

Arby Aiwarzian (SBN 269827)  
Joanna Ghosh (SBN 272479)  
Vartan Madoyan (SBN 279015)  
**LAWYERS for JUSTICE, PC**  
450 North Brand Blvd, Suite 900  
Glendale, California 91203  
Tel: (818) 265-1020 / Fax: (818) 265-1021

*Attorneys for Plaintiff Lisa Martini*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

LISA MARTINI and ISAIAH MA, as  
individuals, and on behalf of other members  
of the general public similarly situated;

Plaintiffs,

vs.

SAN FERNANDO VALLEY  
COMMUNITY MENTAL HEALTH  
CENTER, INCORPORATED, a California  
corporation; SAN FERNANDO VALLEY  
COMMUNITY HEALTH, an unknown  
business entity; and DOES 1 through 100,  
inclusive,

Defendants.

Case No.: 23STCV00900

Honorable Elihu Berle  
Department 6

**CLASS ACTION**

**DECLARATION OF VARTAN MADOYAN  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT**

Hearing Date: June 30, 2025  
Time: 9:00 a.m.  
Department: 6

Complaint Filed: January 13, 2023  
Trial Date: None Set

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

13           5.       Collectively, Class Counsel investigated the veracity, strength, and scope of the  
14 claims, and worked on preparing Plaintiffs' action for class certification and trial, prior to  
15 reaching a settlement in this action. Plaintiffs' action has involved extensive and ongoing  
16 investigations, research, and informal discovery into legal and factual issues. Class Counsel  
17 obtained information from Plaintiffs, reviewed and analyzed a volume of information,  
18 documents, and data obtained from Plaintiffs, Defendant, and other sources, researched  
19 applicable law, and undertook analyses and calculations of the value of claims, damages, and  
20 penalties exposure. Class Counsel requested and received a volume of data for purposes of the  
21 mediation, including a significant sample of timekeeping and payroll data for class members and  
22 aggrieved employees, and other documents relevant to the litigation. Class Counsel met and  
23 conferred with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the  
24 pleadings, case management, formal and informal discovery, and production of information,  
25 documents, and data in the course of litigation and mediation. Other work that Class Counsel  
26 performed included, and was not limited to, case strategy and analysis; drafting, reviewing, and  
27 revising pleadings and motion-related papers; case management; claims assessment and  
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1 evaluation; and preparing for and attending court proceedings, mediation, and settlement  
2 negotiations.

3         6. As outlined herein, the parties have conducted significant informal discovery and  
4 investigation in the Action. Class Counsel analyzed a volume of information, documents, and  
5 data obtained from Plaintiffs, Defendant, or other sources. The information, documents, and data  
6 provided a critical understanding of the nature of the work performed by the Class Members and  
7 Aggrieved Employees, as well as Defendant's operations and employment policies, practices,  
8 and procedures, and other employment records which were used in analyzing liability, damages,  
9 and valuation issues in connection with all phases of litigation, and ultimately with the mediation  
10 and settlement negotiation process. Class Counsel also performed significant research into the  
11 applicable law, which is evolving as it relates class certification, off-the-clock theory, rounding,  
12 meal and rest periods, reimbursement of business-related expenses, representative PAGA claims,  
13 wage-and-hour enforcement, Plaintiffs' claims and allegations, and Defendant's defenses thereto,  
14 as well as facts discovered. Accordingly, sufficient investigation and review of information has  
15 taken place in order for the parties to be adequately informed of the nature and extent of the  
16 claims, and to enable all parties to fully evaluate the Settlement for its fairness, adequacy, and  
17 reasonableness.

