Arby Aiwazian (SBN 269827)
Ryan Slinger (SBN 351297)
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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

TAWONNA JOHNSON, individually, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiff,

vs.

KADIANT, LLC, a Delaware limited liability company; and DOES 1 through 100, inclusive,

Defendant.

TAWONNA JOHNSON, individually, and on behalf of other members of the general public similarly situated;

Plaintiff,

vs.

KADIANT, LLC, a Delaware limited liability company; and DOES 1 through 100, inclusive,

Defendant.

Case No. 23CV001772 (Lead Case)
Consolidated Case No. 23CV001897

Honorable Peter K. Southworth
Department 8B

CLASS ACTION

DECLARATION OF RYAN SLINGER IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND ENHANCEMENT AWARD

Date:	November 13, 2026
Time:	9:00 a.m.
Department:	8B
PAGA Complaint Filed:	May 16, 2023
Class Complaint Filed:	May 16, 2023
Trial Date:	None Set

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DECLARATION OF RYAN SLINGER

I, Ryan Slinger, 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 Tawonna Johnson ("Plaintiff") and the Class in the above-captioned matters. 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 as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On February 9, 2026, in Department 22 of the above-entitled Court, the Honorable Lauri A. Damrell preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release ("Settlement," "Agreement," or "Settlement Agreement,") entered into between Plaintiff and Defendant Kadiant, LLC ("Defendant,") (together with Plaintiff referred to as the "Parties") and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Tawonna Johnson as the representative of the Class ("Class Representative"). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class ("Class Counsel").

3. The Court approved and ordered the mailing of the Notice of Class and Representative Action Settlement ("Class Notice"), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed ILYM Group, Inc. ("ILYM") to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Award ("Motion for Final Approval"), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Attorneys' Fees and Costs, Enhancement Award, and Settlement Administration Costs, or the allocation for the PAGA Amount.

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WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above-captioned actions (the "Actions") since they were filed on May 16, 2023.

6. Before initiating the cases, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiff and research into the various legal issues involved in the cases, namely, the current state of the law relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative Private Attorneys General Act ("PAGA") claims and penalties, and wage-and-hour law and enforcement, Plaintiff's claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiff was well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendant in California employed at any time during the Class Period, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and were preparing the cases for class certification and trial, prior to reaching the Settlement. The Parties exchanged a volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. Class Counsel served multiple sets of formal written discovery requests onto Defendant (specifically, Form Interrogatories—General (Set One), Special Interrogatories (Sets One & Two), and Requests for Production of Documents (Set One)), and reviewed Defendant's responses thereto. Additionally, Class Counsel noticed the depositions of Defendant's Person Most Knowledgeable designees regarding job descriptions and organizational structure. The volume of records and documents that Class Counsel reviewed and analyzed included, and were not limited to: Plaintiff's

employment records, Class Members' time and pay data, multiple iterations of Defendant's Employee Handbook, internal memoranda, Defendant's operations and employment practices, forms, procedures, and policies, among other information and documents. Class Counsel had the opportunity to interview and obtain information from Plaintiff, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. Class Counsel developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, motion practice, formal and informal discovery, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, among other tasks.

8. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating this matter, mediation, and extensive settlement negotiations. Class Counsel analyzed a volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature of the work performed by the Class Members and PAGA Employees, as well as Defendant's organizational structure and their operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing liability, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiations process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest periods, representative PAGA claims and penalties, wage-and-hour enforcement, regular rate, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

9. After conducting significant investigation of the facts and law during the prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in mediation sessions conducted by the Honorable David Borwn (Ret.) and Steven J. Rottman, Esq., who are both well-regarded

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mediators experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of the mediation and settlement negotiations, the Parties exchanged documents and data, and discussed various aspects of the cases, including and not limited to, the risks and delays of further litigation, the risks and expenses to the Parties of proceeding with class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, regular rates of pay, meal and rest periods (including *inter alia*, on premises breaks), expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class certification prevail on the merits and, while Plaintiff and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of $700,000.00, which is thirty-five percent (35%) of the Total Settlement Amount of $2,000,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

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11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (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 this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to these cases. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving an Total Settlement Amount of $2,000,000.00 (with a Net Settlement Amount of approximately at least $1,138,940.77 to be paid to Settlement Class Members (with gross Individual Settlement Payments averaging approximately more than $257.50), payment of $25,000.00 to PAGA Employees (with Individual PAGA Payment averaging approximately $9.32) and payment of $75,000.00 to the State of California)—support the percentage fee sought.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **388.20 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** 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 by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The attorneys identified below have worked on this case, and they have performed their work in this matter exclusively on a contingency basis.

