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Attorneys for Plaintiffs and the Class

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

CANDON LOVETT, KENNITH BOOZE,
DEARTIS SUDDUTH, JONATHAN
GIRVIN, 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,

Plaintiffs,

vs.

WONDER ICE CREAM, INC., a California
corporation; WONDER ICE CREAM
COMPANY, LLC, an unknown business
entity; WIC, LLC, an unknown business
entity; WONDER ICE CREAM, LLC, an
unknown business entity, and DOES 1
through 100, inclusive,

Defendants.

Case No.: RG21109738

Honorable Evelio Grillo
Department 21

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
COUNSEL FEES AND COSTS, AND
SERVICE AWARDS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement, Class
Counsel Fees and Costs, and Service Awards;
Declaration of Class Representatives (Candon
Lovett, Kenneth Booze, DeArtis Sudduth, and
Jonathan Girvin); Declaration of Settlement
Administrator (Yami Burns); and [Proposed]
Final Approval Order and Judgment filed
concurrently herewith]

Date: December 1, 2023
Time: 9:00 a.m.
Department: 21

Complaint Filed: August 4, 2021
FAC Filed: September 1, 2021
SAC Filed: June 15, 2023
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, 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 Candon Lovett, Kennith Booze, DeArtis Sudduth, and Jonathan Girvin (together, “Plaintiffs”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On May 26, 2023, in Department 21 of the above-entitled Court, the Honorable Evelio Grillo preliminarily approved the First Amended Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiffs and Defendant Wonder Ice Cream, Inc. erroneously named as Wonder Ice Cream Company, LLC, WIC, LLC, and Wonder Ice Cream, LLC (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Candon Lovett, Kennith Booze, DeArtis Sudduth, and Jonathan Girvin to represent the Class (together, “Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). 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, also known as Phoenix Class Action Settlement Administration Solutions (“Phoenix” or “Settlement Administrator”), to serve as the third-party settlement administrator and to handle the notice and settlement administration process.

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

1 (“PAGA”).

2 **WORK PERFORMED BY CLASS COUNSEL**

3 4. I and several other attorneys at Lawyers *for* Justice, PC have been actively
4 engaged in litigating the above-captioned action (“Action” or “Lovett Action”) since prior to its
5 commencement on August 4, 2021, as well as the separate action entitled *Jonathan Girvin v.*
6 *Wonder Ice Cream Company, LLC, et al.*, Santa Clara County Superior Court Case No.
7 22CV397371 that was commenced on April 28, 2022 (“Girvin Action”).

8 5. Before initiating the cases, Lawyers *for* Justice, PC investigated and researched
9 the facts and circumstances underlying the pertinent factual and legal issues and applicable law.
10 This required thorough discussions and interviews between attorneys at our firm and Plaintiffs
11 Lovett, Booze, and Girvin and research into the various legal issues involved in the cases,
12 namely, the current state of the law as it applied to class certification, manageability, off-the-
13 clock theory, misclassification theory, exemptions, meal and rest periods, wage-and-hour
14 enforcement and penalties, Plaintiffs’ claims and allegations, and potential defenses. After
15 conducting initial investigation, our firm determined that the claims of Plaintiffs Lovett, Booze,
16 and Girvin were well-suited for class-wide adjudication owing to what appeared to be a common
17 course of conduct affecting a similarly situated group of current and former non-exempt, hourly-
18 paid employees of Defendant who worked in the State of California and all salaried sales
19 employees who worked for Defendant in the State of California as DSD Route Sales
20 Representatives, or other similar positions, classified under the outside salesperson exemption,
21 who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and
22 rest periods, and business expenses.

