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

**ELDER CARE ALLIANCE AND
ALMAVIA WAGE AND HOUR CASES**

Included Actions:

MARITES BALLESTEROS v. ELDER
CARE ALLIANCE OF SAN FRANCISCO
INC. dba ALMAVIA OF SAN
FRANCISCO, et al. Superior Court of
California, County of San Francisco, Case
No. CGC-21-588913

YESENIA ARIAS v. ELDER CARE
ALLIANCE, et al. Superior Court of
California, County of Alameda, Case No.
RG21090600

YESENIA ARIAS v. ELDER CARE
ALLIANCE, et al. Superior Court of
California, County of Alameda, Case No.
RG21102829

MARTA AGUILAR v. ELDER CARE
ALLIANCE OF SAN RAFAEL INC., et al.
Superior Court of California, County of
Alameda, Case No. RG21107053

MARIA TABUYO v. MERCY
RETIREMENT AND CARE CENTER
AND ELDER CARE ALLIANCE INC., et
al.
Superior Court of California, County of
Alameda, Case No. 22CV022908

MARITES BALLESTEROS v. ELDER
CARE ALLIANCE OF SAN FRANCISCO
INC. dba ALMAVIA OF SAN
FRANCISCO, et al. Superior Court of
California, County of
Alameda, Case No. 23CV046186

Case No.: RG21090600 (Lead Case)
CGC-21-588913 (San Francisco);
RG21090600;
RG21102829;
RG21107053;
22CV022908;
23CV046186

Honorable Somnath Raj Chatterjee
Department 21

CLASS ACTION

**DECLARATION OF BRIAN J. ST. JOHN IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS AND
SERVICE AWARDS**

Date: December 9, 2025
Time: 2:00 p.m.
Department: 21

Ballesteros SF Action filed: January 13, 2021
Arias Class Action filed: March 3, 2021
Arias PAGA Action filed: June 24, 2021
Aguilar Action filed: July 29, 2021
Tabuyo Action filed: November 30, 2021
Ballesteros AM Action: October 2, 2023
Filed:

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DECLARATION OF BRIAN J. ST. JOHN

I, Brian J. St. John, 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 Yesenia Arias (“Plaintiff Arias”) in *Arias v. Elder Care Alliance*, Alameda Superior Court, Case No. RG21090600 (“*Arias* Class Action”) and *Arias v Elder Care Alliance*, Alameda Superior Court, Case No. RG21102829 (“*Arias* PAGA Action”) (together, the “*Arias* Actions”), included actions in the above-captioned consolidated actions. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On June 12, 2025, in Department 21 of the above-entitled court (“Court”), the Honorable Somnath Raj Chatterjee preliminarily approved the Amended Settlement Agreement With Changes Per Court’s Tentative Order on Preliminary Approval (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs Yesenia Arias, Marites Ballesteros, Maria Tabuyo, and Marta Aguilar (collectively, “Plaintiffs”) and Elder Care Alliance, AlmaVia of San Francisco, Elder Care Alliance of San Francisco, Elder Care Alliance of San Rafael, and Mercy Retirement and Care Center (collectively “Defendants”) (together, Plaintiffs and Defendants are referred to as the “Parties”). The Court conditionally certified the Class for settlement purposes, preliminarily appointed Plaintiffs to represent the Class (“Class Representatives”), and preliminarily appointed and designated Lawyers *for* Justice, PC, The Ottinger Firm, P.C., Wilshire Law Firm, and Work Lawyers P.C. (collectively, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Proposed Settlement of Class Action and Hearing Date for Final Court Approval (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed CPT Group, Inc. (“CPT” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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WORK PERFORMED BY CLASS COUNSEL

3. Lawyers for Justice, PC has been actively engaged in this litigation from the inception of the *Arias* Class Action, which was filed March 3, 2021, and the *Arias* PAGA Action, which was filed June 24, 2021, and throughout the pendency of those cases. Lawyers for Justice, PC eventually joined forces with other plaintiff's counsel, The Ottinger Firm, P.C., counsel for Plaintiff Marites Ballesteros ("Plaintiff Ballesteros"), who commenced the action entitled *Marites Ballesteros v. AlmaVia of San Francisco et al.*, San Francisco Superior Court, Case No. CGC-21-588913 ("*Ballesteros* Action"), which was filed January 13, 2021 and re-filed in the Alameda Superior Court, Case No. 23CV046186 on October 2, 2023, Wilshire Law Firm, counsel for Plaintiff Maria Tabuyo ("Plaintiff Tabuyo"), who commenced the action entitled *Maria Tabuyo v. Mercy Retirement and Care Center*, Alameda County Superior Court, Case No. 22CV022908 ("*Tabuyo* Action"), which was filed November 30, 2021, and Work Lawyers P.C., counsel for Plaintiff Marta Aguilar ("Plaintiff Aguilar"), who commenced the action entitled *Marta Aguilar v. Elder Care Alliance of San Rafael*, Alameda Superior Court, Case No. RG21107053 ("*Aguilar* Action"), which was filed July 29, 2021. On April 19, 2024, the *Arias* Class Action, *Arias* PAGA Action, *Ballesteros* Action, *Tabuyo* Action, and *Aguilar* Action (collectively, the "Actions") were consolidated, with the *Aria* Class Action designated as the lead action. Together, Class Counsel have worked cooperatively in a coordinated and combined effort to strategize and prosecute the matter, and areas of responsibility were divided between the firms so as to avoid unnecessary duplication of work and effort. When the abilities of experienced and skilled co-counsel were needed, however, the firms worked together. Lawyers for Justice, PC actively participated in all aspects of litigation, including and not limited to, investigation and research, preparing the pleadings, litigation and case strategy, motion practice, court proceedings, and claims evaluation and analysis in the *Arias* Actions. Upon joining forces with other plaintiff's counsel, Lawyers for Justice, PC collaborated and coordinated with The Ottinger Firm, P.C., Wilshire Law Firm, and Work Lawyers P.C regarding litigation and case strategy, claims evaluation and analysis, mediation and settlement discussions, and preparation of settlement-related papers. Ultimately, Class Counsel's efforts and the efforts of Plaintiffs