Attorneys	Titles	Bar Nos.	Years Admitted & Practicing in CA	Rate	Total Hours	Lodestar

Edwin Aiwazian	Chief Executive Officer	232943	2004 (22 years)	$1,795	23.50	$42,182.50
Arby Aiwazian	Senior Partner	269827	2010 (16 years)	$1,495	37.70	$56,361.50
Joanna Ghosh	Senior Partner	272479	2010 (16 years)	$1,495	2.00	$2,990.00
Elizabeth M. R-H Parker-Fawley	Partner	301592	2014 (12 years)	$1,195	17.40	$20,793.00
Tara Zabehi	Partner	314706	2017 (9 years)	$1,195	7.60	$9,082.00
Yasmin Hosseini	Senior Attorney	326399	2019 (7 years)	$850	9.70	$8,245.00
Brian J. St. John	Senior Attorney	304112	2015 (11 years)	$850	1.50	$1,275.00
Hagit C. Goltzer	Senior Attorney	324276	2018 (8 years)	$850	20.50	$17,425.00
Ryan Slinger	Associate Attorney	351297	2023 (3 years)	$725	10.70	$7,757.00
Alborz Javaheri	Associate Attorney	362246	2025 (1 year)	$575	44.30	$25,472.00
Melissa A. LeBlanc-Mansell	Senior Attorney (formerly)	283080	2012 (14 years)	$850	80.60	$68,510.00
Travis J. Maher	Supervising Attorney (Formerly)	327206	2019 (7 years)	$850	14.90	$12,665.00
Christian E. Galajan	Associate Attorney (formerly)	343985	2022 (4 years)	$575	3.90	$2,242.50
Ani Menedjian	Associate Attorney (formerly)	360616	2025 (1 year)	$575	14.40	$8,280.00
Tatyana N. Matni (formerly Akbarian)	Associate Attorney (formerly)	354153	2024 (2 years)	$575	41.10	$23,632.50
Domininc Scarangella	Associate Attorney (formerly)	347695	2022 (4 years)	$575	3.10	$1,782.50
Margaux K. Gundzik	Associate Attorney (formerly)	340116	2021 (5 years)	$725	55.30	$40,092.50
				Total:	388.20	$348,789.00

14. Each of the attorneys identified above performed their work in this matter exclusively on a contingency basis. Plaintiff has not been billed for, and have not paid for, any of the work performed in the instant action to date by attorneys at Lawyers *for* Justice, PC (i.e., Plaintiff has not been billed for or paid the hourly rates of the various attorneys who performed

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work in the instant action). Lawyers *for* Justice, PC will receive compensation for the work performed by attorneys at the firm thus far, if attorneys' fees are awarded by the Court as a part of the Settlement.

15. The billing rates for each of the attorneys listed above, who worked on this matter, are reasonable, usual, and commensurate with the individual backgrounds, training, and experience of the attorneys, in litigating complex wage-and-hour actions, and in particular, employment class actions and representative actions. These rates are the reasonable and usual hourly rates for the referenced attorneys' services in wage and hour class action cases handled by Lawyers *for* Justice, PC, and are commensurate with rates charged in the community by other plaintiffs-side and defense-side attorneys in this practice area. Lawyers *for* Justice, PC almost exclusively handles the prosecution of plaintiffs' side cases. To the best of undersign counsel's knowledge, Lawyers for Justice, PC has not billed nor required any of its clients, who are usually workers who do not have the financial means to pay a retainer or otherwise fund the prosecution or litigation of their wage-and-hour cases against their current or former employers, to pay the firm for the legal work performed by attorneys at the firm (and thus, has not billed any clients using any hourly rates).

EXPERIENCE AND ADEQUACY OF

LAWYERS *for* JUSTICE, PC

16. 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 the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of

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wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

17. Edwin Aiwazian is the Chief Executive Officer 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 some 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 over 1,000

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class action or representative action cases.