23 6. Class Counsel investigated the veracity, strength, and scope of the claims, and
24 was preparing for class certification and for trial, prior to reaching the Settlement. The parties
25 conducted significant informal discovery and investigation into the facts of the cases, and
26 exchanged a volume of information, documents, and data throughout the course of the litigation
27 and in connection with mediation and settlement negotiations. Class Counsel had the
28 opportunity to interview and obtain information from Plaintiffs and other percipient witnesses,

1 and reviewed and analyzed a volume of information, documents, and data obtained from
2 Plaintiffs, Defendant, and other sources. The information, documents, and data reviewed and
3 analyzed by Class Counsel included and were not limited to: Plaintiffs' employment records, a
4 sampling of Class Members' time and pay data, job descriptions, and employment and
5 operations policies, practices, and procedures documents, among other information and
6 documents. Class Counsel developed liability, damages, and penalties valuation models in the
7 course of litigation and in connection with mediation and settlement negotiations, and met and
8 conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the
9 pleadings, case management, the production of information, documents, and data in the course of
10 litigation and in connection with mediation and settlement negotiations, as well as mediation and
11 settlement negotiation. Other work performed by Class Counsel included, and was not limited
12 to, case strategy and analysis; drafting, reviewing, and revising the pleadings, the mediation
13 brief, and settlement documents; and preparing for and/or attending court proceedings and
14 mediation and settlement negotiations, among other tasks.

15 7. The parties have conducted significant investigation and informal discovery
16 during the course of litigating the cases and mediation and settlement negotiations. Class
17 Counsel analyzed a volume of information, documents, and data obtained from Plaintiffs,
18 Defendant, and other sources. The information, documents, and data that were considered
19 provided a critical understanding of the nature of the work performed by the Class Members and
20 Aggrieved Employees, as well as Defendant's operations and employment policies, practices,
21 and procedures, and were used in analyzing liability, damages, penalties, and valuation issues in
22 connection with all phases of the litigation, and ultimately, in connection with the mediation and
23 settlement negotiation process. Class Counsel also performed research regarding the applicable
24 law, which is evolving as it relates to class certification, manageability, off-the-clock work,
25 misclassification, exemptions, meal and rest periods, waivers, rounding, representative PAGA
26 claims and penalties, wage-and-hour enforcement, Plaintiffs' claims and allegations, and
27 Defendant's defenses thereto, as well as facts discovered.

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8. After conducting significant litigation and 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 preparing for and participating in a formal, full-day mediation that was conducted by Francis J. Ortman III, Esq., a well-regarded mediator experienced in mediating complex labor and employment matters. During all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and settlement negotiations, the parties exchanged information, documents, and data, and discussed all 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 work, misclassification, exemptions, meal and rest periods, waivers, rounding, representative PAGA claims, and wage-and-hour enforcement, as well as the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the parties was not easy. Defendant and its counsel felt strongly about Defendant's ability to prevail on the merits and to avoid class certification and representative adjudication, while Plaintiffs and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the parties ultimately agreed that 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 asserted in the cases, and the real possibility of no monetary recovery after years of litigation.

9. The Settlement Agreement provides for a Gross Settlement Amount in the amount of \$1,100,000, however, the Settlement Agreement also includes an Escalator Clause in Section II.15. The Escalator Clause provides in pertinent part that, if the number of Workweeks for all Class Members during the Class Period exceeds 31,993 by more than 12.5% (i.e., if the number of Workweeks exceed 35,992), then, at Defendant's option, either (a) the Class Period and

1 PAGA Period will end on the last day that the total Workweeks do not exceed 35,992
2 Workweeks or (b) the Gross Settlement Amount will increase on a proportional basis to the
3 extent the 35,992-Workweeks threshold is exceeded. The Settlement Administrator confirmed
4 that the Workweeks during the Class Period, using the date that the Court granted preliminary
5 approval of the Settlement, exceeded the threshold set in the Escalator Clause and triggered the
6 Escalator Clause. Thereafter, Defendant elected to end the Class Period and PAGA Period on
7 March 31, 2023 (the last day that the total Workweeks do not exceed 35,992; the Settlement
8 Administrator confirmed that with the Class Period and PAGA Period ending on March 31,
9 2023, the Workweeks count during the Class Period is now 35,970).

10 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks
11 attorneys' fees in the amount of \$385,000.00, which is thirty-five percent (35%) of the Gross
12 Settlement Amount of \$1,100,000.00, as set forth in the Settlement Agreement and the Class
13 Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs and
14 Class Counsel, Plaintiffs have each agreed to a contingency fee of at least thirty-five percent
15 (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class
16 Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel
17 dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the
18 results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement
19 that Class Counsel has achieved in the cases; and (6) the other cases that Class Counsel has
20 turned down in order to devote their time and efforts to this matter.