1 have been successful in reaching the Settlement.

2 4. Before initiating the *Arias* Class Action and *Arias* PAGA Action, Lawyers *for*
3 Justice, PC conducted extensive investigation and research into the facts and circumstances
4 underlying the pertinent factual and legal issues and applicable law. This required thorough
5 discussions and interviews between attorneys at our firm and Plaintiff Arias, and research into
6 the various legal issues involved in the case, namely, the current state of the law as it applied to
7 class certification, off-the-clock theory, meal and rest periods, PAGA representative claims,
8 wage-and-hour enforcement, Plaintiff Arias' claims and damages, and potential defenses. After
9 conducting initial investigation, our firm determined that Plaintiff Arias' claims were well-
10 suited for class action treatment and representative adjudication owing to what appeared to be a
11 common course of conduct affecting a similarly situated group of current and former hourly-
12 paid or non-exempt employees who worked for Defendant Elder Care Alliance within the State
13 of California, who were not properly compensated for, *inter alia*, all hours worked, non-
14 compliant meal and rest periods, and unreimbursed business expenses.

15 5. Lawyers *for* Justice, PC has investigated the veracity, strength, and scope of the
16 claims, and worked on preparing the cases for class certification and trial, prior to reaching the
17 Settlement. The Arias Actions have involved extensive and ongoing investigations, research
18 into legal and factual issues, and informal discovery. Class Counsel obtained information,
19 documents, and data in the course of litigation and in connection with mediation and settlement
20 negotiations. Lawyers *for* Justice, PC reviewed and analyzed a volume of information,
21 documents, and data obtained from Plaintiffs, Defendants, and other sources, researched
22 applicable law, and undertook analyses and calculations of the value of claims, damages, and
23 penalties exposure. Lawyers *for* Justice, PC also met and conferred with Defendants' counsel
24 on numerous occasions, e.g., to discuss issues relating to the pleadings, case management,
25 discovery and production of information, documents, and data in the course of litigation and
26 mediation and settlement negotiations, and mediation and settlement negotiations. Other work
27 that Lawyers *for* Justice, PC has performed includes, and is not limited to, case strategy and
28 analysis; drafting, reviewing, and revising the pleadings; claims assessment and evaluation; and

1 preparing for and attending mediation and settlement negotiations.

2 6. As outlined herein, the parties have conducted significant investigations and
3 exchange, review, and analysis of a volume of information, documents, and data obtained from
4 Plaintiffs, Defendants, and other sources during the course of litigating the cases and in
5 connection with mediation and settlement negotiations. This information, documents, and data
6 provided a critical understanding of the nature of the work performed by putative class members
7 and aggrieved employees, as well as Defendants' operations and employment policies, practices,
8 and procedures, and were used in analyzing liability, damages, and penalties valuation issues in
9 connection with all phases of the litigation, and ultimately, in connection with the mediation and
10 settlement negotiation process. Accordingly, sufficient investigation and review of information
11 has taken place in order for the parties to be sufficiently informed of the nature and extent of the
12 claims, and to enable all parties to fully evaluate the Settlement for its fairness, adequacy, and
13 reasonableness.

14 7. After conducting significant investigation of the facts and law during the
15 prosecution of the case, counsel for the parties engaged in mediation and extensive settlement
16 negotiations to try to resolve the case. These efforts included participating in mediation with
17 Mark Rudy, Esq., a well-regarded mediator who is experienced in mediating complex labor and
18 employment matter. During all settlement discussions, the parties conducted their negotiations
19 at arm's length in an adversarial position. In the course of mediation and settlement negotiations
20 the parties discussed and considered all aspects of the case, including the risks and delays of
21 further litigation, the risks to the parties of proceeding with class certification, and/or trial, the
22 law relating to class certification, off-the-clock theory, meal and rest periods, and wage-and-
23 hour enforcement, as well as the evidence produced and analyzed, and the possibility of appeals,
24 among other things. However, the parties were unable to resolve these Actions after the first
25 round of mediation on August 11, 2022. Thus, the parties later agreed to attend a second round
26 of mediation with Mr. Rudy again on March 21, 2023 which ultimately resulted in a resolution
27 of the Actions. Arriving at a settlement that was acceptable to the parties was not easy. After
28 conducting extensive investigations and settlement negotiations, and with the aid of the

mediator's evaluation, the parties have agreed to resolve the cases given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to both sides that would attend further litigation, and the real possibility of no recovery after years of litigation. Ultimately, the parties reached a resolution, obviating the need to file a contested class certification motion or trial.

8. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$1,925,000.00, which is thirty-five percent (35%) of the Gross Settlement Amount of \$5,500,000.00. Pursuant to the contingency fee agreements entered into by Plaintiff Arias and Lawyers *for* Justice, PC, Plaintiff Arias has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

9. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the action; (2) the time, effort, and expense that Class Counsel dedicated to the action; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the action; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter.

10. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has performed many hours of work in connection with prosecuting this action such that the requested attorneys' fees award is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **461.30 hours** performing tasks to obtain a recovery on behalf of Plaintiffs, Class Members, PAGA Settlement Group Members, and the State of California. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred in performing those services. These hours include work done by several attorneys at the firm. Also, separate from the hours references herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of the case.

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

12. Applying the rate of \$850 per hour to 461.30 hours worked by Lawyers for Justice, PC, would place a base lodestar value of \$392,105.00 on the services provided by Lawyers for Justice, PC.

EXPERIENCE AND ADEQUACY OF LAWYERS for JUSTICE, PC

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

Private Attorneys General Act (“PAGA”) representative actions. Lawyers *for* Justice has successfully litigated cases involving executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Lawyers *for* Justice, PC, sometimes in association with other law firms, has recovered millions of dollars on behalf of thousands of individuals in California.

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

1 over 1,000 class action or representative action cases.

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

21 16. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a
22 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
23 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
24 Georgetown University Law Center in 2010. She is admitted to practice in California (since
25 2010) and in New York (since 2013) and is admitted to practice in all U.S. District Courts in
26 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S.
27 Supreme Court. She has taken and defended dozens of depositions and successfully handled
28 motion practice in class action cases regarding discovery (including and not limited to, regarding

class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and has handled this process in over five-hundred (500) cases. Under Edwin Aiwasian, Arby Aiwasian, and her supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. She is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

17. I am a member of Lawyers for Justice, PC. I received my Bachelor's degree from the University of California, San Diego in 2010 and earned my Juris Doctor degree from the University of California, Berkeley, School of Law in 2013. I was admitted to practice law in California in 2015. I am admitted to practice before all courts of the State of California and all federal district courts in the State of California. I have worked on many wage and hour class action and PAGA representative matters, and my work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation and analysis, and making court appearances. Prior to working at Lawyers for Justice, PC, I spent several years working for a boutique employment and labor law firm representing employers,

1 and, in 2019 and 2020, I was employed as general counsel for a DMHC licenses discount dental
2 plan.

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

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

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

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

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

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

27 e) LFJ, in association with co-counsel therein, represented the plaintiff in a
28 wage-and-hour class and PAGA representative action against a bank, involving allegations of

1 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
2 granted final approval of the class and PAGA representative action settlement. The Kern County
3 Superior Court Case Number is S-1500-CV-273194-LHB.

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

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

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

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

26 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a national retailer of upscale
28 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the

1 court granted final approval of the class and PAGA representative action settlement. The Los
2 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
3 Council Coordination Proceeding Number is 4794.

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

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

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

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

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

27 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
28 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to

1 the employer's motion to compel arbitration, which resulted in a published opinion by the
2 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
3 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
4 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
5 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
6 5046.

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

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

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

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

27 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
28 representative action against a food company on behalf of non-exempt employees. On June 30,

2017, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175871.

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

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

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

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

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

aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a global provider of flexible office

space solutions. On February 15, 2018, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC498401.

bb) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class action against a container manufacturer, on behalf of non-exempt employees. On October 15, 2018, the court granted the plaintiff's motion for class certification. On March 20, 2023, the court granted final approval of the class action settlement. The Tulare County Superior Court Case Number is VCU264528.

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

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

ee) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class action against a parking company on behalf of non-exempt employees. On September 3, 2019, the court granted the plaintiff's motion for class certification and certified a class. On November 7, 2024, the court granted final approval of the class action settlement. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding Number is 4886.

ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt employees. On September 27, 2019, the court granted the plaintiffs' motion for class

certification in part and certified a class. The Alameda County Superior Court Case Number is RG15757606 and the Judicial Council Coordination Proceeding Number is 4921.

gg) 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 apparel and fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

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

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

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

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

14 mm) LFJ in association with co-counsel therein, represented the plaintiffs in a
15 wage-and-hour class action against manufacturer and supplier of power products and services
16 on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
17 motion for class certification and certified a class. On August 27, 2021, the court granted final
18 approval of the class action settlement. The San Diego County Superior Court Case Number is
19 37-2015-00025968-CU-OE-CTL.

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

26 oo) LFJ represents the plaintiffs in a wage-and-hour class action against a
27 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for
28 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. On June 2, 2025, the court granted final approval of the class action settlement and entered an order dismissing the action. 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.

