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Attorneys for Plaintiff and the Class

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

JO-NATHAN GREEN, 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.

BENDER ROSENTHAL, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 34-2023-00335755

Honorable Jill H. Talley
Department 23

CLASS ACTION

**DECLARATION OF RYAN SLINGER IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND ENHANCEMENT
AWARD**

Date: January 23, 2026
Time: 9:00 a.m.
Department: 23

Complaint Filed: March 7, 2023
FAC Filed: August 7, 2025
Trial Date: None Set

DECLARATION OF RYAN SLINGER

I, Ryan Slinger hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Jo-Nathan Green (“Plaintiff”) and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On November 14, 2025, in Department 23 of the above-entitled Court, the Honorable Jill H. Talley preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Bender Rosenthal, Inc., (“Defendant”) (together with Plaintiff referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff as the representative of the Class (“Class Representative”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement, Attorneys’ Fees and Costs, and Enhancement Award (“Motion for Final Approval”), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Attorneys’ Fees and Costs, Enhancement Award and Settlement Administration Costs, or the 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 CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above captioned action (the “Action”) since it was filed on March 7, 2023.

6. Before initiating the case, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiff and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims, and wage-and-hour law and enforcement, Plaintiff’s claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiff were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing the case for class certification and trial, prior to reaching the Settlement. The Parties exchanged a volume of pages of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. On June 12, 2023, Plaintiff served Requests for Production of Documents (Set One), Special Interrogatories (Sets One & Two), and Form Interrogatories—General (Set One) on Defendant. On October 25, 2023, Plaintiff served Special Interrogatories (Set Three) on Defendant. The volume of records and documents that Class Counsel reviewed and analyzed included, and were not limited to: Plaintiff’s and other Class Members’ employment records, Class Members’ time and pay data, multiple iterations of Defendant’s Employee Handbook, company policy acknowledgements, internal memoranda, Defendant’s operations and employment practices, forms, procedures, and

1 policies, among other information and documents. Class Counsel had the opportunity to
2 interview and obtain information from Plaintiff and percipient witnesses, and reviewed and
3 analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and
4 other sources. Class Counsel developed liability, damages, violation, and penalties valuation
5 models in the course of litigation and in connection with the mediation and settlement
6 negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to
7 discuss issues relating to the pleadings, case management, motion practice, formal and informal
8 discovery, and the production of information, documents, and data in the course of litigation and
9 in connection with mediation and settlement negotiations, and settlement. Other work performed
10 by Class Counsel included, and was not limited to, case strategy and analysis; researching,
11 drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation briefing
12 and supporting materials, and settlement documents; drafting and propounding multiple sets of
13 formal written discovery requests on Defendant; and preparing for and attending court
14 proceedings, mediation, and settlement negotiations, among other tasks.

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

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1 9. After conducting significant investigation of the facts and law during the
2 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to
3 try to resolve the case. These efforts included participating in a mediation session conducted by
4 Tagore Subramaniam, Esq., a well regarded mediator experienced in handling complex labor and
5 employment matters. During all settlement discussions, the Parties conducted their negotiations
6 at arm's length in an adversarial position. In the course of the mediation and settlement
7 negotiations, the Parties exchanged documents and data, and discussed various aspects of the
8 case, including and not limited to, the risks and delays of further litigation, the risks and
9 expenses to the Parties of proceeding with class certification, manageability, off-the-clock
10 theory, regular rates of pay, meal and rest periods (including *inter alia*, on premises breaks),
11 expense reimbursements, recordkeeping and wage statement requirements, representative PAGA
12 claims and penalties, and wage-and-hour law and enforcement; Plaintiff's claims and allegations,
13 and Defendant's defenses thereto, as well as the evidence produced and analyzed; and the
14 possibility of appeals, among other things. Arriving at a settlement that was acceptable to the
15 Parties was not easy. Defendant contended that individualized questions of fact predominate over
16 any common issues, and these issues would pose challenges to class certification and
17 representative adjudication. Defendant and its counsel felt strongly about Defendant's ability to
18 avoid class certification prevail on the merits and, while Plaintiff and Class Counsel believed that
19 they would be able to obtain class certification and prevail at trial. With the aid of the mediator's
20 evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the
21 legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that
22 would attend further litigation. These risks of further litigation include, and are not limited to, a
23 determination that the claims are unsuitable for class treatment and/or representative
24 adjudication, class de-certification after certification of a class, allowing a jury to decide the
25 claims asserted in this matter, and the real possibility of no monetary recovery after years of
26 litigation.