21 11. I am aware that common and acceptable rates for contingency representation in
22 wage-and-hour class action and representative action litigation are in the range of 33.3% to 50%.

23 12. While not necessarily required to be demonstrated because the percentage fee is
24 proper for this settlement, Class Counsel has incurred many hours of work in connection with
25 prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar
26 analysis. Attorneys at Lawyers for Justice, PC have spent a total of **601.30** performing tasks and
27 obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and
28 Time Chart that sets forth in detail the nature of the legal services provided by attorneys at

1 Lawyers for Justice, PC and the time incurred in performing those services. These hours include
2 work done by myself and several other attorneys at Lawyers for Justice, PC. Additionally,
3 separate from the hours referenced herein, Lawyers for Justice, PC had litigation support
4 personnel actively engaged in assisting with the prosecution of this matter.

5 13. The work performed in this particular matter, the background of Lawyers for
6 Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who
7 worked on this matter, in litigating complex wage-and-hour actions, and in particular,
8 employment class and representative actions, support a reasonable blended hourly rate of
9 compensation of at least \$700 per hour for work performed by Lawyers for Justice, PC. Lawyers
10 for Justice, PC has been awarded attorneys' fees, compensating the firm at the blended rate of at
11 least \$700 per hour for legal services performed, by courts granting approval of settlements in
12 other wage-and-hour cases: final approval of the class and representative action settlement in
13 *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No.
14 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved
15 compensation at the rate of \$936.47 per hour; final approval of the class and representative
16 action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court
17 Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved
18 compensation at the rate of \$919.57 per hour; final approval of the class action settlement in
19 *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court
20 Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of
21 attorneys' fees involved compensation at the rate of \$766.05 per hour; final approval of the class
22 and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC*
23 (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the
24 award of attorneys' fees involved compensation at the rate of \$764.82 per hour; final approval of
25 the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma
26 County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award
27 of attorneys' fees involved compensation at the rate of \$855.96 per hour; final approval of the
28 class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation*

(Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved compensation at the rate of \$831.38 per hour; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorneys' fees involved compensation at the rate of \$780.77 per hour; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved compensation at the rate of \$845.64 per hour.

ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

14. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have extensive formal education and 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, I have previously served as a *pro bono* mediator for the Los Angeles County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

JUDICIAL EXTERNSHIPS

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

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LITIGATION AND CLASS ACTION EXPERIENCE

16. In December of 2004, I obtained a license to practice law from the California State Bar. From approximately December 2004 to approximately August 2008, I was employed by a prominent plaintiff-side law firm. At the prominent plaintiff-side law firm, my practice focused on class actions and other complex cases involving toxic torts and products liability. In addition, I gained substantial experience on cases involving insurance bad faith, premises liability, and medical negligence.

17. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions and representative actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. In association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

***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

1 granted final approval of the class action settlement. The Los Angeles County Superior Court
2 Case Number is BC413498.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

16 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
17 representative action against a food company on behalf of non-exempt employees. On June 30,
18 2017, the court granted final approval of the class and PAGA representative action settlement.
19 The Sacramento County Superior Court Case Number is 34-2015-00175871.

20 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
21 representative action against a chocolate company on behalf of non-exempt employees. On July
22 19, 2017, the court granted final approval of the class and PAGA representative action
23 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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1 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
2 representative action against a manufacturer of plastic containers on behalf of non-exempt
3 employees. On October 31, 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 BC577233.

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

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

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

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

26 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
27 representative action against a behavioral health service provider on behalf of non-exempt
28 employees. On November 13, 2018, the court granted final approval of the class and PAGA

1 representative action settlement. The Alameda County Superior Court Case Number is
2 RG16811450.

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

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

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

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

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

1 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
2 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
3 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
4 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
5 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
6 approval of the PAGA representative action settlement. The San Diego County Superior Court
7 Case Number is 34-2015-00175330.

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

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

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

26 mm) LFJ represents the plaintiff in a wage-and-hour class action against a
27 nutritional products manufacturer on behalf of non-exempt production line employees. On
28 December 13, 2021, the court granted the plaintiff's motion for class certification in part and

certified a class. The Solano County Superior Court Case Number is FCS051001.

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

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

19. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$15,782.83** 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.