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS *FOR* JUSTICE, PC

19. To date, Lawyers *for* Justice, PC has borne the risks and costs of litigation of the action and will not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$14,002.62** in litigation costs and expenses incurred in this matter, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement.

SERVICE PAYMENTS TO PLAINTIFFS

20. The Settlement provides for Class Representative Service Payments of Seven Thousand Five Hundred Dollars (\$7,700.00) each to Plaintiffs. The contemplated service payments are fair and appropriate in light of the time and effort that Plaintiffs expended to pursue the case. Plaintiffs were available whenever Class Counsel needed them, actively tried to obtain and provide information, and spent a substantial amount of time and effort providing the facts and evidence necessary to facilitate the pursuit of the class and PAGA claims. Accordingly, it is appropriate and just for Plaintiffs to each receive reasonable service payments for their services in the cases, in addition to their individual settlement payments under the Settlement.

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1 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
2 interests of Plaintiff, Class Members, PAGA Settlement Group Members, and the State of
3 California.

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

6 Executed this 13th day of November 2025, at Glendale, California.

7 

8 _____
Brian J. St. John

EXHIBIT A

YESENIA ARIAS V. ELDER CARE ALLIANCE
Alameda Superior Court Case No. RG21090600 (“Class Action”)
Alameda Superior Court Case No. RG21102829 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Yesenia Arias (“Plaintiff Arias”) during the Case	18.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and Percipient Witnesses	15.50
Review and Analyze Court Filings in <i>Marites Ballesteros v. Elder Care Alliance of San Francisco Inc., dba Almavia of San Francisco, et al.</i> , San Francisco Superior Court, Case No. CGC-21-588913; <i>Marites Ballesteros v. Elder Care Alliance of San Francisco Inc., dba Almavia of San Francisco, et al.</i> , Alameda Superior Court, Case No. 23CV046186; <i>Marta Aguilar v. Elder Care Alliance of San Rafael, Inc., et al.</i> , Alameda Superior Court, Case No. RG21107053; and <i>Maria Tabuyo v. Mercy Retirement and Care Center and Elder Care Alliance Inc., et al.</i> , Alameda Superior Court, Case No. 22CV022908	6.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Arias’s Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft Plaintiff Arias’s Class Action Complaint for Damages (filed on March 3, 2021) (Class Action)	7.50
Review Court’s Notice of Hearing (filed on March 8, 2021) (Class Action)	0.10
Review Court’s Minute Order Re: Complex Designation (filed on April 14, 2021) (Class Action)	0.10
Draft Plaintiff Arias’s Notice of Posting Jury Fees (filed on May 3, 2021) (Class Action)	0.10
Draft Plaintiff Arias’s Case Management Conference Statement (filed on May 11, 2021) (Class Action)	1.30

Review Court's Case Management Order and Minute Order (filed on May 18, 2021)	0.10
Review and Analyze Defendant Elder Care Alliance, Inc.'s ("Defendant Elder Care") Answer to Plaintiff Arias's Class Action Complaint (served on May 21, 2021), and Research Affirmative Defenses in Defendant Elder Care's Answer (Class Action)	1.30
Investigate the Merits of Plaintiff Arias's PAGA Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft Plaintiff Arias's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on June 24, 2021) (PAGA Action)	7.10
Review Court's Notice of Case Management Conference and Order and Notice of Assignment of Judge for All Purposes (filed on June 25, 2021) (PAGA Action)	0.10
Review Defendant Elder Care's Substitution of Attorney (filed on July 28, 2021) (Class Action)	0.10
Review Court's Notice of Reassignment of Judge for All Purposes (filed on August 11, 2021) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Case Management Conference Statement (filed on August 24, 2021) (Class Action)	1.50
Draft Plaintiff Arias's Notice of Posting Jury Fees (filed on August 31, 2021) (Class Action)	0.10
Review Court's Case Management Order and Minute Order (filed on September 7, 2021) (Class Action)	0.10
Review Court's Case Management Order and Minute Order (filed on September 15, 2021) (Class Action)	0.10
Review Defendant Elder Care's Notice of Change of Attorney within Handling Firm (filed on October 6, 2021) (Class Action)	0.10
Draft Plaintiff Arias's Notice of Posting Jury Fees (filed on October 7, 2021) (PAGA Action)	0.10
Review Court's Case Management Order (filed on October 19, 2021) (PAGA Action)	0.10
Review and Analyze Defendant Elder Care Alliance of San Rafael's ("Defendant Elder Care San Rafael") Answer to Plaintiff Arias's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (served on November 1, 2021), and Research Affirmative Defenses from Defendant Elder Care San Rafael's Answer (PAGA Action)	1.50

