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Attorneys for Plaintiffs and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF STANISLAUS**

TED FERGUSON, individually, and on
behalf of other members of the general
public similarly situated, and LISA
FLATHERS and JOEL FLORES,
individually, and on behalf of all other
aggrieved employees pursuant to the
California Private Attorney General Act,

Plaintiffs,

vs.

G3 ENTERPRISES, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: CV-21-000848

Honorable John D. Freeland
Department 23

**DECLARATION OF JOANNA GHOSH IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND
ENHANCEMENT AWARDS**

Hearing Date: February 15, 2024
Hearing Time: 8:30 a.m.
Dept: 23

Complaint Filed: February 23, 2021
FAC Filed: June 27, 2023
Trial Date: None Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Ted Ferguson, Lisa Flathers, Joel Flores (together, the “Plaintiffs”) and the Class in the above-captioned action. 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 August 11, 2023, in Department 23 of the above-entitled Court, the Honorable John D. Freeland preliminarily approved the Class Action and PAGA Action Settlement Agreement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between the Plaintiffs and Defendant G3 Enterprises (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Ted Ferguson, Lisa Flathers, Joel Flores to represent the Class (together, “Class Representatives”). The Court also preliminarily appointed and designated Arby Aiwarzian, Joanna Ghosh, and Kyla Buenaventura of Lawyers *for* Justice, PC, as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action and PAGA Representative Action Settlement (“Notice”), and adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party administrator and handle the notice and settlement administration process.

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

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WORK PERFORMED BY LAWYERS FOR JUSTICE, PC

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned putative class action since prior to its commencement on February 23, 2021, as well as the PAGA action entitled *Lisa Flathers, Joel Flores v. G3 Enterprises, Inc.*, commenced on October 5, 2022 in the Superior Court of the State of California, County of Stanislaus, Case No. CV-22-004547.

5. Before initiating the cases, 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 the Plaintiffs, and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour enforcement and penalties, Plaintiffs' claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that Plaintiffs' claims were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former non-exempt or hourly-paid employees who worked for Defendant in the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed expenses.

6. Class Counsel conducted significant formal and informal discovery and investigated into the facts of the cases, to assess the veracity, strength, and scope of the claims, and worked on preparing the cases for class certification and trial prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiffs and other Class Members and reviewed and analyzed a large volume of information, documents, and data obtained from Plaintiffs, Defendant, Class Members, and other sources. Class Counsel propounded multiple sets of written discovery requests on Defendant (including but not limited to: Form Interrogatories – General (Set One), Special Interrogatories (Sets One and

1 Requests for Production of Documents (Set One)), reviewed Defendant's objections and
2 responses thereto, and prepared and served numerous deposition notices. The information,
3 documents, and data reviewed and analyzed by Class Counsel included, and were not limited
4 to, Plaintiffs' employment records, a sampling of Class Members' time and pay data,
5 information regarding true up payments and waiting-time penalty payments, various employee
6 handbooks, collective bargaining agreements (including list of employee ID numbers for
7 employees that signed collective bargaining agreements), arbitration agreements (including list
8 of employee ID numbers for employees that signed arbitration agreements), severance and
9 general release agreements (including list of employee ID numbers for employees that signed
10 such agreements and releases), wage and hour employee training materials (including
11 timekeeping training, expense reimbursement training, overtime policy training, meal and rest
12 break training), expense report logs, job descriptions, organization charts, and Defendant's other
13 operations and employment practices, policies, and procedures documents (including meal
14 waiver agreements (including list of employee ID numbers for employees that signed meal
15 period waivers), meal and rest attestations, payroll exemplar, meal and rest period premium
16 exemplar, time correction form exemplar, union wage statement exemplar, non-union wage
17 statement exemplar, manual check log, and expense reimbursement policies), among other
18 information and documents. Class Counsel also met and conferred with Defendant's counsel
19 on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, court
20 proceedings, discovery and production of various information, documents, and data in the course
21 of litigation and mediation and settlement negotiations, and mediation and settlement
22 negotiations. Other work that Class Counsel performed included, and was not limited to, case
23 strategy, analysis, and researching, outlining, and briefing internal memoranda regarding class
24 certification and merits issues; drafting, reviewing, and revising the pleadings, the mediation
25 brief, and settlement documents; case management; claims assessment and evaluation; and
26 preparing for and attending court proceedings and mediation and settlement negotiations, among
27 other tasks.