18         7. After conducting significant investigation of the facts and law during the  
19 prosecution of the case, the Parties engaged in mediation and extensive settlement negotiations to  
20 try to resolve the Action. These efforts included participating in a formal, full-day private  
21 mediation conducted by Hon. Carl J. West (Ret.) on November 1, 2023. During all settlement  
22 discussions, the parties conducted their negotiations at arm's length in an adversarial position. In  
23 the course of mediation and settlement negotiations, the parties discussed all aspects of  
24 Plaintiffs' action, including the risks and delays of further litigation, class certification, and/or  
25 trial, the law relating to, *inter alia*, class certification, off-the-clock theory, meal and rest periods,  
26 PAGA representative claims, and wage-and-hour enforcement, as well as the evidence produced  
27 and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that  
28 was acceptable to all parties was not easy. After conducting extensive investigations, discovery,

1 and settlement negotiations, and with the aid of the mediator's evaluations, the parties have  
2 agreed to resolve Plaintiffs' action given the legal issues relating to Plaintiffs' principal claims,  
3 as well as the costs and risks to both sides that would attend further litigation, and the real  
4 possibility of no recovery after years of litigation

5 8. Plaintiffs move for an award of attorneys' fees to Class Counsel in the amount of  
6 one-third (1/3<sup>rd</sup>) of the escalated Gross Settlement Amount of \$1,666,280.33. Pursuant to the  
7 contingency-fee agreement entered into by and between Plaintiffs and Class Counsel, Plaintiffs  
8 have agreed to a contingency fee of at least one-third (1/3<sup>rd</sup>) of the recovery.

9 9. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel  
10 took in commencing and/or pursuing the Action; (2) the time, effort, and expense that Class  
11 Counsel dedicated to the Action; (3) the skill and determination that Class Counsel have shown;  
12 (4) the substantial results that Class Counsel have achieved throughout the litigation of the  
13 Action; (5) the value of the settlement that Class Counsel have achieved; and (6) the other cases  
14 that Class Counsel have turned down in order to devote their time and efforts to the Action.

15 10. While not necessarily required to be demonstrated because the percentage fee  
16 from the common fund is proper for this settlement, Class Counsel has incurred many hours of  
17 work in connection with prosecuting the Action such that the award of attorneys' fees is also  
18 justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of  
19 **86.50 hours** performing tasks and obtaining recovery in the Action. Attached hereto as  
20 **"EXHIBIT A"** is an Attorney Task and Time Chart that sets forth in detail the nature of the  
21 legal services provided by Lawyers *for* Justice, PC, and the time incurred in performing those  
22 services. The hours attributable to Lawyers *for* Justice, PC include work done by several other  
23 attorneys at the firm and myself. Additionally, separate from the hours of work referenced  
24 herein and in the attached chart, Lawyers *for* Justice, PC had litigation support personnel actively  
25 engaged in assisting with the prosecution of this matter.

26 11. The work performed in this particular matter, the background of our firm, as well  
27 as the individual backgrounds, training, and experience of the attorneys who worked on this  
28 Action, in litigating complex wage-and-hour cases, and in particular, employment class actions

1 and representative actions, support a reasonable blended hourly rate of compensation at the rate  
2 of at least \$850 per hour for work performed by Lawyers *for* Justice, PC. Thus, my firm's base  
3 lodestar is \$73,525.00 (\$850 x 86.50 hours). Lawyers *for* Justice, PC has been awarded  
4 attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services  
5 performed, by courts granting approval of settlements in other wage-and-hour class action and/or  
6 representative action cases: final approval of the class and representative action settlement in  
7 *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No.  
8 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved  
9 compensation at the rate of \$936.47 per hour; final approval of the class and representative  
10 action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court  
11 Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved  
12 compensation at the rate of \$919.57 per hour; final approval of the class and representative  
13 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.  
14 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved  
15 compensation at the rate of \$855.96 per hour.

#### 16 **EXPERIENCE AND ADEQUACY OF**

#### 17 **LAWYERS *for* JUSTICE, PC**

18 12. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the  
19 prosecution of consumer and employment class actions, involving wage-and-hour claims, race  
20 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC  
21 is attorney of record in dozens of employment-related putative class actions in both state and  
22 federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who  
23 focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA")  
24 representative actions. The firm has successfully litigated cases involving nearly every aspect of  
25 California wage and hour law, including payment of overtime and minimum wages, provision of  
26 meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of  
27 compliant wage statements, reimbursement of business expenses, executive, administrative, and  
28 other overtime exemptions to the State of California and federal overtime compensation

1 requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has  
2 recovered (sometimes in association with other law firms) millions of dollars on behalf of  
3 thousands of individuals in California.

