

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs and the Class

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

WILLIAM CAMPOS; 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;
JUANITA HERNANDEZ; 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.

MOTIVE ENERGY, INC., a California
corporation; MOTIVE ENERGY
TELECOMMUNICATIONS GROUP, INC., a
California corporation; ADVANCED
CHARGING TECHNOLOGIES, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 30-2016-00828352-CU-OE-CXC

Honorable William D. Claster
Department CX104

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Service
Payments; Declarations of Class
Representatives (William Campos and
Juanita Hernandez); Declaration of
Settlement Administrator (Lindsay Kline);
and [Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: March 15, 2019
Time: 9:00 a.m.
Department: CX104

Complaint Filed: January 5, 2016
FAC Filed: September 22, 2016
SAC Filed: December 2, 2016
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, 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 William Campos and Juanita Hernandez ("Plaintiffs"). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On November 16, 2018, in Department CX104 of the above-entitled Court, the Honorable William D. Claster issued the Order Granting Preliminary Approval of Class Action Settlement ("Preliminary Approval Order"), thereby preliminarily approving the Joint Stipulation of Class Action and PAGA Settlement and Release, Amendment No. 1 to Joint Stipulation of Class Action and PAGA Settlement and Release, and Amendment No. 2 to Joint Stipulation of Class Action and PAGA Settlement and Release (together, "Settlement," "Agreement," or "Settlement Agreement"), and conditionally certifying the Class for settlement purposes. The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as Class Counsel, Plaintiffs William Campos and Juanita Hernandez as Class Representatives, and Simpluris, Inc. ("Simpluris") to serve as Settlement Administrator for handling the notice and settlement administration process. The Court preliminarily approved and ordered the mailing of the Notice of Class Action Settlement ("Class Notice") and Opt Out Form (together, "Notice Packet") to the Class Members. The Court adopted the notice, opt-out, and objection procedures, and ordered their implementation.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Payments ("Motion for Final Approval"), no Class Members have objected to the Settlement or the request for Attorneys' Fees and Litigation Costs and Expenses, Service Payments, Settlement Administration Costs, or the allocation toward penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* ("PAGA").

WORK PERFORMED BY CLASS COUNSEL

4. I have been actively engaged in this litigation since the lawsuit was commenced on January 5, 2016, as have several other attorneys and members in our firm.

5. Before initiating this lawsuit, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff William Campos ("Plaintiff Campos"), and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, representative PAGA claims, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, Plaintiff Campos' claims, and potential defenses. After conducting initial investigation, our firm determined that Plaintiff Campos' claims were well-suited for class treatment and representative adjudication owing to what appeared to be a common course of conduct affecting a similarly-situated group of current and former hourly-paid or non-exempt employees who worked for Defendants Motive Energy, Inc., Motive Energy Telecommunications Group, Inc., and Advanced Charging Technologies, Inc. (collectively, "Defendants") within the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel used the pre-mediation time period to investigate the veracity, strength, and scope of the claims, and also to prepare the matter for class certification and trial. The parties actively litigated this case, conducted extensive formal and informal discovery and investigation into the facts of the case, and also informally exchanged information and data in preparation for mediation. Class Counsel propounded multiple sets of written discovery requests in various forms, reviewed Defendants' responses and supplemental thereto, and noticed the depositions of Defendants' Person Most Knowledgeable designees. Class Counsel worked with Plaintiffs to provide responses and supplemental responses to multiple sets of formal written discovery requests that were propounded by Defendants. Class Counsel also took the depositions of Defendants' Persons Most Knowledgeable designees over the course of five (5) days and prepared for and defended the deposition of Plaintiff Campos and two (2) separate

depositions of Plaintiff Juanita Hernandez. The parties engaged in a *Belaire-West* notice administration, and Defendants produced the contact information of Class Members who did not opt out during the *Belaire-West* notice administration process. Class Counsel also interviewed and obtained information from Plaintiffs and other Class Members, including and not limited to the names of potential witnesses, and reviewed and analyzed thousands of pages of documents and data produced by Defendants and obtained through other sources. The documents and data reviewed and analyzed by Class Counsel included, and were not limited to, Plaintiffs and other Class Members' employment records, a detailed sampling of Class Members' time and pay data (including, and not limited to, timecards, payroll records, and wage statements), Defendants' Employee Handbooks, forms, agreements (including, and not limited to, the Employee Handbook Acknowledgement and Agreement), internal memoranda, job descriptions, and Defendants' operations and employment practices, procedures, and policies (including, and not limited to, Defendants' Recording Time and Meal Period Policy and Travel Time Policy), among other information and documents. Class Counsel also engaged in extensive motion practice regarding discovery and the pleadings, researched applicable law, developed damages/valuation models in preparation for mediation, and prepared for and attended court proceedings, mediation, and settlement negotiations. Counsel for the parties also met and conferred on numerous occasions, e.g., to discuss issues relating to the pleadings, motion practice, discovery, *Belaire-West* notice administration, class certification, and production of documents and data prior to mediation.

7. As outlined herein, the parties have conducted extensive formal and informal discovery and investigation during the course of this litigation. Class Counsel analyzed a large volume of documents and data either produced by Defendants or obtained by Class Counsel through other sources. These documents and data provided a critical understanding of the nature of the work performed by the Class Members, as well as Defendants' operations and employment policies, practices, and procedures, and were used in analyzing liability and damages issues in connection with all phases of the litigation, and ultimately with mediation and the settlement negotiation process.

1 8. After conducting formal and informal discovery and investigation into the facts of
2 the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve the
3 matter. These efforts included participating in a formal, full-day mediation conducted by Paul
4 Grossman, Esq., a well-regarded mediator experienced in mediating complex labor and
5 employment matters. During all settlement discussions, the parties conducted their negotiations
6 at arm's length in an adversarial position. Prior to and during mediation, the parties exchanged
7 documents, information and data, and discussed various aspects of the case, including the risks
8 and delays of further litigation; the risks to the parties of proceeding with class certification
9 and/or trial; the law relating to off-the-clock theory, meal and rest periods, representative PAGA
10 claims, and wage-and-hour enforcement; the evidence produced and analyzed; and the possibility
11 of appeals, among other things. Arriving at a settlement that was acceptable to the parties was
12 not easy. Defendants and their counsel felt very strongly about Defendants' ability to prevail on
13 the merits and to obtain a denial of class certification, while Plaintiffs and Class Counsel
14 believed that class certification would be obtained and that they would prevail at trial. After
15 conducting significant formal and informal discovery and investigation, settlement negotiations,
16 and with the aid of the mediator's evaluation, the parties agreed that this case was well-suited for
17 settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and
18 risks to the parties that would attend further litigation. These risks of further litigation include,
19 and are not limited to, a determination that the claims were unsuitable for class treatment and/or
20 representative adjudication, and failure to obtain certification, class de-certification after
21 certification of a class, allowing a jury to decide the claims asserted in the case, appeals, and the
22 real possibility of no recovery after years of litigation.

23 9. As set forth more fully in the accompanying Motion for Final Approval, Class
24 Counsel seeks attorneys' fees in the amount of \$262,500, which is thirty-five percent (35%) of
25 the Maximum Settlement Amount of \$750,000, and \$33,759.87 for reimbursement of litigation
26 costs and expenses. Pursuant to the contingency-fee agreement entered into by and between
27 Plaintiffs and Class Counsel, Plaintiffs have each agreed to a contingency fee of at least thirty-
28 five percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the

1 risk that Class Counsel took in commencing this case; (2) the time, effort, and expense that Class
2 Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4)
3 the results that Class Counsel has achieved throughout the litigation; (5) the value of the
4 settlement that Class Counsel has achieved for the Class Members; and (6) the other cases that
5 Class Counsel has turned down in order to devote its time and efforts to this matter.

