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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE**

MICHELLE MOJICA, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

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

Defendants.

Case No.: 20STCV36088

Honorable Stuart M. Rice
Department SSC-1

CLASS ACTION

**DECLARATION OF JOANNA GHOSH IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
COUNSEL FEES PAYMENT, CLASS
COUNSEL LITIGATION EXPENSES
PAYMENT, AND CLASS
REPRESENTATIVE SERVICE
PAYMENT**

[Plaintiff's Motion for Final Approval of Class
Action Settlement, Class Counsel Fees
Payment, Class Counsel Litigation Expenses
Payment, and Class Representative Service
Payment; Declaration of Class Representative
(Michelle Mojica); Declaration of Settlement
Administrator (Jennifer Beliveau); and
[Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: May 29, 2024
Time: 10:30 a.m.
Department: SSC-1

Complaint Filed: September 22, 2020
FAC Filed: May 31, 2023
Trial Date: None Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, hereby declare as follows:

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

PRELIMINARY APPROVAL OF SETTLEMENT

2. On June 26, 2023, in Department SSC-1 of the above-entitled Court, the Honorable Stuart M. Rice preliminarily approved the First Amended Class Action and PAGA Settlement Agreement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between the Plaintiff and Defendant Mini Pharmacy Enterprises, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Michelle Mojica to represent the Class (“Class Representative”). The Court also preliminarily appointed Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Court Approved Notice of Class Action Settlement and Hearing Date For Final Court Approval (“Class Notice”), and adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party administrator and handle the notice and settlement administration process. Due to an administrative error by the Settlement Administrator, the Class Notice that was distributed to the Class referenced an incorrect Response Deadline. At first, because Defendant was in the middle of changing counsel (and this took some time), Class Counsel was anticipating filing an *ex parte* application to address the issue. However, Class Counsel was eventually able to work out a stipulation with Defendant’s new counsel, to address the issue. On December 7, 2023, pursuant to the Parties’ stipulation, the Court entered an order continuing the hearing on Plaintiff’s Motion for Final Approval, approving the mailing of a Corrective Notice which informed Class Members that the deadline to submit a Request for Exclusion, Workweek

1 Dispute, or Notice of Objection is extended, and granting Class Members an extension of their
2 Response Deadline to the date that is thirty calendar days after the mailing of the Corrective
3 Notice, thereby correcting the administrative error.

4 3. As of the date of filing the accompanying Motion for Final Approval of Class Action
5 Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class
6 Representative Service Payment (“Motion for Final Approval”), no Class Members have objected
7 to the Class Settlement or the request for Class Counsel Fees Payment, Class Counsel Litigation
8 Expenses Payment, Class Representative Service Payment, Administration Expenses, or
9 allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code
10 section 2698, *et seq.* (“PAGA”).

11 **WORK PERFORMED BY LAWYERS FOR JUSTICE, PC**

12 4. Several attorneys at Lawyers for Justice, PC have been actively engaged in litigating
13 the above-captioned action since prior to its commencement on September 22, 2020.

14 5. Before initiating the matter, Lawyers for Justice, PC conducted extensive
15 investigation and research into the facts and circumstances underlying the pertinent factual and
16 legal issues and applicable law. This required thorough discussions and interviews between
17 attorneys at our firm and Plaintiff, and research into the various legal issues involved in the case,
18 namely, the current state of the law as it applied to, *inter alia*, class certification, off-the-clock
19 theory, meal and rest periods, wage-and-hour enforcement and penalties, Plaintiff’s claims and
20 allegations, and potential defenses. After conducting initial investigation, Lawyers for Justice, PC
21 determined that Plaintiff’s claims were well-suited for class-wide adjudication, owing to what
22 appeared to be a common course of conduct affecting a similarly situated group of current and
23 former hourly-paid or non-exempt employees of Defendant within the State of California, who
24 were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest
25 periods, and unreimbursed expenses.

