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Attorneys for Plaintiff, YVETTE ALLISON WRIGHT on behalf of
herself and all others similarly situated and aggrieved

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

YVETTE CHERRI ALLISON-WRIGHT, an
individual and on behalf of all others similarly
situated,

Plaintiff,

v.

APERTO PROPERTY MANAGEMENT,
INC., a California corporation; and DOES 1
through 100, inclusive,

Defendant.

CASE NO.: 30-2023-01312346-CU-OE-CXC
[*Wright* Action]
Consolidated with Case No. 30-2023-
01327244-CU-OE-CXC [*Barahona* Action]

[Assigned for all purposes to the Hon. Lon
Hurwitz in Dept. CX103]

**DECLARATION OF DAVID D. BIBIYAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

ACTION FILED: March 14, 2023
TRIAL DATE: None set

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2. I submit this declaration in support of Plaintiffs' Motion for Approval of Representative Action Settlement. I believe that the Settlement is fair, reasonable, and adequate in light of the probable outcome of further litigation relating to liability and damage issues.

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1 sponsor of that event.

2 9. Not only have I practiced almost exclusively in this field for years and have
3 contributed to the legal education curriculum for attorneys practicing within it, I am also a
4 published author in the Daily Journal as a contributor in the Wage and Hour and PAGA context,
5 including, in December 15, an article entitled: “PAGA: What’s Gone, What’s Left and What’s
6 Next.” I have also been a quoted source in multiple other publications, including in article pushed
7 by Bloomberg Law dated November 1, 2023 entitled: “Adidas, Home Depot Sued in Test Cases
8 on Job Ad Pay Transparency.”

9 10. My firm has the experience, resources and means necessary to allow us to provide
10 adequate representation as Class Counsel to all class members in this litigation.

11 11. I have filed contested motions for class certification in the past and have been
12 appointed Class Counsel by the Superior Court of California in the past for purposes of certifying
13 a class. Some examples of Actions in which I was appointed Class Counsel include:

14 • *Santoyo v. Consolidated Foundries, Inc.*, Case No. BC612298, California Superior Court,
15 County of Los Angeles, Honorable Judge Ann I. Jones, presiding.

16 • *Arendorff v. Stanley Steamer International, Inc.*, Case No. BC681368, California
17 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos, presiding.

18 • *Barreto v. Don Roberto Jewelers, Inc.*, Case No. BC495451, California Superior Court,
19 County of Los Angeles, Honorable Ann I. Jones, presiding.

20 • *Junior Amilcar Laguna Gonzalez v. Takaaki Koyama*, Case No. BC641998, Los Angeles
21 Superior Court, Honorable Elihu M. Berle, presiding.

22 • *Rios v. Nongshim America, Inc.*, Case No. CIVDS1807390, California Superior Court,
23 County of San Bernardino, Honorable David S. Cohn, presiding.

24 • *Stoddard v. Molded Fiber Glass – West*, Case No. 1517758, California Superior Court,
25 County of San Bernardino, Honorable David S. Cohn, presiding.

26 • *Mata v. Sahara Scaffold, Inc.*, Case No. CIVDS1810785, California Superior Court,
27 County of San Bernardino, Honorable David S. Cohn, presiding.

28 • *Carrasco v. Pure Dental Solutions*, Case No. BC645995, Los Angeles Superior Court,

1 Honorable Kenneth R. Freeman, presiding.

2 • *Gonzalez v. Gochez, et al.*, Case No. BC648729, Los Angeles Superior Court, Honorable

3 Maren Nelson, presiding.

4 • *Montoya v. Superior Paving Co.*, Case No. CIVDS1833422, County of San Bernardino,

5 Honorable David S. Cohn, presiding.

6 • *Lopez v. Norred & Associates, Inc.*, Case No. CIVDS1824109, California Superior Court,

7 County of San Bernardino, David S. Cohn, presiding.

8 • *Noyola v. Lacren, LLC*, Case No. BC717024, California Superior Court, County of Los

9 Angeles, Hon. Anthony Mohr, presiding.

10 • *Luciano, et al. v. O'Tasty Foods, Inc., et al.*, Case No. BC711988, California Superior

11 Court, County of Los Angeles, Honorable Maren Nelson, presiding.

12 • *Gordon v. Hospice Source, LLC*, Case No. 34-2018-00250022-CU-OE-GDS, California

