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Attorneys for Plaintiff
Ronald Evans and the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

RONALD EVANS; individually, and on behalf of other members of the general public similarly situated,

Plaintiff,

vs.

SWEETENER PRODUCTS CO., an unknown business entity; SWEETENER PRODUCTS, INC., a California corporation; VERNON WAREHOUSE CO., an unknown business entity; VERNON CENTRAL WAREHOUSE, INC., a California corporation; and DOES 1 through 100, inclusive,

Defendants.

RONALD EVANS; individually, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act,

Plaintiff,

vs.

SWEETENER PRODUCTS CO., an unknown business entity; SWEETENER PRODUCTS, INC., a California corporation; VERNON WAREHOUSE CO., an unknown business entity; VERNON CENTRAL WAREHOUSE, INC., a California corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. 22STCV38329 (LEAD)
[*Consolidated with Case No. 22NWCV01544*]

DECLARATION OF BRIAN J. ST. JOHN IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Hearing Information:

Date:	December 10, 2026
Time:	10:00 a.m.
Dept.:	9
Judge:	Hon. Elaine Lu

Arby Aiwazian (SBN 269827), arby@calljustice.com
Joanna Ghosh (SBN 272479), joanna@calljustice.com
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Attorneys for Plaintiff
Ronald Evans and the Proposed Class

DECLARATION OF BRIAN J. ST. JOHN

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

1. I am an attorney duly licensed to practice law before all courts of the State of California and all United States District Courts in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Ronald Evans ("Plaintiff") and the Class in the consolidated actions pending in the Superior Court of California for the County of Los Angeles, Lead Case No. 22STCV38329 ("Class Action"), consolidated with Case No. 22NWCV01544 ("PAGA Action") (collectively, the "Actions"). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify thereto.

PROCEDURAL HISTORY

2. On October 3, 2022, Plaintiff submitted a letter to the Labor and Workforce Development Agency ("LWDA") providing notice of alleged violations of the California Labor Code and seeking civil penalties under the Private Attorneys General Act of 2004, Labor Code section 2698 et seq. ("PAGA").

3. On December 8, 2022, Plaintiff filed the Class Action in Los Angeles County Superior Court, Case No. 22STCV38329, alleging a single cause of action against Defendants for violation of California Business and Professions Code section 17200 et seq., based on underlying violations of the Labor Code and Wage Orders, including: (1) failure to pay overtime; (2) failure to provide compliant meal periods; (3) failure to provide compliant rest periods; (4) failure to pay all minimum wages owed; (5) failure to timely pay wages upon termination; (6) failure to timely pay wages during employment; (7) failure to provide compliant wage statements; (8) failure to keep accurate payroll records; and (9) failure to reimburse necessary business expenses.

PRELIMINARY APPROVAL OF SETTLEMENT

4. On July 23, 2026, in Department 9 of the above-entitled Court, the Honorable Elaine Lu preliminarily approved the Class Action and PAGA Settlement Agreement, as amended ("Agreement"), entered into between Plaintiff and Defendants Sweetener Products Co., Sweetener Products, Inc., Vernon Warehouse Co., and Vernon Central Warehouse, Inc. (collectively,

"Defendants") (together, the "Parties"). The Court also conditionally certified the Class for settlement purposes, and provisionally appointed Plaintiff as the representative of the Class ("Class Representative"). The Court also provisionally appointed and designated Lawyers *for* Justice, PC and Domb & Rauchwerger LLP as counsel for the Class (together, "Class Counsel").

5. The Court approved and ordered the mailing of the Notice of Class Action and PAGA Settlement and Hearing Date for Final Court Approval ("Class Notice"), adopted the notice, opt-out, dispute, and objection procedures, and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions ("Phoenix" or "Settlement Administrator") to serve as the third-party settlement administrator and handle the notice and settlement administration process.

6. As of October 15, 2026, Phoenix had received no objections to the Settlement. The deadline for submitting objections was October 13, 2026, for the initial mailing, and is October 27, 2026, for Class Members whose notices were re-mailed. (Declaration of Taylor Mitzner ("Mitzner Decl.") ¶ 9.)