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10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$120,750.00, which is thirty-five percent (35%) of the Total Settlement Amount of \$345,000.00. Pursuant to the contingency fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this case. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Total Settlement Amount of \$345,000.00 (with a Net Settlement Amount of approximately at least \$135,858.88 to be paid to Settlement Class Members (with gross Individual Settlement Payments averaging approximately more than \$475.59), payment of \$19,250.00 to PAGA Employees (with Individual PAGA Payment averaging approximately \$641.67) and payment of \$35,750.00 to the State of California)—support the percentage fee sought.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **233.10 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

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13. The attorneys identified below have worked on this case, and they have performed their work in this matter exclusively on a contingency basis.

Attorneys	Titles	Bar Nos.	Years Admitted & Practicing in CA	Rate	Total Hours	Lodestar
Edwin Aiwazian	Managing Attorney & Shareholder	232943	2004 (21 years)	\$1,495	16.90	\$25,265.50
Arby Aiwazian	Shareholder	269827	2010 (15 years)	\$1,295	0.80	\$1,036.00
Joanna Ghosh	Managing Attorney	272479 (CA); 518149 (NY)	2010 (CA); 2013 (NY) (15 years)	\$1,295	1.90	\$2,460.50
Elizabeth Parker-Fawley	Senior Attorney	301592	2014 (10 years)	\$850	13.90	\$11,815.00
Yasmin Hosseini	Senior Attorney	326399	2019 (6 years)	\$850	7.40	\$6,290.00
Ryan M. Slinger	Attorney	351297	2023 (2 years)	\$575	70.70	\$40,652.50
Alicia A. Brush	Attorney	322989	2018 (7 years)	\$725	62.40	\$45,240.00
Hagit C. Goltzer	Attorney	324276	2018 (7 years)	\$725	4.40	\$3,190.00
Melissa A. LeBlanc-Mansell	Senior Attorney (formerly)	283080	2012 (13 years)	\$850	37.10	\$31,535.00
Charles T. Sweeny	Attorney (formerly)	325167	2019 (6 years)	\$725	4.10	\$2,972.50
Eli J. Drummond	Attorney (formerly)	348281	2023 (2 years)	\$575	13.50	\$7,762.50
Total:					233.10	\$178,219.50

14. Each of the attorneys identified above performed their work in this matter exclusively on a contingency basis. Plaintiff has not been billed for, and has not paid for, any of the work performed in the instant action to date by attorneys at Lawyers for Justice, PC (i.e., Plaintiff has not been billed for or paid the hourly rates of the various attorneys who performed work in the instant action). Lawyers for Justice, PC will receive compensation for the work performed by attorneys at the firm thus far, if attorneys' fees are awarded by the Court as a part of the Settlement.

1 15. The billing rates for each of the attorneys listed above, who worked on this
2 matter, are reasonable, usual, and commensurate with the individual backgrounds, training, and
3 experience of the attorneys, in litigating complex wage-and-hour actions, and in particular,
4 employment class actions and representative actions. These rates are the reasonable and usual
5 hourly rates for the referenced attorneys' services in wage and hour class action cases handled by
6 *Lawyers for Justice, PC*, and are commensurate with rates charged in the community by other
7 plaintiffs-side and defense-side attorneys in this practice area. *Lawyers for Justice, PC* almost
8 exclusively handles the prosecution of plaintiffs' side cases. To the best of undersigned
9 counsel's knowledge, *Lawyers for Justice, PC* has not billed nor required any of its clients, who
10 are usually workers who do not have the financial means to pay a retainer or otherwise fund the
11 prosecution or litigation of their wage-and-hour cases against their current or former employers,
12 to pay the firm out of pocket for the legal work performed by attorneys at the firm (and thus, has
13 not billed any clients using any hourly rates).