6 10. I am aware that the common and acceptable rate for contingency representation in
7 wage and hour class action litigation is normally 40% before trial, with the range being from
8 33.3% up to 50%.

9 11. While not necessarily required to be demonstrated because the percentage fee that
10 is sought is proper for this settlement, Class Counsel has incurred many hours of work in
11 connection with this matter such that the request for an award of attorneys' fees is also justified
12 under a simple lodestar analysis. Class Counsel has spent a considerable number of hours
13 litigating this action and has spent a total of **713.30** hours performing tasks on behalf of
14 Plaintiffs and Class Members. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time
15 Chart that sets forth in detail the breakdown of time for the tasks performed by Class Counsel.
16 These hours include work done by myself and several of the firm's other members. We also had
17 litigation support personnel actively engaged in assisting with the prosecution of this case.

18 12. The work performed in this particular case, the background of our firm, as well as
19 the individual backgrounds, training, and experience of the attorneys who worked on this matter,
20 in litigating complex wage-and-hour class and representative actions, support a reasonable
21 hourly rate of compensation at the rate of at least \$500 for work performed by Class Counsel.
22 The rate of at least \$500 per hour has been found to be a reasonable hourly rate of compensation
23 for work performed by members of Lawyers for Justice, PC, by courts granting final approval in
24 other cases: final approval of the class and representative action settlement in *Stanley Bland, et*
25 *al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was
26 granted on November 21, 2018, and the award of attorneys' fees involved a higher hourly rate of
27 \$831.38; approval of the Private Attorneys General Act settlement in *Roberta Robles v. Altamed*
28 *Health Services Corporation* (Los Angeles County Superior Court Case No. BC639623) was

1 granted on October 31, 2018, and the award of attorneys' fees involved a higher hourly rate of
2 \$602.22; final approval of the class and representative action settlement in *Patrick Sinay, et al. v.*
3 *Essendant Co., et al.* (Los Angeles County Superior Court Case No. BC651043) was granted on
4 September 28, 2018, and the award of attorneys' fees involved a higher hourly rate of \$624.81;
5 final approval of the class and representative action settlement in *Ruben Sanchez, et al. v.*
6 *CalPortland Company, et al.* (Los Angeles County Superior Court Case No. BC590426) was
7 granted on August 8, 2018, and the award of attorneys' fees involved a higher hourly rate of
8 \$730.16; final approval of the class and representative action settlement in *Samuel Guerra, et al*
9 *v. Graphic Packaging International, Inc.* (Sacramento County Superior Court Case No. 34-2016-
10 00203789) was granted on June 5, 2018, and the award of attorneys' fees involved a higher
11 hourly rate of \$600; final approval of the class and representative action settlement in *Maryjo*
12 *Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No.
13 2020582) was granted on May 15, 2018, and the award of attorney's fees involved a higher
14 hourly rate of \$780.77; final approval of the class and representative action settlement in *Renee*
15 *Rivera, et al. v. Farmers and Merchants Bank of Long Beach* (Los Angeles County Court Case
16 No. BC569646) was granted on December 11, 2017, and the award of attorneys' fees involved a
17 higher hourly rate of \$629.96; final approval of the class and representative action settlement in
18 *Rebekah Perez, et al. v. Nestlé USA, Inc., et al.* (Alameda County Superior Court Case No.
19 RG15773654) was granted on August 18, 2017; final approval of the class and representative
20 action settlement in *Elizabeth Ortiz, et al. v. Ghirardelli Chocolate Company* (Alameda County
21 Superior Court Case No. RG15764300) was granted on July 19, 2017, and the award of
22 attorneys' fees involved a higher hourly rate of \$575; final approval of the class and
23 representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento
24 County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the
25 award of attorneys' fees involved a higher hourly rate of \$845.64; final approval of the class and
26 representative action settlement in *Mark Aceves v. Cambro Manufacturing Company* (Orange
27 County Superior Court Case No. 30-2015-00810013-CU-OE-CXC) was granted on April 14,
28 2017; final approval of the class and representative action settlement in *East West Bank Wage*

1 *and Hour Cases* (San Francisco County Superior Court Case No. CJC-13-004839) was granted
2 on November 18, 2016; approval of the Private Attorneys General Act settlement in *Tatiana*
3 *Kemp v. The Irvine Company Apartment Communities, Inc.* (Orange County Superior Court Case
4 No. 30-2015-00775439) was granted on November 4, 2016; final approval of the class and
5 representative action settlement in *Erick Guzman, et al. v. Banana Republic, LLC* (Los Angeles
6 County Superior Court Case No. BC488069) was granted on August 5, 2016; final approval of
7 the class and representative action settlement in *Restoration Hardware Wage & Hour Cases* (Los
8 Angeles County Superior Court Case No. JCCP4794) was granted on April 28, 2016; final
9 approval of the class and representative action settlement in *Kevin Coonce v. Ferguson*
10 *Enterprises, Inc.* (Sacramento County Superior Court Case No. 34-2021-00136285) was granted
11 on May 22, 2014, and the award of attorneys' fees involved a higher hourly rate of \$625; and
12 final approval of the class action settlement in *Anthony Powell v. Fairfield Residential Company,*
13 *LLC* (Alameda County Superior Court Case No. RG12660811) was granted on August 6, 2014.

14 ADEQUACY OF LAWYERS for JUSTICE, PC

15 EDUCATION

16 13. In May of 2004, I graduated from *Pepperdine University School of Law* with a
17 Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from
18 the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree
19 program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles
20 County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from
21 the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard*
22 *University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a
23 concentration in Natural Sciences from *Pepperdine University*.

24 JUDICIAL EXTERNSHIPS

25 14. From approximately September 2002 to approximately December 2002, I served
26 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of*
27 *Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I
28

1 served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal*
2 *for the Second Appellate District.*

3 **LITIGATION AND CLASS ACTION EXPERIENCE**

4 15. In December of 2004, I obtained a license to practice law from the California
5 State Bar. From approximately December 2004 to approximately August 2008, I was employed
6 by *Girardi & Keese*.

7 16. At *Girardi & Keese*, my practice focused on class actions and other complex
8 cases involving toxic torts and products liability. In addition, I gained substantial experience on
9 cases involving insurance bad faith, premises liability, and medical negligence. While employed
10 by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150
11 depositions, and prepared dozens of expert witnesses for deposition or trial.

12 17. Since its inception, in or around October of 2008, our firm has almost exclusively
13 focused on the prosecution of consumer and employment class actions, involving wage-and-hour
14 claims, race discrimination, unfair business practices or consumer fraud. Currently, we are the
15 attorneys of record in over a dozen employment-related putative class actions in both state and
16 federal courts in the State of California. Our firm has successfully litigated cases involving,
17 among other things, the executive, administrative, and other overtime exemptions to the State of
18 California and federal overtime compensation requirements. During this relatively short time, in
19 association with other law firms, we have recovered millions of dollars on behalf of thousands of
20 individuals in California.

21 **EXAMPLES OF CLASS ACTION RESULTS**

22 18. What follows are just a few examples of the type of results we have achieved on
23 behalf of our clients:

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

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

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

d) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class action involving allegations of misclassification of the "Store Manager" position. On June 10, 2011, the court granted plaintiffs' motion for class certification. On August 26, 2013, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC424012.

e) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class and representative action against a bank, involving allegations of misclassification of the "Assistant Branch Manager" position. On August 27, 2013, the court granted final approval of the class and representative action settlement. The Kern County Superior Court Case Number is S-1500-CV-273194-LHB.

f) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class and representative action against a national wholesale distributor of plumbing and builder supplies, involving allegations of misclassification of multiple salaried "manager" positions. On May 22, 2014, the court granted final approval of the class and representative action settlement. The Sacramento County Superior Court Case Number is 34-2012-00136285.