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

19. Jonna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010), in New York (since 2013), and in Washington (since 2026) and is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, U.S. District Court for the Western District of Washington, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion

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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 claims and employer efforts to compel arbitration of such claims, 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.5th175. 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 three hundred (300) cases. Under her, Edwin Aiwazian, and Arby Aiwazian's 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, she has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

20. I am a Member of Lawyers for Justice. PC. I received my Bachelor of Arts degree from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice before all courts of the State of California. I have worked on many wage-and-hour class action and PAGA representative cases, and my work on these cases has included preparing pleadings and motions, making court appearances, drafting and finalizing settlement agreements.

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LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS *FOR* JUSTICE, PC

21. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to $35,000.00. Lawyers *for* Justice, PC seeks reimbursement of **$29,109.23** in litigation costs and expenses incurred in the matter, as reflected in **"EXHIBIT 2"** attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. The cost savings of $5,890.77 will be part of the Net Settlement Amount, which will be distributed to the Settlement Class Members in accordance with the Settlement.

ENHANCEMENT AWARD TO PLAINTIFF

22. In recognition of her efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as her broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 39 of the Settlement Agreement), the Settlement provides for an Enhancement Award, in the amount of up to $10,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing her employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive $10,000.00 as a reasonable Enhancement Award for her broader waiver and release of claims and services performed in this matter, in addition to her individual settlement payments.

23. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, the Class, and the State of California.

24. I have reviewed the Court's Checklist for Approval of Class Action and/or Private Attorneys General Act ("PAGA") Settlements and confirm that the moving papers filed herewith comply with the checklist.

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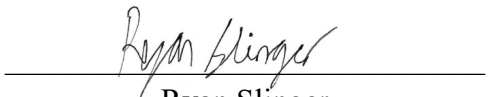
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 21st day of October 2026, at Glendale, California.



Ryan Slinger

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EXHIBIT 1

TAWONNA JOHNSON V. KADIANT LLC
Sacramento County Superior Court Case No. 23CV001897 ("Class Action")
Sacramento County Superior Court Case No. 23CV001772 ("PAGA Action")
United States District Court, Eastern District of California, Case No. 2:24-CV-01372-KJM-CKD ("Federal Action")

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS *for* JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Tawonna Johnson ("Plaintiff")	17.80
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	19.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff's Class Action Claims, Conduct Legal Research and Analysis Regarding Class Action Claims, and Draft, Review, and/or Revise Plaintiff's Class Action Complaint for Damages (filed on May 16, 2023) (Class Action)	7.50
Investigate the Merits of Plaintiff's Private Attorneys General Act ("PAGA") Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on May 16, 2023) (PAGA Action)	6.50
Review Court's Notice of Case Assignment and Case Management Conference (filed on May 17, 2023) (PAGA Action)	0.30
Review Court's Notice of Case Assignment and Case Management Conference (filed on May 19, 2023) (Class Action)	0.30

Review Court's Minute Order Re: Complex Determination and Notice of Case Reassignment (filed on July 20, 2023) (Class Action)	0.30
Review and Analyze Defendant Kadiant LLC's ("Defendant") Answer to Plaintiff's Class Action Complaint (served on July 27, 2023) and Research Affirmative Defenses in Defendant's Answer (Class Action)	1.30
Review and Analyze Defendant's Answer to Plaintiff's Private Attorneys General Act ("PAGA") Complaint (served on July 27, 2023) and Research Affirmative Defenses in Defendant's Answer (PAGA Action)	0.90
Review Court's Notice of Case Management Conference and Orders Re: Complex Case Management Procedures (filed on August 17, 2023) (Class Action)	0.30
Review Court's Minute Order Re: Complex Determination and Notice of Case Reassignment (filed on August 28, 2023) (PAGA Action)	0.30
Review Court's Notice of Case Management Conference and Orders Re: Complex Case Management Procedures (filed on August 29, 2023) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order Regarding Agreement to Mediate (submitted on August 30, 2023) (Class Action)	1.50
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order Regarding Agreement to Mediate (submitted on August 30, 2023) (PAGA Action)	1.20
Review Court's Order Regarding Agreement to Mediate (filed on September 1, 2023) (Class Action)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Posting Complex Fees (filed on September 6, 2023) (PAGA Action)	0.10
Review Defendant's Notice of Posting Complex Case Fees (served on September 7, 2023) (PAGA Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on October 13, 2023) (Class Action)	0.10
Review Court's Notice of Department Relocation (filed on January 9, 2024) (Class Action)	0.10