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

16 16. For over a decade, *Lawyers for Justice, PC* has almost exclusively focused on the
17 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
18 discrimination, unfair business practices, or consumer fraud. Currently, *Lawyers for Justice, PC*
19 is the attorney of record in well over a dozen employment-related putative class actions in both
20 state and federal courts in the State of California. *Lawyers for Justice, PC* is comprised of
21 attorneys who focus on litigating complex wage-and-hour class and PAGA representative
22 actions. The firm has successfully litigated cases involving nearly every aspect of California
23 wage and hour law, including payment of overtime and minimum wages, provision of meal and
24 rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant
25 wage statements, reimbursement of business expenses, executive, administrative, and other
26 overtime exemptions to the State of California and federal overtime compensation requirements,
27 PAGA claims, and sister statutes under federal law. During a relatively short time, in association
28 with other law firms, *Lawyers for Justice, PC* has recovered millions of dollars on behalf of

1 thousands of individuals in California.

2 17. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice,
3 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
4 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
5 extensive formal training in dispute resolution and negotiation from the Straus Institute for
6 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
7 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
8 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
9 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
10 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
11 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
12 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
13 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
14 Appellate District. In December of 2004, he obtained a license to practice law from the
15 California State Bar. Since in or around October of 2008, through his work at Lawyers *for*
16 Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment
17 class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
18 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
19 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.
20 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
21 has successfully litigated cases involving the executive, administrative, and other overtime
22 exemptions to the State of California and federal overtime compensation requirements. Under his
23 supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested
24 motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000
25 class action or representative action cases.

26 18. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He
27 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
28 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.

1 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
2 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
3 From approximately August 2008 to approximately December 2008, he served as a Judicial
4 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the
5 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
6 before all courts of the State of California and all United States District Courts in the State of
7 California. He has worked on many wage-and-hour class action and representative action cases,
8 taking the lead in taking and defending depositions, arguing motions, and attending mediations.
9 He has played an integral role in preparing matters for class certification, including and not
10 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
11 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
12 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
13 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
14 representative action cases have resulted in settlements that have been granted court approval. He
15 has handled over one hundred and fifty (150) mediations and worked on over two hundred and
16 fifty (250) class action or representative action cases which have resulted in settlement.

17 19. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a
18 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
19 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
20 Georgetown University Law Center in 2010. She is admitted to practice in California (since
21 2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District
22 Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the
23 U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled
24 motion practice in class action cases regarding discovery (including and not limited to, regarding
25 class contact information), class certification (both contested class certification and stipulated
26 class certification), arbitration agreements, coordination, and intervention. She has successfully
27 handled briefing and oral arguments on appeal and obtained notable decisions regarding Private
28 Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g.,

1 *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th
2 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v.*
3 *Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including
4 and not limited to working on cases to obtain class certification through contested motion
5 practice and working on cases in the post-certification stage (e.g., post-certification discovery,
6 appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel
7 in a case involving a certified class consisting of approximately 2,600 individuals). She has
8 extensive experience with class action and/or representative action settlements, and has handled
9 this process in over five hundred (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's
10 supervision, Lawyers for Justice, PC has handled the class certification and court approval
11 process for hundreds of class action and/or representative action matters that have successfully
12 resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and, on
13 several occasions, has been a speaker regarding topics in wage and hour law at the organization's
14 continuing legal education events.

15 20. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree
16 from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law
17 School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice
18 before all courts of the State of California. I have worked on many wage-and-hour class action
19 and PAGA representative cases, and my work on these cases has included preparing pleadings
20 and motions, making court appearances, and drafting and finalizing settlement agreements.

21 **LITIGATION COSTS AND EXPENSES INCURRED BY**

22 **LAWYERS FOR JUSTICE, PC**

23 21. To date, Class Counsel has borne all of the risks and costs of litigation and will
24 not receive any compensation until recovery is obtained in this matter. The Settlement provides
25 for reimbursement of litigation costs and expenses of up to \$30,000.00. Lawyers for Justice, PC
26 seeks reimbursement of \$15,891.12 in litigation costs and expenses incurred in the matter, as
27 reflected in "EXHIBIT 2" attached hereto. These expenses were reasonable and necessary in
28 the prosecution of the matter and to obtain the Settlement. The cost savings of \$14,108.88 will

1 be part of the Net Settlement Amount, which will be distributed to the Settlement Class Members
2 in accordance with the Settlement.

