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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY ALAMEDA**

ASHLEY DENNIS, 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;

Plaintiff,

vs.

BRIDGE PROPERTY MANAGEMENT
CO.; and DOES 1 through 100, inclusive,

Defendants.

Case No.: RG20063553

Honorable Michael Markman
Department 23

Reservation No. A-20063553-001

CLASS ACTION

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
CLASS COUNSEL ATTORNEYS' FEES
AND COSTS, AND INCENTIVE AWARD
TO PLAINTIFF**

Hearing Date: April 8, 2025
Time: 10:00 a.m.
Department: 23

Complaint Filed: June 4, 2020
FAC Filed: May 8, 2024
Trial Date: None Set

DECLARATION OF VARTAN MADOYAN

I, Vartan Madoyan, 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 Ashley Dennis (“Plaintiff”) and the Class. 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 October 7, 2024, the above-entitled Court preliminarily approved the Amended Joint Stipulation of Class Action and PAGA Settlement Agreement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant, and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff as a representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Proposed Class Action Settlement and Hearing date for Final Court Approval (“Class Notice”), and 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 Settlement Administrator for handling the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Class Counsel Attorneys’ Fees and Costs, and Incentive Award to Plaintiff (“Motion for Final Approval”), no Class Members have objected to the Class Settlement or to the request for Class Counsel Attorneys’ Fees and Costs, Incentive Award to Plaintiff, Settlement Administration Costs, or allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, et seq (“PAGA”).

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WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating this matter action since the inception of Plaintiff’s lawsuit (the “Action”).

5. Lawyers *for* Justice, PC fully and actively participated in the litigation of the Action, including and not limited to, preparing the pleadings, case strategy, undertaking investigation, performing legal research, and conducting claims evaluation and analysis. Class Counsel has worked cooperatively to strategize and prosecute the Action. Ultimately, Class Counsel’s efforts and Plaintiff’s efforts have been successful in reaching the Settlement.

6. Before initiating the Action, 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 Plaintiff, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, misclassification, off-the-clock theory, meal and rest periods, reimbursement of business-related expenses, wage-and-hour enforcement, representative PAGA claims, Plaintiff’s claims and allegations, and potential defenses. After conducting initial investigation, Lawyers *for* Justice, PC determined that Plaintiff’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 “all current and former salaries property-level ‘managers,’ or persons who held similar job titles and/or performed similar job duties, employed by Defendant in California at any time during the period from June 4, 2016 through February 11, 2022” who were misclassified as ‘exempt’ and who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses.

7. Collectively, Class Counsel investigated the veracity, strength, and scope of the claims and were preparing the Action for class certification and trial prior to reaching the Settlement. Class Counsel conducted formal and informal discovery and investigation into the facts of the case, exchanging a large volume of information, documents, and data in the course of

litigation and mediation and settlement negotiations. Class Counsel reviewed and analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. The documents and data reviewed and analyzed by Class Counsel included, and were not limited to: Plaintiff's Employment Application, Plaintiff Offer Letter, Defendant's Employee Occupancy Agreement, Memorandum Regarding Utility Expenses, Employee Performance Evaluation, Earnings Statements, Arbitration Agreement, Employee Handbook Policy, Definition of Employment Status Definition Policy, Overtime Policies, Work Schedule Policies, Meal and Rest Period Policies, Personnel Records, Travel and Expenses Reimbursement Policies, and Sampling of Class Members' Employment Data. Plaintiff propounded multiple sets of formal discovery and engaged in extended meet and confer efforts, followed by negotiations over a Belaire-West Notice and then extensive informal discovery. Such discovery and investigation was critical for the private mediation and settlement negotiations conducted in this matter. Class Counsel researched applicable law, developed liability and damages valuation models in connection with the mediation and settlement negotiation, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery, and production of various information, documents, and data in the course of litigation and settlement negotiations. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising pleadings, drafting the mediation brief; preparing and appearing for court proceedings; and preparing for and attending a mediation session and engaging in extensive settlement negotiations, among other tasks.

8. As outlined herein, the parties have conducted significant formal and informal discovery and investigation in the Action. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, or other sources. The information, documents, and data provided a critical understanding of the nature of the work performed by the Class Members and the PAGA Employees, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability,

1 damages, and valuation issues in connection with all phases of litigation, and ultimately with the
2 mediation and settlement negotiation process. Class Counsel also performed significant research
3 into the applicable law, which is evolving as it relates to misclassification, class certification, off-
4 the-clock theory, meal and rest periods, reimbursement of business-related expenses,
5 representative PAGA claims, wage-and-hour enforcement, Plaintiff's claims and allegations, and
6 Defendant's defenses thereto, as well as facts discovered. Accordingly, sufficient investigation
7 and review of information have taken place in order for the parties to be adequately informed of
8 the nature and extent of the claims, and to enable all parties to fully evaluate the Settlement for
9 its fairness, adequacy, and reasonableness.