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1 g) Our firm, in association with other co-counsel, represented the plaintiff in
2 a wage-and-hour class action involving allegations of misclassification of the "Operations
3 Manager" position. On September 16, 2014, the court granted plaintiff's motion for class
4 certification. The Los Angeles County Superior Court Case Number is BC478769.

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

10 i) Our firm, in association with other co-counsel, represented the plaintiff in
11 a wage-and-hour class action involving allegations of misclassification of the salaried residential
12 "Property Manager" position. On September 17, 2015, the court granted plaintiff's motion for
13 class certification. The Los Angeles County Superior Court Case Number is BC474784.

14 j) Our firm, in association with co-counsel, represented the plaintiffs in a
15 wage-and-hour class and representative action against a national retailer of upscale hardware and
16 home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted
17 final approval of the class and representative action settlement. The Los Angeles County
18 Superior Court Case Number is JCCP4794.

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

24 l) Our firm, in association with co-counsel, represented the plaintiffs in a
25 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
26 involving allegations of misclassification of the "Department Manager" position. On August 12,
27 2016, the court granted plaintiffs' motion for class certification. The Alameda County Superior
28 Court Case Number is RG 13680477.

1 m) Our firm represented the plaintiff in a representative action under the
2 Private Attorneys General Act, against a real estate and property management company, on
3 behalf of non-exempt employees. On November 4, 2016, the court granted approval of the
4 Private Attorneys General Act settlement. The Orange County Superior Court Case Number is
5 30-2015-00775439-CU-OE-CXC.

6 n) Our firm, in association with other co-counsel, represented the plaintiffs in
7 a wage-and-hour class and representative action against a full-service bank, on behalf of non-
8 exempt employees. On November 18, 2016, the court granted final approval of the class and
9 representative action settlement. The San Francisco County Superior Court Case Number is CJC-
10 13-004839.

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

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

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

24 r) Our firm represented the plaintiff in a wage-and-hour class and
25 representative action against a food company on behalf of non-exempt employees. On June 30,
26 2017, the court granted final approval of the class and representative action settlement. The
27 Sacramento County Superior Court Case Number is 34-2015-00175871.

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1 s) Our firm represented the plaintiffs in a wage-and-hour class and
2 representative action against a chocolate company on behalf of non-exempt employees. On July
3 19, 2017, the court granted final approval of the class and representative action settlement. The
4 Alameda County Superior Court Case Number is RG15764300.

5 t) Our firm, in association with other co-counsel, represented the plaintiffs in
6 a wage-and-hour class and representative action against a property management company on
7 behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
8 approval of the class and representative action settlement. The Los Angeles County Superior
9 Court Case Number is JCCP4819.

10 u) Our firm, in association with other co-counsel, represented the plaintiffs in
11 a wage-and-hour class and representative action against a company that operates business
12 centers. On February 15, 2018, the court granted final approval of the class and representative
13 action settlement. The Los Angeles County Superior Court Case Number is BC498401.

14 v) Our firm, in association with co-counsel, represented the plaintiff in a
15 representative action under the Private Attorneys General Act, against a global provider of
16 products and services to the energy industry, on behalf of hourly-paid and non-exempt
17 employees. On November 19, 2018, the Court granted approval of the settlement. The Kern
18 County Superior Court Case Number is S-I 500-CV-280215-SDC.

19 **LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL**

20 19. Lawyers for Justice, PC has incurred \$33,759.87 in litigation costs and expenses
21 as reflected in "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in
22 the prosecution of this case. It should be noted that Class Counsel has borne all of the risks and
23 costs of litigation and will not receive any compensation until recovery is obtained by Plaintiffs
24 and Settlement Class Members

25 **SERVICE PAYMENTS TO PLAINTIFFS**

26 20. In recognition of their efforts and work serving as Class Representatives, the
27 Settlement provides for Service Payments in the amount of \$8,000 to Plaintiff Campos and
28 \$7,000 to Plaintiff Hernandez. The requested Service Payments are fair and appropriate.

1 Plaintiffs spent a substantial amount of time and effort in producing relevant documents and past
2 employment records and provided the facts and evidence necessary to attempt to prove the
3 allegations, including and not limited to, by way of preparing and appearing for depositions and
4 working with Class Counsel to provide responses and supplemental responses to multiple sets of
5 discovery requests that were propounded on each of them by Defendants. Plaintiffs were
6 available whenever Class Counsel needed them and actively tried to obtain information that
7 would benefit the Class. Plaintiffs spent numerous hours speaking with Class Counsel about
8 their claims, describing their work experiences with Defendants, and gathering and reviewing
9 documents. Accordingly, it is appropriate for Plaintiffs to receive reasonable Service Payments
10 in the amount of \$8,000 to Plaintiff Campos and \$7,000 to Plaintiff Hernandez, in addition to
11 their Individual Settlement Payments, for their services on behalf of the Class.

12 21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
13 Settlement is in the best interests of Plaintiffs and the Class.

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

16 Executed this 21st day of February 2019, at Glendale, California.

17 

18 Edwin Aiwasian

EXHIBIT A

CAMPOS, ET AL. V. MOTIVE ENERGY INC., ET AL.
(ORANGE COUNTY SUPERIOR COURT CASE NO. 30-2016-00828352-CU-OE-CXC)
ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on 1) Class Certification Elements, including Adequacy, Typicality, Superiority and Commonality; 2) Merits of Plaintiff William Campos' Claims and the Merits of the Claims of the Putative Class Members; and 3) Potential Damages Exposure of Defendants Motive Energy, Inc., Motive Energy Telecommunications Group, Inc., and Advanced Charging Technologies, Inc. ("Defendants") with respect to the Damages Sustained by Plaintiff Campos and the Putative Class	11
Pre-Lawsuit Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Certification Decisions in California, Including all New Relevant DLSE Materials	7
Investigation of Defendants, Defendants' Business Relationships, and the Industry in which Defendants Operate	5
Investigation of Defendants' Organizational and Corporate Structure and Executive Reporting Structure as It Related to the Employment and Management of the Putative Class Members	4
Research and Investigation Re: Staffing Models and Staffing Levels at Defendants' Locations and Worked by Putative Class Members Throughout California	2
Research and Investigation Re: Defendants' Policies, Practices, and Procedures Relating to Rounding, Reporting Time, Timekeeping, Meal/Rest Breaks, Overtime Compensation, and Reimbursement of Business-Related Expenses	5
Meet and Communicate with Plaintiff William Campos Throughout the Pendency of the Case	32

Meet and Communicate with Plaintiff Juanita Hernandez Throughout the Pendency of the Case	24
Pleadings and Court Filings	
Research and Draft Plaintiff Campos' Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on January 5, 2016)	6.25
Review Court's Notice of Case Assignment (filed on January 5, 2016)	0.10
Review Court's Order Scheduling Case Management Conference (filed on February 18, 2016)	0.10
Draft Plaintiff Campos' Case Management Statement (filed on March 25, 2016)	2.25
Draft Plaintiff Campos' Notice of Case Management Conference (filed on March 29, 2016)	0.50
Review and Analyze Defendants' Answer to Plaintiff Campos' Class Action Complaint and Research Affirmative Defenses in Defendants' Answer (served on April 26, 2016)	3
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement (filed on May 24, 2016)	2.25
Review Court's Order Regarding Case Management Conference (filed on June 1, 2016)	0.10
Draft Plaintiff Campos' Notice Regarding Case Management Conference Hearing (filed on June 1, 2016)	0.50
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement (filed on September 22, 2016)	2
Draft Plaintiffs' First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on September 22, 2016)	3.50
Review Defendants' Notice of Ruling (served on September 27, 2016)	0.10

