

1 **LAUREL EMPLOYMENT LAW**

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8 Attorneys for Plaintiff,

Angel Vera on behalf of himself and all

9 others similarly situated

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF LOS ANGELES**

12 ANGEL VERA, an Individual,

13  
14 Plaintiff,

15 vs.

16 LAUREL HARDWARE, INC., a  
California Corporation; IS BUSINESS  
17 SERVICES, INC. A Georgia Limited  
Liability Corporation; VENSURE HR, an  
18 Arizona Corporation and DOES 1 through  
100, inclusive,

19  
20 Defendants.  
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**CASE NO.: 23STCV15421**

*Assigned for all purposes to  
Honorable Kenneth R. Freeman, Dept. 14*

**DECLARATION OF WILLIAM HOGG,  
ESQ. IN SUPPORT OF PLAINTIFF'S  
MOTION FOR FINAL APPROVAL OF  
CLASS ACTION AND PAGA SETTLEMENT**

Hearing Date: February 18, 2026

Hearing Time: 10:00 A.M.

Location: Dept. 14

Action Filed: July 3, 2023

Trial Date: Not Yet Set

1 **DECLARATION OF WILLIAM HOGG**

2 I, Will Hogg, declare as follows:

3 1. I am an attorney duly licensed to practice law before all courts of the State of  
4 California. I am an Associate with Laurel Employment Law, APC, attorneys of record for Plaintiff  
5 ANGEL VERA ("Plaintiff"). I have personal knowledge of the facts stated herein, and if called as a  
6 witness, I could and would competently testify thereto.

7 **CLASS COUNSEL'S BACKGROUND AND EXPERIENCE**

8 2. I am making this declaration in support of the Motion for Final Approval of the Class  
9 Action and PAGA Settlement filed in this action.

10 3. Laurel Employment Law, APC is a law firm specifically devoted to the representation  
11 of employees against employers in California involving claims relating to violations of the California  
12 Labor Code, including claims for failure to pay all wages owed, failure to pay overtime premiums,  
13 failure to pay meal and rest premiums, and failure to provide accurate wage records. The practice of  
14 employment law is a very specific, narrow field which requires diligence in an ever-evolving field of  
15 substantive and procedural law.

16 4. Both the attorneys at Laurel Employment Law, APC and Plaintiff's prior counsel at  
17 Barkhordarian Law Firm, LLP have extensive experience in wage and hour class and representative  
18 actions. Prior counsel at Barkhordarian Law Firm handled the initial phases of this litigation through  
19 the Motion for Preliminary Approval, bringing substantial expertise in complex wage and hour class  
20 actions. Since June 2, 2025, Laurel Employment Law has continued the representation through  
21 preliminary approval, settlement administration, and now final approval.

22 5. I am fully familiar with the legal and factual issues in the Action and have specific  
23 experience with complex wage and hour actions. I have actively participated as plaintiffs' counsel in  
24 many class/collective actions that have achieved significant and beneficial results for the class. For  
25 instance, I was counsel of record in the following class and collective actions on behalf of non-exempt  
26 employees:

- 27 a. Non-exempt employees who alleged they were owed unpaid wages for on-duty meal  
28 periods, non-compliant rest periods, and improper time-rounding under the FLSA and

1 Washington State wage-and-hour laws in which the United States District Court for  
2 the Western District of Washington granted final approval of a \$1.4 million class and  
3 collective action settlement covering approximately 1,950 class members. *See Britt v.*  
4 *Clallam County Public Hospital District No. 2 d/b/a Olympic Medical Center*, Case  
5 No. 3:23-cv-05377, Dkt. # 61 (W.D. Wash. Jan. 24, 2025).

6 b. I was also counsel of record in a class and collective action on behalf of non-exempt  
7 employees who alleged they were owed unpaid wages for on-duty meal periods, non-  
8 compliant rest periods, and improper time-rounding under the FLSA, Washington  
9 State wage-and-hour laws, and Oregon state wage-and-hour laws in which the United  
10 States District Court for the Western District of Washington granted final approval of  
11 a \$1.1 million class and collective action settlement covering approximately 6,700  
12 class members. *See Kastel v. Cascade Living Grp. Mgmt., LLC*, Case No. 2:23-cv-  
13 00684-JCC, Dkt. # 39 (W.D. Wash. Feb. 11, 2025).

14 c. I was counsel of record in a collective action on behalf of dancers who were found on  
15 summary judgment to be misclassified as contractors and were awarded \$1.4 million  
16 in compensatory damages and liquidated damages under the FLSA. *See Schulke v.*  
17 *Isbaz Corp.*, No. H-20-2571, 2023 WL 02452 (S.D. Tex. Aug. 4, 2023).

18 d. I was also counsel of record in a class and collective action on behalf of dancers who  
19 were found to be misclassified as contractors under the FLSA and Maryland wage-  
20 and-hour laws, and were awarded over \$1.1 million in back wages, compensatory  
21 damages, and penalties. *Butler v. PP&G, Inc.*, No. 20-3084-JRR, 2023 WL 3580374  
22 (D. Md. May 22, 2023).

23 e. I was also counsel of record in a class and collective action lawsuit, *Etcheverry v.*  
24 *Franciscan Health Sys.*, No. 19-cv-05261-RJB-MAT (W.D. Wash.) that resulted in a  
25 settlement of \$5,500,000 to resolve the wage-and-hour claims of approximately 8,000  
26 class members and 1,275 opt-in plaintiffs under Washington State law and the FLSA.

27 f. I was also counsel of record in a wage-and-hour lawsuit brought by exotic dancers  
28 against their club, *Jones v. SHAC, LLC*, No. 2:15-cv-01382-RFB-EJY (D. Nev.),

1 which resulted in a \$2,060,000 settlement on behalf of a class of more than 100 exotic  
2 dancers who claimed they were misclassified as independent contractors. The *Jones*  
3 case's favorable resolution was driven in large part by a summary judgment finding  
4 in the plaintiffs' favor on the merits of the underlying FLSA claims. *See Jones v.*  
5 *SHAC, LLC*, 2019 WL 4246681(D. Nev. Sept. 6, 2019).

6 g. I was also counsel of record in a class and collective action lawsuit, *Lytle v. Coquille*  
7 *Valley Hospital*, No. 6:19-cv-00722-AA (D. Or.), which resulted in a settlement of  
8 \$1,150,000 to resolve the wage-and-hour claims of 88 class members under Oregon  
9 law and the FLSA alleging unpaid meal breaks and off-the-clock claims.

10 h. I was also one of the counsel of record in a class action and California Private Attorney  
11 General Act ("PAGA") action, *Madrigal v. Mission Lakes Country Club, Inc.*, Case  
12 No. RIC2003428 (Superior Court, County of Riverside), which resulted in a  
13 settlement of \$345,000 to resolve the wage-and-hour claims of approximately 60  
14 workers alleging various violations of the California Labor Code.

15 i. I was one of the primary attorneys of record in a collective action lawsuit, *Tollefson*  
16 *v. Bergaila & Associates, Inc.*, Case No. 7:21-cv-00171-RCG (W.D. Tex.), which  
17 resulted in a settlement of nearly \$200,000 to resolve the FLSA claims of a group of  
18 23 oil and gas workers claiming they were misclassified as exempt from overtime.

19 j. I was one of the primary attorneys of record in a collective action lawsuit, *Sanchez v.*  
20 *S&P Data New Mexico, LLC, et al.*, Case No. 1:20-cv-00979-KWR-GJF (D.N.M.)  
21 that resulted in a settlement of \$325,000 to resolve off-the-clock and pre-shift claims  
22 of approximately 400 call center workers.

23 6. The Settlement presented here resulted after extensive discovery and investigation and  
24 is the product of hard-fought litigation and arms-length negotiations. In my opinion as counsel  
25 involved in this matter, the Settlement is fair, reasonable, adequate, and in the best interest of the  
26 Class, the Aggrieved Employees, and the State of California.

## 27 **PROCEDURAL HISTORY AND FACTUAL BACKGROUND**

28 7. Defendant Laurel Hardware, Inc. operates a restaurant in West Hollywood, California.

1 Plaintiff Angel Vera worked for Defendant as a non-exempt, hourly employee from approximately  
2 March 2021 until his termination on January 28, 2022.