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7. As outlined herein, the parties have conducted significant formal and informal discovery and investigation during the course of litigating the cases and mediation and settlement negotiations. Class Counsel analyzed thousands of pages of information, documents, and data obtained from Plaintiffs, Defendant, and other sources. The information, documents, and data obtained from Plaintiffs, Defendant, and other sources provided a critical understanding of the nature of the work performed by Class Members and Aggrieved Employees, as well as Defendant's operations and employment policies, practices, and procedures, and 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. Class Counsel also performed research regarding applicable law, which is evolving as it relates to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiffs' claims and allegations, and Defendant's defenses thereto, as well as facts discovered. 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.

8. After conducting significant investigation of the facts and law during the prosecution of the cases, counsel for the parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in a formal, full-day mediation conducted by Lynn Frank, Esq., a well-regarded mediator experienced in mediating complex labor and employment matters. Prior to and during mediation and settlement discussions, the parties exchanged information and data, and discussed various aspects of the cases, including and not limited to, the risks and delays of further litigation, the risks to the parties of proceeding with class certification and trial, the law relating to class certification, manageability, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour law and enforcement, alternative workweek schedules, arbitration agreements, collective bargaining agreements, exemption, pre-emption, waivers, and releases/*Pick Up Stix* agreements, as well as the evidence produced and analyzed, and the possibility of appeals, among other things. During

all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position. Arriving at a settlement that was acceptable to the parties was not easy. Defendant and its counsel felt very strongly about Defendant's ability to compel arbitration of Class Members' and Aggrieved Employees' claims, enforce its individual settlement and release agreements obtained from Class Members and Aggrieved Employees, demonstrate California Labor Code exemptions apply based on its collective bargaining agreements, prevail on the merits, and to obtain a denial of class certification, while Plaintiffs and Class Counsel believed that the arbitration and release agreements would not be enforced, that class certification would be obtained, and that Plaintiffs would prevail at trial. After conducting significant formal and informal discovery and investigations and extensive settlement negotiations, with the aid of the mediator's evaluation, the parties agreed that the cases were well-suited for settlement given the legal issues relating to Plaintiffs' 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, and the real possibility of no monetary recovery after years of litigation. The Settlement takes into account the strengths and weaknesses of each side's position and the uncertainty of how the cases might have concluded at certification, trial, and/or appeals.

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$1,460,129.86, which is thirty-eight percent (38%) of the Total Settlement Amount of \$3,842,447.00. Pursuant to the contingency-fee agreements entered into by and between the Plaintiffs and Lawyers for Justice, PC, the Plaintiffs have each agreed to a contingency fee of at least thirty-eight percent (38%) of the recovery.

10. The attorneys' fees that are sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation of the cases; (5) the value of the settlement that Class Counsel has achieved; and (6) the other cases that Class Counsel has

1 turned down in order to devote their time and efforts to the cases.

2 11. I am aware that common and acceptable rates for contingency representation in
3 wage and hour class and representative action litigation are normally in the range from 33.3%
4 to 50%.

5 12. While not necessarily required to be demonstrated because the percentage fee is
6 proper for this settlement, Class Counsel has incurred many hours of work in connection with
7 prosecuting the cases, such that the award of attorneys' fees is also justified under a lodestar
8 analysis. Attorneys at Lawyers for Justice, PC have spent a total of **929.70 hours** performing
9 tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney
10 Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys
11 at Lawyers for Justice, PC, and the time incurred in performing those services. The hours
12 include work done by myself and several other attorneys at Lawyers for Justice, PC.
13 Additionally, separate from the hours of work referenced herein and in the attached chart,
14 Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the
15 prosecution of this matter.