Draft Plaintiffs' Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on December 2, 2016)	2
Meet and Confer with Defendants' Counsel, Draft Joint Stipulation and [Proposed] Order Granting Plaintiffs Leave to File [Proposed] Second Amended Complaint (submitted on November 17, 2016), and Review Court's Order Granting Plaintiffs Leave to File Second Amended Complaint (filed on November 28, 2016)	1.75
Prepare Notice of Entry of Judgment or Order (filed on December 2, 2016)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement (filed on December 19, 2016)	1.75
Review Court's Order Regarding Status Conference (filed on January 3, 2017)	0.10
Draft Plaintiffs' Notice of Ruling at Further Status Conference (filed on January 4, 2017)	0.25
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and [Proposed] Order Continuing Hearing Date of Plaintiff Campos' Motion to Compel Further Deposition of Defendant Motive Energy Telecommunications Group, Inc.'s Person Most Knowledgeable and Production of Documents at Deposition and Request for Sanctions (submitted on January 27, 2017)	1.50
Meet and Confer with Defendants' Counsel, Draft Amended Joint Stipulation and [Proposed] Order Continuing Hearing Date of Plaintiff Campos' Motion to Compel Further Deposition of Defendant Motive Energy Telecommunications Group, Inc.'s Person Most Knowledgeable and Production of Documents at Deposition and Request for Sanctions (submitted on February 3, 2017), and Review Court's Order Continuing Hearing Date of Plaintiff Campos' Motion to Compel (filed on February 3, 2017)	0.50
Review and Analyze Defendants' Answer to Plaintiffs' Second Amended Class Action Complaint and Research Affirmative Defenses in Defendants' Answer (served on March 20, 2017)	1.75

Draft Plaintiff Campos's Notice of Withdrawal of Motion to Compel Further Deposition of Defendant Motive Energy Telecommunications Group, Inc.'s Person Most Knowledgeable and Production of Documents at Deposition and Request for Sanctions (filed on March 23, 2017)	0.25
Meet and Confer with Defendants' Counsel, Draft Joint Stipulation and [Proposed] Order Granting Defendants' Leave to File First Amended Answer (submitted on April 6, 2017), and Review Court's Order Granting Defendants' Leave to File First Amended Answer (filed on April 6, 2017)	1.50
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement (filed on April 26, 2017)	1.75
Review Court's Order Regarding Status Conference (filed on April 3, 2017)	0.10
Draft Plaintiffs' Notice Regarding May 3, 2017 Status Conference (filed on April 3, 2017)	0.50
Review and Analyze Defendants' First Amended Answer to Plaintiffs' Second Amended Class Action Complaint and Research Affirmative Defenses in Defendants' Answer (served on April 8, 2017)	1.50
Draft Plaintiffs' Discovery Status Conference Statement (filed on May 19, 2017)	3
Review Defendants' Statement Regarding Discovery of Putative Class Contact Information and Time and Wage Records (served on May 19, 2017)	0.75
Review Court's Order Regarding Status Conference (filed on May 30, 2017)	0.10
Draft Plaintiffs' Notice of Ruling at Status Conference (filed on June 29, 2017)	0.50
Review Defendants' Status Conference Statement (served on June 28, 2017)	0.25
Draft Plaintiffs' Discovery Status Conference Statement (filed on June 29, 2017)	1.25
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulated Protective Order Concerning Discovery and Confidential Information; And [Proposed] Order Thereon (submitted on July 6, 2017)	3

Review Court's Order Regarding Status Conference (filed on July 6, 2017)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and [Proposed] Order Regarding Discovery (submitted on July 21, 2017), and Review Court's Order Regarding Discovery (filed on July 24, 2017)	1.75
Prepare Notice of Entry of Judgment or Order (filed on July 25, 2017)	0.10
Review Defendant's Substitution of Attorney (filed on October 10, 2017)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement and Stipulation to Continue Case Management Conference and [Proposed] Order Re: Joint Status Conference Statement and Stipulation to Continue November 7, 2017 Status Conference (submitted on October 31, 2017)	1.50
Meet and Confer with Defendants' Counsel, Draft Joint Case Management Statement and Stipulation to Continue Case Management Conference and [Proposed] Order Re: Joint Status Conference Statement and Stipulation to Continue Case Management Conference (submitted on February 21, 2018), and Review Court's Order Continuing Status Conference (filed on February 22, 2018)	1
Meet and Confer with Defendants' Counsel, Draft Joint Case Management Statement and Stipulation to Continue Case Management Conference and [Proposed] Order Re: Joint Status Conference Statement and Stipulation to Continue Case Management Conference (submitted on May 10, 2018), and Review Court's Order Continuing Status Conference (filed on May 10, 2018)	1
Meet and Confer with Defendants' Counsel, Draft Joint Case Management Statement and Stipulation to Continue Case Management Conference and [Proposed] Order Re: Joint Status Conference Statement and Stipulation to Continue Case Management Conference (submitted on July 12, 2018)	0.75
Review Court's Order Regarding Status Conference (filed on July 16, 2018)	0.10
Review Court's Order Regarding Status Conference (filed on July 31, 2018)	0.10

Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement; and [Proposed] Order Thereon (submitted on September 14, 2018); and Review Court's Order Continuing Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement (filed on September 17, 2018)	0.75
Review Court's Minute Order Regarding Motion for Preliminary Approval (filed on October 22, 2018)	0.10
Prepare Notice of Entry of Judgment or Order (filed on November 28, 2018)	0.10
Appearances	
Prepare for and Attend Case Management Conference via CourtCall (March 28, 2016)	1.25
Prepare for, Travel to/from, and Attend Case Management Conference (June 1, 2016)	3.75
Prepare for, Travel to/from, and Attend Motion to Compel and Status Conference (September 23, 2016)	4
Prepare for, Travel to/from, and Attend Status Conference (January 3, 2017)	4
Prepare for and Attend Status Conference via CourtCall (May 3, 2017)	2
Prepare for, Travel to/from, and Attend Status Conference (May 26, 2017)	4
Prepare for, Travel to/from, and Attend Status Conference (June 30, 2017)	4.50
Prepare for, Travel to/from, and Attend Status Conference (July 6, 2017)	5
Prepare for and Attend Status Conference via CourtCall (July 16, 2018)	1
Prepare for and Attend Status Conference via CourtCall (July 31, 2018)	0.50
Prepare for, Travel to/from, and Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Payments (May 15, 2019) (Anticipated)	4

Discovery and Deposition	
Draft Letter and Follow-up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Campos (served on September 14, 2015 and October 15, 2015)	0.25
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Campos (served on October 22, 2015)	1.50
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Hernandez (served on April 20, 2016)	0.10
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Hernandez (served on May 14, 2016 and May 25, 2016)	2.50
Review and Analyze Defendant Motive Energy, Inc.'s Form Interrogatories – Employment Law (Set One), Form Interrogatories – General (Set One), Special Interrogatories (Set One), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Plaintiff Campos; and Draft Plaintiff Campos' Responses to Defendant Motive Energy Inc.'s Form Interrogatories – Employment Law (Set One), Responses to Form Interrogatories – General (Set One), Responses to Special Interrogatories (Set One), Responses to Requests for Admission (Set One), and Responses to Requests for Production of Documents (Set One) (served on June 20, 2016)	15
Draft Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (August 1, 2016; Organizational Structure), Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (August 2, 2016; Job Duties), and Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (August 3, 2016; Affirmative Defenses) (served on July 5, 2016)	12
Draft Plaintiff Campos' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant Motive Energy, Inc. (served on July 5, 2016)	19

