

Joanna Ghosh (SBN 272479)
Brian J. St. John (SBN 304112)
Matthew Richard Soto (353499)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021
Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE**

SHANNON BOSTIC, SOCORRO
GAMBOA, individually, and on behalf of
other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiffs,

vs.

LAMP COMMUNITY, an unknown
business entity; LAMP, INC., a California
corporation; THE PEOPLE CONCERN, a
California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case Nos.: 21STCV07381

Honorable Laura A. Seigle
Department SSC17

CLASS ACTION

**DECLARATION OF BRIAN J. ST. JOHN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs and Enhancement
Payment; Declaration of Class Representative
(Socorro Gamboa) Declaration of Settlement
Administrator (Bryn Bridley); and [Proposed]
Final Approval Order and Judgment filed
concurrently herewith]

Date: October 2, 2024
Time: 9:00 a.m.
Department: SSC17

Complaint Filed: February 24, 2021
FAC Filed: May 12, 2022
SAC Filed: June 20, 2023
Trial Date: None Set

DECLARATION OF BRIAN J. ST. JOHN

I, Brian J. St. John, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Socorro Gamboa (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On April 30, 2024, in Department SSC17 of the above-entitled Court, the Honorable Laura A. Seigle preliminarily approved the Second Amended Joint Stipulation of Class Action and PAGA Settlement and Amendment No. 1 to Second Amended Joint Stipulation of Class Action and PAGA Settlement (together, the “Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant The People Concern’s, successor by merger to Lamp, Inc., dba Lamp Community, (“Defendant,”) (together with Plaintiff, the “Parties”) and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Socorro Gamboa as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Atticus Administration, LLC (“Atticus” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Payment (“Motion for Final Approval”), not a single Class Member has objected to or requested exclusion from any aspect of the Settlement, including the requested Attorneys’ Fees and Costs, Enhancement Payment, Settlement Administration Costs, or allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

///

WORK PERFORMED BY

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned action, which was commenced by former plaintiff Shannon Bostic (“Former Plaintiff Bostic”) on February 19, 2021, and the representative PAGA action entitled *Shannon Bostic v. Lamp Community, et al.*, Los Angeles County Superior Court, Case No. 21CMCV00123 (“*Bostic* PAGA Action”), which was filed by Former Plaintiff Bostic on April 27, 2021, since prior to their commencement. On May 12, 2022, Former Plaintiff Bostic filed a First Amended Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. in the above-captioned action, which added the PAGA claims alleged in the *Bostic* PAGA Action. On June 20, 2023, Former Plaintiff Bostic and Plaintiff Gamboa filed a Second Amended Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Esq. (“Operative Complaint”) in the above-captioned action, which added Plaintiff Gamboa as a named plaintiff, and as a proposed representative for the putative class claims and as a representative for the PAGA claim in the above-captioned action. On November 1, 2023, Former Plaintiff Bostic and Plaintiff Gamboa filed a Request for Dismissal of Plaintiff Bostic’s Individual Claims Without Prejudice Pursuant to California Rules of Court, Rule 3,770 in the above-captioned action. On November 9, 2023, the Court dismissed Former Plaintiff Bostic’s individual claims in the above-captioned action without prejudice and ordered that Former Plaintiff Bostic no longer be a plaintiff, proposed class representative, PAGA representative, or party in the above-captioned action. On November 1, 2023, Plaintiff Gamboa and Former Plaintiff Bostic requested dismissal of the *Bostic* PAGA Action without prejudice, and on November 1, 2023 the dismissal without prejudice was entered in the *Bostic* PAGA Action.

5. Before initiating the cases, Lawyers *for* Justice, PC conducted extensive investigation and research into the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Former Plaintiff Bostic, and research into the various legal issues

involved in the cases, namely, the current state of the law as it applied to, *inter alia*, class certification, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement, and penalties, Former Plaintiff Bostic's claims and allegations, and potential defenses. After conducting initial investigation, Lawyers for Justice, PC determined that Former Plaintiff Bostic's claims (and later Plaintiff Gamboa's claims) were 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, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed expenses.

6. Collectively, Class Counsel conducted significant informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and Class Counsel worked on preparing the case for class certification and trial, prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of litigation and in connection with the mediation sessions and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Former Plaintiff Bostic, Plaintiff Gamboa, Defendant, other Class Members, PAGA Employees, and percipient witnesses. The information, documents, and data reviewed and analyzed by Class Counsel included, and were not limited to: Plaintiff Socorro Gamboa and Former Plaintiff Shannon Bostic's employment records, a detailed sampling of Class Members' and PAGA Employees' timekeeping and payroll records, multiple iterations of Defendant's Employee Handbook and wage and hour policies, earning statements, company policy acknowledgements (including, but not limited to, Defendant's Acknowledgment of Receipt of Handbook), forms, new hire checklist, Defendant's operations and employment practices, forms, procedures, and policies (including, not limited to, Defendant's policies regarding Workweek, Work Day, and Work Schedule, Meal and Rest Periods, Dress Code, Compensation, Overtime Pay, Payroll, Paychecks, and Deductions, and Expenses and Vehicle Use), among

1 other information and documents. Class Counsel also developed damages, violation, and
2 penalties valuation models in connection with the mediation sessions and settlement
3 negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to
4 discuss issues relating to the pleadings, case management, informal discovery, the mediation
5 sessions, and production of documents and data in the course of litigation and the mediation
6 sessions and settlement negotiations. Other work performed by Class Counsel included, and was
7 not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the
8 pleadings, motion-related papers, claims assessment and evaluation, the mediation briefs, and
9 settlement documents; and preparing for and attending court proceedings, two mediation
10 sessions, and settlement negotiations, among other tasks.

