20 hours</li> </ul>                                                                                                                                                     |      |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                |       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| <ul style="list-style-type: none"> <li>• Margaux Gundzik – 5.50 hours</li> </ul>                                                                                                                                                                                                                                                                                                                                                                               |       |
| <p>Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; March 23, 2023) (served on January 5, 2023)</p> <ul style="list-style-type: none"> <li>• Tara Zabehe – 0.40 hours</li> <li>• Margaux Gundzik – 2.00 hours</li> </ul>                                                                                                                                   | 2.40  |
| <p>Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Job Duties; March 24, 2023) (served on January 5, 2023)</p> <ul style="list-style-type: none"> <li>• Tara Zabehe – 1.10 hours</li> <li>• Margaux Gundzik – 2.80 hours</li> </ul>                                                                                                                                                 | 3.90  |
| <b>Letters and Correspondence</b>                                                                                                                                                                                                                                                                                                                                                                                                                              |       |
| <p>Draft PAGA Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff under the Private Attorneys General Act (served on August 10, 2022)</p> <ul style="list-style-type: none"> <li>• Edwin Aiwazian – 2.70 hours</li> <li>• Arby Aiwazian – 1.60 hours</li> </ul>                                                                                                                                                                | 4.30  |
| <p>Meet with Defendant's Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defense Counsel</p> <ul style="list-style-type: none"> <li>• Edwin Aiwazian – 5.40 hours</li> <li>• Arby Aiwazian – 1.60 hours</li> <li>• Elizabeth M. R-H Parker Fawley – 0.90 hours</li> <li>• Tara Zabehe – 3.40 hours</li> <li>• Brian St. John – 5.10 hours</li> <li>• Margaux Gundzik – 6.70 hours</li> <li>• Melissa LeBlanc – 3.30 hours</li> </ul> | 26.40 |

| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation <ul style="list-style-type: none"> <li>• Edwin Aiwazian – 11.90 hours</li> <li>• Arby Aiwazian – 6.70 hours</li> <li>• Melissa LeBlanc - 9.20 hours</li> </ul>                                                                                                                                                                                                              | 27.80 |
| Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (July 21, 2023) <ul style="list-style-type: none"> <li>• Melissa LeBlanc – 0.50 hours</li> <li>• Brian St. John – 2.10 hours</li> </ul>                                                                                                                                                                                                                                                                                       | 2.60  |
| Draft, Review, Revise, Negotiate, and Finalize Settlement Stipulation (executed on October 11, 2023), and Draft Notice of Class Action Settlement <ul style="list-style-type: none"> <li>• Joanna Ghosh – 0.90 hours</li> <li>• Brian St. John – 3.90 hours</li> </ul>                                                                                                                                                                                                                                   | 4.80  |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |       |
| Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Brian J. St. John in Support Thereof, Declaration of Tae Kim in Support Thereof, Declaration of Leydi Morales in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on October 13, 2023) <ul style="list-style-type: none"> <li>• Joanna Ghosh – 2.70 hours</li> <li>• Brian St. John - 5.4 hours</li> </ul> | 8.10  |
| Review, and/or Revise Plaintiff's Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Tae Kim in Support Thereof, Declaration of                                                                                                                                                                                                                                                                                                    | 3.70  |