13 Superior Court, County of Sacramento, Honorable Christopher E. Krueger, presiding.

14 • *Barragan v. Refrigeration Supplies Distributor*, Case No. 19STCV09312, California

15 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;

16 • *Ramirez v. Acre Gourmet, Inc.*, Case No. CGC-19-575117, California Superior Court,

17 County of San Francisco, Honorable Andrew Y.S. Cheng, presiding.

18 • *Villafuerte v. Bay Alarm Company*, Case No. BC689110, California Superior Court,

19 County of Los Angeles, Honorable Amy D. Hogue, presiding.

20 • *Cazares v. Areas USA LAX, LLC*, Case No. 19STCV08209, California Superior Court,

21 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding.

22 • *Magana v. Castlerock Environmental, Inc., et al.*, Case No. 19STCV38353, California

23 Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding.

24 • *Chilel v. Sushi California, Inc.*, Case No. 19STCV08209, California Superior Court,

25 County of Los Angeles, Honorable Ann I. Jones, presiding.

26 • *Malone v. Orange Courier, Inc., et al.*, Case No. 30-2016-00763474, California Superior

27 Court, County of Orange, Honorable Glenda Sanders, presiding.

28 • *Rivera v. Talamo Food Services, Inc.*, Case No. 19CV355856, California Superior Court,

1 County of Santa Clara, Honorable Patricia M. Lucas, presiding.
2 • *Olguin v. Cal Central Harvesting, Inc.*, Case No. 18CV03860, California Superior Court,
3 County of Santa Barbara, Honorable James F. Rigali, presiding.
4 • *Pence v. Sober Living by the Sea, Inc.*, Case No. 2018-00988742, California Superior
5 Court, County of Orange, Honorable Randall J. Sherman, presiding.
6 • *Franco v. Vincent Rags, Inc.*, Case No. 20STCV07768, California Superior Court,
7 County of Los Angeles, Honorable Ann I. Jones, presiding.
8 • *Cabral v. Miller Castings, Inc.*, Case No. 19STCV39556, California Superior Court,
9 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding.
10 • *Bolanos v. Texas Roadhouse, Inc.*, Case No. 19STCV39556, California Superior Court,
11 County of Los Angeles, Honorable Sunshine Sykes, presiding.
12 • *Rodriguez v. Scott A. Humphreys, Inc.*, Case No. 30-2021-01184556-CU-OE-CXC,
13 California Superior Court, County of Ventura, Honorable Matthew P. Guasco, presiding.
14 • *Torres v. Primal Pet Foods, Inc.* Case No. FCS054783, California Superior Court,
15 County of Solano, Honorable Wendy G. Getty, presiding.
16 • *Hanson v. Zapata Nuccio, Inc.*, Case No. 20STCV28951, California Superior Court,
17 County of Los Angeles, Honorable Elihu M. Berle, presiding.
18 • *Molina v. Avibank Mfg, Inc.*, Case No. 20STCV03910, California Superior Court, County
19 of Los Angeles, Honorable John P. Doyle, presiding.
20 • *Cetina v. Lawry's Restaurants, Inc.*, Case No. 19STCV05201, California Superior Court,
21 County of Los Angeles, Honorable Amy D. Hogue, presiding;
22 • *Luna v. Pronto California General Agency, LLC*, Case No. 19STCV39951, California
23 Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding.
24 • *Alvarez v. Kazak-Mars, Inc.*, Case No. 20STCV42587, California Superior Court, County
25 of Los Angeles, Honorable Elihu M. Berle, presiding.
26 • *Noe v. My Pillow, Inc.* Case No. CIVDS 2011360, California Superior Court, County of
27 San Bernardino, Honorable David Cohn, presiding.
28 • *Nunez v. 2751 West Coast Acquisition Company*, Case No. 30-2020-01145215-CU-

1 OE-CXC, California Superior Court, County, County of Orange, Honorable Randall J. Sherman,
2 Presiding.

3 • *Smith v. McMillen Enterprises, Inc.*, Case No. CV-20-002938, California Superior Court,
4 County of Stanislaus, Honorable John R. Mayne, presiding.