11 7. As outlined herein, the Parties have conducted significant and meaningful
12 investigation and informal discovery during the course of litigating the cases and the mediation
13 sessions and settlement negotiations. Class Counsel analyzed a large volume of information,
14 documents, and data obtained from Former Plaintiff Bostic and Plaintiff Gamboa, Defendant,
15 and other sources. The information, documents, and data provided a critical understanding of the
16 nature of the work performed by the Class Members and PAGA Employees, as well as
17 Defendant's operations and employment policies, practices, and procedures, and were used in
18 analyzing liability, damages, penalties, and valuation issues in connection with all phases of the
19 litigation, and ultimately, in connection with the the mediation sessions and settlement
20 negotiations. Class Counsel also performed significant research into the applicable law, which is
21 evolving as it relates to class certification, representative adjudication, and trial; the law relating
22 to manageability, off-the-clock theory, meal and rest periods, expense reimbursements,
23 recordkeeping and wage statement requirements, representative PAGA claims and penalties, and
24 wage-and-hour law and enforcement, Former Plaintiff Bostic and Plaintiff Gamboa's claims and
25 allegations, and Defendant's defenses thereto, as well as facts discovered.

26 8. After conducting significant investigation of the facts and law during the
27 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
28 try to resolve the cases. These efforts included participating in two mediation session conducted

by Lynn Frank, Esq., a well-regarded mediator experienced in handling complex labor and employment matters. Prior to and during the mediation sessions and settlement negotiations, the Parties exchanged information, data, and documents, and discussed various aspects of the case, 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, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement; Defendant's financial condition; the evidence produced and analyzed; and the possibility of appeals, among other things. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. 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 prevail on the merits and to avoid class certification and representative adjudication, while Plaintiff and Class Counsel believed that they would be able to obtain class certification and prevail at trial. After conducting extensive informal discovery and investigations and settlement negotiations, with the aid of the mediator's evaluation, the Parties ultimately agreed that the case 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, that the claim are unsuitable for class treatment and/or representative adjudication, class decertification after certification of a class, allowing a jury to decide the claims asserted in the cases, and the real possibility of no monetary recovery after years of litigation, especially in light of Defendant's financial condition. The Settlement takes into account the strengths and weaknesses of each side's position and the uncertainty of how the case might have concluded at certification, trial, and/or appeals.

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$500,000.00, which is one-third (1/3) of the Total Settlement

1 Amount of \$1,500,000.00. Pursuant to the contingency fee agreement entered into by and
2 between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least one-
3 third (1/3) of the recovery.

4 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
5 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
6 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
7 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
8 have achieved in the case; and (6) the other cases that Class Counsel has turned down in order to
9 devote their time and efforts to this matter. The nature of the work performed, skill exercised,
10 and the outcome in this matter support the percentage fee sought and the application of a lodestar
11 multiplier.

12 11. While not necessarily required to be demonstrated because the percentage fee is
13 proper for this settlement, Class Counsel has incurred many hours of work in connection with
14 prosecuting the case such that the award of attorneys' fees is also justified under a lodestar
15 analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **631.80 hours** performing
16 tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney
17 Task and Time Chart that sets forth in detail the nature of the legal services provided by
18 attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services.
19 The hours attributable to Lawyers *for* Justice, PC include work done by several other attorneys at
20 the firm and myself. Additionally, separate from the hours referenced herein and in the attached
21 chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with
22 the prosecution of this matter.

23 12. The work performed in this particular matter, the background of our firm, as well
24 as the individual backgrounds, training, and experience of the attorneys who worked on this
25 matter, in litigating complex wage-and-hour actions, and in particular, employment class and
26 representative actions, support a reasonable blended hourly rate of compensation of at least \$850
27 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been
28 awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal

services performed, by courts granting approval of settlements in other wage-and-hour cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour.

**EXPERIENCE AND ADEQUACY OF
LAWYERS for JUSTICE, PC**

13. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is 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 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 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.

14. Edwin Aiwazian is the Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of

1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension 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, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. While employed by Lawyers for Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in many cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers for Justice, PC has successfully obtained class certification by contested motion practice in approximately fifteen (15) cases in the last decade, and litigated over 1,000 class action or representative action cases.