|                                                                                                                                                                                                                                                                                                                                                            |      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| <p>Alejandra Zarate, and [Proposed] Order Granting Motion for Preliminary Approval of Class Action Settlement (filed on April 17, 2024)</p> <ul style="list-style-type: none"> <li>• Joanna Ghosh – 1.30 hours</li> <li>• Brian St. John – 2.40 hours</li> </ul>                                                                                           |      |
| <p>Draft Plaintiff's Supplemental Declaration of Brian J. St. John in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on May 20, 2024)</p> <ul style="list-style-type: none"> <li>• Joanna Ghosh – 0.90 hours</li> <li>• Brian St. John – 2.50 hours</li> </ul>                                                   | 3.40 |
| <p>Review, and/or Revise Plaintiff's Second Supplemental Declaration of Tae Kim in Support Thereof and [Proposed] Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on September 4, 2024)</p> <ul style="list-style-type: none"> <li>• Joanna Ghosh – 0.50 hours</li> <li>• Brian St. John – 2.60 hours</li> </ul> | 3.10 |
| <p>Review, and/or Revise Plaintiff's Second Supplemental Brief in Support of Motion for Preliminary Approval of Class and Representative Action Settlement (filed on September 6, 2024)</p> <ul style="list-style-type: none"> <li>• Joanna Ghosh – 0.30 hours</li> <li>• Brian St. John – 1.50 hours</li> </ul>                                           | 1.80 |
| <p>Review, and/or Revise [Proposed] Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on October 25, 2024)</p> <ul style="list-style-type: none"> <li>• Joanna Ghosh – 0.60 hours</li> <li>• Brian St. John – 0.90 hours</li> </ul>                                                                                | 1.50 |
| <p>Research, Review, Revise and/or Draft Plaintiff's Motion for Final Approval of Class Action Settlement; Class Representative Enhancement Payment; and Class Counsel Award; Declaration of Brian St. John in</p>                                                                                                                                         | 7.70 |

|                                                                                                                                                                                                                                                                            |        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Support Thereof; and [Proposed] Final Approval Order and Judgment; and Review Declaration of Settlement Administrator in Support Thereof (Anticipated) <ul style="list-style-type: none"> <li>• Brian St. John – 5.70 hours</li> <li>• Tara Zabehi – 2.00 hours</li> </ul> |        |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                        | 194.90 |

# **EXHIBIT B**

**LAWYERS for JUSTICE PC CASE COST DETAIL**  
**Morales vs. Mastroianni Family Enterprises LTD.**

| <u>Date</u>   | <u>Payee</u>                         | <u>Expense Description</u> | <u>Amount</u>     |
|---------------|--------------------------------------|----------------------------|-------------------|
| 8/11/2022     | Labor & Workforce Development Agency | PAGA Filing Fee            | \$75.00           |
| 10/17/2022    | Legal Document Server, Inc.          | Attorney Service           | \$110.86          |
| 10/17/2022    | Orange County Superior Court         | Complex Filing Fee         | \$1,000.00        |
| 10/17/2022    | Orange County Superior Court         | Complaint Filing Fee       | \$435.00          |
| 10/18/2022    | Legal Document Server, Inc.          | Attorney Service           | \$14.00           |
| 10/21/2022    | Legal Document Server, Inc.          | Attorney Service           | \$14.00           |
| 11/1/2022     | ProLegal                             | Attorney Service           | \$99.51           |
| 11/22/2022    | Legal Document Server, Inc.          | Attorney Service           | \$42.00           |
| 1/5/2023      | General Logistics Systems US, Inc.   | Courier Service            | \$23.61           |
| 1/27/2023     | Legal Document Server, Inc.          | Attorney Service           | \$14.00           |
| 1/30/2023     | General Logistics Systems US, Inc.   | Courier Service            | \$25.36           |
| 2/2/2023      | Legal Document Server, Inc.          | Attorney Service           | \$14.00           |
| 5/12/2023     | Judicate West                        | Mediation Fee              | \$1,912.50        |
| 8/11/2023     | Orange County Superior Court         | Document Download Fee      | \$7.50            |
| 5/1/2024      | Orange County Superior Court         | Document Download Fee      | \$7.50            |
| 5/20/2024     | Legal Document Server, Inc.          | Attorney Service           | \$14.20           |
| 6/11/2024     | Orange County Superior Court         | Document Download Fee      | \$7.50            |
| 12/26/2024    | Orange County Superior Court         | Document Download Fee      | \$67.50           |
| <b>Total:</b> |                                      |                            | <b>\$3,884.04</b> |