Review Defendant Elder Care San Rafael's Case Management Statement (served on January 11, 2022) (PAGA Action)	0.50
Draft Plaintiff Arias's Case Management Statement (filed on January 14, 2022) (PAGA Action)	1.50
Review Court's Minute Order and Order Re: Non-Appearance Case Review (filed on January 28, 2022) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Trial and All Trial Related Deadlines; and Proposed Order Thereon (submitted on February 28, 2022) (PAGA Action)	1.60
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on March 14, 2022) (Class Action)	1.10
Review Court's Order to Continue Trial and All Trial Related Deadlines (filed on March 18, 2022) (PAGA Action)	0.20
Review Court's Case Management Order and Minute Order (filed on March 22, 2022) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Stipulation and Order Allowing Defendant to File an Amended Answer to Substitute the Correct Party Defendant (submitted on May 27, 2022) (PAGA Action)	1.50
Review Court's Notice of Case Reassignment (filed on June 2, 2022) (PAGA Action)	0.10
Review Defendant Elder Care San Rafael's Notice of Entry of Judgment or Order (served on July 22, 2022) (PAGA Action)	0.10
Review and Analyze Defendant Elder Care Alliance of Camarillo's ("Defendant Elder Care Camarillo") Amended Answer of Defendant Elder Care Alliance of Camarillo dba Almavia of Camarillo to Unverified Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (served on July 22, 2022), and Research Affirmative Defenses from Defendant Elder Care Camarillo's Answer (PAGA Action)	1.50
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Stipulation to Continue Compliance Hearing Re ADR Completion, Trial and Trial Related Deadlines; and [Proposed] Order (submitted on August 4, 2022) (PAGA Action)	1.30

Review Court's Order to Continue Compliance Hearing Re ADR Completion, Trial and Trial Related Deadlines (filed on August 4, 2022) (PAGA Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on August 12, 2022) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Case Management Conference Statement (filed on September 29, 2022) (Class Action)	1.30
Review Court's Case Management Order and Minute Order (filed on October 11, 2022) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Case Management Conference Statement (filed on November 29, 2022) (Class Action)	1.30
Review Court's Case Management Order and Minute Order (filed on December 6, 2022) (Class Action)	0.10
Review Defendant Elder Care Camarillo's Substitution of Attorney (served on December 27, 2022) (PAGA Action)	0.10
Review Defendant Elder Care's Substitution of Attorney (served on December 27, 2022) (Class Action)	0.10
Review Court's Notice of Case Reassignment (filed on January 5, 2023) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Stipulation to Continue Trial and All Trial Related Deadlines; and [Proposed] Order Thereon (submitted on January 30, 2023) (PAGA Action)	1.50
Review Court's Order Granting Stipulation to Continue Trial and Related Dates (filed on January 30, 2023) (PAGA Action)	0.20
Draft Notice of Entry of Judgment or Order (filed on February 2, 2023) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Case Management Conference Statement (filed on March 1, 2023) (Class Action)	1.50
Review Court's Case Management Order and Minute Order (filed on March 8, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Statement and Notice of Settlement (filed on May 10, 2023) (Class Action)	0.90

Review Court's Case Management Order and Minute Order (filed on May 17, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Notice of Settlement and Joint Stipulation to Vacate Trial Dates; and [Proposed] Order (submitted on May 18, 2023) (PAGA Action)	1.10
Review Court's Order Re: Notice of Settlement and Joint Stipulation to Vacate Trial Dates (filed on May 23, 2023) (PAGA Action)	0.20
Review Court's Notice of Hearing (filed on May 23, 2023) (PAGA Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on May 23, 2023) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Case Management Conference Statement (filed on September 8, 2023) (Class Action)	1.10
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Conference Statement (filed on September 12, 2023) (PAGA Action)	0.90
Review Court's Case Management Order and Minute Order (filed on September 15, 2023) (Class Action)	0.10
Review Court's Case Management Order (filed on September 16, 2023) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Case Management Conference Statement (filed on November 13, 2023) (Class Action)	0.90
Review Court's Minute Order and Order Re: Case Management Conference (filed on November 17, 2023) (Class Action)	0.10
Review Court's Notice of Case Reassignment (filed on December 14, 2023) (Class Action)	0.10
Review Court's Case Management Order (filed on January 10, 2024) (Class Action)	0.10
Review Court's Order Re: Case Management (filed on January 26, 2024) (PAGA Action)	0.10
Review Court's Order Re: Case Management (filed on February 28, 2024) (Class Action)	0.10
Review Court's Notice of Case Reassignment (filed on March 14, 2024) (Class Action)	0.10
Review Court's Notice of Case Reassignment and Notice of Case Rescheduling or Relocation (filed on March 14, 2024) (PAGA Action)	0.10

Review Court's Minute Order and Order Re: Notice of Related Cases (filed on March 26, 2024) (Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference and Minute Order Re: Related Cases (filed on March 26, 2024) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel and Other Plaintiffs' Counsel, and Draft, Review, and Revise Joint Stipulation to Consolidate Case Numbers RG21090600, RG21102829, RG21107053, 22CV022908 and 23CV046186; and [Proposed] Order Thereon (submitted on April 16, 2024) (Class Action)	2.10
Review Court's Order to Consolidate Case Numbers RG21090600, RG21102829, RG21107053, 22CV022908 and 23CV046186 (filed on April 18, 2024) (Class Action)	0.20
Review Court's Minute Order and Order Re: Consolidated Case (filed on April 19, 2024) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Case Management Conference Statement (filed on July 8, 2024) (Class Action)	0.80
Review Court's Minute Order and Order Re: Case Management Conference (filed on July 23, 2024) (Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference and Minute Order Re: Compliance Hearing (filed on July 23, 2024) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Case Management Conference Statement (filed on September 16, 2024) (Class Action)	0.70
Review Defendants Elder Care Alliance, Elder Care Alliance, Inc., Elder Care Alliance of San Rafael, Elder Care Alliance of San Francisco, and Mercy Retirement and Care Center's (collectively, "Defendants") Notice of Appearance of Counsel (served on October 16, 2024) (Class Action)	0.10
Review Court's Notice of Case Reassignment (filed on December 17, 2024) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and Revise Joint Case Management Conference Statement (filed on January 13, 2025) (Class Action)	0.70
Review Court's Minute Order and Order Re: Case Management Conference (filed on February 3, 2025) (Class Action)	0.10