15. Arby Aiwazian is a Member and Shareholder 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, including and not limited to, those listed in paragraph 7 herein. He has handled over one hundred and fifty (150) mediations and has worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

16. Joanna Ghosh is a Managing Member 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) and in New York (since 2013) and she is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration of PAGA claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9

1 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB*,
2 *N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions,
3 including and not limited to working on cases to obtain class certification through contested
4 motion practice and working on cases in the post-certification stage (e.g., post-certification
5 discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with
6 co-counsel in a case involving a certified class consisting of approximately 2,600 individuals).
7 She has extensive experience with class action and/or representative action settlements, and has
8 handled this process in over five hundred (500) cases. Under her, Edwin Aiwarzian, and Arby
9 Aiwarzian's supervision, Lawyers for Justice, PC has handled the class certification and court
10 approval process for hundreds of class action and/or representative action matters that have
11 successfully resolved. She is a member of the California Employment Lawyers Association and,
12 on several occasions, has been a speaker regarding topics in wage and hour law at the
13 organization's continuing legal education events.

14 17. I am a Member of Lawyers for Justice, PC. I received my Bachelor's degree from
15 the University of California, San Diego in 2010 and earned my Juris Doctor degree from the
16 University of California, Berkeley, School of Law in 2013. I was admitted to practice law in
17 California in 2015. I am admitted to practice before all courts of the State of California and all
18 federal district courts in the State of California. I have worked on many wage and hour class
19 action and PAGA representative matters, and my work has included, *inter alia*, researching and
20 drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing
21 stipulations and settlement agreements, engaging in motion practice, claims evaluation and
22 analysis, and making court appearances. Prior to working at Lawyers for Justice, PC, I spent
23 several years working for a boutique employment and labor law firm representing employers,
24 and, in 2019 and 2020, I was employed as general counsel for a DMHC licensed discount dental
25 plan.

26 ///

27 ///

28 ///

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

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

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

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

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

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

e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a bank, involving allegations of misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court granted final approval of the class and PAGA representative action settlement. The Kern County

Superior Court Case Number is S-1500-CV-273194-LHB.

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

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

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

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

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

Council Coordination Proceeding Number is 4794.

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

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

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

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

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

p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer’s motion to compel arbitration, which resulted in a published opinion by the California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*

1 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
2 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
3 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
4 5046.

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

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

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

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

25 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
26 representative action against a food company on behalf of non-exempt employees. On June 30,
27 2017, the court granted final approval of the class and PAGA representative action settlement.
28 The Sacramento County Superior Court Case Number is 34-2015-00175871.

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

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

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

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

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

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

1 BC498401.

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

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

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

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

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

26 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a national retailer of apparel and
28 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted

the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

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

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

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

///

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

8 mm) LFJ, in association with co-counsel therein, represented the plaintiffs in a
9 wage-and-hour class action against manufacturer and supplier of power products and services on
10 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
11 motion for class certification and certified a class. On August 27, 2021, the court granted final
12 approval of the class action settlement. The San Diego County Superior Court Case Number is
13 37-2015-00025968-CU-OE-CTL.

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

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

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

27 ///

28 ///

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS FOR JUSTICE, PC

19. To date, Class Counsel have borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. However, Lawyers *for* Justice, PC only seeks reimbursement of **\$16,136.97** in litigation costs and expenses incurred in the Actions, as reflected in “**EXHIBIT B**” attached hereto. The cost savings of \$8,863.03 will be part of the Net Settlement Amount, which will be distributed to Settlement Class Members in accordance with the Settlement. These expenses were reasonable and necessary in the prosecution of the case and to obtain the Settlement.

ENHANCEMENT AWARD TO PLAINTIFF

20. In recognition of her efforts and work expended in the case and serving as the Class Representative, the Settlement provides for an Enhancement Payment, in the amount of \$7,500.00 to Plaintiff. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in providing relevant documents, past employment records, and the facts and evidence necessary to attempt to prove the allegations in the cases. Plaintiff was available whenever her attorneys needed her and actively tried to obtain and provide information that would facilitate the pursuit of the case. Accordingly, it is appropriate and just for Plaintiff to receive \$7,500.00 as a reasonable Enhancement Payment for her services performed in the matter.

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

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

Executed this 9th day of September 2024, at Glendale, California.



Brian J. St. John

EXHIBIT A

SHANNON BOSTIC ET AL. V. LAMP COMMUNITY ET AL
(Los Angeles Superior Court Case No. 21STCV07381) (“Class Action”)

SHANNON BOSTIC V. LAMP COMMUNITY ET AL
(Los Angeles Superior Court Case No. 21CMCV00097) (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality	11.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Shannon Bostic’s (“Former Plaintiff Bostic”) Claims and the Merits of the Claims of the Putative Class Members	10.40
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant The People Concern, successor by merger to Lamp, Inc. dba Lamp Community (“Defendant”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members	9.40
Pre-Notice Investigation of the Merits of Former Plaintiff Bostic and Plaintiff Socorro Gamboa (“Plaintiff”)’s Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Former Plaintiff Bostic, Plaintiff, and the Aggrieved Employees	8.50
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Former Plaintiff Bostic, Plaintiff, and the Aggrieved Employees	7.70