SERVICE AWARDS TO PLAINTIFFS

20. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for Service Awards in the amount of \$10,000.00 each to Plaintiffs Candon Lovett, Kennith Booze, DeArtis Sudduth, and Jonathan Girvin. The requested Service Awards are fair and appropriate. Plaintiffs spent a substantial amount of time and effort to provide the facts and evidence necessary to attempt to prove the allegations. Plaintiffs were available whenever Class Counsel needed them and actively tried to facilitate the pursuit of the cases. Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs Candon Lovett, Kennith Booze, DeArtis Sudduth, and Jonathan Girvin to each receive \$10,000.00 as a reasonable Service Award, for their services on behalf of the Class Members, State of California, and Aggrieved Employees, in addition to their individual settlement payment.

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Executed this 6th day of November 2023, at Glendale, California.

Edwin Aiwazian

EXHIBIT A

LOVETT, ET AL. V. WONDER ICE CREAM, INC., ET AL.
Alameda County Superior Court Case No. RG21109738 (“Lovett Action”)

GIRVIN, ET AL. V. WONDER ICE CREAM, INC., ET AL.
Santa Clara County Superior Court Case No. 22CV397371 (“Girvin Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality	10.80
Pre-Lawsuit Investigation of the Merits of the Claims of Plaintiff Candon Lovett (“Plaintiff Lovett”), Kenneth Booze (“Plaintiff Booze”), DeArtis Sudduth (“Plaintiff Sudduth”), and Plaintiff Jonathan Girvin (“Plaintiff Girvin”) and the Putative Class Members	9.60
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Wonder Ice Cream, Inc., erroneously named as Wonder Ice Cream Company, LLC, WIC, LLC, and Wonder Ice Cream, LLC (“Defendant”) with Respect to Plaintiffs and the Putative Class Members	9.10
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 Candon Lovett, Kenneth Booze, DeArtis Sudduth, and Jonathan Girvin (collectively, “Plaintiffs”) and the Aggrieved Employees	7.50
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiffs and the Aggrieved Employees	6.70

Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock Work, Misclassification, Meal and Rest Breaks, Representative PAGA Actions, Manageability, and Class Certification in California, Including all New and Relevant DLSE Materials	8.10
Investigation of Defendant, Its Products and Services, Its Business Relationships, and the Industries/Markets in which It Operates	3.10
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	3.50
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	3.50
Analysis of Competitors in 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	3.90
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	3.40
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Consumer 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	4.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California	3.80
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Scheduling, Assignments, Facility/Warehouse Operations, Reports and Paperwork, Timekeeping, Rounding, Deduction from/Claw Back of Wages, Meal and Rest Breaks, Meal Period Waiver Agreements, On-Premises Rest Breaks, Non-Discretionary Commission/Bonuses/Incentive/Shift Differential Pay, Regular Rate Calculation, Compensation for Non-Productive Time and Rest Periods, Overtime Compensation, Reporting Time Pay, Locker Room, Dress Code, Donning and Doffing,	19.50

PPE/Safety Gear, Footwear, Tools/Equipment/Supplies, Use of Personal Cell Phones, and Reimbursement of Business-Related Expenses	
Research and Investigation Re: Various Software Programs and Other Technology That Defendant Uses to Conduct Everyday Business, Including Timekeeping, Payroll, Sales, Customer Relations Management, Marketing, Delivery, 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	4.30
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Exemption, Waiver, and Compliant Policies	8.50
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	6.30
Research and Investigation on the Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' and Aggrieved Employees' Work	4.50
Meet and Communicate with Plaintiff Candon Lovett Throughout the Pendency of the Case	47.50
Meet and Communicate with Plaintiff Kennith Booze Throughout the Pendency of the Case	52.50
Meet and Communicate with Plaintiff DeArtis Sudduth Throughout the Pendency of the Case	51.50
Meet and Communicate with Plaintiff Jonathan Girvin Throughout the Pendency of the Case	45.50
Investigate, Meet, Communicate with, and/or Interview Putative Class Members and/or Percipient Witnesses	14.50
Pleadings and Court Filings	
Draft Plaintiffs Lovett and Booze's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on August 4, 2021) (Lovett Action)	7.30
Review Court's Notice of Hearing re: Complex Determination (filed on August 25, 2021) (Lovett Action)	0.10