Review Court's Minute Order and Order Re: Case Management Conference (filed on February 3, 2025) (PAGA Action)	0.10
Review Court's Minute Order and Order Re: Case Management Conference (filed on March 4, 2025) (Class Action)	0.10
Review Court's Minute Order and Order Re: Case Management Conference (filed on March 4, 2025) (PAGA Action)	0.10
Review Court's Minute Order and Order Re: Case Management Conference (filed on April 8, 2025) (Class Action)	0.10
Review Court's Minute Order and Order Re: Case Management Conference (filed on April 8, 2025) (PAGA Action)	0.10
Review Court's Minute Order and Order Re: Case Management Conference (filed on September 9, 2025) (Class Action)	0.10
Appearances	
Prepare for and Remotely Attend Case Management Conference (September 15, 2021) (Class Action)	0.90
Discovery and Deposition	
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Yesenia Arias (served on December 18, 2020)	1.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Yesenia Arias (served on February 3, 2021)	5.80
Draft Plaintiff Arias's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Elder Care (served on August 23, 2021) (Class Action)	4.50
Draft Plaintiff Arias's Notice of Deposition of Person Most Knowledgeable at Defendant Elder Care Alliance and Requests for Production of Documents (noticed for November 18, 2021; Organizational Structure) (served on August 23, 2021) (Class Action)	1.30

Draft Plaintiff Arias's Notice of Deposition of Person Most Knowledgeable at Defendant Elder Care Alliance and Requests for Production of Documents (noticed for November 19, 2021; Wage and Hour Practices) (served on August 23, 2021) (Class Action)	1.60
Review Defendant Elder Care Camarillo's Notice of Taking Deposition of Yesenia Arias and Request for Production of Documents (Pursuant to C.C.P. § 2025, §2031) (served on October 20, 2022) (PAGA Action)	0.30
Review Defendant Elder Care Camarillo's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), and Requests for Production of Documents (Set One) to Plaintiff Arias (served on October 21, 2022) (PAGA Action)	0.80
Review Defendant Elder Care's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), and Requests for Production of Documents (Set One) to Plaintiff Arias (served on October 24, 2022) (Class Action)	0.80
Draft Plaintiff Arias's Objections to Defendant Elder Care San Raphael's Notice of Deposition of Plaintiff and Requests for Production of Documents and Gather Documents Produced as Exhibit A [ARIAS_0001 – ARIAS_00295] (served on October 26, 2022) (PAGA Action)	7.50
Review Defendant Elder Care San Rafael's Amended Notice of Taking Deposition of Plaintiff and Request for Production of Documents (Pursuant to C.C.P. § 2025, §2031) (served on October 27, 2022) (PAGA Action)	0.20
Draft Plaintiff Arias's Objections to Defendant Elder Care San Rafael's Amended Notice of Deposition of Plaintiff and Request for Production of Documents (served on October 27, 2022) (PAGA Action)	3.50
Review Defendant Elder Care Camarillo's Notice of Withdrawal of Notice of Taking Deposition of Yesenia Arias and Request for Production of Documents (Pursuant to C.C.P. § 2025, § 2031) (served on October 27, 2022) (PAGA Action)	0.20
Review Defendant Elder Care's Second Amended Notice of Taking Deposition of Plaintiff and Request for Production of Documents (Pursuant to C.C.P. § 2025, § 2031) (served on October 31, 2022) (Class Action)	0.30
Draft Plaintiff Arias's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Elder Care Alliance and Requests for Production of Documents (noticed for November 16, 2022; Organizational Structure) (served on November 2, 2022) (Class Action)	1.20

Review Defendant Elder Care's Objection to Plaintiff Arias's Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (served on November 4, 2022) (Class Action)	1.10
Draft Plaintiff Arias's Responses to Defendant Elder Cares's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), and Requests for Production of Documents (Set One) and Gather Documents Produced as Exhibit A [ARIAS_0001 – ARIAS_00295] (served on December 5, 2022) (PAGA Action)	8.50
Draft Plaintiff Arias's Responses to Defendant Elder Cares's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), and Requests for Production of Documents and Gather Documents Produced as Exhibit A [ARIAS_0001 – ARIAS_00295] (Set One) (served on December 5, 2022) (Class Action)	6.50
Draft Plaintiff Arias's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Elder Care (served on January 13, 2023) (PAGA Action)	4.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Arias under the Private Attorneys General Act ("PAGA") (served on April 19, 2021)	4.50
Meet with, Draft Correspondence to, and/or Respond to Correspondence from, Defendants' Counsel	23.50
Meet With, Draft Correspondence to, and/or Respond to Correspondence from, Other Plaintiffs' Counsel	14.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediations	98.50
Prepare for August 11, 2022 Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support of the Mediation Brief (submitted on August 4, 2022), and Performing Damages and Penalties Analyses and Calculations	38.50
Attend Mediation Session (August 11, 2022; via Zoom Video Conference)	10.50