5 • *Turner v. Plant Prefab Inc., et al.*, Case No. CIVDS2017517, California Superior Court,
6 County of San Bernardino, Honorable David Cohn, presiding.

7 • *Duran v. Fresh Select, LLC*, Case No. VCU284892, California Superior Court, County
8 of Tulare, Honorable Bret Hillman, presiding.

9 • *Reynoso, et al. v. Cream of the Crop AG Service, Inc.*, Case No. VCU278847, California
10 Superior Court, County of Tulare, Honorable Bret Hillman, presiding.

11 • *Michel v. Universal Waste Systems, Inc.*, Case No. 19STCV46181, California Superior
12 Court, County of Los Angeles, Honorable David S. Cunningham presiding.

13 • *Jungers v. U.S. Borax Inc., et al.*, Case No. BCV-21-10003, California Superior Court,
14 County of Kern, Honorable Bernard C. Barmann Jr. presiding.

15 • *Fortune v. Amoroso Limited Partnership, et al.*, Case No. 20STCV25874, California
16 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding.

17 • *Montoya, et al. v. Remo, Inc.* Case No. 20STCV34614, California Superior Court, County
18 of Los Angeles, Honorable Maren Nelson presiding.

19 • *Rincon, et al. v. New-Indy Tripaq, LLC, et al.* Case No. 20STCV17118, California
20 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding.

21 • *De Leon, et al. v. Wismettac Asian Foods, Inc.* Case No. 19STCV18172, California
22 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding.

23 • *Tapia v. Mercer Foods, Inc.* Case No. CV-21-000020, California Superior Court,
24 County of Stanislaus, Honorable Sonny S. Sandhu presiding.

25 • *Molina v. Reser's Fine Foods, Inc.* Case No. 37-2021-00013052-CU-OECTL, California
26 Superior Court, County of San Diego, Honorable Eddie C. Sturgeon presiding.

27 • *Reyes v. Imperial Sprinkler Supply, Inc.* Case No. 30-2020-01167748-CU-OE-CXC,
28 California Superior Court, County of Los Angeles, Honorable Peter Wilson presiding.

1 • *Zavala, et al. v. PLS Check Cashers, Inc.*. Case No. 20STCV42586, California Superior
2 Court, County of Los Angeles, Honorable Elihu M. Berle presiding.

3 • *Paz v. Hill Brothers Chemical Company*. Case No. 20STCV48279, California Superior
4 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding.

5 • *Garcia v. Inwesco Incorporated*. Case No. 20STCV46833, California Superior Court,
6 County of Los Angeles, Honorable Carolyn B. Kuhl presiding.

7 • *Guevara v. J&K Culver, LLC, et al.*. Case No. 19STCV39951, California Superior Court,
8 County of Los Angeles, Honorable Elihu M. Berle presiding.

9 • *Hamilton v. Michael Kors Stores, Inc. et al.*, Case No. 19STCV37061, California
10 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding.

11 • *Arzooian v. A&M Administration, LLC, et al.* Case No. 21STCV05576, California
12 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding.

13 • *Santos, et al. v. Maruzen of America, Inc.*, Case No. 19STCV37662, California
14 Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding.

15 • *Schaffino v. M.O. Dion & Sons., Inc., et al.*, Case No. 20STCV38023, California
16 Superior Court, County of Los Angeles, Honorable Gail Killefer presiding.

17 • *Moreno v. Santa Paula Post Acute, LLC, et al.* Case No. 21STCV12533, California
18 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding.

19 • *Singer v. Desert Area Resources and Training*, Case No. BCV-21-101093, California
20 Superior Court, County of Kern, Honorable Thomas S. Clark presiding.

21 • *Clarizio v. Guard-Systems, Inc.*, Case No. 21STCV28667, California Superior Court,
22 County of Los Angeles, Honorable Armen Tamzarian presiding.

23 • *Guzman v. Freschco Painters, Inc.*, Case No. 21STCV04683, California Superior
24 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding.

25 • *Koutny v. PAE Aviation and Technical Services, LLC*, Case No. 21C-0106, California
26 Superior Court, County of Kings, Honorable Melissa R. D'Morias presiding

27 • *Rodriguez v. Pacifica Trucks, LLC*, Case No. 20STCV37576, California Superior
28 Court, County of Los Angeles, Honorable Stuart Rice presiding.