3 8. On April 26, 2022, Plaintiff filed an individual action against Defendant Laurel  
4 Hardware, Inc. in the Superior Court of California, County of Los Angeles, Case No. 22SMCV00594,  
5 alleging disability discrimination, failure to accommodate, failure to engage in the interactive process,  
6 and wrongful termination in violation of public policy.

7 9. During the individual litigation, Plaintiff's counsel discovered evidence through  
8 discovery and investigation that suggested wage and hour violations affecting other employees.

9 10. On November 9, 2022, Plaintiff provided notice to the LWDA and Defendant of  
10 Plaintiff's intent to seek civil penalties pursuant to PAGA for violations of California wage and hour  
11 laws. On June 30, 2023, Plaintiff provided an amended PAGA notice to the LWDA and Defendant  
12 regarding additional alleged violations.

13 11. On July 3, 2023, Plaintiff filed the Class Action Complaint in this Court, Case No.  
14 23STCV15421, alleging nine causes of action related to wage and hour violations on behalf of himself  
15 and similarly situated employees.

16 12. On January 3, 2025, Plaintiff filed a First Amended Class Action Complaint. On  
17 January 7, 2025, Plaintiff filed a Request for Dismissal of the PAGA causes of action in the individual  
18 action (Case No. 22SMCV00594) without prejudice to facilitate settlement.

19 13. Throughout the litigation, Plaintiff's counsel conducted extensive investigation of the  
20 factual and legal issues affecting the strengths and weaknesses of Plaintiff's claims. This included  
21 propounding formal discovery including Form Interrogatories, Special Interrogatories, and Requests  
22 for Production of Documents, as well as obtaining substantial informal discovery.

23 14. In advance of mediation, Defendants produced substantial discovery including  
24 Plaintiff's complete employment history, payroll and timekeeping data, spreadsheets related to  
25 Defendant's expert's analysis, Defendant's timekeeping and payroll policies and procedures, and  
26 various other documents related to the Plaintiff's claims.

27 15. Plaintiff completed the deposition of Defendant's expert witness relating to Plaintiff's  
28 timekeeping and payroll data and Defendant's person most knowledgeable. This discovery provided

1 all information necessary to evaluate the core wage claims alleged in this action and allowed Class  
2 Counsel to determine that there were 316 members in the proposed Class; 192 Aggrieved Employees;  
3 25,914 workweeks in the four-year statute of limitations; 9,188 pay periods in the one-year PAGA  
4 statute of limitations; and an average rate of pay of \$18.10 per hour.

5 16. Class Counsel calculated potential maximum recoveries for various claims as follows:  
6 Unpaid Minimum Wages (\$90,051.15); Unpaid Overtime (\$175,891.28); Meal Period Premiums  
7 (\$469,043.40); Rest Period Premiums (\$469,043.40); Wage Statement Penalties (\$903,000.00);  
8 Waiting Time Penalties (\$1,003,464.00); and PAGA Penalties (\$1,818,400.00), for a total theoretical  
9 maximum recovery of over \$4.9 million.

10 17. On May 30, 2024, the Parties participated in a full-day mediation with Brandon Coen,  
11 a respected mediator with extensive experience and knowledge in wage and hour class action  
12 mediation. At mediation, the Parties engaged in intensive settlement discussions during which they  
13 debated their respective positions and exchanged views regarding the strengths and weaknesses of  
14 the alleged claims.

15 18. A significant issue in the mediation was Defendant Laurel Hardware's ability to pay.  
16 During the mediation, Defendant professed a significant post-pandemic slowdown in business. The  
17 parties arrived at a compromise whereby Defendant produced to the Profit and Loss Statements and  
18 Cash Flow Statements to allow the mediator to render an opinion regarding the likelihood of  
19 collectability and the availability of additional funds in settlement.

20 19. Plaintiff's counsel's investigation also demonstrated that co-defendants IS Business  
21 Services, LLC and Vensure HR, Inc. were Professional Employer Organizations and did not control  
22 Plaintiff or other members of the Class's wages, hours, or working conditions. As such, Class Counsel  
23 did not calculate any reasonable chance of prevailing against these Defendants and did not allocate  
24 any liability to them.

25 20. Through good-faith and arms-length negotiations at mediation, each Party,  
26 represented by their respective counsel, recognized the substantial risk of an adverse result in the  
27 Action and agreed to settle the Action and all matters covered by the Settlement for a Gross Settlement  
28 Amount of \$80,000.00.

1           21.     The Parties subsequently drafted and executed the Settlement Agreement using the  
2 LASC Model Template. On October 16, 2024, Plaintiff provided the LWDA with notice of the  
3 proposed PAGA settlement.

4           22.     On February 19, 2025, Plaintiff filed a Motion for Preliminary Approval of the  
5 proposed Settlement.

6           23.     On August 12, 2025, the Court heard the Motion for Preliminary Approval and  
7 requested certain modifications to the moving papers.

8           24.     On August 15, 2025, Plaintiff filed amended moving papers addressing the Court's  
9 concerns.

10          25.     On August 15, 2025, the Court granted Plaintiff's Motion for Preliminary Approval,  
11 certifying the case for settlement purposes, appointing CPT Group, Inc. as the Settlement  
12 Administrator, and ordering that the Parties provide notice of the Settlement to the Class. The Court  
13 scheduled the Final Approval Hearing for December 17, 2025.

14          26.     On November 5, 2025, the Court granted the Parties' Joint Stipulation to Continue the  
15 Final Approval Hearing from December 17, 2025, to February 18, 2026, to allow adequate time for  
16 settlement administration.

17          27.     Now, following notice of the Settlement to the Class and the opportunity for Class  
18 Members to opt out or be heard, Plaintiff moves for Final Approval of the proposed Settlement.

19                   **THE ADMINISTRATION PROCESS AND PLAN OF DISTRIBUTION**

20          28.     The Settlement Administrator for this matter is CPT Group, Inc. ("Settlement  
21 Administrator" or "CPT") as approved by the Court.

22          29.     Following the Court's Preliminary Approval order, CPT received the class list from  
23 Defendants containing the name, social security number, last known mailing address, dates of  
24 employment, and workweeks worked by each Class Member. *See* Declaration of Veronica Olivares  
25 ("CPT Decl.") ¶ 3.

26          30.     CPT prepared calculations for review by Class Counsel and Defense Counsel. The  
27 Class List contained 323 Class Members who worked approximately 21,290 workweeks. *See* CPT  
28 Decl. ¶ 4.

1           31.     There are 323 Class Members, which includes 199 Aggrieved Employees. *See* CPT  
2 Decl. ¶ 4.

3           32.     On November 13, 2025, the Notice Packets were mailed to all 323 Class Members.  
4 *See* CPT Decl. ¶ 6.

5           33.     Initially, 27 Notice Packets were returned to the Settlement Administrator. The  
6 Settlement Administrator performed a skip trace on the 27 returned Notice Packets that did not have  
7 a forwarding address. As a result of the skip trace, 26 updated addresses were obtained, and the Notice  
8 Packets were promptly re-mailed to those Settlement Class Members. In sum, 2 Notice Packets  
9 remain undeliverable because no updated address could be obtained via skip trace. *See* CPT Decl. ¶¶  
10 7-8.

11           34.     As of the filing of this motion, 0 member(s) of the Settlement Class have requested to  
12 be excluded from the proposed Settlement, 0 Class Member(s) have objected, and there are 0  
13 workweek/pay period disputes, resulting in a 100.00% participation rate. *See* CPT Decl. ¶ 9.

14           35.     The deadline for Class Members to submit workweek disputes, request exclusion  
15 from, or object to the Settlement expired on January 12, 2026. *See* CPT Decl. ¶ 5.

16           36.     The Settlement Class Members will receive an average payment of approximately  
17 \$56.77 and a high payment of \$228.23. *See* CPT Decl. ¶ 16. In addition, Aggrieved Employees will  
18 also receive a share of the penalties allocated to resolve claims raised under PAGA. On average,  
19 Aggrieved Employees will receive an additional \$18.84 from the employees' share of the PAGA  
20 Penalties with a high payment of \$42.01 and a low payment of \$0.59. *See* CPT Decl. ¶ 16.