Legal Research and Analysis of Latest Decisions Re: Off-the-Clock, Rounding, Meal and Rest Break, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials	8.20
Investigation of Defendants, Defendant's Business Relationships, and the Industry in which Defendant Operates	3.80
Investigation of Defendant's Organizational, Corporate Structure, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	4.10
Investigation, Research, and Analysis Regarding Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity	5.50
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	4.10
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Layout, Configuration, and Differences Between Them (If Any) to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	6.90
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Review, and Other Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	5.0
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations Where Putative Class Members Worked Throughout California	5.40
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Pre-Shift and Post-Shift Duties, Safety, Scheduling and Shifts, Bonuses/Incentive/Shift	26.50

Differential Pay, Timekeeping, Rounding, Meal/Rest Breaks, On-Premises Breaks, Overtime Pay, Uniforms, Footwear, PPE/Supplies, Use of Personal Cell Phones, Use of Personal Vehicles, Mileage Reimbursement, and Reimbursement of Business-Related Expenses	
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Used to Conduct Everyday Business, Including Timekeeping, Scheduling, Communications, Document and Information Sharing, Marketing, Project Management, Customer Relations Management, Inventory, Logistics, Security, and Surveillance Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal and Rest Breaks	3.80
Research and Analysis of Potential Defenses Defendant May Raise, Including De Minimis Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	7.50
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, Including Research Regarding Which Experts to Retain and For What Purpose	5.30
Research and Investigation of Re: Defendant's Financial Circumstances and Impact of COVID-19 Pandemic on Defendant, Its Supply Chains and Operations, and Class Members' and Aggrieved Employees' Work	7.80
Meet and Communicate with Plaintiff Shannon Bostic During the Case	39.0
Meet and Communicate with Plaintiff Socorro Gamboa During the Case	48.40
Investigate, Meet, Communicate with, and/or Interview Class Members, and/or Percipient Witnesses	16.50
Pleadings and Court Filings	
Research and Draft Former Plaintiff Bostic's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 24, 2021) (Class Action)	8.10

Review Court's Notice of Case Assignment (filed on February 24, 2021) (Class Action)	0.10
Review Court's Initial Status Conference Order (Complex Cases and Class Actions) (filed on March 7, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Complex Designation (filed on March 9, 2021) (Class Action)	0.10
Research and Draft Former Plaintiff Bostic's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on April 27, 2021) (PAGA Action)	7.60
Review Court's Notice of Case Assignment (filed on April 27, 2021) (PAGA Action)	0.10
Review Court's Notice of Case Management Conference (filed on April 28, 2021) (PAGA Action)	0.10
Draft Former Plaintiff Bostic's Notice of Posting Jury Fees (filed on May 25, 2021) (Class Action)	0.20
Review Defendant's Notice of Related Case (served on May 28, 2021) (Class Action)	0.10
Review Defendant's Notice of Remote Appearance (served on May 28, 2021) (Class Action)	0.10
Review and Analyze Defendant The People Concern's Answer to Unverified Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq and Research Affirmative Defenses in Defendant The People Concern's Answer (served on May 28, 2021) (PAGA Action)	2.80
Review Defendant The People Concern's Notice of Related Case (served on May 28, 2021) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Statement (submitted on June 1, 2021) (Class Action)	1.60

Draft Former Plaintiff Bostic's Notice of Ruling at June 8, 2021 Initial Status Conference (filed on June 8, 2021) (Class Action)	0.10
Review Court's Order Authorizing Electronic Service (filed on June 8, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on June 8, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Notice of Related Case (filed on June 10, 2021) (Class Action & PAGA Action)	0.10
Draft Former Plaintiff Bostic's Notice of Posting Jury Fees (filed on June 18, 2021) (PAGA Action)	0.20
Review Defendant The People Concern's Notice of Ruling (served on June 25, 2021) (Class Action and PAGA Action)	0.10
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on June 28, 2021) (PAGA Action)	0.10
Review and Analyze Defendant The People Concern's Answer to Unverified Class Action Complaint for Damages and Research Affirmative Defenses in Defendant The People Concern's Answer (served on July 7, 2021) (Class Action)	2.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference and [Proposed] Order (submitted on October 5, 2021) (PAGA Action)	1.50
Review Court's Order Granting Stipulation to Continue Case Management Conference (filed on October 5, 2021) (PAGA Action)	0.10
Draft Former Plaintiff Bostic's Case Management Statement (filed on January 27, 2022) (Class Action)	0.80
Review Court's Minute Order Re: Further Status Conference (filed on February 2, 2022) (Class Action)	0.10