Review Court's Notice of Department Relocation (filed on January 9, 2024) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Notice Regarding January 9, 2024 Notice of Department Relocation (filed on January 23, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice Regarding January 9, 2024 Notice of Department Relocation (filed on January 23, 2024) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulated Protective Order (filed on February 20, 2024) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulated Protective Order (filed on February 20, 2024) (PAGA Action)	0.40
Review Court's Stipulated Protective Order (filed on February 26, 2024) (Class Action)	0.10
Review Court's Stipulated Protective Order (filed on February 26, 2024) (PAGA Action)	0.10
Review Defendant's Notice of Entry of Order (served on February 28, 2024) (Class Action)	0.10
Review Defendant's Notice of Entry of Order (served on February 28, 2024) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Posting Jury Fees (filed on March 7, 2024) (PAGA Action)	0.10
Review Defendant's Substitution of Attorney (served on March 7, 2024) (Class Action)	0.10
Review Defendant's Substitution of Attorney (served on March 7, 2024) (PAGA Action)	0.10
Review Defendant's Notice of Related Case (served on April 10, 2024) (Class Action)	0.10
Review Defendant's Notice of Related Case (served on April 10, 2024) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on April 10, 2024) (Class Action)	1.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on April 18, 2024) (PAGA Action)	0.90

Review Court's Tentative Ruling Re: Case Management Conference (issued on April 23, 2024) (Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on April 23, 2024) (PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on April 25, 2024) (Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on May 2, 2024) (Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on May 2, 2024) (PAGA Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on May 3, 2024) (Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on May 3, 2024) (PAGA Action)	0.10
Review and Analyze Defendant's Corporate Disclosure Statement Pursuant to F.R.C.P 7.1 (served on May 13, 2024) (Federal Action)	0.10
Review Court's Order Setting Status (Pretrial Scheduling) Conference (filed on May 14, 2024) (Federal Action)	0.30
Draft, Review, and/or Revise Appearances of Counsel (filed on May 14, 2024) (Federal Action)	0.20
Review Defendant's Notice to State Court and Adverse Party of Removal of Action to Federal Court (served on May 14, 2024) (Class Action)	0.20
Review Defendant's Notice to State Court and Adverse Party of Removal of Action to Federal Court (served on May 14, 2024) (PAGA Action)	0.20
Draft, Review, and/or Revise Appearance of Counsel (filed on May 15, 2024) (Federal Action)	0.10
Review Defendant's Appearance of Counsel (filed on May 20, 2024) (Federal Action)	0.10
Draft, Review, and/or Revise Consent/Decline to US Magistrate Judge (filed on May 28, 2024) (Federal Action)	0.10

Review Defendant's Consent/Decline to US Magistrate Judge (served on May 28, 2024) (Federal Action)	0.10
Review Defendant's Request to have Defendant's Attorney Osaama Saifi Appear Remotely for Plaintiff's Motion to Remand (served on July 26, 2024) (Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Rule 26(f) Report (filed on September 12, 2024) (Federal Action)	1.70
Review Court's Minute Order Re: Status (Pretrial Scheduling) Conference (filed on September 23, 2024) (Federal Action)	0.10
Review Court's Order of Reassignment (filed on October 10, 2024) (Federal Action)	0.20
Review Court's Initial Case Management Order (filed on October 11, 2024) (Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Case Management Conference Statement and Notice of Settlement (filed on December 23, 2024) (PAGA Action)	0.60
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 31, 2025) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on April 29, 2025) (PAGA Action)	1.10
Review Court's Order to Continue Case Management Conference (filed on May 1, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on May 6, 2025) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on June 25, 2025) (PAGA Action)	0.90
Review Court's Order to Continue Case Management Conference (filed on July 7, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on July 10, 2025) (PAGA Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on August 28, 2025) (PAGA Action)	0.90
Review Court's Order to Continue Case Management Conference (filed on September 10, 2025) (PAGA Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on September 11, 2025) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on October 2, 2025) (PAGA Action)	1.10
Review Court's Tentative Ruling Re: Case Management Conference and Minute Order Re: Case Management Conference (issued on October 17, 2025) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on January 8, 2026) (PAGA Action)	1.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on January 22, 2026) (PAGA Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on January 23, 2026) (PAGA Action)	0.10
Draft, Review, and/or Revise Notice of January 23, 2026 Minute Order (filed on January 30, 2026) (PAGA Action)	0.20
Review Court's Tentative Ruling Re: Status Conference (Compliance Hearing) (issued on February 5, 2026) (PAGA Action)	0.20
Review Court's Minute Order Re: Status Conference (Compliance Hearing) (filed on February 6, 2026) (PAGA Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on February 25, 2026) (PAGA Action)	0.10