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

28 14. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He

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

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

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

17 16. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts  
18 degree in Economics from the University of California, San Diego in 2007, and a Juris Doctor  
19 degree from Loyola Law School in 2011, graduating with Cum Laude and Order of the Coif  
20 honors. I am admitted to practice before all courts in the State of California and all U.S. District  
21 Courts in California. I externed for the Honorable Victoria S. Kaufman of the United States  
22 Bankruptcy Court, Central District of California, from June 2009 to August 2009. I externed for  
23 the Honorable Gary A. Feess of the United States District Court, Central District of California,  
24 from January 2010 to May 2010. From 2011 through and including the present, my practice  
25 consisted almost exclusively of complex wage and hour class action and PAGA action matters in  
26 California. From October 2011 to June 2013, I was an Associate at Littler Mendelson's Century  
27 City, California office, working for one of the largest employer-side labor and employment law  
28 firms in the United States. From July 2013 to March 2014, I was an Associate at Sheppard,

1 Mullin, Richter & Hampton’s Century City, California office. From March 2014 to July 2023, I  
2 worked as an Associate and then as Counsel at Baker Hostetler LLP’s Los Angeles office. From  
3 August 2023 to the present, I have been a Member of Lawyers *for* Justice, PC. I have taken and  
4 defended dozens of depositions and has successfully handled motion practice in class action and  
5 PAGA cases regarding discovery (including and not limited to motions regarding class contact  
6 information), class certification (both contested class certification and stipulated class  
7 certification), dispositive motions, arbitration agreements, coordination, and intervention. I have  
8 successfully handled a complex wage and hour class action and PAGA case through a trial  
9 verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange County Superior Court, Case  
10 No. 30-2013-00692890. I also successfully handled briefing on appeal regarding employer  
11 efforts to compel arbitration. *TitleMax of Cal. v. Pena*, California Court of Appeals for the Fifth  
12 District, Case No. F084706 (Cal. Ct. App. March 28, 2023) (unpublished decision). Further, I  
13 have extensive experience with settlements of class actions and PAGA actions and have handled  
14 and supervised this process in over one hundred (100) cases.

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

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

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

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

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

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

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

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

23 g) LFJ, in association with co-counsel therein, represented the plaintiff in a  
24 wage-and-hour class action against a multinational corporation that provides global workplace  
25 solutions, involving allegations of misclassification of the “Operations Manager” position. On  
26 September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles  
27 County Superior Court Case Number is BC478769.  
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1 h) LFJ, in association with co-counsel therein, represented the plaintiff in a  
2 wage-and-hour class and PAGA representative action against a national retailer of household  
3 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted  
4 final approval of the class and PAGA representative action settlement. The San Francisco  
5 County Superior Court Case Number is CGC-13-532344.

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

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

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

22 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
23 wage-and-hour class action against a national retailer of apparel, accessories, and home products,  
24 involving allegations of misclassification of the “Department Manager” position. On August 12,  
25 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.  
26 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda  
27 County Superior Court Case Number is RG13680477.  
28

1 m) LFJ represented the plaintiff in a PAGA representative action against a  
2 real estate and property management company, on behalf of non-exempt employees. On  
3 November 4, 2016, the court granted approval of the PAGA representative action settlement. The  
4 Orange 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  
7 non-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 foodservice 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  
16 the employer's motion to compel arbitration, which resulted in a published opinion by the  
17 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*  
18 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.  
19 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are  
20 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is  
21 5046.

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

27 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
28 wage-and-hour class and PAGA representative action against a manufacturer of food service

1 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final  
2 approval of the class and PAGA representative action settlement. The Orange County Superior  
3 Court Case Number is 30-2015-00810013-CU-OE-CXC.

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

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

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

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

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

26 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
27 representative action against a manufacturer of plastic containers on behalf of non-exempt  
28 employees. On October 31, 2017, the court granted final approval of the class and PAGA

1 representative action settlement. The Los Angeles County Superior Court Case Number is  
2 BC577233.

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

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

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

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

23 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
24 representative action against a behavioral health service provider on behalf of non-exempt  
25 employees. On November 13, 2018, the court granted final approval of the class and PAGA  
26 representative action settlement. The Alameda County Superior Court Case Number is  
27 RG16811450.  
28

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  
5 Court 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  
14 certification in part and certified a class. The Alameda County Superior Court Case Number is  
15 RG15757606 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, represents 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. The San Bernardino County Superior Court Case  
26 Number is CIVDS1505744.

