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Attorneys for Plaintiffs and the Class

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

BRANDON MCCRAY, individually, and on
behalf of other members of the general public
similarly situated, SERGIO ACOSTA,
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.

DAILYLOOK, INC., an unknown business
entity; and DOES 1 through 100, inclusive,

Defendant.

Case No. 22STCV18793

Honorable Lawrence P. Riff
Department SSC7

CLASS ACTION

**DECLARATION OF ELIZABETH
PARKER-FAWLEY IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES
AND COSTS AND ENHANCEMENT
AWARD**

Date: December 2, 2024
Time: 10:00 a.m.
Department: SSC7

Complaint Filed: June 7, 2022
FAC Filed: April 24, 2024
Trial Date: None Set

DECLARATION OF ELIZABETH PARKER-FAWLEY

I, Elizabeth Parker-Fawley, 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 Brandon McCray (“Plaintiff McCray”), Plaintiff Sergio Acosta (“Plaintiff Acosta”) (together “Plaintiffs” or “Class Representatives”), and the Class in the above-captioned matter. 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 May 31, 2024, in Department SSC7 of the above-entitled Court, the Honorable Lawrence P. Riff preliminarily approved the Joint Stipulation of Class and PAGA Representative Action Settlement and Release Agreement (“Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant DailyLook, Inc. (“Defendant”) (collectively with Plaintiffs, the “Parties”), and conditionally certified the Settlement Class for settlement purposes. The Court preliminarily appointed Plaintiffs as the representatives of the Settlement Class (“Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Settlement Class (“Settlement Class Counsel”). The Court approved and ordered the mailing of the Court Approved Notice of Class and Representative Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix” 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 Awards (“Motion for Final Approval”), no Settlement Class Members have objected to the Class Settlement or the contemplated request for Attorneys’ Fees and Costs, Enhancement Awards, Settlement Administration Costs, and PAGA Allocation.

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WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in this matter since prior to the commencement of Plaintiffs' putative class action (i.e., the above-captioned action) on June 7, 2022 in the Los Angeles County Superior Court.

5. Before initiating this matter, 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 our firm and Plaintiffs and research into the various legal issues involved in this matter, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, on-duty rest periods, representative PAGA claims, wage-and-hour law and enforcement, Plaintiffs' claims and allegations, and potential defenses. After conducting an initial investigation, our firm determined that the claims of Plaintiffs 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 in California at any time during the Settlement Class Period, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, business expenses, non-provision of suitable seating, reporting time wages, and paid leave.

6. Settlement Class Counsel conducted significant investigation and informal discovery regarding the facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing the case for class certification discovery, class certification, and trial prior to reaching the Agreement. The Parties exchanged a large volume of documents, data, and information in the course of the litigation and in connection with the mediation and settlement negotiations. Settlement Class Counsel had the opportunity to interview and obtain information from Plaintiffs and percipient witnesses, and reviewed and analyzed a large volume of information, data, and documents obtained from Plaintiffs, Defendant, and other sources. The large volume of information, documents, and data reviewed and analyzed by Settlement Class Counsel included, and was not limited to: Plaintiffs' employment records, a detailed sampling of Settlement Class Members' time and pay data, job descriptions, company policy acknowledgements, forms

(including but not limited to SOP Acknowledgement and Training Form and PTO Request Form), Defendant's operations and employment practices (including commission schedules and Warehouse Rules), and policies (including but not limited to Dailylook Break Policy, Dailylook Meal Policy, Dailylook Timekeeping Policy, Paid Time Off Policies, DailyLook Client Services Attendance Policy, DailyLook Fulfillment Center Attendance Policy, and Meal Period Waiver Agreement), among other information and documents. Settlement Class Counsel also 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 Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Settlement Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation briefs, and settlement documents; preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

7. As outlined herein, the Parties have conducted significant investigation and informal discovery during the course of litigating the case, mediation, and extensive settlement negotiations. Settlement Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiffs, Defendant, and other sources. The information, documents, and data provided a critical understanding of the nature of the work performed by the Settlement Class Members and PAGA Employees, as well as Defendant's operations and employment policies, practices, and procedures, and 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 negotiation process. Settlement Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, regular rate, meal and rest periods, suitable seating, sick pay, reporting time pay, representative PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiffs' claims and allegations, and Defendant's defenses thereto, as well as facts

1 discovered.

