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

STANLEY RENE, individually and on
behalf of other members of the general
public similarly situated;

Plaintiff,

vs.

KOCH FILTER CORPORATION, a
Kentucky corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: CVRI2300700

Honorable Harold W. Hopp
Department 1

CLASS ACTION

**DECLARATION OF JOANNA GHOSH IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: October 3, 2024
Time: 8:30 a.m.
Department: 1
Reservation #: 972551561962
Complaint Filed: February 9, 2023
FAC Filed: June 11, 2024
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 Stanley Rene (“Plaintiff”). 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.

EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC

2. Since October 2008, 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 well over a dozen 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 many aspects of California wage and hour law, including, *inter alia*, payment of overtime and minimum wages, provision of meal and rest breaks and/or associated premiums, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, as well as the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

3. Edwin Aiwarzian is the Managing Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension

1 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
2 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
3 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
4 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
5 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
6 Appellate District. In December of 2004, he obtained a license to practice law from the California
7 State Bar. From approximately December 2004 to approximately August 2008, he was employed
8 by a prominent plaintiff-side law firm. At the prominent plaintiff-side law firm, his practice
9 focused on class actions and other complex cases involving toxic torts and products liability. In
10 addition, he gained substantial experience on cases involving insurance bad faith, premises
11 liability, and medical negligence. While employed by the prominent plaintiff-side law firm, he
12 argued approximately one hundred (100) motions, took or defended approximately one hundred
13 fifty (150) depositions, and prepared dozens of expert witnesses for deposition or trial. Since in
14 or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively
15 focused on the prosecution of consumer and employment class actions, involving wage-and-hour
16 claims, race discrimination, unfair business practices, or consumer fraud. While employed by
17 Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over
18 one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial,
19 and attended over one hundred seventy-five (175) mediations. Together with other attorneys at
20 the firm, and in many cases in conjunction with co-counsel, he has successfully litigated cases
21 involving the executive, administrative, and other overtime exemptions to the State of California
22 and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC
23 has successfully obtained class certification by contested motion practice in approximately sixteen
24 (16) cases in the last decade and litigated over 1,000 class action or representative action cases.

25 4. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He
26 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
27 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
28 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the

1 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
2 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
3 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
4 He was admitted to practice law in California in 2010. He is admitted to practice before all courts
5 of the State of California and all United States District Courts in the State of California. He has
6 worked on many wage-and-hour class action and representative action cases, taking the lead in
7 taking and defending depositions, arguing motions, and attending mediations. He has played an
8 integral role in preparing matters for class certification, including and not limited to, successful
9 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
10 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
11 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
12 RG13680477). Under his supervision, dozens of class action or representative cases have resulted
13 in settlements that have been granted court approval, including and not limited to, those listed in
14 paragraph 6 herein. He has handled over one hundred and fifty (150) mediations and worked on
15 over two hundred and fifty (250) class action or representative action cases which have resulted
16 in settlement.

17 5. I, Joanna Ghosh, am a Senior Member of Lawyers *for* Justice, PC. I received a
18 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
19 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
20 Georgetown University Law Center in 2010. I am admitted to practice in California (since 2010)
21 and in New York (since 2013) and I am also admitted to practice in all U.S. District Courts in
22 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
23 Court. I have taken and defended dozens of depositions and successfully handled motion practice
24 in class action cases regarding discovery (including and not limited to, regarding class contact
25 information), class certification (both contested class certification and stipulated class
26 certification), arbitration agreements, coordination, and intervention. I have successfully handled
27 briefing and oral argument on appeal, and obtained notable decisions regarding, the Private
28 Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential*

1 *Overall Supply* (2019) 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May
2 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175.
3 I have significant experience with class actions, including and not limited to working on cases to
4 obtain class certification through contested motion practice and working on cases in the post-
5 certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study,
6 and trial preparation in conjunction with co-counsel in a case involving a certified class consisting
7 of approximately 2,600 individuals). I also have extensive experience with class action and/or
8 representative action settlements, and have handled this process in over three hundred (300) cases.
9 Under my, Edwin Aiwazian, and Arby Aiwazian’s supervision, the firm has handled the class
10 certification and court approval process for hundreds of class action and/or representative action
11 matters that have successfully resolved. I am a member of the California Employment Lawyers
12 Association and, on several occasions, have been a speaker regarding topics in wage and hour law
13 at the organization’s continuing legal education events.

14 ***EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND***
15 ***REPRESENTATIVE ACTION CASES***

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

26 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a manufacturer of food service
28 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final

1 approval of the class and PAGA representative action settlement. The Orange County Superior
2 Court Case Number is 30-2015-00810013-CU-OE-CXC.

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

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

13 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
14 representative action against a food company on behalf of non-exempt employees. On June 30,
15 2017, the court granted final approval of the class and PAGA representative action settlement. The
16 Sacramento County Superior Court Case Number is 34-2015-00175871.

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

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

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

1 BC577233.

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

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

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

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

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

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

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

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

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

22 hh) LFJ, in association with co-counsel therein, represented the plaintiff in a
23 wage-and-hour class and PAGA representative action against a medical equipment supplier on
24 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
25 for class certification and certified a class. On November 2, 2023, the court granted final approval
26 of the class and PAGA representative action settlement. The San Bernardino County Superior
27 Court Case Number is CIVDS1505744.