WORK PERFORMED BY CLASS COUNSEL

7. Lawyers *for* Justice, PC has been actively engaged in this litigation from the inception of the Class Action, which was filed on December 8, 2022. Lawyers *for* Justice, PC has fully and actively participated in the litigation process throughout the pendency of the litigation, including developing case strategy, preparing pleadings and other filings, investigating Plaintiff's claims, conducting legal research, and evaluating the claims and potential defenses. Following the unsuccessful July 22, 2024 mediation, Lawyers *for* Justice, PC associated Domb & Rauchwerger LLP to continue litigating the Actions. The work of the firms has been a coordinated and combined effort. Ultimately, the efforts of Plaintiff and Class Counsel have resulted in a settlement recovery.

8. Plaintiff submitted a notice to the Labor and Workforce Development Agency on October 3, 2022. On December 8, 2022, Plaintiff filed the Class Action, alleging a single cause of action under Business and Professions Code section 17200 *et seq.*, predicated on alleged violations concerning overtime, meal and rest periods, minimum wages, timely payment of wages during employment and upon termination, wage statements, payroll records, and reimbursement of

necessary business expenses. Plaintiff filed the separate PAGA Action on the same date, alleging the same underlying Labor Code violations on a representative basis. On June 7, 2023, the Actions were consolidated, with the Class Action designated as the lead case.

9. Class Counsel conducted formal and informal discovery and investigation into the facts of the Actions to assess the strength and scope of the claims. Before filing the Actions, Lawyers for Justice, PC investigated and researched the facts and law underlying Plaintiff's claims through discussions with Plaintiff, review of information and employment documents, and legal research concerning class certification, off-the-clock work, meal and rest periods, wage-and-hour enforcement, PAGA, and potential defenses. Before mediation, Defendants provided employee data, including employee counts, workweeks, pay periods, average hourly rates, and dates of employment, together with employee time records, wage statements, and relevant wage-and-hour policies and procedures. Class Counsel reviewed and analyzed this information and developed liability, damages, and penalties valuation models in preparation for mediation. The information and documents helped Class Counsel assess the work performed by Class Members and Aggrieved Employees, as well as Defendants' operations and employment policies and practices, and evaluate liability, damages, penalties, and settlement value. The Parties also participated in meetings and informal conferences to exchange additional information, class data, and their respective theories of the case. Defendants produced 100% of the employee time records and wage statements for the Class Period, as well as the wage-and-hour policies and procedures applicable during that period.

10. After conducting significant investigation of the facts and law during the prosecution of the Actions, counsel for the Parties engaged in extensive settlement negotiations. The Parties participated in a full-day mediation on July 22, 2024, with Tagore Subramaniam, Esq., but did not reach a settlement at mediation. The Parties selected Mr. Subramaniam based on his experience mediating wage-and-hour class actions. Litigation and discovery continued thereafter, and the Parties ultimately reached a settlement through direct negotiations on December 29, 2025.

11. After mediation, Class Counsel propounded formal written discovery and noticed depositions of Defendants' Persons Most Knowledgeable regarding organizational structure and wage-and-hour practices, with accompanying requests for production of documents. Defendants

provided discovery responses and subsequent further responses following meet-and-confer efforts. The Parties also engaged a third party to administer a Belaire-West notice process, after which Class Counsel obtained class member contact information and spoke with class members to gather additional information. Counsel met and conferred regarding PMK deposition topics and scheduling. Following additional discovery discussions, Defendants provided further responses and updated data, which informed the Parties' subsequent settlement negotiations.

ATTORNEYS' FEES REQUESTED BY CLASS COUNSEL

12. By way of the accompanying Motion for Final Approval, Class Counsel seek attorneys' fees in the amount of $240,263.10, which is 35% of the Gross Settlement Amount of $686,466.00. 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 35% of the recovery.

13. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in prosecuting the Actions on a contingent basis; (2) the time, effort, and expense that Class Counsel dedicated to the Actions; (3) the skill and determination that Class Counsel have shown; (4) the results that Class Counsel have achieved throughout the litigation; and (5) the value of the settlement that Class Counsel have achieved in the Actions.

14. The nature of the work performed, skill exercised, and the outcome in this matter support the percentage fee sought. The Settlement provides for a Gross Settlement Amount of $686,466.00. Based on my review of Taylor Mitzner's October 15, 2026 declaration, Phoenix estimates a Net Settlement Amount of $354,702.90 and an average gross Individual Class Payment of $1,886.72. These estimates assume approval of the requested deductions and remain subject to the results of the extended response period ending October 27, 2026.

15. In support of the requested attorneys' fees and the Court's required lodestar review, attorneys at Lawyers for Justice, PC have spent 229.40 hours performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred in performing those services. These hours include work done by several attorneys at the firm. Also, separate from the hours references herein and in the chart, Lawyers

for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of the case. Applying a reasonable blended rate of $850 to the 229.40 hours of work done by attorneys at Lawyers *for* Justice, PC, results in a lodestar of $194,990.

16. The work performed in this particular matter, the background of Lawyers *for* Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least $850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least $850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of $936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of $919.57 per hour; and final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp*. (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of $855.96 per hour.

EXPERIENCE AND ADEQUACY OF

LAWYERS *for* JUSTICE, PC

17. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is attorney of record in dozens of employment-related putative class actions and/or representative actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private

Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wage, provision of meal and rest breaks and/or premium wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statues under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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

and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade and litigated over 1,000 class action or representative action cases.

19. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010 and in Washington in 2026. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative action cases have resulted in settlements that have been granted court approval. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

20. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010), New York (since 2013), and Washington (since 2026), and is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, all

U.S. District Courts in Washington, the U.S. District Court for the Southern District of New York, the U.S. District Court for the Eastern District of New York, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal, and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration of such claims, e.g., *Betancourt v. Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under Edwin Aiwazian, Arby Aiwazian, and her supervision, Lawyers *for* Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. She has been a speaker regarding topics in wage and hour law at the California Employment Lawyers Association's continuing legal education events.

21. I am a member of Lawyers *for* Justice, PC. I received my Bachelor's degree from the University of California, San Diego in 2010 and earned my Juris Doctor degree from the University of California, Berkeley, School of Law in 2013. I was admitted to practice law in California in 2015. I am admitted to practice before all courts of the State of California and all federal district courts in the State of California. I have worked on many wage and hour class action and PAGA representative matters, and my work has included, inter alia, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and

settlement agreements, engaging in motion practice, claims evaluation and analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, I spent several years working for a boutique employment and labor law firm representing employers, and, in 2019 and 2020, I was employed as general counsel for a DMHC licensed discount dental plan.

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

22. To date, Class Counsel have borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Agreement provides for reimbursement of Class Counsel's litigation costs and expenses in the amount of up to $26,000.00. Lawyers *for* Justice, PC seeks reimbursement of **$20,927.22** in litigation costs and expenses incurred in this matter, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the Agreement.

INCENTIVE AWARD TO PLAINTIFF

23. Section 3.2.1 of the Agreement provides for a Class Representative Service Payment of up to $7,500.00 to Plaintiff, subject to Court approval, in addition to his Individual Class Payment and Individual PAGA Payment. Plaintiff also provides a broader individual release and a waiver under California Civil Code section 1542, as set forth in Sections 5.1 and 5.1.1 of the Agreement. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information that would help obtain a recovery in this matter. Plaintiff spent a substantial amount of time and effort discussing his employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Accordingly, it is fair and appropriate for Plaintiff to receive $7,500.00 as a Class Representative Service Payment, in addition to his individual settlement payments.

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

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

Executed on October 22, 2026, at Glendale, California.