27 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and  
28 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed

1 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a  
2 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,  
3 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted  
4 approval of the PAGA representative action settlement. The San Diego County Superior Court  
5 Case Number is 34-2016-00005578-CU-OE-CTL.

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

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

18           ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
19 wage-and-hour class action against manufacturer and supplier of power products and services on  
20 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'  
21 motion for class certification and certified a class. On August 27, 2021, the court granted final  
22 approval of the class action settlement. The San Diego County Superior Court Case Number is  
23 37-2015-00025968-CU-OE-CTL.

24           mm) LFJ represents the plaintiff in a wage-and-hour class action against a  
25 nutritional products manufacturer on behalf of non-exempt production line employees. On  
26 December 13, 2021, the court granted the plaintiff's motion for class certification in part and  
27 certified a class. The Solano County Superior Court Case Number is FCS051001.  
28

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

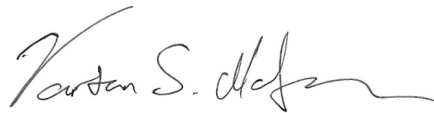
6 **LITIGATION COSTS AND EXPENSES INCURRED BY**

7 **LAWYERS *FOR* JUSTICE, PC**

8 18. To date, Class Counsel have borne all the risks and costs of litigation and will not  
9 receive any compensation until recovery is obtained in the Action. Lawyers *for* Justice, PC  
10 seeks reimbursement of **\$3,807.12** in litigation costs and expenses incurred in the Action, as  
11 reflected in **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in  
12 the prosecution of the Action and to obtain the Settlement.

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

15 Executed this 15th day of April 2025, at Glendale, California.

16  
17 

18 Vartan Madoyan  
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# **EXHIBIT A**

**LISA MARTINI, ET AL. VS. SAN FERNANDO VALLEY COMMUNITY MENTAL HEALTH CENTER, INC.**  
**Los Angeles County Superior Court, Case No. 23STCV00900**

**ATTORNEY TASK AND TIME CHART**

| <b>TASK</b>                                                                                                                                                                                                    | <b>LAWYERS <i>for</i> JUSTICE, PC</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                                              |                                       |
| Meet and Communicate with Plaintiff Lisa Martini (“Plaintiff Martini”)                                                                                                                                         | 11.50                                 |
| Review and Analyze Court Filings in <i>Isaiah Ma v. San Fernando Valley Community Mental Health Center, Inc.</i> , Los Angeles County Superior Court, Case No. 23VECV02797                                     | 2.50                                  |
| Investigate, Meet, Communicate with, and/or Conduct Interviews of Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses                                                                     | 8.50                                  |
| <b>Pleadings and Court Filings</b>                                                                                                                                                                             |                                       |
| Investigate the Merits of Plaintiff Martini’s Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft Plaintiff Martini’s Class Action Complaint for Damages (filed on January 13, 2023) | 9.80                                  |
| Review Court’s Notice of Case Assignment (filed on January 13, 2023)                                                                                                                                           | 0.10                                  |
| Review Court’s Minute Order Re: Initial Status Conference and Initial Status Conference Order (Complex Litigation Program) (filed on January 19, 2023)                                                         | 0.30                                  |
| Review Defendant San Fernando Valley Community Mental Health Center, Incorporated’s (“Defendant’s”) Notice of Appearance (served on February 23, 2023)                                                         | 0.10                                  |