26 6. The parties conducted formal discovery and investigated into the facts of the case,
27 to assess the veracity, strength, and scope of the claims, and Class Counsel worked on preparing
28 the case for class certification and trial, prior to reaching the Settlement. The parties exchanged

information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations. Class Counsel reviewed and analyzed information, documents, and data obtained from Plaintiff, Defendant, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included, and were not limited to, employment records of Plaintiff, a detailed sampling of Class Members' time and pay data, earning statements, multiple iterations of Defendant's Employee Handbook, company policy acknowledgements, internal memoranda, job descriptions, operations and employment policies, practices, and procedures documents (including, but not limited to, Use of Personal Vehicles, Business Expense Reimbursement, Dress Code, 10-Minute Rest Break Obligations, Overtime Policy, Rest and Meal Break Policy, Meal Break Policy, Meal Break/Period Waiver, Second Meal Period Waiver, and Punctuality and Attendance Policy), and Defendant's confidential financial statements and general release agreements, among other information and documents. Class Counsel also met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, court proceedings, discovery and production of various information, documents, and data in the course of litigation and mediation and settlement negotiations, and mediation and settlement negotiations. Other work that Class Counsel performed included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings, the mediation brief, and settlement-related papers; case management; claims assessment and evaluation; and preparing for and attending court proceedings and mediation and settlement negotiations, among other tasks.

7. As outlined herein, the parties have conducted formal and informal discovery and investigation during the course of litigating the case and mediation and settlement negotiations. Class Counsel analyzed a volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources, that provided a critical understanding of the nature of the work performed by Class Members and Aggrieved Employees, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, and penalties valuation issues in connection with multiple phases of the litigation, and ultimately in connection with the mediation and settlement negotiation process. Class Counsel also

1 performed research regarding applicable law, which is evolving as it relates to class certification,
2 manageability, off-the-clock theory, rounding, regular rate, meal and rest periods, meal waivers,
3 release agreements, representative PAGA claims and penalties, wage-and-hour law and
4 enforcement, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts
5 discovered. Accordingly, sufficient investigation and review of information have taken place in
6 order for the parties to be adequately informed of the nature and extent of the claims, and to enable
7 all parties to fully evaluate the Settlement for its fairness, adequacy, and reasonableness.

8 8. After conducting significant investigation of the facts and law during the prosecution
9 of the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve
10 the case. These efforts included participating in a formal, full-day mediation conducted by Jeffrey
11 Krivis, Esq., a well-regarded mediator experienced in mediating complex labor and employment
12 matters. Prior to and during mediation and settlement discussions, the parties exchanged
13 information and data, and discussed various aspects of the case, including and not limited to, the
14 risks and delays of further litigation, the risks to the parties of proceeding with class certification
15 and trial, the law relating to class certification, manageability, off-the-clock theory, rounding,
16 regular rate, meal and rest periods, meal waivers, release agreements, and representative PAGA
17 claims, Defendant's financial condition, wage-and-hour law and enforcement, as well as the
18 evidence produced and analyzed, and the possibility of appeals, among other things. During all
19 settlement discussions, the parties conducted their negotiations at arm's length in an adversarial
20 position. Arriving at a settlement that was acceptable to the parties was not easy. Defendant and
21 its counsel felt very strongly about Defendant's ability to prevail on the merits, and to obtain a
22 denial of class certification, while Plaintiff and Class Counsel believed that class certification
23 would be obtained, and that Plaintiff would prevail at trial. After conducting formal and informal
24 discovery and investigations and extensive settlement negotiations, with the aid of the mediator's
25 evaluation, the parties agreed that the case was well-suited for settlement given the legal issues
26 relating to Plaintiff's principal claims, as well as the costs and risks to the parties that would attend
27 further litigation. These risks of further litigation include, and are not limited to, a determination
28 that the claims are unsuitable for class treatment and/or representative adjudication, class de-

1 certification after certification of a class, allowing a jury to decide the claims, and the real
2 possibility of no monetary recovery after years of litigation. The Settlement takes into account the
3 strengths and weaknesses of each side's position and the uncertainty of how the case might have
4 concluded at certification, trial, and/or appeals.

5 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
6 attorneys' fees in the amount of \$375,000.00, which is one-third (1/3) of the Gross Settlement
7 Amount of \$1,125,000.00, although the Settlement provides for attorneys' fees of up to thirty-five
8 percent (35%). Pursuant to the contingency-fee agreement entered into by and between Plaintiff
9 and Lawyers for Justice, PC, Plaintiff has agreed to a contingency fee of at least one-third (1/3) of
10 the recovery.

11 10. The attorneys' fees that are sought are commensurate with: (1) the risk that Class
12 Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel
13 dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results
14 that Class Counsel has achieved throughout the litigation of the case; (5) the value of the settlement
15 that Class Counsel has achieved; and (6) the other cases that Class Counsel has turned down in
16 order to devote their time and efforts to the case. The nature of the work performed, skill exercised,
17 and the outcome in this matter support the percentage fee sought.