Review Court's Notice of Department Relocation (filed on April 6, 2026) (PAGA Action)	0.10
Draft, Review, and/or Revise Notice Re: April 7, 2026 Notice of Department Relocation (filed on April 22, 2026) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue the Hearing on the Motion for Final Approval of Settlement; [Proposed] Order Thereon (submitted on May 26, 2026) (PAGA Action)	1.70
Review Court's Order Re: Continuing Hearing on Motion for Final Approval and Case Management Conference (filed on June 3, 2026) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on June 8, 2026) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue the Hearing on the Motion for Final Approval of Settlement; [Proposed] Order Thereon (submitted on July 20, 2026) (PAGA Action)	1.30
Review Court's Order Continuing the Hearing on the Motion for Final Approval of Settlement (filed on July 27, 2026) (PAGA Action)	0.20
Review Court's Minute Order Re: Notice and Order of Complex Case Reassignment – Effective August 19, 2026 (filed on September 3, 2026) (PAGA Action)	0.20
Review Court's Minute Order Re: Notice and Order of Complex Case Reassignment – Effective August 19, 2026 (filed on September 8, 2026) (Class Action)	0.20
Appearances	
Prepare for and Remotely Attend Case Management Conference (May 3, 2024) (Class & PAGA Action)	1.10
Prepare for and Remotely Attend Case Management Conference (October 17, 2025) (PAGA Action)	0.50
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on December 22, 2022)	2.20

Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant, and Requests for Production of Documents (noticed for September 7, 2023; Organizational Structure) (served on July 6, 2023) (Class Action)	1.20
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant, and Requests for Production of Documents (noticed for September 8, 2023; Wage and Hour Practices) (served on July 6, 2023) (Class Action)	1.40
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant, and Requests for Production of Documents (noticed for September 21, 2023; Organizational Structure) (served on July 6, 2023) (PAGA Action)	1.10
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant, and Requests for Production of Documents (noticed for September 22, 2023; Wage and Hour Practices) (served on July 6, 2023) (PAGA Action)	1.20
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on July 6, 2023) (Class Action)	3.60
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on July 6, 2023) (PAGA Action)	3.70
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant, and Requests for Production of Documents (noticed for April 18, 2024; Organizational Structure) (served on March 4, 2024) (Class Action)	0.90
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant, and Requests for Production of Documents (noticed for April 19, 2024; Wage and Hour Practices) (served on March 4, 2024) (Class Action)	1.10
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant, and Requests for Production of Documents (noticed for April 25, 2024; Organizational Structure) (served on March 4, 2024) (PAGA Action)	0.90

Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant, and Requests for Production of Documents (noticed for April 26, 2024; Wage and Hour Practices) (served on March 4, 2024) (PAGA Action)	1.10
Review and Analyze Defendant's Objections to Plaintiff's Notices of Deposition of Defendant's Person Most Knowledgeable and Request for Production (Organizational Structure; Wage and Hour Practices) (served on April 15, 2024) (Class Action)	1.50
Review and Analyze Defendant's Objections to Plaintiff's Notices of Deposition of Defendant's Person Most Knowledgeable and Request for Production (Organizational Structure; Wage and Hour Practices) (served on April 15, 2024) (PAGA Action)	1.70
Review and Analyze Defendant's Objections to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on May 20, 2024) (Federal Action)	2.10
Review and Analyze Defendant's Objections to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on May 28, 2024) (Federal Action)	1.40
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Tawonna Johnson under the Private Attorneys General Act (served on March 8, 2023)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendant's Current and Former Counsels	15.20
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to First Mediation	63.50
Prepare for First Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations (submitted on February 14, 2024)	35.50