21           37.     According to the terms of the Agreement, Defendant Laurel Hardware, Inc. shall fully  
22 fund the Gross Settlement Amount in 14 interest-free payments of \$5,333.33, and a final payment of  
23 \$5,333.38. Within 10 business days of the Court granting final approval, Laurel Hardware shall  
24 transmit all payments accrued through that date, and shall continue making payments each 30 days  
25 until full funding of the Gross Settlement Amount. Concurrent with the 15th and final payment,  
26 Laurel Hardware shall also fund the amounts necessary to fully pay its share of payroll taxes by  
27 transmitting the funds to the Administrator. Within 14 days after Defendants fully fund the Gross  
28 Settlement Amount, CPT will issue payments to: (a) the Participating Class Members and Aggrieved

1 Employees; (b) the LWDA; (c) Plaintiff; and (d) Class Counsel. The Settlement Administrator will  
2 also issue a payment to itself for Court-approved services.

3 **REASONABLENESS OF THE TERMS OF THE SETTLEMENT**

4 38. Plaintiff seeks final approval of a Class Action and PAGA Settlement with  
5 Defendants. The Settlement provides for: (1) a non-reversionary Gross Settlement Amount of  
6 \$80,000.00; (2) attorneys' fees not to exceed one-third of the Gross Settlement Amount (i.e.,  
7 \$26,664.00) to Class Counsel; (3) actual litigation costs and expenses incurred by Class Counsel not  
8 to exceed \$10,000.00; (4) payment of \$15,000.00 in PAGA penalties, 75% (\$11,250.00) of which  
9 will be paid to the LWDA and 25% (\$3,750.00) of which will be paid to Aggrieved Employees; (5)  
10 payment of up to \$10,000.00 to the Settlement Administrator; and (6) the requested Class  
11 Representative Service Payment of up to \$1,000.00 to Plaintiff. The result is a Net Settlement Amount  
12 of approximately \$18,336.00 that will be distributed to a Settlement Class consisting of 323  
13 participating individuals who worked for Defendant as non-exempt employees in California from  
14 July 3, 2019, through and including July 25, 2024.

15 39. The preliminarily approved settlement is the result of contested litigation between the  
16 Parties. The relationship between the Parties was adversarial, particularly given that Plaintiff had  
17 been terminated by Defendant and brought claims for wrongful termination prior to the class action  
18 filing. Despite this, the Parties agreed to attend mediation with Brandon Coen, a highly respected and  
19 neutral mediator with extensive experience mediating wage and hour class actions. The settlement  
20 negotiations were arms-length, non-collusive, and adversarial. Following a full-day mediation, and  
21 with the help of the mediator, the Parties eventually agreed to resolve the Action on a class and  
22 representative basis for a Gross Settlement Amount of \$80,000.00.

23 40. Prior to the settlement of this matter, Class Counsel spent a substantial amount of time  
24 researching and investigating the alleged claims. This included drafting formal discovery, legal  
25 research regarding the applicable Labor Code sections, investigation into Defendants' business and  
26 business practices, and review of substantial informal discovery.

27 41. Class Counsel reviewed and analyzed Class Members' time and payroll records, as  
28 well as Defendants' relevant employment policies. Defendants produced information regarding the

1 number of putative class members, the number of current versus former employees, the total  
2 workweeks at issue, and the average rate of pay during the Class Period. Through this informal  
3 discovery and investigation, Class Counsel was able to conduct a class-wide assessment and analysis  
4 of potential damages. This analysis and investigation permitted Class Counsel to effectively and  
5 intelligently negotiate the Settlement.

6 42. Based on my review of the file and involvement in this matter, I believe this settlement  
7 represents a fair and reasonable compromise of the Class's claims against Defendants. Defendants  
8 vigorously contested their liability and raised defenses regarding whether these claims were  
9 appropriate for class certification and the merits of the individual claims. This included arguments  
10 regarding individualized issues with respect to meal period claims, rest period claims, and claims  
11 regarding off-the-clock work. Defendants at all times maintained that they had complied with  
12 California wage and hour laws. The proposed Settlement was reached at the end of a process that was  
13 neither fraudulent nor collusive. To the contrary, counsel for the Parties advanced their respective  
14 positions throughout the settlement negotiations.

15 43. Based on my experience with similar matters and the history of this litigation, I would  
16 reasonably expect a vigorous and lengthy defense to both class certification and merits absent a  
17 settlement, with substantial risk that Class Members could be forced to wait years and incur additional  
18 costs for the same or possibly worse result. Additionally, Defendant Laurel Hardware's financial  
19 condition presented real concerns regarding collectability of any larger judgment.

20 44. The lack of objections to the terms of the proposed Settlement and the fact that  
21 100.00% of the Class wishes to participate also supports the reasonableness of the proposed  
22 Settlement.

23 45. Accordingly, the factors assessed by Class Counsel both at preliminary approval and  
24 here strongly support the conclusion that the Settlement is not only presumed fair but is reasonable.

#### 25 **CLASS COUNSEL FEES**

26 46. Class Counsel seeks attorneys' fees in an amount not to exceed \$26,664.00, which is  
27 one-third (33.33%) of the Gross Settlement Amount. The percentage award of the attorneys' fees is  
28 commensurate with: (1) the economic risk Class Counsel took in commencing the Action on a

1 contingency basis; (2) the time, effort, and expense dedicated to the Action; (3) the skill and  
2 determination the Action required; (4) the results achieved throughout the litigation; and (5) the value  
3 of the settlement achieved for Class Members, Aggrieved Employees, and the State of California.

4 47. Laurel Employment Law, APC is a law firm specifically devoted to the representation  
5 of employees against employers in California involving claims relating to violations of the California  
6 Labor Code. Class Counsel, including Plaintiff's prior counsel at Barkhordarian Law Firm, LLP, has  
7 devoted significant time and attention to this matter on a contingent basis. The significant time and  
8 attention spent on this matter was time that could not be spent on other cases or clients.

9 48. As discussed above, Class Counsel and prior counsel undertook extensive  
10 investigation, analysis, and research prior to filing the lawsuit, during litigation, at mediation, and  
11 after mediation. This included attending client meetings, attending court hearings, propounding  
12 discovery, responding to discovery, extensively meeting and conferring with Defendants' Counsel on  
13 various issues, and conducting legal research. In order to investigate Defendants' policies, practices,  
14 and procedures, Class Counsel reviewed and analyzed extensive time and payroll data. Class Counsel  
15 participated in case strategy and analysis, drafting, reviewing, and revising pleadings, and preparing  
16 for and attending mediation. Class Counsel participated in extensive negotiations at mediation and  
17 following the mediation to reach a settlement and then spent substantial time drafting and revising  
18 the Settlement Agreement. A settlement was achieved despite all of the obstacles that had to be  
19 overcome, because Class Counsel and prior counsel used their complex wage-and-hour litigation  
20 experience and skills to obtain the Settlement.

21 49. In addition to the time and effort required, the Action also required substantial skill to  
22 litigate. Substantial skill was necessary in order to adequately evaluate the alleged claims and  
23 negotiate the settlement reached in this matter on behalf of the putative Class Members. Defendants  
24 retained well-respected counsel and denied liability. Defendants and their counsel felt strongly about  
25 their ability to ultimately prevail in the Action and mounted defenses that posed significant threats to  
26 class certification and the manageability of the Action at trial.

27 50. There were also substantial risks with respect to this matter that Class Counsel was  
28 required to evaluate and overcome before reaching a successful settlement. For instance, Defendants

1 raised issues with Plaintiff's meal period claims. Although Plaintiff maintains that Defendants  
2 maintained unlawful meal period policies and practices, Defendants argued their policies and  
3 practices were lawful and that individualized issues existed with respect to any alleged violations.

4 51. Defendants also challenged Plaintiff's ability to sufficiently prove the alleged rest  
5 period violations as Defendants were not required to record these breaks. Given the lack of records  
6 demonstrating rest period violations, there were legitimate concerns that Plaintiff would not be able  
7 to certify these claims or prove substantial damages even assuming a uniform practice could be  
8 established.