16 13. The work performed in this matter, the background of Lawyers for Justice, PC, as
17 well as the individual backgrounds, training, and experience of the attorneys who worked on
18 this matter, in litigating complex wage-and-hour cases, and in particular, employment class
19 actions and representative actions, support a reasonable blended hourly rate of compensation at
20 the rate of at least \$850 per hour for work performed by Lawyers for Justice, PC. Lawyers for
21 Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850
22 per hour for legal services performed, by courts granting approval of settlements in other wage-
23 and-hour class action and/or representative action cases: final approval of the class and
24 representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles
25 Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of
26 attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class
27 and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los
28 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; and 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 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. Below is a summary of the experience and qualifications of attorneys at Lawyers for Justice, PC who most recently and primarily have been responsible for the representation of Plaintiffs in this matter. Additional attorney and non-attorney staff have also worked on the matter.

15. 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 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

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

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

1 State of California. He has worked on many wage-and-hour class action and representative
2 action cases, taking the lead in taking and defending depositions, arguing motions, and attending
3 mediations. He has played an integral role in preparing matters for class certification, including
4 and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles
5 County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles
6 County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda
7 County Superior Court Case No. RG13680477). Under his supervision, dozens of class action
8 or representative cases have resulted in settlements that have been granted court approval,
9 including and not limited to, those listed in paragraph 18 herein. He has handled over one
10 hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action
11 or representative action cases which have resulted in settlement.

12 17. I am a Managing Member of Lawyers *for* Justice, PC. I received a Bachelor of
13 Arts degree from California State University, Los Angeles in 2006, a Master of Science degree
14 from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown
15 University Law Center in 2010. I am admitted to practice in California (since 2010) and in New
16 York (since 2013) and am admitted to practice in all U.S. District Courts in California, the U.S.
17 Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. I have
18 taken and defended dozens of depositions and successfully handled motion practice in class
19 action cases regarding discovery (including and not limited to, regarding class contact
20 information), class certification (both contested class certification and stipulated class
21 certification), arbitration agreements, coordination, and intervention. I have successfully
22 handled briefing and oral argument on appeal and obtained notable decisions regarding the
23 Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v.*
24 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal.,
25 May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175
26 (2019). I have significant experience with class actions, including and not limited to working
27 on cases to obtain class certification through contested motion practice and working on cases in
28 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). I also have extensive experience with class action and/or representative action settlements, and have handled this process in over three hundred (300) cases. Under Edwin Aiwarzian, Arby Aiwarzian, and my 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. I am a member of the California Employment Lawyers Association.

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

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

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

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

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

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

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

11 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
12 wage-and-hour class and PAGA representative action against a national wholesale distributor
13 of plumbing and builder supplies, involving allegations of misclassification of multiple salaried
14 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
15 representative action settlement. The Sacramento County Superior Court Case Number is 34-
16 2012-00136285.

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

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

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

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

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

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

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

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

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

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

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

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

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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.

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

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

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

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

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

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

21 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
22 representative action against a behavioral health service provider on behalf of non-exempt
23 employees. On November 13, 2018, the court granted final approval of the class and PAGA
24 representative action settlement. The Alameda County Superior Court Case Number is
25 RG16811450.

26 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 PAGA representative action against a global provider of products and services to the energy
28 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the

1 court granted approval of the PAGA representative action settlement. The Kern County
2 Superior Court Case Number is S-1500-CV-280215-SDC.

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

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

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

19 hh) LFJ, in association with co-counsel therein, represents the plaintiff in a
20 wage-and-hour class and PAGA representative action against a medical equipment supplier on
21 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
22 for class certification and certified a class. The San Bernardino County Superior Court Case
23 Number is CIVDS1505744.

24 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
25 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
26 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
27 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
28 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted

1 approval of the PAGA representative action settlement. The San Diego County Superior Court
2 Case Number is 34-2015-00175330.