Prepare for March 21, 2023 Mediation, Including Researching Settlement-Related and Merits-Related Issues (including, <i>inter alia</i> , Defendants' Corporate, Business, and Ownership Structure, Corporate, Tax, and Other Filings, and Financial Circumstances), Drafting the Mediation Brief and Compiling the Exhibits in Support of the Mediation Brief (submitted on March 15, 2023), and Performing Damages and Penalties Analyses and Calculations	42.50
Attend Mediation Session (March 21, 2023; via Zoom Video Conference)	14.50
Review and Analyze Mediator's Proposal (accepted April 6, 2023)	2.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action/PAGA Settlement (executed on June 13, 2023)	3.50
Draft, Review, Revise, Negotiate, and Finalize Class Action Settlement Agreement (executed on October 10, 2024), and Draft Notice of Class Action Settlement	16.50
Draft, Review, Revise, Negotiate, and Finalize Amended Settlement Agreement with Changes Per Court's Tentative Order on Preliminary Approval (executed on April 2, 2025; filed on April 3, 2025) and Draft Notice of Class Action Settlement	2.10
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Settlement-Related Inquiries	7.50
Law and Motion	
Review Defendant Elder Care San Rafael's Notice of Motion and Motion for Leave to File an Amended Answer to Substitute the Correct Party Defendant; Declaration of Sharon L. Hightower; and [Proposed] Order Thereon (served on May 27, 2022) (PAGA Action)	1.10
Review Court's Order Re: Hearing on Motion for Leave to Amend Answer (filed on July 19, 2022) (PAGA Action)	0.40
Review Court's Minute Order and Order Re: Hearing on Motion for Leave to Amend Answer (filed on July 21, 2022) (PAGA Action)	0.20
Review Declaration of Robert Ottinger, Declaration of Justin Lo, Declaration of John G. Yslas, and Declaration of Maria Tabuyo, and Research, Draft, Review, and/or Revise Plaintiffs Yesenia Arias, Marites Ballesteros, Marta Aguilar, and Maria Tabuyo's (collectively, "Plaintiffs") Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in	12.50

Support Thereof, Declaration of Brian J. St. John in Support Thereof, and [Proposed] Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on September 25, 2024) (Class Action)	
Review Defendants' Response to Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (served on October 16, 2024) (Class Action)	0.40
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on October 23, 2024) (Class Action)	0.40
Review Court's Minute Order and Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on October 29, 2024) (Class Action)	0.20
Meet and Confer with Defendants' Counsel and Other Plaintiffs' Counsel, and Draft, Review, and Revise Joint Stipulation to Continue the Hearing Date on Plaintiffs' Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on December 3, 2024) (Class Action)	1.50
Review Court's Order to Continue the Hearing Date on Plaintiffs' Motion for Preliminary Approval (filed on December 5, 2024) (Class Action)	0.20
Meet and Confer with Defendants' Counsel and Other Plaintiffs' Counsel, and Draft, Review, and Revise Joint Stipulation to Continue the Hearing Date on Plaintiffs' Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on January 21, 2025) (Class Action)	1.30
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on January 23, 2025) (Class Action)	0.20
Review Court's Order to Continue the Hearing Date on Plaintiffs' Motion for Preliminary Approval (filed on January 24, 2025) (Class Action)	0.10
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on March 2, 2025) (Class Action)	0.40
Review Court's Minute Order and Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on March 4, 2025) (Class Action)	0.40
Review Court's Tentative Ruling Re: Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (published on April 7, 2025) (Class Action)	0.20

Review Court's Minute Order and Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on April 8, 2025) (Class Action)	0.20
Draft, Review, and Revise [Proposed] Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (submitted on April 23, 2025) (Class Action)	0.20
Review Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on June 12, 2025) (Class Action)	0.20
Review <i>Ex Parte</i> Application to Request the Court's Approval of PAGA Notice; Memorandum of Points and Authorities in Support Thereof; Declaration of Katherine Roussos in Support Thereof; and [Proposed] Order Thereon (filed on June 16, 2025) (Class Action)	0.50
Review Court's Order Granting Approval of PAGA Notice (filed on June 20, 2025) (Class Action)	0.20
Meet and Confer with Defendants' Counsel and Other Plaintiffs' Counsel, and Draft, Review, and Revise Joint Stipulation to Continue the Final Approval Hearing and Related Dates and Deadlines; [Proposed] Order Thereon (submitted on August 25, 2025) (Class Action)	1.50
Review Court's Order Granting Stipulation to Continue the Final Approval Hearing and Related Dates and Deadlines (filed on August 26, 2025) (Class Action)	0.10
Review Declaration of Settlement Administrator, Declaration of Robert Ottinger, Declaration of Justin Lo, Declaration of John G. Yslas, Declaration of Maria Tabuyo, Declaration of Marites Ballesteros, and Declaration of Marta Aguilar, and Research, Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Payments, Declaration of Brian J. St. John in Support Thereof, Declaration of Yesenia Arias in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on November 13, 2025)	16.50
Total Hours:	461.30