2 8. After conducting significant investigation of the facts and law during the
3 prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to try
4 to resolve the case. These efforts included participating in a formal, full-day mediation conducted
5 on January 19, 2023 by Steven Rottman, Esq., a well-regarded mediator experienced in mediating
6 complex labor and employment matters. During all settlement discussions, the Parties conducted
7 their negotiations at arm's length in an adversarial position. In the course of mediation and
8 settlement discussions, the Parties exchanged information, documents, and data, and discussed
9 various aspects of the case, including and not limited to, the risks and delays of further litigation,
10 the risks and expenses to the Parties of proceeding with class certification and trial, the law relating
11 to class certification, manageability, off-the-clock theory, regular rate, meal and rest periods,
12 suitable seating, sick pay, reporting time pay, representative PAGA claims, and wage-and-hour
13 law and enforcement, as well as the evidence produced and analyzed, and the possibility of appeals,
14 among other things. Arriving at a settlement that was acceptable to the Parties was not easy.
15 Defendant contended that individualized questions of fact predominate over any common issues,
16 and these issues would pose challenges to class certification and representative adjudication.
17 Defendant and its counsel felt strongly about Defendant's ability to avoid class certification and
18 prevail on the merits, while Plaintiffs' and Settlement Class Counsel believed that they would be
19 able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the
20 Parties ultimately agreed that the cases were well-suited for settlement given the legal issues
21 relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that would attend
22 further litigation. These risks of further litigation include, and are not limited to, a determination
23 that the claims are unsuitable for class treatment and/or representative adjudication, class de-
24 certification after certification of a class, allowing a jury to decide the claims asserted in the case,
25 and the real possibility of no monetary recovery after years of litigation.

26 9. By way of the accompanying Motion for Final Approval, Settlement Class Counsel
27 seeks attorneys' fees in the amount of \$280,500.00, which is 33% of the Gross Settlement Amount
28 of \$850,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs

1 and Settlement Class Counsel, Plaintiffs have agreed to a contingency fee of at least 35% of the
2 recovery.

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

10 11. While not necessarily required to be demonstrated because the percentage fee is
11 proper for this settlement, Settlement Class Counsel has incurred many hours of work in
12 connection with prosecuting the case such that the award of attorneys' fees is also justified under
13 a lodestar analysis with a modest multiplier of 1.12. Attorneys at Lawyers *for* Justice, PC have
14 spent a total of **296.60 hours** performing tasks and obtaining recovery in this matter. Attached
15 hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of
16 the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them
17 in performing those services. These hours include work done by several attorneys at Lawyers *for*
18 Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice,
19 PC had litigation support personnel actively engaged in assisting with the prosecution of this
20 matter.

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

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

10 **EXPERIENCE AND ADEQUACY OF**

11 **LAWYERS *for* JUSTICE, PC**

12 13. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
13 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
14 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is
15 attorney of record in dozens of employment-related putative class actions in both state and federal
16 courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on
17 litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA")
18 representative actions. Lawyers *for* Justice, PC has successfully litigated cases involving the
19 executive, administrative, and other overtime exemptions to the State of California and federal
20 overtime compensation requirements. Lawyers *for* Justice, PC, sometimes in association with
21 other law firms, has recovered millions of dollars on behalf of thousands of individuals in
22 California.

23 14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice,
24 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
25 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
26 extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute
27 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
28 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 100 motions, taken or defended over 150 depositions, prepared dozens of expert witnesses for deposition or trial, and attended over 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 16 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

1 integral role in preparing matters for class certification, including and not limited to, successful
2 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
3 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
4 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
5 RG13680477). Under his supervision, dozens of class action or representative cases have resulted
6 in settlements that have been granted court approval, including and not limited to, those listed in
7 paragraph 7 herein. He has handled over 150 mediations and worked on over 250 class action or
8 representative action cases which have resulted in settlement.