Brian J. St. John

EXHIBIT A

RONALD EVANS V. SWEETENER PRODUCTS CO., ET AL.
Los Angeles County Superior Court, Case No. 22STCV38329 ("Class Action")

RONALD EVANS V. SWEETENER PRODUCTS CO., ET AL.
Los Angeles County Superior Court, Case No. 22NWCV01544 ("PAGA Action")

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS *for* JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Ronald Evans ("Plaintiff")	17.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	4.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff's Class Action Claims, Conduct Legal Research and Analysis Regarding Class Action Claims, and Draft, Review, and/or Revise Plaintiff's Class Action Complaint for Restitution (filed on December 8, 2022) (Class Action)	7.50
Review Court's Notice of Case Assignment (filed on December 8, 2022) (Class Action)	0.20
Investigate the Merits of Plaintiff's Private Attorneys General Act ("PAGA") Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on December 8, 2022) (PAGA Action)	6.50
Review Court's Notice of Case Assignment (filed on December 8, 2022) (PAGA Action)	0.20
Review Court's Notice of Case Management Conference (filed on December 9, 2022) (PAGA Action)	0.10

Review Court's Initial Status Conference Order and Minute Order Re: Newly Filed Class Action (filed on February 8, 2023) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Posting Jury Fees (filed on March 24, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Statement (filed on March 30, 2023) (Class Action)	1.60
Review Court's Tentative Case Management Order (issued on April 4, 2023) (Class Action)	0.20
Review Court's Case Management Order, Order Authorizing Electronic Filing and Service – Case Anywhere LLC, and Minute Order Re: Initial Status Conference (filed on April 7, 2023) (Class Action)	0.40
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on April 17, 2023) (PAGA Action)	0.90
Review Defendants Vernon Central Warehouse, Inc. dba Sweetener Products Co. and Sweetener Products, Inc.'s (together, "Defendants") Notice of Related Case (served on April 28, 2023) (Class Action)	0.20
Review Defendants' Notice of Related Case and Case Management Statement (served on April 28, 2023) (PAGA Action)	0.40
Review Court's Minute Order Re: Notice of Related Case (filed on May 2, 2023) (Class Action)	0.20
Review Court's Minute Order Re: Notice of Related Case and Initial Status Conference Order (filed on May 2, 2023) (PAGA Action)	0.30
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing and Serving of First Amended Complaint (filed on May 9, 2023) (Class Action)	0.20
Review Defendants' Notice of Ruling on Defendants' Notice of Related Case and Notice of Initial Status Conference (served on May 10, 2023) (Class Action)	0.20
Review Defendants' Notice of Ruling on Defendants' Notice of Related Case and Notice of Initial Status Conference (served on May 10, 2023) (PAGA Action)	0.20
Review Defendants' Notice of Appearance (served on May 10, 2023) (Class Action)	0.20

Draft, Review, and/or Revise Plaintiff's Notice of Posting Jury Fees (filed on June 2, 2023) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on June 5, 2023) (Class Action & PAGA Action)	1.40
Review Court's Minute Order Re: Notice of Consolidated Case (filed on June 7, 2023) (Class Action)	0.20
Review and Analyze Defendants' Answer to Plaintiff's Class Action Complaint for Restitution, and Research Affirmative Defenses in Defendants' Answer (served on July 12, 2023) (Class Action)	1.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Vacate Plaintiff's Motion for Class Certification Deadline; [Proposed] Order (submitted on October 2, 2023) (Class Action)	1.30
Review Court's Order to Vacate Plaintiff's Motion for Class Certification Deadline (filed on October 2, 2023) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Vacate Plaintiff's Motion for Class Certification Deadline (filed on October 4, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Report Re: Status of Mediation (filed on July 3, 2024) (Class Action)	0.90
Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Mediation (filed on July 10, 2024) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Report Regarding Status of Mediation (filed on October 8, 2024) (Class Action)	1.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Mediation (filed on October 16, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Declaration of Arman Marukyan Regarding Order to Show Cause (filed on October 17, 2024) (Class Action)	1.40