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

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

15 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
16 wage-and-hour class action against manufacturer and supplier of power products and services
17 on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
18 motion for class certification and certified a class. On August 27, 2021, the court granted final
19 approval of the class action settlement. The San Diego County Superior Court Case Number is
20 37-2015-00025968-CU-OE-CTL.

21 mm) LFJ represents the plaintiff in a wage-and-hour class action against a
22 nutritional products manufacturer on behalf of non-exempt production line employees. On
23 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
24 certified a class. The Solano County Superior Court Case Number is FCS051001.

25 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
26 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for
27 the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On
28 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.

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

19. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation and will not receive any compensation until a recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$15,337.55** in litigation costs and expenses incurred in the cases, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

ENHANCEMENT AWARDS TO PLAINTIFFS

20. In recognition of their efforts and work expended in the cases and serving as the Class Representatives, Plaintiffs seek Enhancement Awards in the amount of \$11,500.00 each to Plaintiffs (for a collective total of \$34,500.00). The requested enhancement awards are fair and appropriate. Plaintiffs 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. Plaintiffs were available whenever their attorneys needed them and actively tried to obtain and provide information that would facilitate the pursuit of the cases. Plaintiffs spent numerous hours speaking with their attorneys about their claims, describing their work experiences with Defendant, and gathering, providing, and reviewing documents. Accordingly, it is appropriate and just for Plaintiffs to each receive \$11,500.00 as a reasonable enhancement award for their services in the cases.

21. I submit that the settlement is fair, reasonable, and adequate, and in the best interests of Plaintiffs, the Class Members, Aggrieved 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 23rd day of January 2024, at Glendale, California.



Joanna Ghosh

EXHIBIT A

TED FERGUSON V. G3 ENTERPRISES, INC.
Stanislaus Superior Court Case No. CV-21-000848 (“Ferguson Action”)

LISA FLATHERS, ET AL. V. G3 ENTERPRISES, INC.
Stanislaus Superior Court Case No. CV-22-004547 (“Flathers Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, including Adequacy, Typicality, Superiority, and Commonality	15.70
Pre-Lawsuit Investigation of the Merits of the Claims of Plaintiff Ted Ferguson (“Plaintiff Ferguson”) and the Putative Class Members	13.80
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant G3 Enterprises, Inc. (“Defendant”) with Respect to the Damages Sustained by Plaintiff Ferguson and the Putative Class Members	12.40
Pre-Notice Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiffs Lisa Flathers (“Plaintiff Flathers”) and Joel Flores (“Plaintiff Flores”) and the Aggrieved Employees	12.10
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiff Flathers and Flores and the Aggrieved Employees	10.60
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock Work, Meal and Rest Breaks, Representative PAGA Actions, Manageability, Class Certification, and Arbitration Agreements in California, Including all New and Relevant DLSE Materials	10.50

Investigation of Defendant, Its Products and Services, Its Business Relationships, and the Industries/Markets in which It Operates	5.10
Investigation of Defendant's Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	4.80
Investigation, Research, and Analysis Regarding Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues, and Other Related Employment Issues to Evaluate Willfulness and Uniformity	3.60
Analysis of Competitors Within Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Its Competitors	4.50
Research and Investigation Re: Location(s), Division(s), and/or Departments(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Layout and Any Differences Between Them to Determine Whether Individual Issues Predominate Over Common Issues	5.80
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	6.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California	6.10
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Scheduling, Assignments, Facility/Warehouse Operations, Timekeeping, Meal and Rest Breaks, Meal Waiver Agreements, On-Premises Rest Breaks, Meal and Rest Attestations, Time Correction Form/Punch Edit Form, Meal and Rest Premiums, Non-Discretionary Commission/Bonuses/Incentive/Shift Differential Pay, Split Shift Premiums, Regular Rate Calculation, True Ups, Overtime Compensation, Reporting Time Pay, Trainings, Pre-Shift Meetings, Health and Safety Requirements, Checks, and Inspections, COVID-19 Protocols, Remote Work, Locker Room, Dress Code, Donning and Doffing, PPE/Safety Gear, Footwear, Safety Shoe Allowance, Tools/Equipment/Supplies, Company-	44.50