9 16. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a
10 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
11 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
12 Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010)
13 and in New York (since 2013), and she is admitted to practice in all U.S. District Courts in
14 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
15 Court. She has taken and defended dozens of depositions and successfully handled motion practice
16 in class action cases regarding discovery (including and not limited to, regarding class contact
17 information), class certification (both contested class certification and stipulated class
18 certification), arbitration agreements, coordination, and intervention. She has successfully handled
19 briefing and oral argument on appeal and obtained notable decisions regarding the Private
20 Attorneys General Act and employer efforts to compel arbitration of PAGA claims, e.g., *Roberto*
21 *Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert.
22 denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*,
23 (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited
24 to working on cases to obtain class certification through contested motion practice and working on
25 cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling
26 and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified
27 class consisting of approximately 2,600 individuals). She also has extensive experience with class
28 action and/or representative action settlements, and has handled this process in over 500 cases.

Under Edwin Aiwarzian, Arby Aiwarzian, and her supervision, Lawyers *for* Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. She is a member of the California Employment Lawyers Association, and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

17. I am the Director of Legal Operations at Lawyers *for* Justice, PC. I earned my Bachelor of Arts in History at Chapman University in 2011 and my Juris Doctor from the UCLA School of Law in 2014. In December 2014, I obtained a license to practice law from the California State Bar. I am admitted to practice in all courts in the State of California, as well as the Central, Southern, Northern, and Eastern District Courts of California and the Ninth Circuit Court of Appeal. Since December 2014, I have worked at Lawyers *for* Justice, PC, and my practice has almost exclusively focused on the prosecution of employment class actions and representative actions, handling cases in all stages of litigation from initial pleadings to assisting with class action trial matters, attending mediations, and preparing class action settlements. Previously, I was in the role of Manager of Litigation, in which I oversaw approximately twenty-five attorneys working on hundreds of employment class actions and representative actions and provided internal training for our litigation practice group and post-bar law clerks. In my current role, I oversee the legal operations of the firm, review and advise attorneys on work product and practices, provide training, and supervise cases from their inception to final accounting. I am a member of the California Lawyers Association Labor & Employment Group and the California Employment Lawyers Association.

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS FOR JUSTICE, PC

18. To date, Settlement 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. Lawyers *for* Justice, PC seeks reimbursement of **\$17,056.53** in litigation costs and expenses incurred in this matter, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement Agreement.

ENHANCEMENT AWARDS TO PLAINTIFFS

19. In recognition of their efforts and work serving as the Class Representatives, the Settlement Agreement provides for Enhancement Awards in the amount of \$10,000.00 each to Plaintiff McCray and Plaintiff Acosta. The requested Enhancement Awards are fair and appropriate. Plaintiffs spent a substantial amount of time and effort to produce relevant documents and information and provided facts and evidence to support the prosecution of the claims. Plaintiffs were available whenever Settlement Class Counsel needed them and actively tried to obtain and provide information that would facilitate the pursuit of the case. Plaintiffs spent numerous hours speaking with Settlement Class Counsel about their claims, describing their work experiences with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs to each receive \$10,000.00 as an Enhancement Award for their services in the case, in addition to their Individual Settlement Payment and Individual PAGA Payment.

20. I submit that the Agreement is fair, reasonable, and adequate, and is in the best interests of Plaintiffs, Settlement Class Members, 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 5th day of November 2024, at Glendale, California.



Elizabeth Parker-Fawley

EXHIBIT A

BRANDON MCCRAY V. DAILYLOOK, INC.
Los Angeles County Superior Court Case No. 22STCV18793

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Brandon McCray (“Plaintiff McCray”) During the Case	46.00
Meet and Communicate with Plaintiff Sergio Acosta (“Plaintiff Acosta”) (together with Plaintiff McCray, “Plaintiffs”) During the Case	44.00
Investigate, Communicate with, and/or Interview Class Members, Aggrieved Employees, and/or Percipient Witnesses	10.00
Review and Analyze Court Filings in <i>Clavell v. DailyLook, Inc.</i> , Los Angeles Superior Court Case Nos. 23STCV18032 and 23STCV18106	4.50
Pleadings and Court Filings	
Research and Draft Plaintiff McCray’s Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on June 7, 2022)	8.00
Review Court’s Notice of Case Assignment – Unlimited Civil Case (filed on June 7, 2022)	0.20
Draft Plaintiff McCray’s Peremptory Challenge to Judicial Officer (filed on June 10, 2022)	0.20
Review Court’s Minute Order Re: Plaintiff McCray’s Peremptory Challenge (filed on June 13, 2022)	0.10
Review Court’s Minute Order Re: Case Reassignment (filed on June 13, 2022)	0.10
Review Court’s Minute Order Re: Case Reassignment (filed on July 6, 2022)	0.10