Draft, Review, and/or Revise Notice of Association of Counsel (filed on November 21, 2024) (Class Action)	0.20
Review Court's Minute Order Re: Order to Show Cause Re: Sanctions for Failure to File Proof of Service (filed on December 5, 2024) (Class Action)	0.20
Review Plaintiff's Notice of Ruling (filed on December 11, 2024) (Class Action)	0.20
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on December 20, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 22, 2025) (Class Action)	0.20
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing and Serving of Defendant Vernon Warehouse Co.'s Responsive Pleading or Request for Entry of Default Against Defendant Vernon Warehouse Co. (filed on January 28, 2025) (Class Action)	0.20
Review Plaintiff's Notice of Ruling (filed on January 31, 2025) (Class Action)	0.20
Review Defendants' Declaration of Dale Jabour Re: Vernon Warehouse Co. (served on February 10, 2025) (Class Action)	0.30
Review Plaintiff's Request for Dismissal Without Prejudice of Vernon Warehouse Co., Declaration of Devin E. Rauchwerger in Support Thereof, and [Proposed] Order Thereon (filed on February 19, 2025) (Class Action)	0.20
Review Court's Order Granting Plaintiff's Request for Dismissal Without Prejudice of Vernon Warehouse Co. (filed on February 24, 2025) (Class Action)	0.20
Review Court's Minute Order Re: Discharging and Vacating Order to Show Cause (filed on February 25, 2025) (Class Action)	0.20
Review Plaintiff's Notice of Ruling (filed on February 26, 2025) (Class Action)	0.20

Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Stipulation to Continue Deadline to File Motion for Class Certification; and [Proposed] Order Thereon (submitted on May 1, 2025) (Class Action)	0.20
Review Court's Minute Order Re: Denial of Parties' Stipulation to Continue Deadline to File Motion for Class Certification; and [Proposed] Order Thereon (filed on May 8, 2025) (Class Action)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Deadline to File Motion for Class Certification and Extend Time to Bring Action to Trial; and [Proposed] Order Thereon (submitted on June 4, 2025) (Class Action)	0.20
Review Court's Order to Continue Deadline to File Motion for Class Certification and Extend Time to Bring Action to Trial (filed on June 12, 2025) (Class Action)	0.20
Review Joint Status Report for Non-Appearance Case Review Re: Filing and Serving of Motion for Class Certification (filed on February 5, 2026) (Class Action)	0.20
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing and Serving of Motion for Class Certification (filed on February 6, 2026) (Class Action)	0.20
Review Plaintiff's Notice of Ruling (filed on July 24, 2026) (Class Action)	0.40
Appearances	
Prepare for and Remotely Attend Order to Show Cause Re: Sanctions for Failure to File Proof of Service (December 5, 2024) (Class Action)	0.50
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (July 23, 2026) (Class Action)	0.80
Discovery and Deposition	
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on July 18, 2022)	4.50

Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Sweetener Products Inc. (served on July 24, 2024) (Class Action)	4.50
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Vernon Central Warehouse, Inc. (served on July 24, 2024) (Class Action)	3.50
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Sweetener Products Co. (served on July 24, 2024) (Class Action)	3.10
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Sweetener Products Co., and Requests for Production of Documents (noticed for August 27, 2024; Organizational Structure) (served on July 24, 2024) (Class Action)	1.20
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Sweetener Products Co., and Requests for Production of Documents (noticed for August 28, 2024; Wage and Hour Practices) (served on July 24, 2024) (Class Action)	1.40
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Sweetener Products Inc., and Requests for Production of Documents (noticed for September 3, 2024; Organizational Structure) (served on July 24, 2024) (Class Action)	1.10
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Sweetener Products Inc., and Requests for Production of Documents (noticed for September 4, 2024; Wage and Hour Practices) (served on July 24, 2024) (Class Action)	1.30
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Vernon Central Warehouse, Inc., and Requests for Production of Documents (noticed for September 5, 2024; Organizational Structure) (served on July 24, 2024) (Class Action)	0.90
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Vernon Central Warehouse, Inc., and Requests for Production of Documents (noticed for September 6, 2024; Wage and Hour Practices) (served on July 24, 2024) (Class Action)	1.10