9 52. Plaintiff would also face challenges certifying and proving liability for minimum wage  
10 and overtime claims. These claims were largely based on unrecorded, off-the-clock work and  
11 timekeeping errors by Defendants. While Class Counsel believes a uniform and systemic practice  
12 could be established, this claim was not certain and would be an extremely complex and hotly  
13 disputed issue.

14 53. There were also substantial risks associated with Plaintiff's waiting time penalties and  
15 wage statement claims as these claims are derivative of the underlying claims and if certification was  
16 denied on those underlying claims, these claims would also likely fail.

17 54. Additionally, as noted above, Defendant Laurel Hardware's financial condition proved  
18 to be a significant limiting factor. During the mediation, Defendant professed a significant post-  
19 pandemic slowdown in business and provided redacted financial statements to the mediator to  
20 demonstrate limited ability to pay beyond the settlement amount reached. This impacted the realistic  
21 settlement value of the case.

22 55. Additionally, the case was litigated on a contingent basis. Had Class Counsel not been  
23 successful, the time devoted to this matter would have been for naught and Class Counsel would not  
24 have received any fee or any reimbursement for any of the expenses incurred on behalf of the Class.  
25 Class Counsel has borne all the risks and costs of litigation and will not receive any compensation  
26 until recovery is obtained in the Action. Class Counsel could have invested years of time and effort,  
27 and ultimately could have received no compensation. This risk is a relevant factor when considering  
28 the reasonableness of Class Counsel's requested fee.

1           56.     A fee of up to one-third (33.33%) of the Gross Settlement Amount is appropriate here  
2 because of the result achieved for the Class and the Aggrieved Employees despite the substantial risks  
3 described above, including the risk that the Class Members and Aggrieved Employees could recover  
4 nothing at all or could face years of litigation with an uncertain collectability outcome.

5           57.     While the requested fee is a proper and commonly requested percentage of the  
6 common fund, the fee request is also justified under a lodestar analysis.

7           58.     I am a member of the California State Bar and have been licensed to practice law in  
8 California since 2020. I am admitted to practice before all of the courts of California. I received my  
9 Juris Doctor degree from Southwestern Law School in 2020. My practice is focused on representing  
10 employees in complex employment litigation, including wage and hour class actions and PAGA  
11 representative actions.

12           59.     Joshua I. White is the principal attorney at Laurel Employment Law. He is a member  
13 of the California State Bar and has been licensed to practice law in California since 2009. He is  
14 admitted to practice before all of the courts of California. He received his Juris Doctor degree from  
15 the University of San Diego School of Law in 2009. His practice is focused on representing  
16 employees in employment litigation, including wage and hour class actions and PAGA representative  
17 actions.

18           60.     Brendan Burton is an attorney at Laurel Employment Law. He is a member of the  
19 California State Bar and has been licensed to practice law in California since 2017. He is admitted to  
20 practice before all of the courts of California. He received his Juris Doctor degree from Loyola Law  
21 School in 2017. His practice is focused on representing employees in employment litigation,  
22 including wage and hour class actions and PAGA representative actions.

23           61.     Michiko Vartanian was an attorney at Laurel Employment Law. She is a member of  
24 the California State Bar and has been licensed to practice law in California since 2018. She is admitted  
25 to practice before all of the courts of California. She received her Juris Doctor degree from  
26 Southwestern Law School in 2018. Her practice is focused on representing employees in employment  
27 litigation, including wage and hour class actions and PAGA representative actions.

28           62.     Prior counsel at Barkhordarian Law Firm who worked on this matter included John F.

1 Litwin, Gregory P. Wong, and Heather K. Cox, all experienced employment law attorneys who  
2 handled the initial litigation, discovery, mediation, settlement negotiations, and preliminary approval  
3 proceedings.

4 63. Based on my familiarity with prevailing market rates for work of similar complexity  
5 in California, including my review of fee applications in other matters, I can attest that the hourly  
6 rates for Class Counsel range from \$500 to \$750 per hour for attorneys and \$150 per hour for  
7 paralegals and legal assistants, which are within the prevailing market rate for work of similar  
8 complexity performed by attorneys of similar skill and experience. I have knowledge of the prevailing  
9 hourly rates in the community for work of similar nature and complexity to the work in this case.

10 64. Since beginning work on this matter, Class Counsel has spent a total of approximately  
11 362.5 hours litigating this case. Applying a blended rate of \$650.00 per hour, this results in a total  
12 lodestar value of \$235,625.00 for Class Counsel. Attached hereto as Exhibit 1 is a time and task chart  
13 detailing the hours spent on the different tasks associated with this matter and the time spent by each  
14 attorney.

15 65. To date, the lodestar for Class Counsel is approximately \$235,625.00. The lodestar is  
16 based on the billable hours worked by each attorney at their billing rate.

17 66. Further, I believe the use of a multiplier of approximately 0.11 is appropriate in  
18 conjunction with the lodestar value, given (1) the results obtained despite substantial risks and  
19 challenges; (2) the difficult questions involved and skill displayed by Class Counsel; and (3) the  
20 contingent risk assumed by Class Counsel. While this represents a negative multiplier, meaning Class  
21 Counsel is accepting significantly less than the actual lodestar value, this demonstrates the  
22 extraordinary value provided to the Settlement Class and the reasonableness of the fee request.

23 67. I believe that the efforts of Class Counsel have resulted in substantial benefits to the  
24 Settlement Class, in the form of a settlement fund established to compensate Class Members for  
25 Defendant's wage and hour violations. Through the efforts of Class Counsel and Plaintiff in the  
26 Action, a fair and reasonable resolution has been reached that includes a non-reversionary settlement  
27 payment by Defendants of \$80,000.00. I am informed and believe that, without the efforts of Class  
28 Counsel, the Labor Code violations alleged in the Complaint would have gone completely

1 unremedied. The allocation of up to one-third of this amount to fees as provided for in the Settlement  
2 is therefore reasonable given the result achieved.

### 3 **CLASS COUNSEL'S COSTS**

4 68. To date, Class Counsel has borne all risks and costs of litigation and will not receive  
5 any compensation until recovery is obtained by Plaintiff and the participating members of the  
6 Settlement Class. Class Counsel has incurred \$12,484.63 to date in costs and expenses associated  
7 with this litigation. Attached hereto as **Exhibit 2** is a costs chart detailing the various costs incurred  
8 by Class Counsel associated with the Action. These costs include filing fees, mediation fees, expert  
9 fees, deposition costs, service of process fees, and investigation costs. These costs were necessary for  
10 the resolution of the Action, and Class Counsel requests that the Court award \$10,000.00 (not to  
11 exceed \$10,000.00) to cover the costs and expenses associated with this litigation.

### 12 **PLAINTIFF'S CLASS REPRESENTATIVE SERVICE PAYMENT**

13 69. Here, the requested Class Representative Service Payment of up to \$1,000.00 to  
14 Plaintiff Angel Vera is justified. It is reasonable for Class Representatives to recover an award of this  
15 amount as a service payment.

16 70. Plaintiff has been involved in the prosecution of the Action and served as a resource  
17 to Class Counsel. Plaintiff provided valuable information regarding the allegations, kept himself  
18 informed of the development of the matter, worked with Class Counsel on discovery responses, and  
19 participated in decisions concerning the Action. See Declaration of Angel Vera ("Vera Decl.") ¶¶ 5-  
20 11. The information and documentation provided by Plaintiff was instrumental in establishing the  
21 wage and hour violations alleged in the Action, and the recovery provided for in the Settlement  
22 Agreement would have been difficult to obtain without his participation.

23 71. Additionally, Plaintiff has agreed to a broader individual release than that agreed to  
24 by the rest of the Class. See Vera Decl. ¶ 12; Settlement Agreement ¶ 5.1.

25 72. Moreover, Plaintiff faces actual risks with his future employment by putting himself  
26 on public record in an employment lawsuit. Prospective employers routinely conduct searches on job  
27 applicants' litigation history. These searches are easy to run on the internet and relatively inexpensive.  
28 Plaintiff also faced the potential imposition of costs if the Action was unsuccessful. See Vera Decl.

¶¶ 6, 11.

73. As a result of Plaintiff's actions, 323 employees have the opportunity to participate in a settlement, reimbursing them for wage violations they may have never known about or been willing to pursue on their own.