Draft Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 4, 2016; Organizational Structure), Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 5, 2016; Job Duties), and Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 8, 2016; Affirmative Defenses) (served on July 5, 2016)	1
Draft Plaintiff Campos' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant Motive Energy Telecommunications Group, Inc. (served on July 5, 2016)	2.50
Draft Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 9, 2016; Organizational Structure), Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 10, 2016; Job Duties), and Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 11, 2016; Affirmative Defenses) (served on July 5, 2016)	1
Draft Plaintiff Campos' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant Advanced Charging Technologies, Inc. (served on July 5, 2016)	2
Draft Plaintiff Campos' Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 11, 2016; Organizational Structure) and Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 12, 2016; Job Duties) (served on July 5, 2016)	0.75

Review and Analyze Defendant Motive Energy, Inc.'s Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (August 1, 2016; Organizational Structure), Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (August 2, 2016; Job Duties), and Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (August 3, 2016; Affirmative Defenses) (served on July 26, 2016)	3.50
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 4, 2016; Organizational Structure), Objection to Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 5, 2016; Job Duties), and Objection to Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 8, 2016; Affirmative Defenses) (served on July 28, 2016)	2
Review and Analyze Defendant Advanced Charging Technologies, Inc.'s Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 9, 2016; Organizational Structure), Objection to Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 10, 2016; Job Duties), and Objection to Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 11, 2016; Affirmative Defenses) (served on August 1, 2016)	2
Review and Analyze Defendant Motive Energy, Inc.'s Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Responses to Special Interrogatories (Set One), Responses to Special Interrogatories (Set Two), Responses to Special Interrogatories (Set Three), Responses to Requests for Production of Documents (Set One), and Responses to Requests for Production of Documents (Set Two) to Defendant Advanced Charging Technologies, Inc. (served on August 9, 2016)	24

Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Responses to Special Interrogatories (Set One), Responses to Special Interrogatories (Set Two), Responses to Special Interrogatories (Set Three), Responses to Requests for Production of Documents (Set One), and Responses to Requests for Production of Documents (Set Two) to Defendant Advanced Charging Technologies, Inc. (served on August 9, 2016)	14
Review and Analyze Defendant Advanced Charging Technologies, Inc.'s Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Responses to Special Interrogatories (Set One), Responses to Special Interrogatories (Set Two), Responses to Special Interrogatories (Set Three), Responses to Requests for Production of Documents (Set One), and Responses to Requests for Production of Documents (Set Two) to Defendant Advanced Charging Technologies, Inc. (served on August 9, 2016)	5.75
Draft Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (September 7, 2016; Organizational Structure and Job Duties) and Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (September 8, 2016; Job Duties) (served on August 29, 2016)	1
Review and Analyze Defendant's Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (September 7, 2016; Organizational Structure and Job Duties) and Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (September 8, 2016; Job Duties) (served on September 1, 2016)	1.50
Draft Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 11, 2016; Organizational Structure and Job Duties) and Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 12, 2016; Job Duties) (served on September 19, 2016)	0.25

Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 11, 2016; Organizational Structure and Job Duties) and Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 12, 2016; Job Duties) (served on September 26, 2016)	0.50
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Form Interrogatories – General (Set One), Special Interrogatories (Set One), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Plaintiff Campos (served on August 22, 2016); and Draft Plaintiff Campos's Responses to Defendant Motive Energy Telecommunications Group, Inc.'s Form Interrogatories – General (Set One), Responses to Special Interrogatories (Set One), Responses to Requests for Admission (Set One), and Responses to Requests for Production of Documents (Set One) (served on September 26, 2016)	18
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Notice of Taking Deposition of Plaintiff William Campos and Request for Production of Documents (served on September 21, 2016); and Draft Plaintiff Campos' Objections to Defendant Motive Energy Telecommunications Group, Inc.'s Notice of Taking Deposition of William Campos and Request for Production of Documents (served on September 29, 2016)	5.50
Draft Plaintiff Campos' Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (November 8, 2016; Organizational Structure and Job Duties) and Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (November 9, 2016; Job Duties) (served on October 4, 2016)	0.25
Draft Plaintiff Campos' Supplemental Responses to Defendant Motive Energy Telecommunications Group, Inc.'s Form Interrogatories – General (Set One) (served on October 10, 2016)	3.75

Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Objection to Plaintiff Campos' Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (November 8, 2016; Organizational Structure and Job Duties) and Objection to Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (November 9, 2016; Job Duties) (served on October 31, 2016)	0.50
Review Defendant Motive Energy Telecommunications Group, Inc.'s Amended Notice of Taking Deposition of Plaintiff William Campos and Requests for Production of Documents (served on October 31, 2016)	0.50
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Production of Documents (Set One) (Bates Nos. METG0001-METG0124) (served on November 4, 2016)	2
Review and Analyze Defendant Motive Energy, Inc.'s Form Interrogatories -- General (Set One), Form Interrogatories -- Employment Law (Set One), Special Interrogatories (Set One), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Plaintiff Hernandez (served on September 23, 2016); and Draft Plaintiff Hernandez's Response to Defendant Motive Energy, Inc.'s Form Interrogatories -- General (Set One), Response to Form Interrogatories -- Employment Law (Set One), Response to Special Interrogatories (Set One), Response to Request for Admission (Set One), and Response to Requests for Production of Documents (Set One) (served on November 7, 2016)	18
Prepare for and Attend the Deposition of Person Most Knowledgeable Daniel Ponzo (November 8, 2016; Glendale, California) and Review Deposition Transcript	9.75
Prepare for and Attend the Deposition of Person Most Knowledgeable Jason McCombie (November 9, 2016; Glendale, California) and Review Deposition Transcript	6.75
Prepare for and Attend the Deposition of Person Most Knowledgeable Daniel Ponzo (November 9, 2016; Glendale, California) and Review Deposition Transcript	6.50

Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Supplemental Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Supplemental Responses to Plaintiff's Special Interrogatories (Set Two), and Supplemental Responses to Plaintiff Campos' Requests for Production of Documents (Set One) (served on December 16, 2016)	3
Draft Plaintiff Campos's Supplemental Responses to Defendant Motive Energy Telecommunications Group, Inc.'s Form Interrogatories – General (Set One), Supplemental Responses to Special Interrogatories (Set One), and Supplemental Responses to Requests for Production of Documents (Set One) (served on December 21, 2016)	2
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Second Amended Notice of Taking Deposition of Plaintiff Campos and Requests for Production of Documents (served on December 14, 2016); and Draft Plaintiff Campos' Objections to Defendant Motive Energy Telecommunications Group, Inc.'s Second Amended Notice of Taking Deposition of Campos and Request for Production of Documents (served on January 10, 2017)	8.25
Draft Plaintiff Hernandez's Supplemental Responses to Defendant Motive Energy, Inc.'s Form Interrogatories – Employment Law (Set One) and Supplemental Responses to Defendant Motive Energy, Inc.'s Special Interrogatories (Set One) (served on January 10, 2017)	2.25
Review and Analyze Defendant Motive Energy, Inc.'s Notice of Taking Deposition of Plaintiff Hernandez and Requests for Production of Documents (served on December 14, 2016), and Draft Plaintiff Hernandez's Objections to Defendant Motive Energy, Inc.'s Notice of Taking Deposition of Plaintiff Hernandez and Request for Production of Documents (served on January 10, 2017)	8
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Juanita Hernandez (January 12, 2017; Costa Mesa, California) and Review Deposition Transcript	14
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff William Campos (January 13, 2017; Costa Mesa, California) and Review Deposition Transcript	15.50