18 11. While not necessarily required to be demonstrated because the percentage fee is
19 proper for this settlement, Class Counsel has incurred many hours of work in connection with
20 prosecuting the case, such that the award of attorneys' fees is also justified under a lodestar
21 analysis. Attorneys at Lawyers for Justice, PC have spent a total of **443.60 hours** performing tasks
22 and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and
23 Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers
24 for Justice, PC, and the time incurred in performing those services. The hours include work done
25 by myself and several other attorneys at Lawyers for Justice, PC. Additionally, separate from the
26 hours of work referenced herein and in the attached chart, Lawyers for Justice, PC had litigation
27 support personnel actively engaged in assisting with the prosecution of this matter.

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12. The work performed in this 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 cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate 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/or 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**

13. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is attorney of record in dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of

1 compliant wage statements, reimbursement of business expenses, executive, administrative, and
2 other overtime exemptions to the State of California and federal overtime compensation
3 requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has
4 recovered (sometimes in association with other law firms) millions of dollars on behalf of
5 thousands of individuals in California.

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

representative action cases.

15. Arby Aiwarzian 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. 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 cases have resulted in settlements that have been granted court approval, including and not limited to, those listed in paragraph 18 herein. 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.

16. Brian J. St. John is a Member of Lawyers *for* Justice, PC. He received his Bachelor's degree from the University of California, San Diego in 2010 and earned his Juris Doctor degree from the University of California, Berkeley, School of Law in 2013. He was admitted to practice law in California in 2015. He is admitted to practice before all courts of the State of California and the Northern and Southern federal district courts in the State of California. He has worked on many wage and hour class action and PAGA representative matters, and his work has included, *inter alia*, researching and drafting pleadings, administrative notice

1 exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging
2 in motion practice, claims evaluation and analysis, and making court appearances. Prior to
3 working at Lawyers for Justice, PC, he spent several years working for a boutique employment
4 and labor law firm representing employers, and, in 2019 and 2020, he was employed as general
5 counsel for a DMHC licensed discount dental plan. He has successfully overseen the settlement
6 of dozens of class action and PAGA cases, and supervises a team of attorneys

7 17. I am a Managing Member of Lawyers for Justice, PC. I received a Bachelor of Arts
8 degree from California State University, Los Angeles in 2006, a Master of Science degree from
9 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University
10 Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since
11 2013) and I am also admitted to practice in all U.S. District Courts in California, the U.S.
12 Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. I have taken
13 and defended dozens of depositions and successfully handled motion practice in class action cases
14 regarding discovery (including and not limited to, regarding class contact information), class
15 certification (both contested class certification and stipulated class certification), arbitration
16 agreements, coordination, and intervention. I have successfully handled briefing and oral
17 argument on appeal and obtained notable decisions regarding the Private Attorneys General Act
18 and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9
19 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied
20 (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). I have significant
21 experience with class actions, including and not limited to working on cases to obtain class
22 certification through contested motion practice and working on cases in the post-certification stage
23 (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation
24 in conjunction with co-counsel in a case involving a certified class consisting of approximately
25 2,600 individuals). I also have extensive experience with class action and/or representative action
26 settlements, and have handled this process in over three hundred (300) cases. Under Edwin
27 Aiwasian, Arby Aiwasian, and my supervision, Lawyers for Justice, PC has handled the class
28 certification and court approval process for hundreds of class action and/or representative action

1 matters that have successfully resolved. I am a member of the California Employment Lawyers
2 Association.

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

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

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

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

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

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

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

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

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

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

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

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

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

11 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
12 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
13 involving allegations of misclassification of the “Department Manager” position. On August 12,
14 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class. On
15 August 6, 2019, the court granted final approval of the class action settlement. The Alameda
16 County Superior Court Case Number is RG13680477.

17 m) LFJ represented the plaintiff in a PAGA representative action against a real
18 estate and property management company, on behalf of non-exempt employees. On November 4,
19 2016, the court granted approval of the PAGA representative action settlement. The Orange
20 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

26 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
27 representative action against a foodservice distributor, on behalf of non-exempt employees. On
28 January 26, 2017, the court granted final approval of the class and PAGA representative action

1 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

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

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

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

19 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
20 wage-and-hour class and PAGA representative action against a lumber and hardware company on
21 behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class
22 and PAGA representative action settlement. The Orange County Superior Court Case Number is
23 30-2014-00747750-CU-OE-CXC.