74. As such, Plaintiff did more than simply lend his name for the lawsuit, and he deserves the requested Service Payment. See Vera Decl. ¶¶ 10-11.

**PAYMENT TO THE SETTLEMENT ADMINISTRATOR**

75. The Settlement Agreement calls for the award of up to \$10,000.00 to the Settlement Administrator, CPT Group, Inc., for the costs associated with administration of the settlement. The Settlement Administrator is a necessary third-party who has performed substantial services on behalf of the putative Class including sending the notice and the administration of settlement payments. See CPT Decl. ¶¶ 3, 17. Accordingly, Class Counsel requests that the Court award CPT \$10,000.00 for the services performed in this Action

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

Executed on January 23, 2026.

/s/William Hogg

William Hogg, Esq.

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# EXHIBIT 2

***VERA V. LAUREL HARDWARE, INC., ET AL.***  
**LOS ANGELES COUNTY SUPERIOR COURT, CASE NO. 23STCV15421 (“CLASS ACTION”)**  
***VERA V. LAUREL HARDWARE, INC., ET AL.***  
**LOS ANGELES COUNTY SUPERIOR COURT, CASE NO. 22SMCV00594 (“INDIVIDUAL ACTION”)**

**ATTORNEY TASK AND TIME CHART**

| <b>TASK</b>                                                                                                                                                                                                                                               | <b>HOURS</b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| <b>Pre-Litigation Investigation and Research / Due Diligence<br/>BARKHORDARIAN LAW FIRM</b>                                                                                                                                                               |              |
| Initial client consultation and intake with Angel Vera regarding disability discrimination and wrongful termination claims                                                                                                                                | 1.5          |
| Investigation of the key facts regarding Angel Vera's employment with Defendant Laurel Hardware and termination on January 28, 2022                                                                                                                       | 2.0          |
| Investigation of potential wage and hour violations affecting Plaintiff and putative class members, including review of Plaintiff's time records and payroll data                                                                                         | 3.0          |
| Investigation of the merits of Plaintiff's disability discrimination, failure to accommodate, failure to engage in the interactive process, and wrongful termination claims                                                                               | 3.5          |
| Investigation of the merits of Plaintiff's wage and hour claims, including minimum wage violations, overtime violations, meal period violations, rest period violations, wage statement violations, waiting time penalties, and unfair business practices | 5.0          |
| Investigation of the merits of Plaintiff's Private Attorneys General Act ("PAGA") claims on behalf of the State of California with respect to Plaintiff and aggrieved employees                                                                           | 2.5          |
| Investigation of potential damages exposure of Defendants with respect to Plaintiff and putative class members, including calculation of potential maximum recoveries                                                                                     | 4.0          |
| Investigation of potential civil penalties exposure of Defendants with respect to alleged California Labor Code violations pursuant to PAGA, including calculation of potential penalties of \$1,818,400.00                                               | 3.0          |

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| Legal research and analysis of latest decisions and law regarding meal and rest break violations, auto-deduction policies, off-the-clock work, timekeeping violations, wage statement violations, and class certification requirements in California | 6.5 |
| Investigation of Defendants Laurel Hardware, Inc., IS Business Services, LLC, and Vensure HR, Inc., including business structure, operations, and relationships between entities                                                                     | 2.0 |
| Investigation of Defendants' organizational and corporate structures as they relate to employment and management of putative class members and aggrieved employees, including analysis of Professional Employer Organization relationships           | 2.5 |
| Investigation of Defendants' past litigation history involving wage-and-hour issues and other related employment issues                                                                                                                              | 1.0 |
| Research and investigation regarding Defendants' written and unwritten policies, practices, and procedures relating to timekeeping, meal/rest breaks, auto-deduction, overtime compensation, and recordkeeping                                       | 3.5 |
| Research and analysis of potential defenses Defendants may raise, including compliant policies, employee error, individualized issues, manageability concerns, and post-Duran trial issues                                                           | 3.0 |
| Research and investigation regarding class certification requirements, including adequacy, typicality, superiority, commonality, numerosity, and ascertainability                                                                                    | 4.5 |
| Prepare discovery strategy plan of action, including topics of inquiry important to certification, liability, damages, and penalties                                                                                                                 | 2.5 |
| Research, brief, and outline issues important to class certification and trial manageability                                                                                                                                                         | 3.5 |
| Meet and communicate with Plaintiff Angel Vera throughout the pendency of both actions (Barkhordarian Law Firm period)                                                                                                                               | 3.0 |
| <b>PAGA Notice Preparation and Filing<br/>BARKHORDARIAN LAW FIRM</b>                                                                                                                                                                                 |     |
| Draft PAGA notice to California Labor and Workforce Development Agency regarding claims for penalties under California Labor Code Section 2698 et seq. (served November 9, 2022 to LWDA and Defendants)                                              | 2.5 |
| Draft amended PAGA notice to California Labor and Workforce Development Agency regarding additional alleged violations, including auto-deduction and one-way rounding issues (served June 30, 2023)                                                  | 2.5 |
| Prepare proofs of service and coordinate service of PAGA notices via certified mail                                                                                                                                                                  | 0.5 |

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| Correspondence with LWDA regarding PAGA notices                                                                                                                                                                        | 0.3 |
| <b>Pleadings and Court Filings - Individual Action (Case No. 22SMCV00594)</b><br><b>BARKHORDARIAN LAW FIRM</b>                                                                                                         |     |
| Draft Angel Vera's individual complaint for disability discrimination, failure to accommodate, failure to engage in interactive process, and wrongful termination in violation of public policy (filed April 26, 2022) | 6.0 |
| Prepare and file civil case cover sheet, summons, and Alternative Dispute Resolution packet for individual action (filed April 26, 2022)                                                                               | 1.0 |
| Prepare service packet for individual complaint                                                                                                                                                                        | 0.5 |
| Coordinate and supervise service of summons and complaint on Defendants Laurel Hardware, Inc., IS Business Services, LLC, and Vensure HR, Inc.                                                                         | 2.5 |
| Prepare and file application for order authorizing service through Secretary of State (filed May 31, 2022)                                                                                                             | 2.0 |
| Prepare declaration in support of application for order authorizing service through Secretary of State (filed June 28, 2022)                                                                                           | 1.5 |
| Prepare and file proofs of service of summons (filed July 11, 2023)                                                                                                                                                    | 1.0 |
| Review and analyze Defendant Vensure HR Inc.'s notice of appearance (filed August 28, 2023 in class action)                                                                                                            | 0.3 |
| Review and analyze Defendant IS Business Services, LLC's notice of appearance (filed November 9, 2023 in class action)                                                                                                 | 0.3 |
| Review and analyze Defendant Laurel Hardware, Inc.'s answer to individual complaint (filed January 8, 2024)                                                                                                            | 2.0 |
| Review and analyze Defendants Vensure HR, Inc.'s and IS Business Services LLC's answer and affirmative defenses to individual complaint (filed January 5, 2024)                                                        | 2.5 |
| <b>LAUREL EMPLOYMENT LAW</b>                                                                                                                                                                                           |     |
| Prepare request for dismissal of PAGA causes of action in individual case without prejudice to facilitate class action settlement (filed January 7, 2025)                                                              | 1.5 |
| <b>Pleadings and Court Filings - Class Action (Case No. 23STCV15421)</b><br><b>BARKHORDARIAN LAW FIRM</b>                                                                                                              |     |