Draft Former Plaintiff Bostic's Notice Regarding February 2, 2022 Further Status Conference (filed on February 3, 2022) (Class Action)	0.10
Research and Draft Former Plaintiff Bostic's First Amended Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq, and Legal Research and Analysis of All Claims Involved (filed on May 12, 2022); Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Former Plaintiff Bostic's Leave to File First Amended Consolidated Complaint; and [Proposed] Order Thereon (submitted on April 29, 2022) (Class Action)	4.80
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement and Notice of Settlement (submitted on May 9, 2022) (Class Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement and Notice of Settlement (filed on May 9, 2022) (PAGA Action)	0.80
Review Court's Order Granting Former Plaintiff Bostic's Leave to File First Amended Consolidated Complaint (filed on May 9, 2022) (Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on May 26, 2022) (PAGA Action)	0.10
Review and Analyze Defendant The People Concern's Answer to Former Plaintiff Bostic's Unverified Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq., and Research Affirmative Defenses in Defendant The People Concern's Answer (served on June 1, 2022) (Class Action)	1.20
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on July 8, 2022) (PAGA Action)	0.10
Draft Former Plaintiff Bostic's Status Conference Statement (filed on July 21, 2022) (Class Action)	0.80

Review Court's Minute Order Re: Status Conference (filed on July 28, 2022) (Class Action)	0.10
Draft Former Plaintiff Bostic's Notice Regarding July 28, 2022 Status Conference (filed on July 29, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (Settlement) (filed on September 16, 2022) (PAGA Action)	1.30
Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (Settlement) (filed on September 27, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (Settlement) (filed on December 28, 2022) (PAGA Action)	1.10
Draft Former Plaintiff Bostic's Notice Regarding January 5, 2023 Order to Show Cause Regarding Dismissal (Settlement) Hearing (filed on January 5, 2023) (PAGA Action)	0.10
Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (Settlement) (filed on January 5, 2023) (PAGA Action)	0.10
Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (Settlement) (filed on April 6, 2023) (PAGA Action)	0.10
Draft Declaration of Alexandra Rose in Response to Order to Show Cause Regarding Why Sanctions Should Not Be Imposed for Counsel for Plaintiff's Failure to Appear/Contact the Court Pursuant to CCP 177.5 (filed on April 27, 2023) (PAGA Action)	0.90
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (Settlement) (submitted on April 27, 2023) (PAGA Action)	1.20
Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (Settlement) (filed on May 5, 2023) (PAGA Action)	0.10

Research and Draft Former Plaintiff Bostic and Plaintiff's Second Amended Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on June 20, 2023); Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Former Plaintiff Bostic and Plaintiff Leave to File a Second Amended Consolidated Complaint; and [Proposed] Order Thereon (submitted on June 9, 2023) (Class Action)	3.10
Review Court's Order Granting Former Plaintiff Bostic and Plaintiff Leave to File a Second Amended Consolidated Complaint (filed on June 16, 2023) (Class Action)	0.10
Review and Analyze Defendant The People Concern's Answer to Former Plaintiff Bostic and Plaintiff's Unverified Second Amended Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq., and Research Affirmative Defenses in Defendant The People Concern's Answer (served on June 30, 2023) (Class Action)	0.80
Review Defendant's Notice of Lodging (served on June 30, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (Settlement) (submitted on September 28, 2023) (PAGA Action)	1.10
Review Court's Minute Order Re: Order to Show Cause Re: Dismissal (Settlement) (filed on October 2, 2023) (PAGA Action)	0.10
Review Defendant's Notice of Ruling (served on October 27, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Statement (submitted on November 28, 2023) (Class Action)	0.90
Review Court's Minute Order Re: Further Status Conference (filed on December 4, 2023) (Class Action)	0.10
Appearances	

Prepare for and Telephonically Attend Initial Status Conference (June 8, 2021) (Class Action)	1.0
Prepare for and Telephonically Attend Further Status Conference (February 2, 2022) (Class Action)	0.60
Prepare for and Telephonically Attend Case Management Conference (May 26, 2022) (PAGA Action)	0.70
Prepare for and Telephonically Attend Re: Status Conference (July 28, 2022) (Class Action)	1.0
Prepare for and Telephonically Attend Order to Show Cause Re: Dismissal (September 27, 2022) (PAGA Action)	0.20
Prepare for and Telephonically Attend Non-Appearance Case Review (September 30, 2022) (Class Action)	0.20
Prepare for and Telephonically Attend Order to Show Cause Re: Dismissal (January 5, 2023) (PAGA Action)	0.50
Prepare for and Telephonically Attend Motion for Preliminary Approval of Class Action Settlement (May 3, 2023) (Class Action)	1.0
Prepare for and Telephonically Attend Order to Show Cause Re: Dismissal (May 5, 2023) (PAGA Action)	0.30
Prepare for and Telephonically Attend Motion for Preliminary Approval of Class Action Settlement (May 5, 2023) (Class Action)	1.0
Prepare for and Telephonically Attend Motion for Preliminary Approval of Class Action Settlement (June 16, 2023) (Class Action)	1.20
Prepare for and Telephonically Attend Order to Show Cause Re: Dismissal (October 2, 2023) (PAGA Action)	0.30
Prepare for and Telephonically Attend Motion for Preliminary Approval of Class Action Settlement (October 11, 2023) (Class Action)	2.50