|                                                                                                                                                                          |      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Statement (filed on March 6, 2023)                            | 1.50 |
| Draft Plaintiff Martini's Notice of Posting Jury Fees (filed on March 8, 2023)                                                                                           | 0.10 |
| Review Court's Minute Order Re: Initial Status Conference (filed on March 13, 2023)                                                                                      | 0.10 |
| Draft Plaintiff Martini's Notice of Court's Minute Order (filed on March 15, 2023)                                                                                       | 0.20 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise [Proposed] Order Authorizing Electronic Service (Case Anywhere) (submitted on March 17, 2023) | 0.40 |
| Review and Analyze Defendant's Answer to Plaintiff Martini's Class Action Complaint (served on March 20, 2023), and Research Affirmative Defenses in Defendant's Answer  | 1.50 |
| Review Court's Order Authorizing Electronic Service (Case Anywhere) (filed on March 21, 2023)                                                                            | 0.10 |
| Draft Notice of Entry of Judgment or Order (filed on March 29, 2023)                                                                                                     | 0.10 |
| Draft Notice of Association of Counsel (filed on April 19, 2023)                                                                                                         | 0.10 |
| Review Defendant's Substitution of Attorney (served on May 13, 2023)                                                                                                     | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on June 6, 2023)                                     | 0.30 |
| Review Court's Minute Order Re: Status Conference (filed on June 15, 2023)                                                                                               | 0.10 |
| Review Plaintiff Ma's Notice of Related Case (served on June 28, 2023)                                                                                                   | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on July 7, 2023)                                     | 0.30 |

|                                                                                                                                                                                                                                                                                                    |      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Review Court's Minute Order Re: Status Conference (filed on July 21, 2023)                                                                                                                                                                                                                         | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on November 6, 2023)                                                                                                                                                           | 0.30 |
| Review Court's Minute Order Re: Status Conference (filed on November 21, 2023)                                                                                                                                                                                                                     | 0.10 |
| Draft, Review, and/or Revise Plaintiff Martini's Notice of Ruling Regarding Status Conference (filed on November 27, 2023)                                                                                                                                                                         | 0.10 |
| Review Defendant's Notice of Change of Address (filed on November 28, 2023)                                                                                                                                                                                                                        | 0.10 |
| Draft, Review, and/or Revise First Amended Class Action Complaint for Damages (filed on February 21, 2024), Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation and [Proposed] Order for Leave to File First Amended Complaint (submitted on February 13, 2024) | 1.90 |
| Review Court's Order for Leave to File First Amended Complaint (filed on February 16, 2024)                                                                                                                                                                                                        | 0.10 |
| Review Court's Notice Re: Continuance of Hearing and Order (filed on March 12, 2024)                                                                                                                                                                                                               | 0.10 |
| Review Court's Notice Re: Continuance of Hearing and Order (filed on July 3, 2024)                                                                                                                                                                                                                 | 0.10 |
| <b>Appearances</b>                                                                                                                                                                                                                                                                                 |      |
| Prepare for and Telephonically Attend Status Conference (March 13, 2023)                                                                                                                                                                                                                           | 1.20 |
| Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (November 21, 2024)                                                                                                                                               | 0.50 |
| Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (February 24, 2025)                                                                                                                                               | 0.40 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| <b>Discovery and Deposition</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |       |
| Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Martini (served on October 18, 2022)                                                                                                                                                                                                                                                                                                                              | 4.50  |
| <b>Letters and Correspondence</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |       |
| Draft Correspondence to, Meet and Confer with, and Respond to Correspondence from, Defense Counsel                                                                                                                                                                                                                                                                                                                                                                                                            | 10.50 |
| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |       |
| Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources, Research Settlement-Related and Merits-Related Issues, Perform Claims Evaluation, and Draft, Review, and/or Revise Mediation Brief (mediation on November 1, 2023)                                                                                                                                                                                                                                | 11.50 |
| Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding                                                                                                                                                                                                                                                                                                                                                                                                                                    | 0.50  |
| Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on February 13, 2024), and Draft Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval                                                                                                                                                                                                                                                                               | 1.50  |
| Coordinate Settlement Administration with Settlement Administrator and Ongoing Monitoring of Settlement Administration                                                                                                                                                                                                                                                                                                                                                                                        | 4.50  |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |       |
| Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; Declaration of Jean-Claude Lapuyade in Support Thereof; Declaration of Vartan Madoyan in Support Thereof; Declaration of Shani O. Zakay in Support Thereof; Declaration of Aidin Ghavimi in Support Thereof; Declaration of Plaintiff Lisa Martini | 4.10  |