Draft Plaintiffs Lovett, Booze, and Sudduth's First Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on September 1, 2021) (Lovett Action)	3.10
Review Court's Tentative Ruling Re: Complex Determination (issued on September 28, 2021) (Lovett Action)	0.10
Review Court's Order Re: Complex Determination (filed on September 29, 2021) (Lovett Action)	0.10
Draft Plaintiffs' Complex Case Management Conference Statement (filed on October 13, 2021) (Lovett Action)	0.70
Review Defendant's Complex Case Management Conference Statement (served on October 27, 2021) (Lovett Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Extend Defendant's Deadline to Respond to Plaintiff's Complaint; [Proposed] Order (submitted on October 27, 2021) (Lovett Action)	1.20
Review Court's Tentative Ruling Re: Case Management Conference (issued on October 27, 2021) (Lovett Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on October 28, 2021) (Lovett Action)	0.10
Review Court's Order to Extend Defendant's Deadline to Respond to Plaintiff's Complaint (filed on November 5, 2021) (Lovett Action)	0.10
Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Legal Research and Analysis of Allegations and Affirmative Defenses and Defendant's Declaration of Derek Kingham (served on November 18, 2021) (Lovett Action)	1.90
Meet and Confer with Defendant's Counsel, and Draft Joint Complex Case Management Statement and Request for Continuance of Case Management Conference (submitted on December 23, 2021) (Lovett Action)	1.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on January 3, 2022) (Lovett Action)	0.10

Review Court's Minute Order Re: Case Management Conference (filed on January 4, 2022) (Lovett Action)	0.10
Review Court's Order Re: Case Management Conference (filed on January 4, 2022) (Lovett Action)	0.10
Research and Draft Plaintiff Girvin's Class Action Complaint for Restitution and Legal Research and Analysis of All Claims Involved (filed on April 28, 2022) (Girvin Action)	6.30
Review Court's Civil Lawsuit Notice (filed on April 28, 2022) (Girvin Action)	0.10
Review Court's Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadline (filed on May 2, 2022) (Girvin Action)	0.10
Review Defendant's Notice of Change of Address of Counsel for Defendant Wonder Ice Cream, Inc. (served on May 3, 2022) (Lovett Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on September 1, 2022) (Girvin Action)	1.10
Review Court's Order Granting Stipulation to Continue Case Management Conference (filed on September 2, 2022) (Girvin Action)	0.10
Review Court's Notice of Rescheduled Case Management Conference (filed on September 6, 2022) (Girvin Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement and Notice of Settlement (submitted on September 9, 2022) (Lovett and Girvin Actions)	0.90
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on September 28, 2022) (Lovett Action)	1.10
Review Court's Order Granting Stipulation to Continue Case Management Conference (filed on September 30, 2022) (Lovett Action)	0.10
Review Court's Notice of Rescheduled Case Management Conference (filed on October 26, 2022) (Girvin Action)	0.10

Review Court's Notice of Rescheduled Case Management Conference (filed on October 27, 2022) (Girvin Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (submitted on December 27, 2022) (Lovett Action)	1.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on December 30, 2022) (Lovett Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on January 4, 2023) (Lovett Action)	0.10
Review Court's Order Re: Case Management Conference (filed on January 4, 2023) (Lovett Action)	0.10
Draft Plaintiffs' Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on June 15, 2023) and Legal Research and Analysis of All Claims Involved, Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiffs Leave to File Second Amended Complaint; and [Proposed] Order Thereon (submitted on February 23, 2023) (Lovett Action)	5.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on March 16, 2023) (Lovett Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on March 30, 2023) (Lovett Action)	0.10
Review Court's Order Re: Case Management Conference (filed on March 30, 2023) (Lovett Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on April 7, 2023) (Girvin Action)	0.90
Review Court's Notice of Rescheduled Case Management Conference (filed on April 10, 2023) (Girvin Action)	0.10
Review Court's Order Granting Plaintiffs Leave to File Second Amended Complaint (filed on May 1, 2023) (Lovett Action)	0.10