1 • *Ramos v. AEGIS Treatment Centers, LLC*, Case No. 20STCV41429, California
2 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding.

3 • *Valdez v. Integrated Building Services, Inc.* Case No. 20STCV37793, California Superior
4 Court, County of Los Angeles, Honorable Elihu M. Berle presiding.

5 12. I have also settled matters on a “PAGA Only” basis for aggrieved employees in the
6 past, including in:

7 • *Flores v. Delta Apparel, Inc.*, Case No. BC641499, California Superior Court, County
8 of Los Angeles, Honorable Daniel J. Buckley, presiding.

9 • *Segura v. CJ Foods Service Holdings USA, LLC*, Case No. 19STCV24918, California
10 Superior Court, County of Los Angeles, Honorable Maureen Duffy-Lewis, presiding.

11 • *Sierra v. Nexem-Allied, LLC*, Case No. 20STCV11281, California Superior Court,
12 County of Los Angeles, Honorable Randolph M. Hammock, presiding.

13 • *Nodal v. Sodexo, Inc.*, Case No. 20STCV40601, California Superior Court, County of
14 Los Angeles, Honorable Lawrence Riff, presiding.

15 • *Cooper v. Lucas Health Partners*, Case No. 20STCV20050, California Superior Court,
16 County of Los Angeles, Honorable Maren Nelson, presiding.

17 • *Herrera v. Greystar Management, LP, et al.*, Case No. 37-2020-00009672-CU-OE-CTL,
18 California Superior Court, County of San Diego, Honorable Carolyn Caietti, presiding.

19 • *Slater v. Jo-Ann Stores, LLC.*, Case No. 21STCV18454, California Superior Court,
20 County of Los Angeles, Honorable Maurice A. Leiter, presiding;

21 • *Bolanos v. Canoga Park Heating & Air Conditioning, Co., Inc.*, Case No. 21STCV12674,
22 California Superior Court, County of Los Angeles, Honorable Yolanda Orozco, presiding.

23 • *Granados v. Cosmetic Ideas, Inc.* Case No. 21STCV10797, California Superior Court,
24 County of Los Angeles, Honorable Richard L. Fruin, presiding.

25 • *Ruano v. DPC Woodwork, Inc.* Case No. 21STCV00408, California Superior Court,
26 County of Los Angeles, Honorable Jon R. Takasugi presiding.

27 • *Tarin v. TPS Solutions, Inc.*, Case No. 21STCV07844, California Superior Court, County
28 of Los Angeles, Honorable Maren E. Nelson presiding

1 13. Currently, my firm is acting as counsel in tens of wage and hour class actions and
2 representative PAGA actions.

3 14. After a thorough investigation and settlement discussions, I arrived at terms that I
4 viewed was in the best interest of both Plaintiff and Aggrieved Employees.

5 **Plaintiff's Counsel's Requested Fees and Costs are Reasonable**

6 15. "Plaintiff's Counsel" means Bibiyan Law Group, P.C. and Crosner Legal, P.C.

7 16. I believe Plaintiff's Counsel are entitled to recover attorneys' fees and costs.
8 Plaintiff's Counsel requests a fee of 1/3 of the Gross Settlement Amount, which, unless and until
9 escalated pursuant to the Parties' Settlement Agreement, amounts to \$170,000.00, is reasonable,
10 is well within the range of fees generally sought and approved in other class and representative
11 cases, and is also reasonable based on Plaintiffs' Counsel's lodestar.

12 17. Plaintiff's Counsel invested time and resources into litigating this Action, with
13 more than \$9,311.72 of costs to date by Bibiyan Law Group, P.C. and counting, deferred to the
14 end of the case and entirely contingent on the outcome, which, as set forth above, the recovery of
15 which was far from certain with much of the litigation still potentially pending.

16 18. During the period that this Action has been pending, Plaintiffs' Counsel have
17 advanced all expenses, and have not received any compensation for prosecuting the Action on
18 behalf of the State and other Aggrieved Employees.

19 **An Award of Fees Based on a Percentage of the Common Fund**
20 **is Appropriate and Reasonable**

21 19. I believe the percentage of attorneys' fees set forth in the Settlement (i.e., 1/3 of the
22 Gross Settlement Amount) is reasonable. I am informed and believe that, historically, courts have
23 awarded percentage fees in the range of 20% to 50% in collective actions, depending on the
24 circumstances of the case.