Issued Cell Phones, Radio Devices, and Computing Devices, Use of Personal Cell Phones, Reimbursement of Business-Related Expenses, Company-Paid Purchasing Card, Waiting-Time Penalty Payments, and Individual Settlement Program/ <i>Pick Up Stix</i> Campaign and Payments	
Research and Investigation Re: Various Software Programs and Other Technology That Defendant Uses to Conduct Everyday Business, Including Timekeeping, Payroll, Sales, Customer Relations Management, Order Management, Marketing, Delivery, Logistics, Inventory, Production, Resource Management, Quality Control, Communication, Information and Document Management, Surveillance, and Security Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	4.60
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Alternative Workweek Schedules, Collective Bargaining Agreements, Exemption, Pre-Emption, Waiver, Release/ <i>Pick Up Stix</i> , Accord and Satisfaction, and Compliant Policies	14.50
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.70
Research and Investigation on the Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' Work and Aggrieved Employees' Work	7.50
Research and Draft Preliminary Outlines and Memorandum Re: Class Certification and/or Merits Issues	34.50
Prepare a Discovery Strategy and Plan of Action, including Topics of Inquiry Important to Certification, Liability, and Damages	6.20
Meet and Communicate with Plaintiff Ted Ferguson throughout the Pendency of the Case	65.50
Meet and Communicate with Plaintiff Lisa Flathers throughout the Pendency of the Case	67.50
Meet and Communicate with Plaintiff Joel Flores throughout the Pendency of the Case	63.50

Investigate, Meet, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	30.50
Pleadings and Court Filings	
Draft Plaintiff Ferguson's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 23, 2021) (Ferguson Action)	8.60
Review Court's Notice of Case Management Conference (filed on February 23, 2021) (Ferguson Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff Ferguson's Class Action Complaint for Damages (served on April 29, 2021), and Legal Research and Analysis of Allegations and Affirmative Defenses in Defendant's Answer (Ferguson Action)	2.50
Review Court's Minute Order Re: Case Management Conference Order (issued on May 28, 2021) (Ferguson Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (submitted on June 11, 2021) (Ferguson Action)	1.90
Draft Plaintiff Ferguson's Case Management Statement (filed on December 10, 2021) (Ferguson Action)	1.10
Review Defendant's Case Management Statement (filed on December 13, 2021) (Ferguson Action)	0.20
Review Court's Minute Order Re: Case Management Conference Order (issued on December 27, 2021) (Ferguson Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Stipulation; [Proposed] Protective Order – Confidential and Highly Confidential Designations (filed on February 11, 2022) (Ferguson Action)	2.30
Review Court's Protective Order – Confidential and Highly Confidential Designations (issued on February 11, 2022) (Ferguson Action)	0.10
Draft Plaintiff Ferguson's Case Management Statement (filed on June 9, 2022) (Ferguson Action)	0.90