Draft Plaintiff's Notice of Entry of Judgment (filed on May 5, 2023) (Lovett Action)	0.10
Draft Plaintiff's Notice and Acknowledgement of Receipt (filed on July 31, 2023) (Lovett Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on August 17, 2023) (Girvin Action)	1.10
Review Court's Notice of Rescheduled Case Management Conference (filed on August 17, 2023) (Girvin Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on September 6, 2023) (Lovett Action)	0.90
Review Court's Tentative Ruling Re: Case Management Conference (issued on September 14, 2023) (Lovett Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on September 15, 2023) (Lovett Action)	0.10
Appearances	
Prepare for and Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Class Counsel Fees and Costs, and Service Awards (December 1, 2023) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Candon Lovett (served on May 4, 2021) (Lovett Action)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Candon Lovett (served on May 14, 2021) (Lovett Action)	3.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kennith Booze (served on June 7, 2021) (Lovett Action)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kennith Booze (served on June 24, 2021) (Lovett Action)	4.90

Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff DeArtis Sudduth (served on July 19, 2021) (Lovett Action)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jonathan Girvin (served on August 2, 2021) (Girvin Action)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff DeArtis Sudduth (served on August 9, 2021) (Lovett Action)	4.40
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jonathan Girvin (served on September 2, 2021) (Girvin Action)	3.60
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff DeArtis Sudduth for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 21, 2022) (Lovett Action)	4.10
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Kennith Booze for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 21, 2022) (Lovett Action)	4.10
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Jonathan Girvin for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 21, 2022) (Lovett Action)	4.10
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Candon Lovett for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on October 5, 2022) (Lovett Action)	4.10
Meet with, Draft Correspondence to, and/or Respond to Correspondence from, Defendant's Counsel	16.50

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant (including, <i>inter alia</i> , Lovett_WIC 000001-000571 served on August 26, 2022), and Other Sources Prior to the Mediation • Employee Handbooks/Manuals and Employment and Operations Policies, Practices, and Procedures Documents • Sampling of Employee Time Data • Sampling of Employee Pay Data	54.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on September 1, 2022)	34.50
Telephonically Attend Mediation Session (September 7, 2022; Zoom Video Conference)	11.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on February 28, 2023) and Notice of Class Action Settlement	19.50
Draft, Review, Revise, Negotiate, and Finalize First Amended Joint Stipulation of Class Action and PAGA Settlement and Release (executed on May 12, 2023) and Notice of Class Action Settlement	3.10
Meet and Confer with Settlement Administrator and Defendant's Counsel Regarding, and Review and Monitor, Settlement Administration Process and Corrective Notice Mailing (To Address Settlement Administrator's Calculation and Notice Mailing Error), and Analyze Weekly Reports	7.10
Law and Motion	
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Alexandra Rose in Support Thereof, Declaration of Candon Lovett in Support Thereof, Declaration of Kenneth Booze in Support Thereof, Declaration of DeArtis Sudduth in Support Thereof, Declaration of Jonathan Girvin in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on March 15, 2023) (Lovett Action)	18.20

Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (issued on March 23, 2023) (Lovett Action)	0.20
Review Court's Minute Order and Order Re: Hearing on Motion - Other Motion for Preliminary Approval of Class Action Settlement (filed on April 11, 2023) (Lovett Action)	0.10
Draft Supplemental Declaration of Alexandra Rose in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on May 12, 2023) (Lovett Action)	2.10
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (issued on May 17, 2023) (Lovett Action)	0.10
Review Court's Minute Order and Order Re: Hearing on Motion - Other Motion for Preliminary Approval of Class Action Settlement (filed on May 19, 2023) (Lovett Action)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on May 26, 2023) (Lovett Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Amend Putative Class Member Settlement Notices; [Proposed] Order (submitted on August 18, 2023) (Lovett Action)	1.50
Meet and Confer with Defendant's Counsel, and Draft Stipulation to Continue Motion for Final Approval Hearing (submitted August 30, 2023)	0.70
Review Court's Order Granting Stipulation to Continue Motion for Final Approval Hearing (filed September 8, 2023) (Lovett 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, Class Counsel Fees and Costs, and Service Awards, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on November 6, 2023) (Anticipated)	20.50
Total Hours:	601.30