3 **ENHANCEMENT AWARD TO PLAINTIFF**

4 22. In recognition of his efforts and work spearheading the prosecution of this matter
5 and serving as the Class Representative, as well as his broader individual waiver and release of
6 claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 33 of the
7 Settlement Agreement), the Settlement provides for an Enhancement Award, in the amount of up
8 to \$10,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing his
9 employment with Class Counsel, gathering and providing relevant documents and information,
10 and providing facts and evidence to support the prosecution of the claims. Plaintiff was available
11 whenever Class Counsel needed him and actively tried to obtain and provide information that
12 would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive
13 \$10,000.00 as a reasonable Enhancement Award for his broader waiver and release of claims and
14 services performed in this matter, in addition to his individual settlement payment.

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

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

19 Executed this 30th day of December 2025, at Glendale, California.

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21 _____
22 Ryan Slinger
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EXHIBIT 1

JO-NATHAN GREEN V. BENDER ROSENTHAL, INC.
Sacramento County Superior Court Case No. 34-2023-00335755-CU-OE-GDS

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Jo-Nathan Green (“Plaintiff”) during the Case	8.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	4.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Claims, Conduct Legal Research and Analysis Regarding Class Claims Involved, and Draft Plaintiff’s Class Action Complaint for Damages (filed on March 7, 2023)	8.50
Review Court’s Notice and Order of Complex Case Determination (filed on March 9, 2023)	0.10
Review Court’s Notice of Case Management Conference and Orders Re: Complex Case Management Procedures (filed on March 28, 2023)	0.10
Review and Analyze Defendant Bender Rosenthal, Inc.’s (“Defendant”) Answer to Plaintiff’s Complaint (served on May 15, 2023), and Research Affirmative Defenses in Defendant’s Answer	1.50
Meet and Confer with Defendant’s Counsel, and Draft, Review, and/or Revise Parties’ Stipulation for a Protective Order (submitted on August 9, 2023)	1.50
Review Court’s Order Granting Parties’ Stipulation for a Protective Order (filed on August 23, 2023)	0.10
Draft Plaintiff’s Notice of Posting Jury Fees (filed on October 10, 2023)	0.10
Meet and Confer with Defendant’s Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on October 11, 2023)	1.30

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue the Case Management Conference; [Proposed] Order (submitted on October 17, 2023)	1.30
Review Court's Order Granting Joint Stipulation to Continue the Case Management Conference (filed on October 25, 2023)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Court's Order Continuing Case Management Conference (filed on October 30, 2023)	0.10
Review Court's Notice of Department Relocation (filed on January 5, 2024)	0.10
Draft Notice Regarding January 5, 2024, Notice of Department Relocation (filed on January 16, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on May 28, 2024)	1.10
Review Court's Order Granting Joint Stipulation to Continue the Case Management Conference (filed on July 11, 2024)	0.10
Draft Notice of Entry of Judgment or Order Re: Court's Order Continuing Case Management Conference (filed on July 12, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement and Joint Stipulation to Vacate Case Management Conference and All Related Deadlines; [Proposed] Order (filed on December 12, 2024)	1.50
Review Court's Order Granting Joint Stipulation to Vacate Case Management Conference and All Related Deadlines (filed on December 31, 2024)	0.10
Draft Notice of Change of Address or Other Contact Information and Notice of Entry of Judgment or Order Re: Court's Order Continuing Case Management Conference (filed on January 13, 2025)	0.20
Draft Notice of Change of Address or Other Contact Information (filed on February 5, 2025)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on May 27, 2025)	1.10
Review Court's Tentative Ruling Re: Case Management Conference (published on May 29, 2025)	0.10

Review Court's Minute Order Re: Case Management Conference (filed on May 30, 2025)	0.10
Research and Draft Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on August 7, 2025); Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation Permitting Plaintiff to File a First Amended Complaint; [Proposed] Order Thereon (submitted on July 18, 2025)	4.30
Review Court's Order Granting Joint Stipulation Permitting Plaintiff to File a First Amended Complaint (filed on August 7, 2025)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on August 8, 2025)	1.10
Review Court's Tentative Ruling Re: Case Management Conference (published on August 21, 2025)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on August 22, 2025)	0.10
Review and Analyze Defendant's Answer to Plaintiff's First Amended Complaint (served on September 8, 2025), and Research Affirmative Defenses in Defendant's Answer	1.10
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on January 17, 2023)	7.10
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Sets One & Two), and Requests for Production of Documents (Set One) to Defendant (served on June 12, 2023)	4.50
Draft Plaintiff's Special Interrogatories (Set Three) to Defendant (served on October 25, 2023)	1.80
Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff under the Private Attorneys General Act (served on May 15, 2025)	4.50
Meet with, Draft Correspondence to, Review Correspondence with, and/or Respond to Correspondence from, Defendant's Counsel	10.90