Review and Analyze Defendant Motive Energy, Inc.'s Supplemental Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Supplemental Responses to Plaintiff Campos' Special Interrogatories (Set Two), and Supplemental Responses to Plaintiff Campos' Requests for Production of Documents (Set One) (served on January 13, 2017)	3.50
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard for Defendants Motive Energy, Inc. and Motive Energy Telecommunications Group, Inc. (drafted on January 17, 2017)	1.50
Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (January 30, 2017; Joint Employer) and Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (January 30, 2017; Joint Employer) (served on January 25, 2017)	6
Prepare for and Attend the Deposition of Person Most Knowledgeable Daniel Ponzo (January 30, 2017; Glendale, California) and Review Deposition Transcript	9
Draft Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (February 6, 2017; Joint Employer) and Plaintiffs' Notice of Continued Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (February 6, 2017; Policies and Procedures) (served on February 2, 2017)	2
Draft Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (February 23, 2017; Joint Employer) (served on February 6, 2017)	0.25
Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (February 23, 2017; Joint Employer) (served on February 6, 2017)	0.25
Prepare for and Attend the Depositions of Person Most Knowledgeable Witnesses (Non-Appearences) (February 6, 2017; Glendale, California)	1.75

Draft Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (February 28, 2017; Joint Employer) and Notice of Continued Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (February 28, 2017; Policies and Procedures) (served on February 16, 2017)	0.50
Prepare for, Travel to/from, and Attend the Deposition of Person Most Knowledgeable Daniel Ponzo (February 28, 2017; Long Beach, California) and Review Deposition Transcript	10.50
Draft Plaintiffs' Re-Notice of Continued Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (March 22, 2017; Organizational Structure) (served on March 8, 2017)	0.25
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Objections to Plaintiffs' Re-Notice of Continued Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (March 22, 2017; Organizational Structure) (served on March 16, 2017)	2
Prepare for and Attend the Deposition of Person Most Knowledgeable Daniel Ponzo (March 22, 2017; Glendale, California) and Review Deposition Transcript	9.75
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Notice of Taking Continued Deposition of Plaintiff Juanita Hernandez and Requests for Production of Documents (served on March 15, 2017); and Draft Plaintiff Hernandez's Objections to Defendant Motive Energy Telecommunications Group, Inc.'s Notice of Taking Continued Deposition of Plaintiff Hernandez and Requests for Production of Documents (served on March 28, 2017)	9.50
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Juanita Hernandez (March 31, 2017; Costa Mesa, California) and Review Deposition Transcript	14.75
Draft Plaintiff Hernandez's Further Supplemental Responses to Defendant Motive Energy, Inc.'s Special Interrogatories (Set One) (served on May 2, 2017)	2

Review and Analyze Defendant Motive Energy, Inc.'s Supplemental Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Supplemental Responses to Plaintiff Campos' Special Interrogatories (Set Two), and Supplemental Responses to Plaintiff Campos' Requests for Production of Documents (Set One) (served on May 31, 2017)	5
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Supplemental Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Supplemental Responses to Plaintiff Campos' Special Interrogatories (Set Two), and Supplemental Responses to Plaintiff Campos' Requests for Production of Documents (Set One) (served on May 31, 2017)	2
Review and Analyze Defendant Advanced Charging Technologies, Inc.'s Supplemental Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Supplemental Responses to Plaintiff Campos' Special Interrogatories (Set Two), and Supplemental Responses to Plaintiff Campos' Requests for Production of Documents (Set One) (served on May 31, 2017)	1.25
Review and Analyze Documents Produced by Defendant Motive Energy Telecommunications Group, Inc. (Bates Nos. METG0125-0244) (served on January 24, 2017; January 27, 2017; March 21, 2017; and June 1, 2017)	1.75
Review and Analyze Documents Produced by Defendant Advanced Charging Technologies, Inc. (Bates Nos. ACT0001-0081) (served on January 27, 2017 and June 1, 2017)	1.25
Review and Analyze Documents Produced by Defendant Motive Energy, Inc. (Bates Nos. MEI0001-0082) (served on January 27, 2017; June 1, 2017; and June 8, 2017)	1.25
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Natasha Villalobos (served on August 21, 2017)	0.25
Draft Letters to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Lara Maes and Greg Ocfemia (served on August 22, 2017)	0.25
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for James Salvador Gollaz Jr. and Freddie Arvizu (served on August 23, 2017)	0.10

Review and Analyze Documents Produced by Putative Class Member (produced on August 29, 2017)	3
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Anthony Green (served on August 31, 2017)	0.10
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Jesse Lucero (served on September 7, 2017)	0.10
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Natasha Villalobos (served on September 11, 2017)	2
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Freddy Arvizu (served on September 15, 2017)	1
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Anthony Green (served on September 21, 2017)	1.25
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Rigoberto Garcia (served on September 27, 2017)	0.10
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Tomas Aparacio (served on September 28, 2017)	0.10
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Jesse Lucero (served on September 28, 2017)	1.50
Draft Follow-up Letters to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Greg Ocfemia, James Salvador Gollaz Jr., and Lara Maes (served on October 12, 2017)	0.25
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Greg Ocfemia, James Salvador Gollaz Jr., and Lara Maes (served on October 17, 2017)	7.50

Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Rigoberto Garcia (served on October 18, 2017)	1.25
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Tomas Aparacio (served on October 20, 2017)	3
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Dave Morgan, Kriek Jones, and Octavio Herrera (served on November 14, 2017)	0.25
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Carlos Santiago (served on November 20, 2017)	0.10
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Steven Varni (served on December 28, 2017)	0.10
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Oscar Leon (served on January 19, 2018)	0.10
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Fidel Ramos Jr. (served on January 22, 2018)	0.10
Letters and Correspondence	
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Campos for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on December 1, 2015)	1.50
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Hernandez for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on June 3, 2016)	0.25
Meet with Defendants' Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	12

Mediation/Settlement	
Review and Analyze Mediation Data and Documents Produced by Defendants (DEFS_MEDIATION000001-005614) (served on January 5, 2018) • Employee Handbooks and Policies • Sampling of Employee Time Data • Sampling of Employee Pay Data • Class-Wide Data Regarding Class Size, Compensation, Workweeks, and Premium Pay	44
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Exhibits to the Mediation Brief, and Performing Damages Analysis/Calculations (submitted on January 29, 2018)	14
Travel to/from and Attend Mediation Session (January 31, 2018; Los Angeles, California)	8
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on July 10, 2018) and Draft Exhibits	4.50
Law and Motion	
Draft Plaintiff Campos' Notice of Motion and Motion for Leave to File an Amended Complaint, Declaration of Elizabeth M.R. Parker in Support Thereof, and [Proposed] Order Thereon (filed on August 18, 2016)	6
Draft Plaintiff Campos' Notice of Errata (filed on August 24, 2016)	0.25
Review and Analyze Defendants' Opposition to Motion for Leave to File Amended Complaint, Declaration of Nida L. Henderson in Support Thereof, Evidentiary Objections to the Declaration of Elizabeth M.R. Parker, and [Proposed] Order Thereon (served on September 2, 2016); and Draft Plaintiff Campos' Reply in Support of Motion for Leave to File an Amended Complaint (filed on September 9, 2016)	6