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Lovett v. Wonder Ice Cream, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/4/2021	U.S. Postmaster	Postage	6.95
6/7/2021	U.S. Postmaster	Postage	7.00
7/19/2021	U.S. Postmaster	Postage	7.00
8/4/2021	Legal Document Server, Inc.	Attorney Service	200.23
8/4/2021	Alameda Superior Court	Complex Filing Fee	1,000.00
8/4/2021	Alameda Superior Court	Court Filing Fee	435.00
9/1/2021	Legal Document Server, Inc.	Attorney Service	150.00
9/7/2021	ProLegal	Attorney Service	535.00
10/8/2021	Legal Document Server, Inc.	Attorney Service	150.00
10/15/2021	One Legal	Attorney Service	20.54
10/18/2021	One Legal	Attorney Service	20.54
12/21/2021	Ortman Mediation, Inc.	Mediation Fee	10,000.00
9/9/2022	Legal Document Server, Inc.	Attorney Service	18.70
9/21/2022	Labor & Workforce Development Agency	Filing Fee	75.00
10/5/2022	Labor & Workforce Development Agency	Filing Fee	75.00
10/5/2022	Labor & Workforce Development Agency	Filing Fee	75.00
10/5/2022	Labor & Workforce Development Agency	Filing Fee	75.00
10/5/2022	Alameda Superior Court	Document Download Fee	4.00
12/27/2022	Legal Document Server, Inc.	Attorney Service	18.70
2/22/2023	Legal Document Server, Inc.	Attorney Service	20.05
2/22/2023	Alameda Superior Court	Stipulation Fee	20.00
2/23/2023	Legal Document Server, Inc.	Attorney Service	20.05
2/23/2023	Alameda Superior Court	Stipulation Fee	20.00
2/27/2023	Legal Document Server, Inc.	Attorney Service	170.00
2/27/2023	Legal Document Server, Inc.	Attorney Service	20.05
2/27/2023	Alameda Superior Court	Stipulation Fee	20.00
3/15/2023	Legal Document Server, Inc.	Attorney Service	22.75
3/15/2023	Alameda Superior Court	Motion Fee	60.00
3/16/2023	Legal Document Server, Inc.	Attorney Service	214.00
4/11/2023	Alameda Superior Court	Document Download Fee	1.00
5/11/2023	Alameda Superior Court	Document Download Fee	18.00
5/16/2023	Legal Document Server, Inc.	Attorney Service	18.90
5/18/2023	Alameda Superior Court	Document Download Fee	1.00
5/31/2023	Legal Document Server, Inc.	Attorney Service	18.90
5/31/2023	Alameda Superior Court	Document Download Fee	7.00
6/6/2023	Legal Document Server, Inc.	Attorney Service	11.95
6/6/2023	Legal Document Server, Inc.	Attorney Service	18.90
6/30/2023	Legal Document Server, Inc.	Attorney Service	18.90
8/4/2023	Legal Document Server, Inc.	Attorney Service	18.90
8/31/2023	Legal Document Server, Inc.	Attorney Service	20.29
8/31/2023	Alameda Superior Court	Stipulation Fee	20.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Lovett v. Wonder Ice Cream, Inc.

9/6/2023	Legal Document Server, Inc.	Attorney Service	18.90
Total:			13,653.20

LAWYERS for JUSTICE PC CASE COST DETAIL
Girvin v. Wonder Ice Cream Company, LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/2/2021	U.S. Postmaster	Postage	7.00
4/28/2022	Legal Document Server, Inc.	Attorney Service	113.66
4/28/2022	Santa Clara County Superior Court	Court Filing Fee	435.00
4/28/2022	Santa Clara County Superior Court	Complex Filing Fee	1,000.00
5/31/2022	ProLegal	Attorney Service	351.60
6/21/2022	Legal Document Server, Inc.	Attorney Service	16.80
8/17/2022	Legal Document Server, Inc.	Attorney Service	17.67
9/1/2022	Legal Document Server, Inc.	Attorney Service	18.90
9/1/2022	Santa Clara County Superior Court	Stipulation Fee	20.00
9/1/2022	Legal Document Server, Inc.	Attorney Service	18.90
9/1/2022	Legal Document Server, Inc.	Filing Fee	20.00
9/6/2022	Legal Document Server, Inc.	Attorney Service	17.55
9/9/2022	Legal Document Server, Inc.	Attorney Service	17.55
10/5/2022	Labor & Workforce Development Agency	Filing Fee	75.00
Total:			2,129.63