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Arias vs. Elder Care Alliance

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/18/2020	U.S. Postmaster	Postage	\$7.50
3/3/2021	Legal Document Server, Inc.	Attorney Service	\$200.23
3/3/2021	Alameda Superior Court	Complex Filing Fee	\$1,000.00
3/3/2021	Alameda Superior Court	Complaint Filing Fee	\$435.00
4/21/2021	Legal Document Server, Inc.	Attorney Service	\$150.00
5/3/2021	Legal Document Server, Inc.	Attorney Service	\$135.25
5/4/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
5/11/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
5/11/2021	General Logistics Systems US, Inc.	Courier Service	\$35.72
8/17/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
8/24/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
8/31/2021	Legal Document Server, Inc.	Attorney Service	\$135.25
8/31/2021	Alameda Superior Court	Jury Fee	\$150.00
3/15/2022	Legal Document Server, Inc.	Attorney Service	\$140.00
3/18/2022	Legal Document Server, Inc.	Attorney Service	\$19.30
3/18/2022	Alameda Superior Court	Stipulation & Order Fee	\$20.00
6/14/2022	Mark S. Rudy	Mediation Fee	\$5,500.00
8/5/2022	FedEx Express	Courier Service	\$111.49
9/30/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
10/27/2022	General Logistics Systems US, Inc.	Courier Service	\$23.05
11/29/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
3/1/2023	Legal Document Server, Inc.	Attorney Service	\$18.70
3/10/2023	Mark S. Rudy	Second Mediation	\$3,125.00
5/10/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
9/8/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
11/13/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
1/31/2024	Alameda Superior Court	Document Download Fee	\$53.50
7/8/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
7/25/2024	Alameda Superior Court	Document Download Fee	\$3.00
9/16/2024	Legal Document Server, Inc.	Attorney Service	\$20.45
9/17/2024	Legal Document Server, Inc.	Attorney Service	\$135.00
12/24/2024	Alameda Superior Court	Document Download Fee	\$10.00
1/13/2025	Legal Document Server, Inc.	Attorney Service	\$21.45
2/10/2025	Alameda Superior Court	Document Download Fee	\$3.00
3/5/2025	Alameda Superior Court	Document Download Fee	\$15.50
4/10/2025	Alameda Superior Court	Document Download Fee	\$11.00
8/1/2025	Alameda Superior Court	Document Download Fee	\$9.50
8/26/2025	Legal Document Server, Inc.	Attorney Service	\$22.84

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Arias vs. Elder Care Alliance

8/26/2025	Alameda Superior Court	Document Download Fee	\$69.00
8/26/2025	Alameda Superior Court	Stipulation & Order Fee	\$20.00
9/4/2025	Legal Document Server, Inc.	Attorney Service	\$21.45
Total:			<u>\$12,255.18</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Arias vs. Elder Care Alliance (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/19/2021	U.S. Postmaster	Postage	\$7.16
4/19/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
6/24/2021	Alameda Superior Court	Complaint Filing Fee	\$435.00
6/25/2021	Legal Document Server, Inc.	Attorney Service	\$165.23
7/19/2021	ProLegal	Attorney Service	\$157.25
7/19/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
8/25/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
10/7/2021	One Legal	Attorney Service	\$73.92
10/7/2021	Alameda Superior Court	Jury Fee	\$150.00
1/14/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
2/28/2022	Legal Document Server, Inc.	Attorney Service	\$18.90
2/28/2022	Alameda Superior Court	Stipulation & Order Fee	\$20.00
8/4/2022	Legal Document Server, Inc.	Attorney Service	\$20.05
8/4/2022	Alameda Superior Court	Stipulation & Order Fee	\$20.00
8/12/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
10/24/2022	General Logistics Systems US, Inc.	Courier Service	\$25.15
1/13/2023	General Logistics Systems US, Inc.	Courier Service	\$23.44
1/30/2023	Legal Document Server, Inc.	Attorney Service	\$34.50
1/30/2023	Alameda Superior Court	Motion Fee	\$60.00
2/2/2023	Legal Document Server, Inc.	Attorney Service	\$18.70
2/2/2023	Alameda Superior Court	Document Download Fee	\$1.00
5/23/2023	Legal Document Server, Inc.	Attorney Service	\$39.19
5/23/2023	Alameda Superior Court	Stipulation & Order Fee	\$20.00
9/12/2023	Legal Document Server, Inc.	Attorney Service	\$11.95
9/13/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
1/15/2025	Legal Document Server, Inc.	Attorney Service	\$21.45
2/10/2025	Alameda Superior Court	Document Download Fee	\$3.00
3/5/2025	Alameda Superior Court	Document Download Fee	\$3.00
4/10/2025	Alameda Superior Court	Document Download Fee	\$2.00
8/1/2025	Alameda Superior Court	Document Download Fee	\$12.00
8/12/2025	Alameda Superior Court	Document Download Fee	\$14.00
Total:			<u>\$1,747.44</u>