Review Court's Minute Order Re: Newly Filed Class Action (filed on July 18, 2022)	0.10
Review Court's Initial Status Conference Order (Complex Litigation Program) (filed on July 18, 2022)	0.20
Review Defendant's Declaration of Ian A. Wright Re: Inability to Comply with Meet and Confer Requirement Related to Defendant's Demurrer to Plaintiff Brandon McCray's Complaint (served on July 20, 2022)	0.20
Review Defendant's Peremptory Challenge to Judicial Officer (served on July 22, 2022)	0.10
Review Court's Minute Order Re: Peremptory Challenge to Judicial Officer (filed on July 22, 2022)	0.10
Review Defendant's Notice of General Appearance of Defendant DailyLook, Inc. (served on July 22, 2022)	0.10
Review Court's Minute Order Re: Scheduling Initial Status Conference (filed on July 27, 2022)	0.10
Review Court's Minute Order Re: Case Reassignment (filed on July 27, 2022)	0.20
Review Court's Initial Status Conference Order (filed on July 27, 2022)	0.20
Review Defendant's Substitution of Attorney – Civil (served on August 30, 2022)	0.30
Draft Plaintiff McCray's Notice of Posting Jury Fees (filed on September 1, 2022)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on September 30, 2022)	1.60
Review Court's Minute Order Re: Initial Status Conference (filed on October 7, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Regarding Mediation and Discovery and [Proposed] Order (filed on October 7, 2022)	3.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulated Protective Order and [Proposed] Order Thereon (submitted on January 3, 2023)	1.40
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Statement and Notice of Settlement (submitted on January 26, 2023)	0.50
Review Court's Minute Order Re: Initial Status Conference (filed on February 8, 2023)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on May 30, 2023)	0.80
Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (issued on May 30, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on August 15, 2023)	0.80
Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (issued on August 16, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on September 14, 2023)	0.80
Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (issued on September 18, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order (submitted on October 12, 2023)	0.80
Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (issued on October 13, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval [Proposed] Order (submitted on November 28, 2023)	0.80
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Stipulation to Continue Plaintiff's and Deadline to File Motion for Preliminary Approval (filed on December 6, 2023)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval [Proposed] Order (submitted on December 27, 2023)	0.80
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on January 5, 2024)	0.20

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval [Proposed] Order (submitted on January 18, 2024)	0.80
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Stipulation to Continue Plaintiff McCray's and Deadline to File Motion for Preliminary Approval (filed on January 22, 2024)	0.20
Review Defendant's Notice of Related Case (served on February 9, 2024)	0.80
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order Thereon (submitted on February 16, 2024)	1.60
Research and Draft Plaintiffs' First Amended Class Action Complaint for Damages & Enforcement under the Private Attorneys General Act, Cal. Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed April 24, 2024)	7.50
Review and Analyze Defendant's Answer to Plaintiffs' First Amended Class Action Complaint and Research Affirmative Defenses in Defendant's Answer (served on May 7, 2024)	1.20
Appearances	
Prepare for and Remotely Attend Hearing Re: Initial Status Conference (October 7, 2022)	1.0
Prepare for, Travel to/from, and Attend Hearing Re: Initial Status Conference (February 8, 2023)	0.80
Prepare for, Travel to/from, and Attend Hearing Re: Motion for Preliminary Approval of Settlement (of Class Action Settlement) (May 31, 2024)	5.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff McCray (sent on April 11, 2022)	0.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff McCray (sent on May 3, 2022)	5.60
Draft E-Mail to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Acosta (sent on April 5, 2024)	0.20

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Acosta (sent on April 6, 2023)	4.20
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Sergio Acosta for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (“PAGA”) (served on May 30, 2023)	3.00
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant’s Counsel	12.20
Mediation/Settlement	
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 and Penalties Analysis/Calculations (submitted on January 12, 2023)	33.00
Attend Mediation Session (January 19, 2023; Zoom Video Conference)	8.00
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding Following Mediation (fully executed on January 23, 2023)	4.00
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class and PAGA Representative Action Settlement and Release Agreement (executed on February 19, 2024) and Notice of Class Action Settlement	22.50
Draft Revised Notice of Class and Representative Action Settlement	2.10
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	8.50
Law and Motion	
Research and Draft Plaintiffs’ Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Brandon McCray in Support Thereof, Declaration of Sergio Acosta in Support Thereof, Declaration of Jeremy Stern in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on February 20, 2024)	15.00

Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement of Class Action Settlement (filed on April 10, 2024)	0.10
Review Court's Order – Checklist for Preliminary Approval of Class Action Settlement (filed on April 10, 2024)	1.00
Research and Draft Declaration of Joanna Ghosh in Support Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on May 8, 2024)	7.50
Review and Analyze Defendant's Declaration of Paul M. Suh in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (served on May 8, 2024)	0.30
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement of Class Action Settlement (filed on May 31, 2024)	0.10
Review Court's Revised Order Granting Preliminary Approval of Class Action Settlement (issued on May 31, 2024)	0.30
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Preliminary Approval of Class Action Settlement (filed on June 12, 2024)	0.20
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Award, Declaration of Elizabeth Parker-Fawley in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on November 5, 2024)	21.50
Total Hours:	296.6

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
McCray vs. DailyLook, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/11/2022	U.S. Postmaster	Postage	\$7.38
6/8/2022	Legal Document Server, Inc.	Attorney Service	\$112.06
6/8/2022	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
6/8/2022	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
6/10/2022	Legal Document Server, Inc.	Attorney Service	\$235.00
6/15/2022	ProLegal	Attorney Service	\$116.16
7/19/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
8/5/2022	Legal Document Server, Inc.	Attorney Service	\$11.75
9/1/2022	Legal Document Server, Inc.	Attorney Service	\$30.28
9/1/2022	Los Angeles Superior Court	Jury Fee	\$150.00
10/3/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
10/3/2022	Steven J. Rottman, LLC	Mediation Fee	\$12,500.00
10/7/2022	Legal Document Server, Inc.	Attorney Service	\$34.60
10/7/2022	Los Angeles Superior Court	Stipulation Fee	\$20.00
12/7/2022	Case Anywhere LLC	Attorney Service	\$125.40
1/27/2023	Legal Document Server, Inc.	Attorney Service	\$15.95
3/2/2023	Case Anywhere LLC	Attorney Service	\$141.00
5/30/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
5/30/2023	U.S. Postmaster	Postage	\$10.20
5/30/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
5/30/2023	Los Angeles Superior Court	Stipulation Fee	\$20.00
6/2/2023	Case Anywhere LLC	Attorney Service	\$141.00
8/15/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
8/15/2023	Los Angeles Superior Court	Stipulation Fee	\$20.00
9/3/2023	Case Anywhere LLC	Attorney Service	\$141.00
9/12/2023	Legal Document Server, Inc.	Attorney Service	\$15.95
9/14/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
10/13/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
10/13/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
10/17/2023	Los Angeles Superior Court	Document Download Fee	\$5.00
11/29/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
11/29/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
12/6/2023	Legal Document Server, Inc.	Attorney Service	\$141.15
12/7/2023	Case Anywhere LLC	Attorney Service	\$153.00
12/27/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
12/27/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
1/3/2024	Los Angeles Superior Court	Document Download Fee	\$5.40
1/5/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
1/19/2024	Legal Document Server, Inc.	Attorney Service	\$17.54

LAWYERS for JUSTICE PC CASE COST DETAIL
McCray vs. DailyLook, Inc.

1/19/2024	Los Angeles Superior Court	Stipulation Fee	\$20.00
1/23/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
2/15/2024	Legal Document Server, Inc.	Attorney Service	\$28.10
2/16/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
2/16/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
2/21/2024	One Legal	Attorney Service	\$19.71
2/21/2024	Legal Document Server, Inc.	Attorney Service	\$208.32
2/21/2024	Los Angeles Superior Court	Motion Fee	\$60.00
3/5/2024	Case Anywhere LLC	Attorney Service	\$213.00
4/24/2024	Legal Document Server, Inc.	Attorney Service	\$32.30
5/9/2024	Legal Document Server, Inc.	Attorney Service	\$184.00
5/10/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
6/4/2024	Case Anywhere LLC	Attorney Service	\$171.00
6/12/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
9/5/2024	Case Anywhere LLC	Attorney Service	\$141.00
Total:			<u>\$17,056.53</u>