Review and Analyze Defendant Motive Energy, Inc.'s Motion to Compel Plaintiff William Campos to Further Respond to Form Interrogatories – General and Request for Monetary Sanctions, Declaration of Nida L. Henderson in Support Thereof, Separate Statement Pursuant to C.R.C., Rule 3.1345 in Support Thereof, and [Proposed] Order Thereon (served on August 16, 2016); and Draft Plaintiff Campos' Opposition to Defendant Motive Energy, Inc.'s Motion to Compel Further Responses to Form Interrogatories – General (Set One) and Request for Sanctions and Declaration of Elizabeth M.R. Parker in Support Thereof (filed on September 12, 2016)	11.75
Review and Analyze Defendant Motive Energy, Inc.'s Reply to Plaintiff Campos' Opposition to Motion to Compel Plaintiff to Further Respond to Form Interrogatories – General (served on September 16, 2016)	1.75
Review Court's Order Regarding Defendant Motive Energy, Inc.'s Motion to Compel Plaintiff to Further Respond to Form Interrogatories – General (filed on September 23, 2016)	0.10
Draft Plaintiff Campos' Motion to Compel Further Deposition of Defendant Motive Energy Telecommunications Group, Inc.'s Person Most Knowledgeable and Production of Documents at Deposition and Request for Sanctions, Declaration of Elizabeth M.R. Parker in Support Thereof, Rule 3.1345 Separate Statement in Support Thereof, and [Proposed] Order Thereon (filed on January 17, 2017)	8
Review and Analyze Defendants' Demurrer to Plaintiffs' Second Amended Complaint, Declaration of Nida L. Henderson Regarding Efforts to Meet and Confer Prior to Filing Demurrer to Second Amended Complaint on Behalf of Defendants, and [Proposed] Order Thereon (served on January 30, 2017); and Draft Plaintiffs' Opposition to Defendants' Demurrer to Plaintiffs' Second Amended Complaint (filed on February 27, 2017)	7.50
Review and Analyze Defendants' Reply to Opposition to Demurrer to Plaintiffs' Second Amended Complaint (filed on March 3, 2017)	2
Review Court's Order on Defendants' Demurrer (filed on March 10, 2017)	0.10

Draft Plaintiffs' Consolidated Motion to Compel Defendants to Provide Further Responses to Plaintiffs' Special Interrogatories (Set One) Nos. 1 and 2 and Request for Monetary Sanctions, Declaration of Arya Djaifroudi in Support Thereof, Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy Telecommunications Group, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set One), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set One), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Advanced Charging Technologies, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set One), and [Proposed] Order in Support Thereof (filed on June 22, 2017)	9
Draft Plaintiffs' Consolidated Motion to Compel Defendants to Provide Further Responses to Plaintiffs' Special Interrogatories (Set Two) and Requests for Production of Documents (Set One) and Request for Monetary Sanctions, Declaration of Arya Djaifroudi in Support Thereof, Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy Telecommunications Group, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set Two), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set Two); Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Advanced Charging Technologies, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set Two), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy Telecommunications Group, Inc. to Provide Further Responses to Plaintiffs' Requests for Production (Set One), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy, Inc. to Provide Further Responses to Plaintiffs' Requests for Production (Set One), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Advanced Charging Technologies, Inc. to Provide Further Responses to Plaintiffs' Requests for Production (Set One), and [Proposed] Order Thereon (filed on June 22, 2017)	16
Draft Plaintiffs' Notice of Errata to the Declarations of Arya Djaifroudi in Support of Plaintiffs' Consolidated Motions to Compel Defendants to Provide Further Responses to Discovery and Requests for Monetary Sanctions (filed on June 30, 2017)	0.50

Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwasian in Support Thereof, Declaration of William Campos in Support Thereof, Declaration of Juanita Hernandez in Support Thereof, and [Proposed] Order (filed on July 27, 2018)	12
Meet and Confer with Defendants' Counsel, and Draft Joint Supplemental Brief in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Edwin Aiwasian in Support Thereof, Declaration of Larry Sneg Regarding Class Notice in Support Thereof, and [Revised Proposed] Order Thereon (filed on September 21, 2018)	4
Draft Plaintiffs' Further Supplemental Declaration of Edwin Aiwasian in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and [Further Revised Proposed] Order Thereon (filed on November 6, 2018)	4
Prepare [Further Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on November 15, 2018)	0.75
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on November 16, 2018)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Notice of Motion and Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Payments, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (February 21, 2019)	18
Total Hours:	713.30

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Campos, et al. v. Motive Energy, Inc., et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/1/2015	U.S. Postmaster	Postage	13.48
1/6/2016	One Legal	Attorney Service	47.26
1/6/2016	Superior Court of California, County of Orange	Filing Fee	435.00
1/6/2016	Superior Court of California, County of Orange	Complex Fee	1,000.00
3/24/2016	Pro Legal	Attorney Service	334.35
3/25/2016	CourtCall, LLC.	Attorney Service	116.00
3/25/2016	One Legal	Attorney Service	87.85
3/30/2016	One Legal	Attorney Service	9.95
4/20/2016	U.S. Postmaster	Postage	6.47
5/24/2016	One Legal	Attorney Service	9.95
5/31/2016	Golden State Overnight	Courier Service	11.22
6/2/2016	One Legal	Attorney Service	9.95
6/3/2016	U.S. Postmaster	Postage	13.15
6/16/2016	Fed Ex Express	Courier Service	18.05
6/16/2016	Golden State Overnight	Courier Service	19.67
6/17/2016	Golden State Overnight	Courier Service	11.22
6/20/2016	U.S. Postmaster	Postage	9.85
7/5/2016	U.S. Postmaster	Postage	9.85
7/15/2016	FedEx Express	Courier Service	18.23
8/19/2016	One Legal	Attorney Service	11.51
8/19/2016	Superior Court of California, County of Orange	Filing Fee	60.00
8/24/2016	CourtCall, LLC.	Attorney Service	86.00
8/24/2016	Pro Legal	Attorney Service	330.22
8/25/2016	One Legal	Attorney Service	9.95
8/31/2016	Golden State Overnight	Courier Service	15.05
9/7/2016	A&B Reporting, LLC.	Court Reporter	190.00
9/9/2016	Golden State Overnight	Courier Service	18.62
9/9/2016	One Legal	Attorney Service	9.95
9/12/2016	Golden State Overnight	Courier Service	14.98
9/12/2016	One Legal	Attorney Service	9.95
9/16/2016	Romina Keshishyan	Travel Reimbursement	39.73
9/19/2016	Golden State Overnight	Courier Service	14.98
9/19/2016	U.S. Postmaster	Postage	2.20
9/22/2016	One Legal	Attorney Service	9.95
9/22/2016	U.S. Postmaster	Postage	2.41
9/23/2016	Arby Aiwarzian	Travel Reimbursement	11.75
9/23/2016	FedEx Express	Courier Service	21.56
9/23/2016	One Legal	Attorney Service	19.90
9/26/2016	Golden State Overnight	Courier Service	24.27
9/29/2016	Golden State Overnight	Courier Service	21.42
9/30/2016	Golden State Overnight	Courier Service	11.17
10/4/2016	Golden State Overnight	Courier Service	15.05
10/10/2016	Golden State Overnight	Courier Service	11.22
10/11/2016	A&B Reporting, LLC.	Court Reporter	190.00
10/11/2016	U.S. Postmaster	Postage	1.57
11/7/2016	Golden State Overnight	Courier Service	43.16
11/8/2016	A&B Reporting, LLC.	Court Reporter	2,578.70