25 20. Here, I believe the requested fee is consistent with the fees awarded in other PAGA
26 settlements approved by California courts.

27 21. Plaintiff's Counsel invested time and resources into litigating this Action, with over
28 \$9,311.72 of costs to date incurred by Bibiyan Law Group, P.C. and counting, deferred to the end

1 of the case and entirely contingent on the outcome, which, as set forth above, the recovery of
2 which was far from certain with much of the litigation still potentially pending. It has been a long-
3 recognized principle that an attorney merits a significantly larger fee when the compensation is
4 contingent, rather than being fixed on a time or contractual basis. During the period that this
5 Action has been pending, Plaintiff's Counsel have advanced all expenses and have not received
6 any compensation for prosecuting the Action on behalf of the State and other Aggrieved
7 Employees.

8 22. I believe the significant outlay of monetary and personnel resources has been
9 completely at risk and wholly dependent upon obtaining a substantial settlement or the imposition
10 of civil penalties at trial. I believe Plaintiff's Counsel should not be penalized with a lower fee for
11 settling the case prior to trial, because the percentage of the fund method "encourages early
12 settlement, which avoids protracted litigation." Thus, the requested award of attorneys' fees is
13 reasonable under the percentage of the fund method.

14 **The Requested Fees are Also Reasonable Under a Lodestar Crosscheck**

15 23. I understand from my position as principal of Bibiyan Law Group, P.C., my
16 involvement with the case, and information provided by my staff, that Bibiyan Law Group, P.C.,
17 will have collectively billed 257.6 hours at customary hourly rates. David D. Bibiyan billed 31.8
18 hours at his hourly rate of \$1,000 per hour. Jeffrey D. Klein billed 22.5 hours at his hourly rate of
19 \$900. Diego Aviles billed 11.3 hours at his rate of \$700 per hour. Vedang J. Patel billed 43.7 hours
20 at his hourly rate of \$650 per hour. Joshua Shirian billed 61.9 hours at his rate of \$475 per hour.
21 Brian Zaghi billed 54.4 hours at his rate of \$450 per hour. Paralegals billed 16.0 hours at \$175 per
22 hour. Finally, legal assistants billed 16.0 hours at \$75 per hour. Cumulatively, this amounts to a total
23 lodestar of \$146,248.00.

24 24. Plaintiff's Counsel requests, in total for this action and the consolidated *Barahona*
25 action, attorneys' fees of \$170,000.00

26 **Summary of Billing**

27 25. Plaintiff's Counsel have already spent over 257.6 hours litigating this case to bring
28 it to resolution, not including time which will be expended monitoring the administration of the

1 settlement and distribution of funds to Aggrieved Employees. Specifically, I am informed and
2 believe that the following increments of time were spent by myself and my staff from the time of
3 meeting Plaintiff through the present:

4 26. Approximately 27.2 hours were spent on this case prior to litigation in investigation
5 of the matter, including meeting with Plaintiff, reviewing Defendants' policies, and requesting and
6 reviewing Plaintiff's time and pay records, personnel files, and exploring the corporate structure of
7 the entity Defendant to determine whether any other individuals or entities should be named in the
8 litigation;

9 27. Approximately 21.1 hours were spent complying with the prerequisites in connection
10 with Plaintiff's cause of action under the Labor Code Private Attorneys' General Act of 2004
11 ("PAGA"), including the preparation and submission of Plaintiff's letter to the Labor and Workforce
12 Development Agency ("LWDA"), filing the initial complaint in this Action for Plaintiff's claims
13 under PAGA against Defendant;

14 28. Approximately 10.2 hours were spent shortly after filing to better understand
15 Defendant's corporate structure, investigating corporate affiliates, and determine which individuals,
16 if any, could be individually liable in the Action and may be added as additional defendants;

17 29. Approximately 14.4 hours were spent reviewing, analyzing, drafting, filing, and
18 serving Plaintiff's Complaint and Amended Complaint;

19 30. Approximately 5.2 hours were spent reviewing and analyzing Defendant's
20 Answers filed in response to Plaintiff's Complaint and Amended Complaint;

21 31. Approximately 21.7 hours were spent reviewing, analyzing, and debating the
22 enforceability of the purported arbitration agreements Defendants sought to enforce.