Prepare for and Telephonically Attend Status Conference (December 4, 2023) (Class Action)	0.30
Prepare for and Telephonically Attend Non-Appearance Case Review re: Filing of Motion for Preliminary Approval of Settlement (January 4, 2024) (Class Action)	0.30
Prepare for and Telephonically Attend Non-Appearance Case Review re: Filing of Motion for Preliminary Approval of Settlement (January 16, 2024) (Class Action)	0.20
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (April 9, 2024)	0.80
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (April 30, 2024)	0.30
Discovery and Deposition	
Draft Letter to Defendant The People Concern Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Shannon Bostic (served on September 11, 2020)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Shannon Bostic (served on October 29, 2020)	6.20
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Socorro Gamboa (served on May 3, 2023)	3.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Socorro Gamboa (served on May 15, 2023)	1.10
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Shannon Bostic for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on February 19, 2021)	4.50

Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Socorro Gamboa for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on May 31, 2023)	3.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	22.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Former Plaintiff Bostic, Defendant, and Other Sources (served on December 21, 2021, December 22, 2021, and January 5, 2022)	85.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages Analysis/Calculations (submitted on January 9, 2022)	32.50
Remotely Attend Mediation Session (January 18, 2022; Zoom Video Conference)	14.50
Review and Analyze Confidential Financial Records Produced by Defendant (served on January 20, 2022)	6.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement (executed on September 22, 2022) and Draft Exhibits	20.50
Draft, Review, Revise, Negotiate, and Finalize First Amended Joint Stipulation of Class Action and PAGA Settlement (executed on June 30, 2023)	10.50
Prepare for Supplemental Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Statement Letter, and Compiling the Mediation Exhibits in Support of Mediation Statement Letter (submitted on November 22, 2023)	14.0
Remotely Attend Supplemental Mediation Session (November 29, 2023; Zoom Video Conference)	3.30
Draft, Review, Revise, Negotiate, and Finalize Addendum Memorandum of Understanding (executed on November 30, 2023)	2.10

Draft, Review, Revise, Negotiate, and Finalize Second Amended Joint Stipulation of Class Action and PAGA Settlement (executed on January 11, 2024)	6.50
Draft, Review, Revise, Negotiate, and Finalize Amendment No. 1 to Second Amended Finalize Joint Stipulation of Class Action and PAGA Settlement (executed on April 23, 2024)	1.50
Law and Motion	
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue July 28, 2022 Hearing on Motion for Preliminary Approval of Class Action Settlement; and [Proposed] Order Thereon (submitted on July 1, 2022) (Class Action)	1.20
Review Court's Order Stipulation to Continue July 28, 2022 Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on July 6, 2022) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval of Class Action Settlement (filed on September 30, 2022) (Class Action)	0.10
Research and Draft Former Plaintiff Bostic's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Joanna Ghosh in Support Thereof, Declaration of John Maceri in Support Thereof, Declaration of Shannon Bostic in Support Thereof, Declaration of Eric Springer on Behalf of Simpluris, Inc., (Proposed Settlement Administrator), and [Proposed] Order Thereon (filed on September 29, 2022) (Class Action)	21.50
Review Court's Motion for Preliminary Approval Checklist (filed on February 6, 2023) (Class Action)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Settlement (filed on February 8, 2023) (Class Action)	0.10
Draft Former Plaintiff Bostic's Notice Regarding February 8, 2023 Preliminary Approval Hearing (filed on February 17, 2023) (Class Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Deadline to File Supplemental Briefing in Support of Former Plaintiff Bostic's Motion for Preliminary Approval of Class Action Settlement; and [Proposed] Order Thereon (submitted on March 27, 2023) (Class Action)	1.30
Review Court's Order Re: Stipulation to Continue Deadline to File Supplemental Briefing in Support of Former Plaintiff Bostic's Motion for Preliminary Approval of Class Action Settlement (filed on March 30, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Hearing on Former Plaintiff Bostic's Motion for Preliminary Approval and Related Deadlines; and [Proposed] Order Thereon (submitted on April 20, 2023) (Class Action)	1.0
Review Court's Order Granting Stipulation to Continue Hearing on Former Plaintiff Bostic's Motion for Preliminary Approval and Related Deadlines (filed on April 21, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on May 5, 2023) (Class Action)	0.10
Draft Former Plaintiff Bostic's Notice Regarding May 5, 2023 Preliminary Approval Hearing (filed on May 12, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on June 16, 2023) (Class Action)	0.10
Draft Former Plaintiff Bostic and Plaintiff's Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement, Declaration of Brian J. St. John in Support Thereof, Declaration of John Maceri in Support Thereof, and [Revised Proposed] Order Thereon (filed on June 30, 2023) (Class Action)	10.50
Review Declaration of Marie D. Davis, Esq., Counsel for the People Concern Regarding <i>Cy Pres</i> Beneficiary , Declaration of John Maceri Regarding <i>Cy Pres</i> Beneficiary, and Declaration of Evelyn	0.40