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| Draft Angel Vera's class action complaint for damages alleging nine causes of action on behalf of himself and similarly situated employees, including causes of action for minimum wage violations, overtime violations, meal period violations, rest period violations, wage statement violations, recordkeeping violations, waiting time penalties, unfair business practices, and PAGA penalties (filed July 3, 2023) | 10.0 |
| Prepare and file civil case cover sheet, summons, and Alternative Dispute Resolution packet for class action (filed July 3, 2023)                                                                                                                                                                                                                                                                                        | 1.0  |
| Review and analyze notice of related case filed by Defendants (filed July 14, 2023)                                                                                                                                                                                                                                                                                                                                      | 0.5  |
| Review and analyze Court's Initial Status Conference Order regarding newly filed class action and mandatory procedures (filed July 27, 2023)                                                                                                                                                                                                                                                                             | 1.0  |
| Review and analyze Court's order and notice regarding notice of related case (filed August 24, 2023)                                                                                                                                                                                                                                                                                                                     | 0.5  |
| Review and analyze notice of ruling regarding notice of related case (filed August 11, 2023)                                                                                                                                                                                                                                                                                                                             | 0.3  |
| Review and analyze Defendant Laurel Hardware, Inc.'s notice of motion and motion to consolidate cases (filed September 13, 2023)                                                                                                                                                                                                                                                                                         | 2.0  |
| Research and prepare regarding consolidation issues and opposition strategies                                                                                                                                                                                                                                                                                                                                            | 1.5  |
| Review and analyze notice of errata regarding motion to consolidate (filed September 14, 2023)                                                                                                                                                                                                                                                                                                                           | 0.3  |
| Prepare joint initial status conference class action statement (filed November 13, 2023)                                                                                                                                                                                                                                                                                                                                 | 2.5  |
| Prepare for and appear at Initial Status Conference (held December 8, 2023)                                                                                                                                                                                                                                                                                                                                              | 3.0  |
| Review and analyze Court's minute order following Initial Status Conference (filed December 8, 2023)                                                                                                                                                                                                                                                                                                                     | 0.5  |
| Review and analyze Court's Case Management Order establishing procedures and deadlines (filed December 8, 2023)                                                                                                                                                                                                                                                                                                          | 1.0  |
| Prepare joint informal pleading conference report in coordination with Defense Counsel (filed January 23, 2024)                                                                                                                                                                                                                                                                                                          | 2.0  |
| Review and analyze Court's minute order regarding setting informal pleading conference (filed December 26, 2023)                                                                                                                                                                                                                                                                                                         | 0.5  |
| Meet and confer with Defense Counsel regarding pleading issues, including discussions regarding amendment of complaint to add wage and hour claims from individual action                                                                                                                                                                                                                                                | 3.0  |
| Prepare for and appear at informal status conference regarding pleadings (held January 31, 2024)                                                                                                                                                                                                                                                                                                                         | 2.5  |

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| Review and analyze Court's minute order following informal status conference on pleadings (filed January 31, 2024)                                                                                          | 0.5 |
| Meet and confer with Defense Counsel and draft joint stipulation to file First Amended Complaint (filed November 22, 2024)                                                                                  | 3.0 |
| Review and analyze proposed order granting joint stipulation to file First Amended Complaint (filed December 27, 2024)                                                                                      | 0.5 |
| <b>LAUREL EMPLOYMENT LAW</b>                                                                                                                                                                                |     |
| Draft Plaintiff's First Amended Class Action Complaint consolidating all wage and hour claims (filed January 3, 2025)                                                                                       | 6.0 |
| <b>BARKHORDARIAN LAW FIRM</b>                                                                                                                                                                               |     |
| Review and analyze Defendant Laurel Hardware, Inc.'s answer to class action complaint (filed January 8, 2024)                                                                                               | 2.0 |
| Review and analyze Defendants Vensure HR, Inc.'s and IS Business Services LLC's answer and affirmative defenses to class action complaint (filed January 5, 2024)                                           | 2.5 |
| <b>Discovery - Formal Written Discovery<br/>BARKHORDARIAN LAW FIRM</b>                                                                                                                                      |     |
| Draft Plaintiff's responses to Defendants' form interrogatories - employment law, set one, including comprehensive responses regarding employment details and alleged violations (served November 15, 2022) | 3.0 |
| Draft Plaintiff's responses to Defendants' special interrogatories, set one, including detailed responses regarding wage and hour claims (served November 2, 2022)                                          | 4.0 |
| Draft Plaintiff's responses to Defendants' form interrogatories - general, set one (served November 15, 2022)                                                                                               | 2.5 |
| Coordinate Plaintiff's document production in response to Defendants' requests for production, including personnel records, wage statements, and time records (Bates VERA-000001 to VERA-000032)            | 2.0 |
| Draft Plaintiff's requests for production of documents, set one, to Defendant Laurel Hardware (served August 11, 2022)                                                                                      | 2.5 |
| Draft Plaintiff's requests for production of documents, set two, to Defendant Laurel Hardware (served February 9, 2023)                                                                                     | 2.0 |

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| Draft Plaintiff's requests for production of documents, set three, to Defendant Laurel Hardware (served May 12, 2023)                                                                                                                                        | 2.0 |
| Draft Plaintiff's demand for exchange of expert witness information (served May 24, 2023)                                                                                                                                                                    | 1.5 |
| Review and analyze Defendants' discovery responses and objections to interrogatories and requests for production                                                                                                                                             | 3.0 |
| Meet and confer with Defense Counsel regarding discovery disputes, objections, and supplemental responses                                                                                                                                                    | 4.0 |
| <b>Discovery - Document Review and Analysis<br/>BARKHORDARIAN LAW FIRM</b>                                                                                                                                                                                   |     |
| Review and analyze Defendant Laurel Hardware's initial document production (Bates LHI 000001-000092), including employee handbook, policies, procedures, and Plaintiff's personnel file (produced October 5, 2022)                                           | 4.0 |
| Review and analyze Defendant Laurel Hardware's document production (Bates LHI 000098-000148), including time and attendance detail reports for Plaintiff and timekeeping policies                                                                            | 4.5 |
| Review and analyze Defendant Laurel Hardware's additional document production (Bates LHI 0156-0250), including additional payroll records, policies, and class data                                                                                          | 5.0 |
| Review and analyze Defendants' responses to discovery requests                                                                                                                                                                                               | 2.0 |
| Review and analyze Defendants' expert designation for Dr. Brian Roger Kriegler, Ph.D. regarding timekeeping and payroll analysis (served June 26, 2023)                                                                                                      | 1.5 |
| Review and analyze expert reports and analysis provided by Defendant's expert regarding class size, workweeks, pay periods, and alleged violations                                                                                                           | 5.0 |
| Review and analyze class data provided by Defendants, including spreadsheets showing 316 class members, 25,914 workweeks, 9,188 pay periods, and average hourly rate of \$18.10                                                                              | 4.0 |
| Analysis of timekeeping and payroll data to identify systematic violations, including auto-deduction practices and one-way rounding                                                                                                                          | 6.0 |
| Prepare damages calculations for minimum wage (\$90,051.15), overtime (\$175,891.28), meal periods (\$469,043.40), rest periods (\$469,043.40), wage statements (\$903,000.00), waiting time penalties (\$1,003,464.00), and PAGA penalties (\$1,818,400.00) | 8.0 |
| Review and analyze Plaintiff's personnel file, complete time records, and payroll records                                                                                                                                                                    | 3.0 |
| <b>Depositions</b>                                                                                                                                                                                                                                           |     |

| <b>BARKHORDARIAN LAW FIRM</b>                                                                                                                                              |     |
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| Prepare for defense of Plaintiff Angel Vera's deposition, including preparation of deposition outline and review of discovery                                              | 4.5 |
| Defend Plaintiff Angel Vera's deposition (June 20, 2023)                                                                                                                   | 6.5 |
| Review and analyze deposition transcript of Plaintiff Angel Vera                                                                                                           | 3.0 |
| Prepare deposition notice for Defendant's person most knowledgeable                                                                                                        | 1.0 |
| Prepare for deposition of Defendant's person most knowledgeable, including preparation of examination outline and review of documents                                      | 3.5 |
| Take deposition of Defendant's person most knowledgeable regarding policies, procedures, timekeeping, and payroll practices                                                | 4.0 |
| Review and analyze deposition transcript of Defendant's person most knowledgeable                                                                                          | 2.5 |
| Prepare deposition notice for Defendant's expert witness Dr. Brian Roger Kriegler                                                                                          | 0.5 |
| Prepare for deposition of Defendant's expert witness, including review of expert designation, anticipated testimony, and analysis of expert's methodology (August 4, 2023) | 5.0 |
| Take deposition of Defendant's expert witness Dr. Brian Roger Kriegler, Ph.D. regarding timekeeping analysis and damages calculations (August 4, 2023)                     | 5.0 |
| Review and analyze deposition transcript of Defendant's expert witness                                                                                                     | 3.5 |
| Prepare deposition summaries and analysis for use in mediation and settlement negotiations                                                                                 | 2.0 |
| <b>Law and Motion Practice<br/>BARKHORDARIAN LAW FIRM</b>                                                                                                                  |     |
| Research and prepare regarding Defendant's motion in limine no. 1 to limit PAGA claims to those identified in November 9, 2022 PAGA notice                                 | 2.5 |
| Draft Declaration of Heather K. Cox in support of Plaintiff's opposition to Defendant's motion in limine no. 1 (filed June 30, 2023)                                       | 2.0 |
| Draft opposition to Defendant's motion in limine no. 1 (filed July 14, 2023)                                                                                               | 3.5 |
| Research and prepare regarding trial-related motions and briefing on PAGA and class action trial issues                                                                    | 2.0 |
| Draft brief regarding PAGA-class action trials and procedural requirements                                                                                                 | 2.5 |