23 32. Approximately 10.2 hours were spent meeting and conferring with counsel for
24 Defendants, drafting, serving, and filing notices, Joint Statements in advance of the conferences
25 and hearings held by the Court, and preparation and attendance of the same.

26 33. Approximately 32.3 hours were spent negotiating the parameters of an early
27 mediation, agreeing to a mediator, and determining informal discovery to be exchanged
28 beforehand.

1 34. Approximately 26.3 hours were spent performing informal discovery, including
2 obtaining and reviewing Defendant's policies, as well as obtaining and reviewing, with the aid of
3 expert consultants, the voluminous time and pay records from Defendant, and the compliance rate
4 of meal and rest periods.

5 35. Approximately 43.1 hours were spent preparing for and attending the mediation
6 session, including preparation of a mediation brief and damages model with the consultation of
7 expert consultants.

8 36. Approximately 37.7 hours were spent drafting and negotiating the Memorandum
9 of Understanding following mediation, the long form Settlement Agreement, which required
10 multiple exchanges of documents and discussions between counsel, obtaining bids from third
11 party administrators for administration of a PAGA Payment Letter to Aggrieved Employees
12 regarding the settlement of this Action.

13 37. Approximately 8.2 hours were spent preparing the Motion for Approval and
14 declarations in support thereof, including reviewing the case file, informal discovery, mediation
15 brief, damages model, and analyzing such information in light of the Court's standards and
16 requirements of a PAGA Settlement Approval motion.

17 38. And, the over 257.6 hours expended by the lawyers and staff members of
18 Bibiyan Law Group, P.C. in connection with this Action is only a calculation of efforts made
19 as of the date the Motion for PAGA Settlement Approval was filed; it does not include the
20 time spent preparing for the approval hearing or any further meeting and conferring between
21 counsel after filing. As such, Class Counsel requests that the Court find that these hours are
22 reasonable in this litigation

23 **Costs Incurred by Bibiyan Law Group, P.C.**

24 39. The Settlement provides for reimbursement of Plaintiff's Counsel's reasonable
25 litigation costs, in total for Plaintiff's action and the consolidated *Barahona* action, in an amount
26 up to \$30,000.00. Bibiyan Law Group, P.C. requests only \$9,311.72 in total for costs incurred.
27 Because these costs are reasonable, Plaintiff's Counsel requests that the Court approve those costs.

28 40. The itemized costs incurred by Bibiyan Law Group, P.C., in the above-referenced

1 matter total \$9,311.72 as follows:

2	(1) Filing and Messenger Costs	\$1,510.12
3	(2) Service of Process	\$93.50
4	(3) Mediation	\$5,000.00
5	(4) Expert Consulting Fees	\$2,700.00
6	(5) Postage	\$8.10

7 41. A true and correct copy of a list of the costs incurred by Bibiyan Law Group, P.C.
8 is attached as Exhibit A.

9 I declare under penalty of perjury under the laws of the state of California that the foregoing
10 is true and correct this 8th day of October 2024, at Los Angeles, California.

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12 /s/ David D. Bibiyan
13 David D. Bibiyan

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EXHIBIT A

List of Expenses Items 2024.03.28 - 10/8/2024



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October 8, 2024

DATE	TYPE	PAYABLE TO	TOTAL AMOUNT	
4/24/2024	Expert Data Consultant Fees	Berger Consulting Group, LLC	\$	2,700.00
1/30/2024	E-Filing	All-N-One Legal Support	\$	11.75
1/12/2024	E-Filing	All-N-One Legal Support	\$	20.50
1/11/2024	Case Document Purchase	Pacer	\$	8.62
1/9/2024	Mediation	Lynn Frank	\$	5,000.00
11/17/2023	E-Filing	All-N-One Legal Support	\$	11.75
4/4/2023	E-Filing	All-N-One Legal Support	\$	11.25
3/28/2023	Process Service	All-N-One Legal Support	\$	93.50
3/16/2023	E-Filing	All-N-One Legal Support	\$	1,446.25
2/9/2023	Postage	United States Postal Service	\$	8.10
		Total	\$	9,311.72