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	46.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analyses and Calculations (submitted on November 11, 2024)	32.50
Attend Mediation Session (November 18, 2024; via Zoom Video Conference)	13.30
Review and Analyze Mediator's Proposal (November 18, 2024)	0.90
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action and PAGA Settlement (executed on November 27, 2024)	4.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement (executed on May 29, 2025), and Draft, Review, and/or Revise Court Approved Notice of Class Action Settlement	18.50
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration and Review Weekly Reports, and Respond to Class and/or Other Inquiries	6.50
Law and Motion	
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Ryan Slinger in Support Thereof, Declaration of Jo-Nathan Green in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class and PAGA Settlement (filed on July 17, 2025)	21.50
Review Court's Tentative Ruling Continuing the Hearing on Motion for Preliminary Approval of Settlement (published on August 7, 2025)	0.10
Review Court's Minute Order Continuing the Hearing on Motion for Preliminary Approval of Settlement (filed on August 8, 2025)	0.10

Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (published on August 28, 2025)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on August 29, 2025)	0.20
Draft Notice of Entry of Judgment or Order Re: Court's Minute Order Granting Motion for Preliminary Approval (filed on September 4, 2025)	0.10
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on November 14, 2025)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Ryan Slinger in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on December 30, 2025)	21.80
Total Hours:	233.10

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Green vs. Bender Rosenthal, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/28/2022	U.S. Postmaster	Postage	\$15.70
12/21/2022	FedEx Express	Courier Service	\$40.42
3/7/2023	Legal Document Server, Inc.	Attorney Service	\$241.86
3/7/2023	Sacramento Superior Court	Complex Filing Fee	\$1,000.00
3/7/2023	Sacramento Superior Court	Complaint Filing Fee	\$435.00
4/14/2023	ProLegal	Attorney Service	\$191.75
5/2/2023	Legal Document Server, Inc.	Attorney Service	\$125.00
6/12/2023	General Logistics Systems US, Inc.	Courier Service	\$35.66
8/9/2023	Legal Document Server, Inc.	Attorney Service	\$126.39
8/9/2023	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
10/10/2023	Legal Document Server, Inc.	Attorney Service	\$135.43
10/10/2023	Sacramento Superior Court	Jury Fee	\$150.00
10/11/2023	Legal Document Server, Inc.	Attorney Service	\$125.00
10/17/2023	Legal Document Server, Inc.	Attorney Service	\$126.39
10/17/2023	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
10/17/2023	First Mediation Corporation	Mediation Fee	\$8,500.00
10/30/2023	Legal Document Server, Inc.	Attorney Service	\$125.00
1/16/2024	Legal Document Server, Inc.	Attorney Service	\$125.00
5/28/2024	Legal Document Server, Inc.	Attorney Service	\$16.29
5/28/2024	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
7/12/2024	Legal Document Server, Inc.	Attorney Service	\$14.90
11/18/2024	Melissa LeBlanc	Travel Reimbursement	\$22.11
12/9/2024	CPAnalytics	Data Analysis of Sampling of Time Records	\$3,570.00
12/12/2024	Legal Document Server, Inc.	Attorney Service	\$16.84
12/12/2024	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
1/14/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
2/26/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
5/15/2025	U.S. Postmaster	Postage	\$9.92
5/15/2025	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
5/27/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
7/18/2025	Legal Document Server, Inc.	Attorney Service	\$235.92
7/18/2025	Sacramento Superior Court	Motion Fee	\$60.00
7/21/2025	Legal Document Server, Inc.	Attorney Service	\$17.84
7/21/2025	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
7/22/2025	Legal Document Server, Inc.	Attorney Service	\$155.00
8/8/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
8/11/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
9/8/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
Total:			\$15,891.12