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| Research and prepare ex parte application for order to move forward with Belaire-West notice process                                                                                       | 2.0  |
| Draft Declaration in support of ex parte application for consolidation and trial continuance (filed September 12, 2023)                                                                    | 1.5  |
| Prepare and coordinate ex parte application and appearance (September 14, 2023)                                                                                                            | 1.5  |
| Draft opposition to ex parte application regarding Belaire West process                                                                                                                    | 2.0  |
| Draft Plaintiff's supplemental brief in support of ex parte application (filed November 3, 2023)                                                                                           | 1.5  |
| <b>Client Communications and Case Management</b><br><b>BARKHORDARIAN LAW FIRM</b>                                                                                                          |      |
| Regular communications with Plaintiff Angel Vera regarding case status, discovery, strategy, mediation, and settlement throughout both individual and class actions (Barkhordarian period) | 5.0  |
| Client meetings and telephone conferences throughout litigation to discuss case developments, settlement options, and strategy (Barkhordarian period)                                      | 3.0  |
| Case strategy discussions and planning among attorneys regarding litigation approach and settlement negotiations (Barkhordarian period)                                                    | 2.5  |
| File review and management throughout litigation of both individual and class actions (Barkhordarian period)                                                                               | 2.0  |
| Internal meetings and case discussions among attorneys at Barkhordarian Law Firm                                                                                                           | 2.0  |
| Calendar management and compliance with court deadlines and case management order requirements (Barkhordarian period)                                                                      | 1.5  |
| <b>Mediation/Settlement</b><br><b>BARKHORDARIAN LAW FIRM</b>                                                                                                                               |      |
| Research and investigate settlement-related issues and merits of claims in preparation for mediation with Brandon Coen                                                                     | 5.0  |
| Review and analyze payroll data, timekeeping records, policies, and documents obtained from Defendants in preparation for mediation                                                        | 8.0  |
| Prepare for mediation, including drafting comprehensive mediation brief with exhibits detailing all alleged violations and damages (dated May 29, 2024)                                    | 12.0 |
| Compile and organize mediation exhibits, including policies, time records, expert analysis, and damages calculations                                                                       | 4.0  |

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| Perform detailed violation analysis and calculations of damages and penalties for all claims to present at mediation                                                                                                                 | 6.0  |
| Research and analyze Defendant Laurel Hardware's financial condition and ability to pay based on post-pandemic business challenges                                                                                                   | 2.5  |
| Review and analyze Defendant's profit and loss statements and cash flow statements provided to mediator Brandon Coen to assess collectability                                                                                        | 2.0  |
| Prepare settlement demand and negotiation strategy, including analysis of risks and reasonable settlement range                                                                                                                      | 3.0  |
| Prepare for and attend full-day mediation with Brandon Coen on May 30, 2024                                                                                                                                                          | 10.0 |
| Post-mediation negotiations and communications with mediator Brandon Coen and Defense Counsel to finalize settlement terms                                                                                                           | 5.0  |
| Draft, review, revise, negotiate, and finalize memorandum of understanding following mediation                                                                                                                                       | 2.5  |
| Draft Class Action and PAGA Settlement Agreement using LASC Model Template, including all definitions, settlement terms, notice procedures, administration provisions, and releases                                                  | 12.0 |
| Review, revise, and negotiate multiple drafts of Settlement Agreement with Defense Counsel                                                                                                                                           | 8.0  |
| Finalize and execute Settlement Agreement (fully executed September 13, 2024)                                                                                                                                                        | 1.5  |
| <b>Motion for Preliminary Approval<br/>BARKHORDARIAN LAW FIRM</b>                                                                                                                                                                    |      |
| Research applicable law and standards for preliminary approval of class action and PAGA settlements under California law and LASC Local Rules                                                                                        | 4.0  |
| Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement (filed February 19, 2025)                                                                                                 | 3.0  |
| Draft Memorandum of Points and Authorities in Support of Motion for Preliminary Approval, analyzing fairness factors, settlement terms, notice procedures, and class certification for settlement purposes (filed February 19, 2025) | 12.0 |
| Draft Declaration of John F. Litwin in Support of Motion for Preliminary Approval detailing litigation history, investigation, discovery, mediation, and settlement negotiations (filed February 19, 2025)                           | 6.0  |
| Draft Declaration of Angel Vera in Support of Motion for Preliminary Approval detailing participation in litigation and support for settlement (filed February 19, 2025)                                                             | 2.0  |

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| Draft proposed Order Granting Motion for Preliminary Approval with all required findings and provisions                                                                            | 3.5          |
| Draft proposed Class Notice complying with due process and LASC requirements                                                                                                       | 3.0          |
| Prepare settlement agreement and exhibits for filing with preliminary approval motion                                                                                              | 1.5          |
| Coordinate e-filing of preliminary approval motion and all supporting documents                                                                                                    | 1.0          |
| <b>Miscellaneous Litigation Tasks<br/>BARKHORDARIAN LAW FIRM</b>                                                                                                                   |              |
| Correspondence with opposing counsel at Tredway, Lumsdaine & Doyle LLP regarding discovery, case management, settlement discussions, and procedural matters (Barkhordarian period) | 3.0          |
| Document organization and management for both individual and class action cases (Barkhordarian period)                                                                             | 1.5          |
| Preparation of proofs of service for all filings throughout both actions (Barkhordarian period)                                                                                    | 1.5          |
| Coordination of service of documents on all parties throughout litigation (Barkhordarian period)                                                                                   | 1.0          |
| Review of docket and case management system entries to monitor deadlines and case status (Barkhordarian period)                                                                    | 1.5          |
| Research regarding procedural issues, class action procedures, and local court rules (Barkhordarian period)                                                                        | 2.0          |
| Compliance with Los Angeles Superior Court Local Rules for class actions and PAGA actions (Barkhordarian period)                                                                   | 1.0          |
| Review and payment of court filing fees, e-filing fees, and related costs (Barkhordarian period)                                                                                   | 0.3          |
| Coordinate e-filing through Case Anywhere, First Legal, and OneLegal throughout litigation (Barkhordarian period)                                                                  | 0.7          |
| Review invoices from service providers including First Legal, OneLegal, and Case Anywhere (Barkhordarian period)                                                                   | 0.3          |
| Administrative tasks related to case management and file maintenance (Barkhordarian period)                                                                                        | 1.2          |
| <b>SUBTOTAL - BARKHORDARIAN LAW FIRM HOURS:</b>                                                                                                                                    | <b>226.5</b> |
| <b>Substitution of Attorneys<br/>BARKHORDARIAN LAW FIRM &amp; LAUREL EMPLOYMENT LAW (JOINT)</b>                                                                                    |              |