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

1 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
2 representative action against a food company on behalf of non-exempt employees. On June 30,
3 2017, the court granted final approval of the class and PAGA representative action settlement. The
4 Sacramento County Superior Court Case Number is 34-2015-00175871.

5 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
6 representative action against a chocolate company on behalf of non-exempt employees. On July
7 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
8 The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

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

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

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

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

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

1 and the Judicial Council Coordination Proceeding Number is 4921.

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

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

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

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

26 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
28 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the

1 court granted in part the plaintiff's motion for class certification and certified a class. The
2 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
3 Judicial Council Coordination Proceeding Number is 4930.

4 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
5 wage-and-hour class action against manufacturer and supplier of power products and services on
6 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
7 for class certification and certified a class. On August 27, 2021, the court granted final approval
8 of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-
9 00025968-CU-OE-CTL.

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

14 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
15 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the
16 restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July
17 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The
18 Los Angeles County Superior Court Case Number is BC707670.

19 **LITIGATION COSTS AND EXPENSES INCURRED BY**

20 **LAWYERS FOR JUSTICE, PC**

21 19. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation and
22 will not receive any compensation until a recovery is obtained in this matter. Lawyers *for* Justice,
23 PC seeks reimbursement of **\$14,358.73** in litigation costs and expenses incurred in the case, as
24 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the
25 prosecution of the case and to obtain the Settlement.

26 ///

27 ///

28 ///

CLASS REPRESENTATIVE SERVICE PAYMENT TO PLAINTIFF

20. In recognition of her efforts and work expended in the case and serving as the Class Representative, Plaintiff seeks a Class Representative Service Payment in the amount of \$10,000.00. The requested Class Representative Service Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in providing relevant documents, past employment records, and the facts and evidence necessary to attempt to prove the allegations in the case. Plaintiff was available whenever her attorneys needed her and actively tried to obtain and provide information that would facilitate the pursuit of the case. Accordingly, it is appropriate and just for Plaintiff to receive \$10,000.00 as a reasonable Class Representative Service Payment for her services performed in the matter.

21. I submit that the settlement is fair, reasonable, and adequate, and in the best interests of Plaintiff, the Class Members, Aggrieved Employees, and the State of California.

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

Executed this 6th day of May 2024, at Glendale, California.



Joanna Ghosh

EXHIBIT A

MICHELLE MOJICA V. MINI PHARMACY ENTERPRISES, INC.
Los Angeles County Superior Court, Case No. 20STCV36088

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts With a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality	8.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Michelle Mojica’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	8.10
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Mini Pharmacy Enterprises, Inc. (“Defendant”) With Respect to Plaintiff and Putative Class Members	7.30
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, IWC Wage Orders, Representative PAGA, Class Certification, and Manageability in California, Including all New and Relevant Enforcement Guidance and Division of Labor Standard Enforcement (DLSE) Materials	7.50
Investigation of Defendant, Its Business Relationships, and the Industry in Which It Operates	3.20
Investigation of Defendant’s Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of Putative Class Members	3.60
Investigation of Defendant’s Executives, Officers, and Leadership With a Focus on Involvement in Wage-and-Hour Issues to Evaluate Willfulness and Uniformity, and Research and Analysis of Defendant’s Past and Recent Litigation History Involving Labor, Wage-and-Hour, and Other Related Employment Issues	3.80
Analysis of Competitors in Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant’s Policies, Practices, and Procedures With the Policies, Practices, and Procedures of Defendant’s Competitors	4.10

Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	5.90
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other Online Postings and Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	5.60
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California	4.50
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Customer and Patient Care, Scheduling, Timekeeping, Auto-Deduction, Rounding, Reporting Time Pay, Overtime Pay, Non-Discretionary Bonus/Shift Differential/Performance/Incentive Pay, Regular Rate of Pay, Break Room/Area, Meal and Rest Breaks, Meal Waivers, On-Premises/On-Duty Meal and Rest Breaks, Meal/Rest Premiums, Dress Code/Uniform, Use of Personal Vehicles, Reimbursement of Business-Related Expenses, and General Release Agreements	22.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Timekeeping, Patient Care, Health Information, Sales, Order Management, Information and Document Management, Communications, Call Routing, Security, and Surveillance Systems, With a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	4.60
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	8.10
Research and Investigation Re: Post- <i>Duran v. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.20
Review and Investigation of Defendant's Financial Circumstances and Impact of COVID-19 Pandemic on Defendant, Its Operations, and Class Members' and Aggrieved Employees' Work	8.50