Review Defendant's Case Management Statement (filed on June 10, 2022) (Ferguson Action)	0.20
Review Court's Minute Order Re: Case Management Conference (issued on June 27, 2022) (Ferguson Action)	0.10
Draft Plaintiffs Flathers and Flores's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on October 5, 2022) (Flathers Action)	8.50
Review Court's Notice of Hearing re: Case Management Conference (filed on October 5, 2022) (Flathers Action)	0.10
Review and Analyze Notice by Defendant, G3 Enterprises, Inc. of Related Case; Request for Assignment of Case No. CV-22-004547 To Department 23, Where Earlier Filed Case Is Pending; [Proposed] Order Thereon (submitted on November 15, 2022) (Flathers Action)	0.50
Draft Plaintiffs Flathers and Flores' Notice of Posting Jury Fees (filed on November 16, 2022) (Flathers Action)	0.20
Review and Analyze Defendant's Motion Re: Peremptory Challenge Pursuant to California Civil Procedure Code Section 170.6 By Defendant G3 Enterprises, Inc.; Declaration of Nancy L. Abell (submitted on November 30, 2022) (Flathers Action)	0.50
Review Court's Minute Order Re: Defendant's Peremptory Challenge (issued on December 1, 2022) (Flathers Action)	0.10
Review Court's Notice of Reassignment (filed on December 2, 2022) (Flathers Action)	0.10
Review Defendant's Case Management Statement (submitted on December 12, 2022) (Ferguson Action)	0.20
Draft Plaintiff Ferguson's Case Management Statement (filed on December 12, 2022) (Ferguson Action)	0.80
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation; [Proposed] Order To (1) Stay This Action and Continue Defendant's Deadline to File a Response to Plaintiffs' PAGA Complaint Until the Earlier of 30 Days After the Parties Complete Mediation of the Action or June 1, 2023; and (2) Vacate	2.10

the Case Management Conference Set for February 21, 2023, At 8:30 A.M. in Department 24 (filed on December 15, 2022) (Flathers Action)	
Review Court's Order To (1) Stay This Action and Continue Defendant's Deadline to File a Response to Plaintiffs' Paga Complaint Until the Earlier of 30 Days After the Parties Complete Mediation of the Action or June 1, 2023; and (2) Vacate the Case Management Conference Set for February 21, 2023, At 8:30 A.M. In Department 24 (issued on December 19, 2022) (Flathers Action)	0.10
Draft Plaintiff Ferguson's Case Management Statement (filed on December 23, 2022) (Ferguson Action)	0.80
Review Court's Order Re: Relating Cases (issued on December 27, 2022) (Ferguson Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft [Proposed] First Amended Consolidated Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Joint Stipulation; [Proposed] Order Re: (1) Consolidating Case Nos. CV-21-000848 And CV-22-004547; (2) Granting Plaintiff Leave to File First Amended Complaint ("FAC"); (3) Continuing or Vacating CMC; and (4) Preserving Claims and Defenses (filed on June 23, 2023) (Ferguson Action)	5.30
Review Court's Order Re: (1) Consolidating Case Nos. CV-21-000848 And Cv-22-004547; (2) Granting Plaintiff Leave to File First Amended Complaint ("FAC"); (3) Continuing or Vacating CMC; and (4) Preserving Claims and Defenses (issued on June 27, 2023) (Ferguson Action)	0.10
Appearances	
Prepare for and Telephonically Attend Initial Case Management Conference (June 28, 2021) (Ferguson Action)	0.60
Prepare for and Telephonically Attend Case Management Conference (December 27, 2021) (Ferguson Action)	0.50
Prepare for and Telephonically Attend Case Management Conference (June 27, 2022) (Ferguson Action)	0.70

Prepare for and Telephonically Attend Case Management Conference (December 27, 2022) (Ferguson Action)	0.60
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action (July 25, 2023) (Ferguson Action)	0.70
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action (August 11, 2023) (Ferguson Action)	0.30
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Awards (February 15, 2024) (Ferguson Action) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ferguson (served on August 3, 2020)	1.90
Draft Follow-Up to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ferguson (served on October 19, 2020)	2.10
Draft Follow-Up to Defendant Re: Request for Personnel File, Pay Stubs and Time Records of Plaintiff Ferguson (December 31, 2020)	2.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ferguson (January 5, 2021) (Ferguson Action)	5.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Flores (served on June 7, 2022)	5.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Flathers (served on June 21, 2022) (Flathers Action)	5.40