|                                                                                                                                                                               |            |
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| Prepare and coordinate substitution of attorney from Barkhordarian Law Firm, LLP to Laurel Employment Law, APC (filed June 2, 2025)                                           | 1.5        |
| Review and prepare referral fee disclosure and fee-sharing agreements between Barkhordarian Law Firm and Laurel Employment Law                                                | 1.5        |
| Coordinate transition of case files, pleadings, discovery, and all case information between firms                                                                             | 2.0        |
| Client communications with Angel Vera regarding substitution of counsel and introduction to new attorneys at Laurel Employment Law                                            | 1.0        |
| <b>SUBTOTAL - JOINT TRANSITION WORK:</b>                                                                                                                                      | <b>6.0</b> |
| <b>Amended Motion for Preliminary Approval<br/>LAUREL EMPLOYMENT LAW</b>                                                                                                      |            |
| Review Court's tentative ruling from August 12, 2025 hearing identifying required modifications                                                                               | 0.5        |
| Review Court's minute order from August 12, 2025 hearing requesting additional information and revisions to moving papers                                                     | 0.5        |
| Revise all moving papers to address Court's specific concerns and requested modifications on expedited basis                                                                  | 4.0        |
| Draft Amended Notice of Motion and Motion for Preliminary Approval addressing Court's comments (filed August 15, 2025)                                                        | 1.5        |
| Draft Amended Memorandum of Points and Authorities in Support of Motion for Preliminary Approval with revisions (filed August 15, 2025)                                       | 5.0        |
| Draft Amended Declaration of Angel Vera in Support of Motion for Preliminary Approval with additional information (filed August 15, 2025)                                     | 1.5        |
| Draft Declaration of Michiko Vartanian in Support of Motion for Preliminary Approval providing additional analysis and information requested by Court (filed August 15, 2025) | 4.0        |
| Coordinate and file amended preliminary approval papers on same-day expedited basis to meet Court's requirements (filed August 15, 2025)                                      | 1.5        |
| Prepare and file proof of service for amended papers (filed August 15, 2025)                                                                                                  | 0.3        |
| Prepare for and appear at continued hearing on Motion for Preliminary Approval (held August 15, 2025)                                                                         | 2.0        |
| Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed August 15, 2025)                                         | 0.5        |

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| Review Court's minute order granting preliminary approval and establishing deadlines (filed August 15, 2025)                                                                                                         | 0.3  |
| Review Clerk's Certificate of Service by Electronic Notification (filed August 15, 2025)                                                                                                                             | 0.1  |
| <b>Post-Preliminary Approval Administration and Compliance<br/>LAUREL EMPLOYMENT LAW</b>                                                                                                                             |      |
| Coordinate with Settlement Administrator CPT Group, Inc. regarding retention, class list requirements, notice procedures, and administration timeline                                                                | 2.5  |
| Review and approve Settlement Administrator's proposed class notice and mailing materials                                                                                                                            | 2.0  |
| Review workweeks count, pay periods, and settlement payment calculations prepared by Settlement Administrator                                                                                                        | 1.5  |
| Respond to inquiries from Settlement Administrator CPT Group regarding notice procedures and settlement administration                                                                                               | 1.5  |
| Prepare and serve notice to California Labor and Workforce Development Agency regarding proposed PAGA settlement of \$15,000.00 in penalties (served October 16, 2024)                                               | 1.0  |
| <b>Motion for Final Approval<br/>LAUREL EMPLOYMENT LAW</b>                                                                                                                                                           |      |
| Review Settlement Administrator CPT Group's declaration regarding settlement notice administration, including number of notices mailed, returned notices, skip traces, opt-outs, objections, and participation rates | 1.5  |
| Research applicable law and standards for final approval of class action and PAGA settlements                                                                                                                        | 3.0  |
| Draft Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement                                                                                                                             | 3.5  |
| Draft Memorandum of Points and Authorities in Support of Motion for Final Approval, analyzing presumption of fairness, Camden factors, lodestar cross-check, and reasonableness of all requested payments            | 14.0 |
| Draft Declaration of William Hogg in Support of Motion for Final Approval detailing background, experience, litigation history, settlement process, administration results, and fee justification                    | 8.0  |
| Draft updated Declaration of Angel Vera in Support of Motion for Final Approval                                                                                                                                      | 1.5  |
| Prepare detailed time and task chart listing all litigation tasks and hours spent                                                                                                                                    | 4.5  |
| Prepare costs chart detailing all litigation expenses incurred, including filing fees, mediation fees, expert fees, deposition costs, and service fees                                                               | 2.0  |

|                                                                                                                                                                                    |     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| Draft proposed Final Order and Judgment approving settlement and providing for distribution of settlement funds                                                                    | 5.0 |
| Review and finalize all moving papers for final approval to ensure compliance with LASC Local Rules and Court requirements                                                         | 3.0 |
| Coordinate e-filing of final approval motion and all supporting documents                                                                                                          | 0.5 |
| <b>Client Communications and Case Management</b><br><b>LAUREL EMPLOYMENT LAW</b>                                                                                                   |     |
| Regular communications with Plaintiff Angel Vera regarding case status, preliminary approval process, settlement administration, and final approval (Laurel Employment Law period) | 3.0 |
| Client meetings and telephone conferences regarding settlement (Laurel Employment Law period)                                                                                      | 2.0 |
| Case strategy discussions and planning among attorneys at Laurel Employment Law                                                                                                    | 1.5 |
| File review and management (Laurel Employment Law period)                                                                                                                          | 1.0 |
| Communications and coordination with Barkhordarian Law Firm regarding case transition and ongoing representation                                                                   | 2.5 |
| Calendar management and compliance with court deadlines (Laurel Employment Law period)                                                                                             | 0.5 |
| <b>Miscellaneous Litigation Tasks</b><br><b>LAUREL EMPLOYMENT LAW</b>                                                                                                              |     |
| Correspondence with opposing counsel regarding settlement administration and final approval matters (Laurel Employment Law period)                                                 | 2.0 |
| Document organization and management (Laurel Employment Law period)                                                                                                                | 1.0 |
| Preparation of proofs of service for filings (Laurel Employment Law period)                                                                                                        | 0.5 |
| Coordination of service of documents (Laurel Employment Law period)                                                                                                                | 0.5 |
| Review of docket and case management system entries (Laurel Employment Law period)                                                                                                 | 0.5 |
| Research regarding procedural issues (Laurel Employment Law period)                                                                                                                | 1.0 |
| Compliance with Los Angeles Superior Court Local Rules (Laurel Employment Law period)                                                                                              | 0.5 |
| Review and payment of court filing fees and e-filing fees (Laurel Employment Law period)                                                                                           | 0.2 |
| Coordinate e-filing (Laurel Employment Law period)                                                                                                                                 | 0.3 |
| Review invoices from service providers (Laurel Employment Law period)                                                                                                              | 0.2 |

|                                                                                                     |              |
|-----------------------------------------------------------------------------------------------------|--------------|
| Administrative tasks related to case management and file maintenance (Laurel Employment Law period) | 0.8          |
| <b>SUBTOTAL - LAUREL EMPLOYMENT LAW HOURS:</b>                                                      | <b>130.0</b> |
| <b>TOTAL HOURS (BOTH FIRMS):</b>                                                                    | <b>362.5</b> |

1 **PROOF OF SERVICE**

2 COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a  
4 party to the within action. My business address is 808 Wilshire Blvd, Suite 200, Santa Monica, CA 90401.

5 On January 23, 2026, I served the foregoing document(s) described as **DECLARATION OF**  
6 **WILLIAM HOGG, ESQ. IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL**  
7 **OF CLASS ACTION AND PAGA SETTLEMENT** on all interested parties in this action as set forth  
8 below:

9 TREDWAY LUMSDAINE & DOYLE LLP

Shannon M. Jenkins, ESQ.

Email: [sjenkins@tldlaw.com](mailto:sjenkins@tldlaw.com)

2010 Main Street, Suite 1000

Irvine, California 92614

11 *Attorney for Defendant Laurel Hardware Inc.*

12 Rafael G. Nendel-Flores, Esq.

Email: [rnendelflores@clarkhill.com](mailto:rnendelflores@clarkhill.com)

Anthony Flores, Esq.

Email: [jaflores@clarkhill.com](mailto:jaflores@clarkhill.com)

14 CLARK HILL LLP

555 South Flower Street, 24th Floor

Los Angeles, CA 90071

16 *Attorneys for Defendant Vensure HR Inc.*

17  
18 **X BY ELECTRONICALLY UPLOADING** and submitting the documents through the Labor and  
19 Workforce Development Agency's online filing portal, submission is made in accordance with Labor  
Code section 2699.3(a)

20 **X BY ELECTRONIC SERVICE:** Only by emailing the document(s) listed above to the parties in this  
21 action using the email addresses identified on the above Service List pursuant to Code of Civil Procedure  
§1010.6.

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

Executed on January 23, 2026 at Los Angeles, California.

24 Chelsea Broussard

Chelsea Broussard