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1 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
2 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
3 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
4 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
5 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval
6 of the PAGA representative action settlement. The San Diego County Superior Court Case
7 Number is 37-2016-00005578-CU-OE-CTL.

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

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

20 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
21 wage-and-hour class and PAGA representative action against a plastic packaging company on
22 behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs' motion
23 for class certification and certified a class. On November 8, 2021, the court granted approval of
24 the partial settlement of the action. On April 22, 2024, the court granted approval of the PAGA
25 settlement and entered an order dismissing the action. The San Bernardino County Superior Court
26 Case Number is CIVDS1507361.

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

nn) LFJ represented the plaintiff in a wage-and-hour class action against a nutritional products manufacturer on behalf of non-exempt production line employees. On December 13, 2021, the court granted the plaintiff's motion for class certification in part and certified a class. On January 16, 2024, the court granted final approval of the class and PAGA representative action settlement. The Solano County Superior Court Case Number is FCS051001.

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

pp) LFJ represents the plaintiffs in a wage-and-hour class action against a chain of restaurants on behalf of non-exempt employees. On July 22, 2024, the court granted in part the plaintiffs' motion for class certification and certified a class. The San Francisco Superior Court Case Number is CGC-20-582809.

SUMMARY OF WORK PERFORMED

7. Several attorneys at Lawyers for Justice, PC have worked on the above-captioned putative class action that was commenced on February 9, 2023 ("Class Action") and the PAGA representative action that was commenced on February 9, 2023 entitled *Stanley Rene v. Koch Filter Corporation*, Riverside County Superior Court Case No. CIVRI2300698 ("PAGA Action"), since their inception. Lawyers for Justice, PC has worked closely with JCL Law Firm, APC and Zakay Law Group, APLC in the pursuit of the matter since they were associated in as co-counsel, and our work with them has been a coordinated and combined effort. Together, Lawyers for

Justice, PC, JCL Law Firm, APC and Zakay Law Group, APLC are referred to as “Class Counsel.”

8. Collectively, Class Counsel investigated the veracity, strength, and scope of the claims, and worked on preparing the cases for class certification and trial, prior to reaching the Settlement. This matter involved extensive and ongoing investigations and research into legal and factual issues, and formal and informal discovery. Class Counsel obtained information from Plaintiff and percipient witnesses, reviewed and analyzed a volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources, researched applicable law, and undertook analyses and calculations of the value of claims, damages, and penalties exposure. Class Counsel also met and conferred with Defendant’s counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, formal and informal discovery, and production of information, documents, and data in the course of litigation and mediation and settlement negotiations, and the mediation and settlement negotiations. Other work that Class Counsel has performed and/or will perform include, *inter alia*, case strategy and analysis; drafting, reviewing, and revising the pleadings, motion-related papers, and settlement-related papers; case management; claims assessment and evaluation; and preparing for and attending court proceedings and the mediation and settlement negotiations.

9. As outlined herein, the parties have conducted significant investigations and discovery during the course of litigating this matter. Class Counsel analyzed a volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. This information, documents, and data 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 all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Accordingly, sufficient investigation and review of information has taken place in order for the parties to be sufficiently informed of the nature and extent of the claims, and to enable all parties to fully evaluate the Settlement for its fairness, adequacy, and reasonableness.

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1 10. After conducting significant investigation of the facts and law during the prosecution
2 of the cases, counsel for the parties engaged in mediation and extensive settlement negotiations to
3 try to resolve the cases. During all settlement discussions, the parties conducted their negotiations
4 at arm's length in an adversarial position. In the course of the mediation and settlement
5 negotiations, the parties discussed all aspects of the cases, including the risks and delays of further
6 litigation proceedings, class certification, and/or trial, the law relating to, *inter alia*, class
7 certification, off-the-clock theory, meal and rest periods, rounding, regular rate, sick pay, PAGA
8 representative claims, and wage-and-hour enforcement, as well as the evidence produced and
9 analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was
10 acceptable to the parties was not easy. After conducting extensive investigations, formal and
11 informal discovery, and settlement negotiations, and with the aid of the mediator's evaluations,
12 the parties have agreed to resolve the cases given the legal issues relating to Plaintiff's principal
13 claims, as well as the costs and risks to both sides that would attend further litigation, and the real
14 possibility of no recovery after years of litigation.

15 11. The Settlement provides for a Class Representative Service Award in an amount not
16 to exceed Five Thousand Dollars and Zero Cents (\$5,000.00) to Plaintiff. The contemplated
17 service award is fair and appropriate in light of the time and effort that Plaintiff expended to pursue
18 the cases. Plaintiff was available whenever Class Counsel needed him, actively tried to obtain and
19 provide information, and spent a substantial amount of time and effort providing the facts and
20 evidence necessary to facilitate prosecution of the cases. Accordingly, it is appropriate and just
21 for Plaintiff to receive a reasonable service award for his services in the cases, in addition to his
22 individual settlement payment under the Settlement.

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

25 Executed on this 10th day of September 2024 at Glendale, California.

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27 

28 _____
Joanna Ghosh