|                                                                                                                                                                                      |      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| in Support Thereof; Declaration of Isaiah Ma in Support Thereof; and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on February 15, 2024) |      |
| Draft, Review, and/or Revise Amended Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on March 21, 2024)                              | 0.10 |
| Review Court's Minute Order Re: Motion for Preliminary Approval (filed on September 26, 2024)                                                                                        | 0.10 |
| Draft, Review, and/or Revise Second Amended Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on October 15, 2024)                     | 0.10 |
| Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on November 21, 2024)                                                                | 0.10 |
| Review Declaration of Rached N. Newman, Esq. in Support of Plaintiffs' Motion for Preliminary Approval (filed on December 30, 2024)                                                  | 0.50 |
| Review Supplemental Declaration of Rachel N. Newman in Support of Plaintiffs' Motion for Preliminary Approval (filed on January 22, 2025)                                            | 0.20 |
| Review Defendant's Declaration of Timothy Ryder in Support of Plaintiffs' Motion for Preliminary Approval (served on January 22, 2025)                                               | 0.10 |
| Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on February 24, 2025)                                                                | 0.10 |
| Draft, Review, and/or Revise [Proposed] Order Granting Plaintiffs' Motion for Preliminary Approval of Class and PAGA Action Settlement (submitted on February 27, 2025)              | 0.10 |
| Review Supplemental Declaration of Rachel N. Newman in Support of Plaintiffs' Motion for Preliminary Approval (filed on March 3, 2025)                                               | 0.30 |

|                                                                                                                                                                                                                                                                                                                                                                 |       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Review Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement<br>(filed on March 4, 2025)                                                                                                                                                                                                                                | 0.20  |
| Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement,<br>Attorneys' Fees and Litigation Costs, and Class Representative Payment, Declaration of Vartan Madoyan<br>in Support Thereof; Declaration of Settlement Administrator in Support Thereof; and [Proposed] Final<br>Approval Order and Judgment; Review | 4.70  |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                                             | 86.50 |

# **EXHIBIT B**

LAWYERS *for* JUSTICE, PC CASE COST DETAIL  
Martini vs. San Fernando Valley Community Mental Health Center

| <u>Date</u> | <u>Payee</u>                | <u>Expense Description</u> | <u>Amount</u> |
|-------------|-----------------------------|----------------------------|---------------|
| 2/9/2022    | U.S. Postmaster             | Postage                    | \$15.70       |
| 1/17/2023   | Los Angeles Superior Court  | Attorney Service           | \$1,000.00    |
| 1/17/2023   | Legal Document Server, Inc. | Attorney Service           | \$112.81      |
| 1/17/2023   | Los Angeles Superior Court  | Complaint Filing Fee       | \$435.00      |
| 2/2/2023    | ProLegal                    | Attorney Service           | \$204.63      |
| 3/9/2023    | Legal Document Server, Inc. | Attorney Service           | \$151.08      |
| 3/9/2023    | Los Angeles Superior Court  | Jury Fee                   | \$150.00      |
| 3/13/2023   | Legal Document Server, Inc. | Attorney Service           | \$140.95      |
| 3/15/2023   | Legal Document Server, Inc. | Attorney Service           | \$140.95      |
| 3/15/2023   | Los Angeles Superior Court  | Document Download Fee      | \$2.00        |
| 3/17/2023   | Legal Document Server, Inc. | Attorney Service           | \$140.95      |
| 3/29/2023   | Legal Document Server, Inc. | Attorney Service           | \$140.95      |
| 4/20/2023   | Legal Document Server, Inc. | Attorney Service           | \$141.15      |
| 7/3/2023    | Case Anywhere LLC           | Attorney Service           | \$130.95      |
| 10/4/2023   | Case Anywhere LLC           | Attorney Service           | \$135.00      |
| 1/4/2024    | Case Anywhere LLC           | Attorney Service           | \$135.00      |
| 4/2/2024    | Case Anywhere LLC           | Attorney Service           | \$135.00      |
| 7/2/2024    | Case Anywhere LLC           | Attorney Service           | \$135.00      |
| 10/3/2024   | Case Anywhere LLC           | Attorney Service           | \$135.00      |
| 1/8/2025    | Case Anywhere LLC           | Attorney Service           | \$135.00      |
| 2/5/2025    | Case Anywhere LLC           | Attorney Service           | \$45.00       |
| 3/5/2025    | Case Anywhere LLC           | Attorney Service           | \$45.00       |
| Total:      |                             |                            | \$3,807.12    |