LAWYERS for JUSTICE PC CASE COST DETAIL
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11/8/2016	Pure Legal, Inc.	Videography Service	962.50
11/9/2016	A&B Reporting, LLC.	Court Reporter	1,917.30
11/9/2016	A&B Reporting, LLC.	Court Reporter	1,386.80
11/9/2016	Pure Legal, Inc.	Videography Service	1,337.50
11/15/2016	Pro Legal	Attorney Service	87.82
11/30/2016	Golden State Overnight	Courier Service	15.05
12/19/2016	Golden State Overnight	Courier Service	26.15
12/19/2016	One Legal	Attorney Service	9.95
12/21/2016	Golden State Overnight	Courier Service	11.17
12/29/2016	CourtCall, LLC.	Attorney Service	86.00
12/30/2016	FedEx Express	Courier Service	18.41
1/3/2017	Elizabeth Parker	Travel Reimbursement	54.14
1/5/2017	One Legal	Attorney Service	9.95
1/10/2017	Pro Legal	Attorney Service	232.57
1/12/2017	Arby Alwazian	Travel Reimbursement	96.66
1/12/2017	Esquire Deposition Solutions, LLC	Court Reporter	825.35
1/13/2017	Arya Djafroudi	Travel Reimbursement	126.62
1/17/2017	Golden State Overnight	Courier Service	22.91
1/18/2017	Superior Court of California, County of Orange	Filing Fee	60.00
1/25/2017	Golden State Overnight	Courier Service	11.17
1/30/2017	A&B Reporting, LLC.	Court Reporter	2,264.35
1/30/2017	Pure Legal, Inc.	Videography Service	1,225.00
2/2/2017	Golden State Overnight	Courier Service	17.29
2/6/2017	A&B Reporting, LLC.	Court Reporter	464.20
2/7/2017	Golden State Overnight	Courier Service	11.22
2/16/2017	Golden State Overnight	Courier Service	11.22
2/27/2017	Golden State Overnight	Courier Service	11.22
2/27/2017	One Legal	Attorney Service	9.95
2/28/2017	Kusar Court Reporters & Legal Services, Inc.	Court Reporter	1,472.00
2/28/2017	Pure Legal, Inc.	Videography Service	925.00
3/8/2017	Golden State Overnight	Courier Service	11.27
3/22/2017	Kusar Court Reporters & Legal Services, Inc.	Court Reporter	1,788.10
3/22/2017	Pure Legal, Inc.	Videography Service	1,000.00
3/23/2017	Golden State Overnight	Courier Service	11.27
3/28/2017	Pro Legal	Attorney Service	140.32
3/28/2017	Pure Legal, Inc.	Attorney Service	109.50
3/31/2017	Elizabeth Parker	Travel Reimbursement	66.73
3/31/2017	Esquire Deposition Solutions, LLC	Court Reporter	954.15
4/26/2017	One Legal	Attorney Service	19.85
4/28/2017	CourtCall, LLC.	Attorney Service	86.00
5/3/2017	Golden State Overnight	Courier Service	11.32
5/3/2017	One Legal	Attorney Service	9.95
5/18/2017	CourtCall, LLC.	Attorney Service	86.00
5/19/2017	Golden State Overnight	Courier Service	11.32
5/19/2017	One Legal	Attorney Service	9.95
5/25/2017	San Diego Superior Court Online Services	Document Download Fee	7.50
5/25/2017	Superior Court of California, County of Orange	Document Download Fee	15.00
5/26/2017	Elizabeth Parker	Travel Reimbursement	50.99

LAWYERS for JUSTICE PC CASE COST DETAIL
Campos, et al. v. Motive Energy, Inc., et al.

5/31/2017	One Legal	Attorney Service	9.95
6/22/2017	Golden State Overnight	Courier Service	41.35
6/23/2017	One Legal	Attorney Service	42.82
6/23/2017	Superior Court of California, County of Orange	Filing Fee	120.00
6/29/2017	Golden State Overnight	Courier Service	11.37
6/29/2017	One Legal	Attorney Service	9.95
6/30/2017	Elizabeth Parker	Travel Reimbursement	60.14
6/30/2017	One Legal	Attorney Service	82.90
7/3/2017	One Legal	Attorney Service	9.95
7/6/2017	Elizabeth Parker	Travel Reimbursement	59.64
7/25/2017	Golden State Overnight	Courier Service	11.32
7/25/2017	One Legal	Attorney Service	12.20
8/22/2017	Golden State Overnight	Courier Service	11.27
8/22/2017	U.S. Postmaster	Postage	13.18
8/23/2017	U.S. Postmaster	Postage	6.59
8/26/2017	FedEx Express	Courier Service	22.57
8/29/2017	Golden State Overnight	Courier Service	16.53
8/31/2017	U.S. Postmaster	Postage	6.59
9/7/2017	U.S. Postmaster	Postage	6.59
9/27/2017	U.S. Postmaster	Postage	6.59
9/28/2017	Golden State Overnight	Courier Service	15.22
9/28/2017	U.S. Postmaster	Postage	6.59
10/5/2017	U.S. Postmaster	Postage	6.59
10/12/2017	U.S. Postmaster	Postage	20.40
10/16/2017	Pure Legal, Inc.	Notice Mailing	173.25
10/16/2017	U.S. Postmaster	Postage	188.65
10/20/2017	Golden State Overnight	Courier Service	22.74
10/20/2017	U.S. Postmaster	Postage	6.59
10/25/2017	U.S. Postmaster	Postage	6.59
10/26/2017	FedEx Express	Courier Service	19.22
10/27/2017	FedEx Express	Courier Service	19.22
10/30/2017	U.S. Postmaster	Postage	6.59
10/31/2017	One Legal	Attorney Service	12.20
11/7/2017	U.S. Postmaster	Postage	20.19
11/8/2017	U.S. Postmaster	Postage	6.59
11/10/2017	FedEx Express	Courier Service	19.27
11/14/2017	U.S. Postmaster	Postage	26.36
11/20/2017	U.S. Postmaster	Postage	6.59
12/28/2017	U.S. Postmaster	Postage	13.18
1/2/2018	Paul Hastings LLP	Mediation Fee	6,000.00
1/19/2018	U.S. Postmaster	Postage	13.18
1/22/2018	U.S. Postmaster	Postage	13.40
1/31/2018	Tiffany Hyun	Travel Reimbursement	29.85
1/31/2018	U.S. Postmaster	Postage	129.37
2/21/2018	One Legal	Attorney Service	12.20
2/26/2018	Superior Court of California, County of Orange	Filing Fee	20.00
2/26/2018	One Legal	Attorney Service	0.52
5/10/2018	One Legal	Attorney Service	12.72

LAWYERS for JUSTICE PC CASE COST DETAIL
Campos, et al. v. Motive Energy, Inc., et al.

5/10/2018	Superior Court of California, County of Orange	Filing Fee	20.00
7/12/2018	One Legal	Attorney Service	12.20
7/13/2018	CourtCall, LLC.	Attorney Service	116.00
7/27/2018	CourtCall, LLC.	Attorney Service	86.00
8/2/2018	One Legal	Attorney Service	13.76
8/2/2018	Superior Court of California, County of Orange	Filing Fee	60.00
8/20/2018	CourtCall, LLC.	Attorney Service	86.00
9/17/2018	One Legal	Attorney Service	12.72
9/17/2018	Superior Court of California, County of Orange	Filing Fee	20.00
9/27/2018	One Legal	Attorney Service	12.20
10/12/2018	Superior Court of California, County of Orange	Document Download Fee	7.50
11/5/2018	Danielle Chang	Travel Reimbursement	7.50
11/6/2018	One Legal	Attorney Service	12.20
11/6/2018	U.S. Postmaster	Postage	2.47
11/15/2018	One Legal	Attorney Service	12.20
11/15/2018	U.S. Postmaster	Postage	1.63
11/28/2018	One Legal	Attorney Service	12.20
11/28/2018	U.S. Postmaster	Postage	1.10
12/14/2018	One Legal	Attorney Service	12.20
2/21/2019	Superior Court of California, County of Orange	Filing Fee	60.00
2/21/2019	One Legal	Attorney Service	13.76
	LFJ (In-House)	Photocopies (11,560@ \$0.15 Per Page)	1,734.00
		Total:	33,759.87