Review Defendant Sweetener Products, Inc.'s Responses to Plaintiff's Form Interrogatories- General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on August 27, 2024) (Class Action)	1.10
Review Defendant Vernon Central Warehouse, Inc.'s Responses to Plaintiff's Form Interrogatories-General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on August 27, 2024) (Class Action)	1.10
Review Defendant Sweetener Products, Inc.'s Supplemental Responses to Plaintiff's Form Interrogatories-General (Set One) and Requests for Production of Documents (Set One) (served on November 27, 2024) (Class Action)	0.60
Review Defendant Vernon Central Warehouse, Inc. dba Sweetener Products, Co.'s Supplemental Responses to Plaintiff's Form Interrogatories- General (Set One) and Requests for Production of Documents (Set One) (served on November 27, 2024) (Class Action)	0.60
Review and Analyze Documents Produced by Defendants (served on November 27, 2024)	4.60
Review and Analyze Documents Produced by Defendants (served on October 10, 2025)	0.80
Review Defendant Vernon Central Warehouse, Inc. dba Sweetener Products, Co.'s Further Supplemental Responses to Plaintiff's Form Interrogatories- General (Set One) and Requests for Production of Documents (Set One) (served on December 4, 2025) (Class Action)	0.40
Review and Analyze Documents Produced by Defendants (served on December 4, 2025)	0.70
Draft, Review, and/or Revise Contemplated *Belaire-West* Administration Notice and Opt-Out Postcard	0.90
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Ronald Evans under the Private Attorneys General Act (served on October 3, 2022)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendants' Counsel	14.50

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources Prior to Mediation	60.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations (submitted on July 15, 2024)	31.50
Attend Mediation Session (July 22, 2024; Zoom Video Conference)	16.50
Draft, Review, Revise, Negotiate, and/or Finalize Class Action and PAGA Settlement Agreement and Class Notice (executed on May 14, 2026) and Draft, Review, and/or Revise Notice of Class Action Settlement	0.90
Draft, Review, Revise, Negotiate, and/or Finalize Amended Class Action and PAGA Settlement Agreement and Class Notice (executed on July 20, 2026)	0.30
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	2.50
Law and Motion	
Review Settlement Administrator's Declaration, Declaration of Devin E. Rauchwerger, and Declaration of Plaintiff Ronald Evans, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Unopposed Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Ryan Slinger in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on May 18, 2026) (Class Action)	4.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on July 12, 2026) (Class Action)	0.30
Review Supplemental Briefing in Support of Unopposed Motion for Preliminary Approval of Class Action and PAGA Settlement, Supplemental Declaration of Devin E. Rauchwerger, Supplemental Declaration of Taylor Mitzner on Behalf of Phoenix Class Action Administration Solutions, and Amended [Proposed]	0.60

Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on July 20, 2026) (Class Action)	
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on July 23, 2026)	0.30
Review Court's Minute Order Re: Motion for Preliminary Approval and Final Ruling (filed on July 23, 2026) (Class Action)	0.20
Research, Draft, Review, and/or Revise Declaration of Brian J. St. John in Support of Motion for Final Approval of Class Action and PAGA Settlement (Class Action)	3.50
Total Hours:	229.40

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Evans vs. Sweetener Products,Inc., et al.