Draft Plaintiff Ferguson’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 2, 2021) (Ferguson Action)	6.50
Draft Plaintiff’s Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for January 27, 2022; Organizational Structure) (served on December 2, 2021) (Ferguson Action)	4.50
Draft Plaintiff’s Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for January 26, 2022; Wage and Hour Practices) (served on December 2, 2021) (Ferguson Action)	5.50
Review and Analyze Defendant’s Objections and Responses to Plaintiff Ferguson’s Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on February 17, 2022) (Ferguson Action)	6.40
Review and Analyze Documents Produced by Defendant in Response to Plaintiff Ferguson’s Request for Production of Documents (Set One) (produced between February 17, 2022-March 21, 2022) (G3ENT000001 – 010515) (Ferguson Action)	46.50
Draft <i>Belaire-West</i> Notice and Opt-Out Postcard and Meet and Confer with Defendant’s Counsel Regarding and Monitor <i>Belaire-West</i> Administration Process (mailed on May 2, 2022) and Review and Analyze Non-Opt Out List (1,011 individuals) (Ferguson Action)	4.50
Meet and Confer with Defendant’s Counsel Regarding and Monitor <i>Belaire-West</i> Process (notice mailed on June 3, 2022) and Review and Analyze Non-Opt Out List (10 individuals) (Ferguson Action)	3.10
Review and Analyze Defendant’s First Amended Response to Plaintiff Ferguson’s Special Interrogatory No. 26 (Set Two) and Supplemental Objection and Responses to Plaintiff Ferguson’s Request for Production of Documents (Served on September 16, 2022) (Ferguson Action)	5.10

Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Flathers for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on October 1, 2022) (Flathers Action)	4.50
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Flores for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on October 1, 2022) (Flathers Action)	4.50
Draft Follow-Up Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Flathers for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on May 17, 2022) (Flathers Action)	3.50
Draft Follow-Up Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Flores for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on May 17, 2022) (Flathers Action)	3.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	24.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to the Mediation	114.50
Review and Analyze Defendant's Confidential Mediation Brief and Exhibits Thereto (served on April 6, 2023)	20.50
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiffs' Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (served on April 9, 2023)	38.50
Prepare for and Conduct Pre-Mediation Telephone Conference with Mediator (April 14, 2023)	4.50
Telephonically Attend Mediation Session (April 15, 2023; Zoom Video Conference)	12.50

Review and Analyze Mediator's Proposal (issued April 17, 2023; fully executed April 20, 2023)	4.10
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Action Settlement Agreement and Release (executed on June 30, 2023) and Notice of Class Action and PAGA Representative Action Settlement	25.90
Review and Monitor Settlement Administration Process and Settlement Administrator's Weekly Reports	7.50
Law and Motion	
Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities; Declarations of Kyla Buenaventura, Ted Ferguson, Joel Flathers, and Lisa Flathers; and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on June 30, 2023) (Ferguson Action)	23.50
Review Defendant's Statement of Non-Opposition to Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (submitted on July 12, 2023) (Ferguson Action)	0.10
Review Court's Tentative Order Re: Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (issued on July 24, 2023) (Ferguson Action)	0.20
Draft Plaintiffs' Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement and Supplemental Declaration of Kyla Buenaventura (filed on August 1, 2023) (Ferguson Action)	6.80
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Deem the Filing of Plaintiffs' Supplemental Brief and Supplemental Declaration of Kyla Buenaventura in Support of Motion for Preliminary Approval of Class Action Settlement Timely; [Proposed] Order Thereon (filed on August 1, 2023) (Ferguson Action)	1.10
Review Court Order Re: Joint Stipulation to Deem the Filing of Plaintiffs' Supplemental Brief and Supplemental Declaration of Kyla Buenaventura in Support of Motion for Preliminary Approval of Class Action Settlement Timely (issued on August 2, 2023) (Ferguson Action)	0.10