Attend First Mediation Session (February 21, 2024; Zoom Video Conference)	24.50
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to the Second Mediation	16.50
Prepare for Second Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations (submitted on December 10, 2024)	14.50
Attend Second Mediation Session (December 17, 2024; Zoom Video Conference)	12.50
Review and/or Analyze Mediator's Proposal (issued on December 17, 2024; accepted on December 17, 2024)	0.60
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding Re: Class Action and PAGA Settlement (executed on April 4, 2025)	3.50
Draft, Review, Revise, Negotiate, and/or Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on October 22, 2025) and Draft, Review, and/or Revise Notice of Class and Representative Action Settlement	14.70
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	5.30
Law and Motion	
Review and Analyze Defendant's Notice of Removal Pursuant to 28 U.S.C. Section 1332(d) ("CAFA"), Exhibit A, Exhibit B, Exhibit C, Exhibit D, Exhibit E, Exhibit F, Exhibit G, Certification and Notice of Interested Parties, Civil Cover Sheet, Declaration of Osaama Saifi in Support Thereof, and Declaration of David Herbst in Support Thereof (served on May 13, 2024) (Federal Action)	2.90
Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. § 1447; Memorandum of Points and Authorities in Support Thereof and Declaration of Margaux K. Gundzik in Support Thereof (filed on June 12, 2024) (Federal Action)	14.60

Review and Analyze Defendant's Opposition to Plaintiff's Motion to Remand and Declaration of Osaama Saifi in Support Thereof (served on June 26, 2024) (Federal Action)	2.10
Draft, Review, and/or Revise Plaintiff's Reply in Support of Motion to Remand Pursuant to 28 U.S.C. § 1447 (filed on July 5, 2024) (Federal Action)	6.50
Review Court's Minute Order Re: Motion to Remand (filed on July 29, 2024) (Federal Action)	0.30
Review Court's Order Granting Plaintiff's Motion to Remand and Remanding this Action to the Sacramento County Superior Court (filed on October 30, 2024) (Federal Action)	0.30
Review Court's Order Granting Plaintiff's Motion to Remand and Remanding this Action to the Sacramento County Superior Court (filed on November 1, 2024) (PAGA Action)	0.30
Review Court's Minute Order Re: Case Remanded to Sacramento Superior Court (filed on November 13, 2024) (PAGA Action)	0.10
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Tawonna Johnson in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on December 30, 2025) (PAGA Action)	17.50
Review Court's Tentative Ruling Re: Hearing on Motion for Preliminary Approval of Settlement (issued on January 22, 2026) (PAGA Action)	0.60
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on January 23, 2026) (PAGA Action)	0.20
Draft, Review, and/or Revise Supplemental Declaration of Tawonna Johnson in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, Declaration of Alborz Javaheri in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, and [Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on January 30, 2026) (PAGA Action)	4.50
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on February 9, 2026) (PAGA Action)	0.20

Review Declaration of the Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Award; Memorandum of Points and Authorities in Support Thereof, Declaration of Ryan Slinger in Support Thereof, and [Proposed] Final Approval Order and Judgment (PAGA Action)	21.10
Total Hours:	388.20