Meet and Communicate With Plaintiff Michelle Mojica During the Case	44.50
Investigate, Meet, Communicate With, and/or Conduct Interviews of Putative Class Members and Percipient Witnesses	13.50
Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on September 22, 2020)	7.50
Review Court's Notice of Case Assignment (filed on September 22, 2020)	0.10
Review Court's Initial Status Conference Order and Minute Order Re: Complex Determination (filed on October 29, 2020)	0.10
Review Defendant's Notice of Appearance (filed on December 23, 2020)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Initial Case Management Conference Statement (filed on December 30, 2020)	1.70
Review Court's Case Management Order and Minute Order Re: Initial Status Conference (filed on January 7, 2021)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Statement on Informal Status Conference Re Pleading (filed on January 15, 2021)	0.80
Review Defendant's Notice of Cancellation of Informal Status Conference Re Pleading (filed on January 19, 2021)	0.10
Review and Analyze Defendant Mini Pharmacy Enterprises, Inc.'s Answer to Plaintiff Michelle Mojica's Complaint (February 3, 2021) and Legal Research and Analysis of Affirmative Defenses	1.40
Meet and Confer With Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Motion for Class Certification Deadline; [Proposed] Order Thereon (filed on April 12, 2022)	1.30
Review Court's Order Granting Stipulation to Continue Plaintiff's Motion for Class Certification Deadline (filed on April 14, 2022)	0.10

Meet and Confer With Defendant's Counsel, and Draft Joint Post-Mediation Status Conference Statement and Notice of Settlement (filed on November 17, 2022)	0.80
Review Court's Minute Order Re: Vacating Post-Mediation Status Conference (filed December 16, 2022)	0.10
Meet and Confer With Defendant's Counsel, and Draft Stipulation and Protective Order - Confidential and Highly Confidential Designations (filed on February 10, 2023)	1.60
Meet and Confer With Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on April 11, 2023)	0.90
Review Court's Minute Order Re: Further Status Conference (filed April 14, 2023)	0.10
Draft First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on May 30, 2023); Meet and Confer With Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order Thereon (filed on May 8, 2023)	3.50
Review Defendant's Notice of Substitution of Attorney (filed May 22, 2023)	0.10
Meet and Confer With Defendant's Counsel, and Draft Joint Further Case Management Conference Statement (filed on May 25, 2023)	0.80
Review Court's Order Granting Stipulation Granting Plaintiff Leave to File First Amended Complaint; Order Thereon (filed on May 30, 2023)	0.10
Review and Analyze Defendant's Answer to First Amended Complaint (filed on June 13, 2023) and Legal Research and Analysis of Affirmative Defenses	1.10
Review Defendant's Notice of Substitution of Attorney (filed December 5, 2023)	0.10
Appearances	
Prepare for and Remotely Attend Initial Status Conference (January 7, 2021)	0.90
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (June 2, 2023)	2.10

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Michelle Mojica (served on April 27, 2020)	1.90
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Michelle Mojica (served on July 01, 2020)	1.70
Draft 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 (served on August 6, 2021)	5.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for September 7, 2021; Document Retention and Organizational Structure) (served on August 6, 2021)	2.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for September 8, 2021; Wage and Hour Practices) (served on August 6, 2021)	2.30
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Document Retention and Organizational Structure) (served on September 1, 2021)	1.20
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices) (served on September 1, 2021)	1.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Michelle Mojica for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on November 22, 2022)	4.70
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	20.50

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to November 2022 Mediation	73.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief (submitted on October 26, 2022), and Performing Damages and Penalties Analysis and Calculations	35.50
Remotely Attend Mediation Session (November 2, 2022; Zoom Video Conference)	8.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding Re: Class Action and PAGA Settlement (executed on November 14, 2022)	2.50
Review and Analyze Confidential Financial Records Produced by Defendant (served on February 22, 2023)	7.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on March 10, 2023) and Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	20.50
Draft, Review, Revise, Negotiate, and Finalize First Amended Class Action and PAGA Settlement Agreement (executed on June 21, 2023) and Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	2.10
Law and Motion	
Review Declaration of Tiffany L. Luu, Declaration of Shannon Chou, and Declaration of Eric Springer on Behalf of Simpluris, Inc., Research, Review, Revise, and/or Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Joanna Ghosh in Support Thereof, Declaration of Michelle Mojica in Support and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on May 10, 2023)	21.50
Review Court's Checklist for Preliminary Approval of Class Action Settlement (filed May 30, 2023)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on June 2, 2023)	0.10