Draft Plaintiffs' Notice of Entry of Judgment or Order Re: Joint Stipulation to Deem the Filing of Plaintiffs' Supplemental Brief and Supplemental Declaration of Kyla Buenaventura in Support of Motion for Preliminary Approval of Class Action Settlement Timely (filed on August 2, 2023) (Ferguson Action)	0.10
Review Court's Tentative Ruling Re: Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (issued on August 10, 2023) (Ferguson Action)	0.20
Review Court's Minute Order Re: Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (issued on August 11, 2023) (Ferguson Action)	0.10
Review Court Order Granting Preliminary Approval of Class Action Settlement (issued on August 11, 2023) (Ferguson Action)	0.10
Draft Plaintiffs' Notice of Entry of Judgment or Order Re: Order Granting Preliminary Approval of Class Action Settlement (filed on August 11, 2023) (Ferguson Action)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Awards, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on January 23, 2024) (Anticipated) (Ferguson Action)	25.70
Total Hours:	929.70

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Ferguson vs. G3 Enterprises, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/3/2020	U.S. Postmaster	Postage	6.95
10/29/2020	U.S. Postmaster	Postage	6.95
12/30/2020	U.S. Postmaster	Postage	7.10
2/24/2021	Legal Document Server, Inc.	Attorney Service	64.98
2/24/2021	Stanislaus Superior Court	Complex Filing Fee	1,000.00
2/24/2021	Stanislaus Superior Court	Complaint Filing Fee	435.00
3/30/2021	Legal Document Server, Inc.	Attorney Service	110.00
5/19/2021	Legal Document Server, Inc.	Attorney Service	15.20
6/25/2021	Stanislaus Superior Court	Remote Appearance Fee	96.35
12/3/2021	General Logistics Systems US, Inc.	Courier Service	36.54
12/13/2021	Legal Document Server, Inc.	Attorney Service	14.75
5/16/2022	U.S. Postmaster	Postage	7.38
6/9/2022	Legal Document Server, Inc.	Attorney Service	14.75
6/23/2022	Simpluris, Inc.	Privacy Mailing Administration for Contact Information Production	1,746.00
12/14/2022	Legal Document Server, Inc.	Attorney Service	15.50
12/20/2022	Stanislaus Superior Court	Remote Appearance Fee	96.35
12/23/2022	Legal Document Server, Inc.	Attorney Service	15.50
1/12/2023	General Logistics Systems US, Inc.	Courier Service	17.99
2/22/2023	Stanislaus Superior Court	Remote Appearance Fee	96.35
3/17/2023	Lynn S. Frank	Mediation Fee	10,000.00
4/10/2023	FedEx Express	Courier Service	59.10
6/27/2023	Legal Document Server, Inc.	Attorney Service	17.09
6/27/2023	Stanislaus Superior Court	Stipulation & Order Fee	20.00
7/3/2023	Legal Document Server, Inc.	Attorney Service	299.15
7/3/2023	Stanislaus Superior Court	Motion Fee	60.00
7/21/2023	Stanislaus Superior Court	Remote Appearance Fee	30.35
8/1/2023	Legal Document Server, Inc.	Attorney Service	15.55
8/2/2023	Legal Document Server, Inc.	Attorney Service	32.64
8/2/2023	Stanislaus Superior Court	Stipulation & Order Fee	20.00
8/10/2023	Stanislaus Superior Court	Remote Appearance Fee	30.35
8/11/2023	Legal Document Server, Inc.	Attorney Service	15.55
8/14/2023	Legal Document Server, Inc.	Attorney Service	15.55
Total:			14,332.99

LAWYERS for JUSTICE PC CASE COST DETAIL
Flathers, et al. vs. G3 Enterprises, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/16/2022	U.S. Postmaster	Postage	7.50
6/1/2022	U.S. Postmaster	Postage	7.38
8/1/2022	U.S. Postmaster	Postage	48.54
8/1/2022	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
10/11/2022	Legal Document Server	Attorney Service	44.86
10/11/2022	Stanislaus Superior Court	Complaint Filing Fee	435.00
11/17/2022	Legal Document Server	Attorney Service	27.25
11/18/2022	Legal Document Server	Attorney Service	185.13
11/18/2022	Stanislaus Superior Court	Jury Fee	150.00
6/26/2023	Legal Document Server	Attorney Service	11.95
6/27/2023	Legal Document Server	Attorney Service	11.95
Total: \$			1,004.56