Zarraga, Esq., Counsel for The People Concern Regarding Sampling of Records (served on June 30, 2023) (Class Action)	
Review Defendant The People Concern's Notice of and Motion for Order Sealing the Confidential Settlement Agreement Filed in Support of Motion for Preliminary Approval of Class Settlement and Notice of and Motion for Order Sealing the Confidential Declaration of John Maceri Filed in Support of Motion for Preliminary Approval of Class Settlement (served on June 30, 2023) (Class Action)	0.30
Review [Proposed] Order Granting Defendant The People Concern's Motion for Order Sealing the Confidential Declaration of John Maceri Filed in Support of Motion for Preliminary Approval of Class Action Settlement and [Proposed] Order Granting Defendant The People Concern's Motion for Order Sealing the Confidential Settlement Agreement Filed in Support of Motion for Preliminary Approval of Class Settlement (submitted on July 3, 2023) (Class Action)	0.20
Review Court's Ruling Re: Motion for Preliminary Approval (filed on October 11, 2023) (Class Action)	0.10
Review Court's Order Granting Defendant The People Concern's Motion for Order Sealing the Confidential Declaration of John Maceri Filed in Support of Motion for Preliminary Approval of Class Action Settlement (filed on October 11, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Settlement (filed on October 11, 2023) (Class Action)	0.10
Draft Request for Dismissal of Former Plaintiff Bostic's Individual Claims Without Prejudice Pursuant to California Rules of Court, Rule 3.770; Declaration of Joanna Ghosh in Support Thereof; and [Proposed] Order Thereon (filed on November 1, 2023) (Class and PAGA Actions)	1.50
Review Court's Order Dismissing Plaintiff Shannon Bostic's Individual Claims Without Prejudice (filed on November 9, 2023) (Class and PAGA Actions)	0.10
Draft Notice of Entry of Dismissal and Proof of Service (filed on November 8, 2023) (PAGA Action)	0.10

Draft Notice of Entry of Dismissal and Proof of Service (filed November 13, 2023) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review re: Filing of Motion for Preliminary Approval of Settlement (filed on January 4, 2024) (Class Action)	0.10
Draft Plaintiff Gamboa's Notice of Motion and Renewed Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities; Declaration of Brian J. St. John in Support Thereof; and [Proposed] Order Thereon (filed on January 16, 2024) (Class Action)	20.50
Review Court's Minute Order Re: Non- Appearance Case Review Re: Filing of Motion for Preliminary Approval of Settlement (filed on January 16, 2024) (Class Action)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Settlement (filed on April 9, 2024) (Class Action)	0.10
Draft Supplemental Declaration of Brian J. St. John in Support of Plaintiff Gamboa's Renewed Motion for Preliminary Approval of Class Action Settlement; Declaration of Socorro Gamboa in Support of Plaintiff Gamboa's Renewed Motion for Preliminary Approval of Class Action Settlement; [Revised Proposed] Order Thereon (submitted on April 23, 2024) (Class Action)	1.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Settlement (filed on April 30, 2024) (Class Action)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on April 30, 2024) (Class Action)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff Gamboa's Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Payment, and Declaration of Brian J. St. John in Support Thereof, and Revise [Proposed] Final Approval Order and Judgment (filed on September 9, 2024) (Anticipated)	24.50

Total Hours:	631.80
---------------------	--------

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Bostic v. Lamp Community, et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/11/2020	U.S. Postmaster	Postage	6.50
2/25/2021	Legal Document Server, Inc.	Attorney Service	180.23
2/25/2021	Los Angeles Superior Court	Complaint Filing Fee	435.00
2/25/2021	Los Angeles Superior Court	Complex Filing Fee	1,000.00
4/8/2021	Legal Document Server, Inc.	Attorney Service	220.00
4/13/2021	Legal Document Server, Inc.	Attorney Service	220.00
5/3/2021	Legal Document Server, Inc.	Attorney Service	205.00
5/18/2021	Legal Document Server, Inc.	Attorney Service	90.00
5/25/2021	Legal Document Server, Inc.	Attorney Service	115.25
5/25/2021	Los Angeles Superior Court	Jury Fee	150.00
6/2/2021	Legal Document Server, Inc.	Attorney Service	110.00
6/9/2021	Legal Document Server, Inc.	Attorney Service	90.00
9/1/2021	Case Anywhere LLC	Attorney Service	102.00
12/6/2021	Case Anywhere LLC	Attorney Service	120.00
12/21/2021	Lynn S. Frank	Mediation Fee	9,000.00
1/10/2022	FedEx Express	Courier Service	38.48
1/27/2022	Legal Document Server, Inc.	Attorney Service	15.20
2/4/2022	Legal Document Server, Inc.	Attorney Service	15.20
3/2/2022	Case Anywhere LLC	Attorney Service	132.00
4/29/2022	Legal Document Server, Inc.	Attorney Service	16.55
4/29/2022	Los Angeles Superior Court	Stipulation & Order Fee	20.00
5/10/2022	Legal Document Server, Inc.	Attorney Service	15.20
5/11/2022	Los Angeles Superior Court	Document Download Fee	19.00
5/12/2022	Legal Document Server, Inc.	Attorney Service	11.00
5/13/2022	Legal Document Server, Inc.	Attorney Service	15.20
6/6/2022	Case Anywhere LLC	Attorney Service	150.00
7/1/2022	Legal Document Server, Inc.	Attorney Service	17.30
7/1/2022	Los Angeles Superior Court	Stipulation & Order Fee	20.00
7/7/2022	Legal Document Server, Inc.	Attorney Service	15.95
7/22/2022	Legal Document Server, Inc.	Attorney Service	100.95
8/1/2022	Legal Document Server, Inc.	Attorney Service	15.95
9/30/2022	Legal Document Server, Inc.	Attorney Service	223.50
9/30/2022	Los Angeles Superior Court	Motion Fee	60.00
2/21/2023	Legal Document Server, Inc.	Attorney Service	15.95
3/1/2023	Case Anywhere LLC	Attorney Service	126.00
3/11/2023	General Logistics Systems US, Inc.	Courier Service	28.51
3/28/2023	Legal Document Server, Inc.	Attorney Service	45.31
3/30/2023	Legal Document Server, Inc.	Attorney Service	15.95
4/20/2023	Legal Document Server, Inc.	Attorney Service	17.54
4/20/2023	Los Angeles Superior Court	Stipulation & Order Fee	20.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Bostic v. Lamp Community, et al.