Review and Analyze Declaration of Tiffany L. Luu and Declaration of Clay Helton, and Research, Review, Revise, and/or Draft Plaintiff's Supplemental Brief in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Declaration of Brian J. St. John in Support Thereof, and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on June 23, 2023)	5.50
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on June 26, 2023)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on June 26, 2023)	0.10
Draft <i>Ex Parte</i> Application for an Order to Approve a Post Card to be Sent to the Class Members Advising Them of the Correct Date for Response Deadline and to Continue the Final Approval Hearing, Declaration of Brian J. St. John in Support Thereof, and [Proposed] Order Thereon (Not Filed)	5.10
Meet and Confer With Defendant's Counsel, and Draft Joint Stipulation to Mail Corrective Notice and Continue Final Approval Hearing and Related Dates and Deadlines; [Proposed] Order Thereon (filed on December 6, 2023)	1.70
Review Court's Order Granting Stipulation to Mail Corrective Notice and Continue Final Approval Hearing and Related Dates and Deadlines (filed on December 7, 2023)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration, and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on May 6, 2024)	23.50
Total Hours:	443.60

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Mojica v. Mini Pharmacy Enterprises, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/27/2020	U.S. Postmaster	Postage	7.00
9/22/2020	Legal Document Server, Inc.	Attorney Services	160.23
9/22/2020	Los Angeles Superior Court	Complex Filing Fee	1,000.00
9/22/2020	Los Angeles Superior Court	Court Filing Fee	435.00
9/24/2020	Legal Document Server, Inc.	Attorney Services	110.00
11/5/2020	Legal Document Server, Inc.	Attorney Services	410.00
11/5/2020	U.S. Postmaster	Postage	1.80
12/30/2020	Legal Document Server, Inc.	Attorney Services	205.00
1/14/2021	Los Angeles Superior Court	Document Download Fee	23.00
4/3/2021	Case Anywhere, LLC	Attorney Services	115.20
7/2/2021	Case Anywhere, LLC	Attorney Services	120.00
10/4/2021	Case Anywhere, LLC	Attorney Services	162.00
1/5/2022	Case Anywhere, LLC	Attorney Services	120.00
2/15/2022	First Mediation Corporation	Mediation Fee	9,000.00
4/8/2022	Case Anywhere, LLC	Attorney Services	120.00
4/12/2022	Legal Document Server, Inc.	Attorney Services	151.55
4/15/2022	Legal Document Server, Inc.	Attorney Services	15.20
7/6/2022	Case Anywhere, LLC	Attorney Services	132.00
10/7/2022	Case Anywhere, LLC	Attorney Services	120.00
10/13/2022	Case Anywhere, LLC	Attorney Services	120.00
11/17/2022	Legal Document Server, Inc.	Attorney Services	15.95
1/8/2023	Case Anywhere, LLC	Attorney Services	126.00
4/12/2023	Legal Document Server, Inc.	Attorney Services	16.15
4/16/2023	Case Anywhere, LLC	Attorney Services	120.00
5/8/2023	Legal Document Server, Inc.	Attorney Services	17.54
5/8/2023	Los Angeles Superior Court	Stipulation & Order Fee	20.00
5/11/2023	Legal Document Server, Inc.	Attorney Services	254.57
5/11/2023	Los Angeles Superior Court	Motion Fee	60.00
5/25/2023	Legal Document Server, Inc.	Attorney Services	16.15
5/31/2023	Legal Document Server, Inc.	Attorney Services	177.30
6/26/2023	Legal Document Server, Inc.	Attorney Services	232.40
7/3/2023	Case Anywhere, LLC	Attorney Services	204.00
10/4/2023	Case Anywhere, LLC	Attorney Services	120.00
12/6/2023	Legal Document Server, Inc.	Attorney Services	17.54
12/6/2023	Los Angeles Superior Court	Stipulation & Order Fee	20.00
12/12/2023	Legal Document Server, Inc.	Attorney Services	161.15
1/4/2024	Case Anywhere, LLC	Attorney Services	132.00
4/2/2024	Case Anywhere, LLC	Attorney Services	120.00
Total:			14,358.73