Date	Payee	Expense Description	Amount
6/17/2022	U.S. Postmaster	Postage	$7.38
10/3/2022	U.S. Postmaster	Postage	$24.27
10/3/2022	Labor & Workforce Development Agen	PAGA Filing Fee	$75.00
12/9/2022	Legal Document Server, Inc.	Attorney Service	$112.81
12/9/2022	Los Angeles Superior Court	Complex Filing Fee	$1,000.00
12/9/2022	Los Angeles Superior Court	Complaint Filing Fee	$435.00
1/30/2023	Legal Document Server, Inc.	Attorney Service	$15.95
2/1/2023	Legal Document Server, Inc.	Attorney Service	$140.95
3/20/2023	Los Angeles Superior Court	Document Download Fee	$7.00
3/21/2023	Legal Document Server, Inc.	Attorney Service	$140.95
3/24/2023	Legal Document Server, Inc.	Attorney Service	$151.08
3/24/2023	Los Angeles Superior Court	Jury Fee	$150.00
4/3/2023	Legal Document Server, Inc.	Attorney Service	$125.00
4/4/2023	Legal Document Server, Inc.	Attorney Service	$15.95
6/6/2023	Legal Document Server, Inc.	Attorney Service	$16.15
7/2/2023	Case Anywhere LLC	Attorney Service	$153.60
8/10/2023	First Mediation Corporation	Mediation Fee	$10,000.00
10/2/2023	Legal Document Server, Inc.	Attorney Service	$142.54
10/2/2023	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
10/4/2023	Case Anywhere LLC	Attorney Service	$135.00
10/4/2023	Legal Document Server, Inc.	Attorney Service	$141.15
1/4/2024	Case Anywhere LLC	Attorney Service	$147.00
4/1/2024	Case Anywhere LLC	Attorney Service	$135.00
7/2/2024	Case Anywhere LLC	Attorney Service	$135.00
7/3/2024	Legal Document Server, Inc.	Attorney Service	$16.15
7/22/2024	Aliza Grossman	Travel Reimbursement	$48.69
7/24/2024	General Logistics Systems US, Inc.	Courier Service	$20.70
8/1/2024	Codici	Data Analysis	$5,400.00
10/1/2024	Case Anywhere LLC	Attorney Service	$285.00
10/8/2024	Legal Document Server, Inc.	Attorney Service	$130.00
10/8/2024	Case Anywhere LLC	Attorney Service	$16.15
10/18/2024	Legal Document Server, Inc.	Attorney Service	$192.40
11/22/2024	Legal Document Server, Inc.	Attorney Service	$147.70
1/6/2025	Case Anywhere LLC	Attorney Service	$165.00
1/22/2025	Legal Document Server, Inc.	Attorney Service	$147.95
1/23/2025	Legal Document Server, Inc.	Attorney Service	$18.70
2/5/2025	Case Anywhere LLC	Attorney Service	$57.00
3/5/2025	Case Anywhere LLC	Attorney Service	$45.00
4/4/2025	Case Anywhere LLC	Attorney Service	$45.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
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5/2/2025	Case Anywhere LLC	Attorney Service	$45.00
6/2/2025	Case Anywhere LLC	Attorney Service	$45.00
7/1/2025	Case Anywhere LLC	Attorney Service	$45.00
8/4/2025	Case Anywhere LLC	Attorney Service	$45.00
9/2/2025	Case Anywhere LLC	Attorney Service	$45.00
10/1/2025	Case Anywhere LLC	Attorney Service	$45.00
11/3/2025	Case Anywhere LLC	Attorney Service	$45.00
12/1/2025	Case Anywhere LLC	Attorney Service	$45.00
1/2/2026	Case Anywhere LLC	Attorney Service	$45.00
2/2/2026	Case Anywhere LLC	Attorney Service	$45.00
3/2/2026	Case Anywhere LLC	Attorney Service	$45.00
4/1/2026	Case Anywhere LLC	Attorney Service	$45.00
5/1/2026	Case Anywhere LLC	Attorney Service	$45.00
6/1/2026	Case Anywhere LLC	Attorney Service	$45.00
7/1/2026	Case Anywhere LLC	Attorney Service	$45.00
8/1/2026	Case Anywhere LLC	Attorney Service	$45.00
9/1/2026	Case Anywhere LLC	Attorney Service	$45.00
		Total:	$20,927.22

LAWYERS *for* JUSTICE, PC CASE COST DETAIL

Evans vs. Sweetener Products,Inc., et al.