4/26/2023	Legal Document Server, Inc.	Attorney Service	16.15
5/12/2023	Legal Document Server, Inc.	Attorney Service	16.15
6/1/2023	Case Anywhere LLC	Attorney Service	150.00
6/12/2023	Legal Document Server, Inc.	Attorney Service	17.54
6/12/2023	Los Angeles Superior Court	Stipulation & Order Fee	20.00
6/20/2023	Legal Document Server, Inc.	Attorney Service	32.30
6/21/2023	Legal Document Server, Inc.	Attorney Service	16.15
7/3/2023	Legal Document Server, Inc.	Attorney Service	16.15
9/2/2023	Case Anywhere LLC	Attorney Service	180.00
10/25/2023	Legal Document Server, Inc.	Attorney Service	141.15
11/2/2023	Legal Document Server, Inc.	Attorney Service	16.15
11/13/2023	Legal Document Server, Inc.	Attorney Service	16.15
11/28/2023	FedEx Express	Courier Service	90.57
11/29/2023	Legal Document Server, Inc.	Attorney Service	16.15
12/6/2023	Case Anywhere LLC	Attorney Service	162.00
1/9/2024	Legal Document Server, Inc.	Attorney Service	16.15
1/17/2024	Legal Document Server, Inc.	Attorney Service	20.32
1/17/2024	Los Angeles Superior Court	Motion Fee	60.00
3/4/2024	Case Anywhere LLC	Attorney Service	150.00
4/24/2024	Legal Document Server, Inc.	Attorney Service	32.30
5/2/2024	Legal Document Server, Inc.	Attorney Service	16.15
5/6/2024	Legal Document Server, Inc.	Attorney Service	16.15
6/3/2024	Case Anywhere LLC	Attorney Service	162.00
Total:			<u>14,594.40</u>

LAWYERS for JUSTICE PC CASE COST DETAIL
Bostic v. Lamp Community, et al. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/7/2020	Los Angeles Superior Court	Document Download Fee	4.00
2/19/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
2/19/2021	U.S. Postmaster	Postage	7.16
4/27/2021	Legal Document Server, Inc.	Attorney Service	11.00
4/28/2021	Legal Document Server, Inc.	Attorney Service	30.43
4/28/2021	Los Angeles Superior Court	Complaint Filing Fee	435.00
5/6/2021	Legal Document Server, Inc.	Attorney Service	330.00
5/18/2021	Legal Document Server, Inc.	Attorney Service	15.20
6/18/2021	Los Angeles Superior Court	Jury Fee	150.00
6/18/2021	Legal Document Server, Inc.	Attorney Service	20.45
9/1/2021	Case Anywhere LLC	Attorney Service	102.00
10/4/2021	One Legal	Attorney Service	16.68
10/5/2021	One Legal	Attorney Service	17.27
10/5/2021	Los Angeles Superior Court	Stipulation & Order Fee	20.00
10/8/2021	One Legal	Attorney Service	16.68
5/10/2022	Legal Document Server, Inc.	Attorney Service	15.20
7/12/2022	Legal Document Server, Inc.	Attorney Service	15.95
9/16/2022	Legal Document Server, Inc.	Attorney Service	15.95
12/5/2022	Case Anywhere LLC	Attorney Service	120.00
12/28/2022	Legal Document Server, Inc.	Attorney Service	15.95
1/6/2023	Legal Document Server, Inc.	Attorney Service	15.95
4/12/2023	Legal Document Server, Inc.	Attorney Service	28.10
4/27/2023	Legal Document Server, Inc.	Attorney Service	16.15
9/29/2023	Legal Document Server, Inc.	Attorney Service	16.15
11/1/2023	Legal Document Server, Inc.	Attorney Service	16.15
11/8/2023	Legal Document Server, Inc.	Attorney Service	16.15
Total:			<u><u>1,542.57</u></u>