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Johnson vs. Kadiant, LLC

Date	Payee	Expense Description	Amount
11/22/2022	U.S. Postmaster	Postage	$15.70
5/16/2023	Legal Document Server, Inc.	Attorney Service	$244.73
5/16/2023	Sacramento Superior Court	Complex Filing Fee	$1,000.00
5/16/2023	Sacramento Superior Court	Complaint Filing Fee	$435.00
6/23/2023	Legal Document Server, Inc.	Attorney Service	$125.00
7/6/2023	General Logistics Systems US, Inc.	Courier Service	$22.86
7/26/2023	Legal Document Server, Inc.	Attorney Service	$125.00
8/31/2023	Legal Document Server, Inc.	Attorney Service	$126.39
8/31/2023	Sacramento Superior Court	Stipulation & Order Fee	$20.00
9/18/2023	Jams, Inc.	Mediation Fee	$3,462.50
10/13/2023	Legal Document Server, Inc.	Attorney Service	$105.00
1/24/2024	Legal Document Server, Inc.	Attorney Service	$14.90
2/20/2024	Alameda Superior Court	Document Download Fee	$69.00
3/8/2024	Alameda Superior Court	Document Download Fee	$73.00
4/11/2024	Legal Document Server, Inc.	Attorney Service	$14.90
4/17/2024	Tara Zabehi	Travel Reimbursement	$327.87
4/17/2024	Margaux Gundzik	Travel Reimbursement	$77.74
4/23/2024	Los Angeles Superior Court	Document Download Fee	$4.00
7/1/2024	Steven J. Rottman, LLC	Mediation Fee	$15,000.00
1/16/2025	CPAnalytics	Data Analysis	$4,752.50
		Total:	**$26,016.09**

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Johnson vs. Kadiant, LLC (PAGA & Class)

Date	Payee	Expense Description	Amount
3/8/2023	U.S. Postmaster	Postage	$16.26
3/8/2023	Labor & Workforce Development Agency	PAGA Filing Fee	$75.00
5/16/2023	Legal Document Server, Inc.	Attorney Service	$175.23
5/16/2023	Sacramento Superior Court	Complaint Filing Fee	$435.00
6/23/2023	Legal Document Server, Inc.	Attorney Service	$125.00
7/6/2023	General Logistics Systems US, Inc.	Courier Service	$22.86
8/31/2023	Legal Document Server, Inc.	Attorney Service	$126.39
8/31/2023	Sacramento Superior Court	Stipulation & Order Fee	$20.00
9/6/2023	Legal Document Server, Inc.	Attorney Service	$319.50
9/6/2023	Sacramento Superior Court	Complex Filing Fee	$1,000.00
1/24/2024	Legal Document Server, Inc.	Attorney Service	$14.90
3/8/2024	Legal Document Server, Inc.	Attorney Service	$25.33
3/8/2024	Sacramento Superior Court	Jury Fee	$150.00
4/18/2024	Legal Document Server, Inc.	Attorney Service	$14.90
12/23/2024	Legal Document Server, Inc.	Attorney Service	$15.45
2/3/2025	Legal Document Server, Inc.	Attorney Service	$16.45
4/29/2025	Legal Document Server, Inc.	Attorney Service	$17.84
4/29/2025	Sacramento Superior Court	Stipulation & Order Fee	$20.00
5/6/2025	Legal Document Server, Inc.	Attorney Service	$16.45
6/27/2025	Legal Document Server, Inc.	Attorney Service	$17.84
6/27/2025	Sacramento Superior Court	Stipulation & Order Fee	$20.00
7/11/2025	Legal Document Server, Inc.	Attorney Service	$16.45
9/2/2025	Legal Document Server, Inc.	Attorney Service	$17.84
9/2/2025	Sacramento Superior Court	Stipulation & Order Fee	$20.00
9/12/2025	Legal Document Server, Inc.	Attorney Service	$16.45
10/2/2025	Legal Document Server, Inc.	Attorney Service	$16.45
1/2/2026	Legal Document Server, Inc.	Attorney Service	$21.62
1/2/2026	Sacramento Superior Court	Motion Fee	$60.00
1/9/2026	Legal Document Server, Inc.	Attorney Service	$17.45
2/2/2026	Legal Document Server, Inc.	Attorney Service	$17.45
2/25/2026	Legal Document Server, Inc.	Attorney Service	$17.45
4/24/2026	Legal Document Server, Inc.	Attorney Service	$17.45
5/27/2026	Legal Document Server, Inc.	Attorney Service	$133.84
5/27/2026	Sacramento Superior Court	Stipulation & Order Fee	$20.00
6/9/2026	Legal Document Server, Inc.	Attorney Service	$17.45
7/21/2026	Legal Document Server, Inc.	Attorney Service	$18.84
7/21/2026	Sacramento Superior Court	Stipulation & Order Fee	$20.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Johnson vs. Kadiant, LLC (PAGA & Class)

Total: $3,093.14