10 9. After conducting significant investigation of the facts and law during the
11 prosecution of the case, the Parties engaged in extensive settlement negotiations to try to resolve
12 the Action. These efforts included participating in a formal mediation on September 9, 2021
13 with respected mediator Jeffrey Krivis, Esq., a well-regarded mediator experienced in mediating
14 complex labor and employment matters. During all settlement discussions, the parties conducted
15 their negotiations at arm's length in an adversarial position. In the course of mediation and
16 settlement discussions, the Parties exchanged information, documents, and data, and discussed
17 various aspects of the case, including and not limited to, the risks and delays of further litigation,
18 the risks and expenses to the Parties of proceeding with class certification and trial, the law
19 relating to class certification, misclassification, manageability, off-the-clock theory, meal and
20 rest periods, representative PAGA claims, and wage-and-hour law and enforcement, as well as
21 the evidence produced and analyzed, and the possibility of appeals, among other things.
22 Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended
23 that individualized questions of fact predominate over any common issues, and these issues
24 would pose challenges to class certification and representative adjudication. Defendant and its
25 counsel felt strongly about Defendant's ability to avoid class certification and prevail on the
26 merits, while Plaintiff and Class Counsel believed that they would be able to obtain class
27 certification and prevail at trial. The matter did not resolve at mediation, but the Parties
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1 continued with their litigation and settlement efforts. Ultimately, with the aid of Mr. Krivis, the
2 Parties agreed that the case was well-suited for settlement given the legal issues relating to
3 Plaintiff's principal claims, as well as the costs and risks to the Parties that would attend further
4 litigation. These risks of further litigation include, and are not limited to, a determination that
5 the claims are unsuitable for class treatment and/or representative adjudication, class de-
6 certification after certification of a class, allowing a jury to decide the claims asserted in the case,
7 including but not limited to misclassification, and the real possibility of no monetary recovery
8 after years of litigation.

9 10. Plaintiff moves for an award of attorneys' fees to Class Counsel in the amount of
10 \$332,500.00 which is thirty-five (35%) of the Gross Settlement Fund of \$950,000.00. Pursuant
11 to the contingency-fee agreement entered into by and between Plaintiff and my firm, Plaintiff has
12 each agreed to a contingency fee of at least forty-five percent (45%) of the recovery.

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

19 12. While not necessarily required to be demonstrated because the percentage fee
20 from the common fund is proper for this settlement, Class Counsel has incurred many hours of
21 work in connection with prosecuting the Action such that the award of attorneys' fees is also
22 justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of
23 313.80 hours performing tasks and obtaining recovery in the Action. Based on a reasonable
24 blended rate of \$850 per hour, the lodestar for my office totals at least \$266,730.00 (313.80
25 hours x \$850). Attached hereto as "EXHIBIT A" is an Attorney Task and Time Chart that sets
26 forth in detail the nature of the legal services provided by Lawyers *for* Justice, PC. The hours
27 attributable to Lawyers *for* Justice, PC include work done by several other attorneys at the firm
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1 and myself. Additionally, separate from the hours of work referenced herein and in the attached
2 chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with
3 the prosecution of this matter.

4 13. The work performed in this particular matter, the background of our firm, as well
5 as the individual backgrounds, training, and experience of the attorneys who worked on this
6 Action, in litigating complex wage-and-hour cases, and in particular, employment class actions
7 and representative actions, support a reasonable blended hourly rate of compensation at the rate
8 of at least \$850 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice,
9 PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour
10 for legal services performed, by courts granting approval of settlements in other wage-and-hour
11 class action and/or representative action cases: final approval of the class and representative
12 action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court
13 Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved
14 compensation at the rate of \$936.47 per hour; final approval of the class and representative
15 action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court
16 Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved
17 compensation at the rate of \$919.57 per hour; final approval of the class and representative
18 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
19 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved
20 compensation at the rate of \$855.96 per hour.

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

23 14. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the
24 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
25 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC
26 is attorney of record in tens of dozens of employment-related putative class actions in both state
27 and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys
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who focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of 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. Lawyers *for* Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

15. Edwin Aiwarzian is a 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. 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.

1 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
2 has successfully litigated cases involving the executive, administrative, and other overtime
3 exemptions to the State of California and federal overtime compensation requirements. Under
4 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
5 contested motion practice in approximately fifteen (15) cases in the last decade and litigated over
6 1,000 class action or representative action cases.

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

27 17. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
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1 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
2 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
3 Georgetown University Law Center in 2010. She is admitted to practice in California (since
4 2010) and in New York (since 2013), and is admitted to practice in all U.S. District Courts in
5 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S.
6 Supreme Court. She has taken and defended dozens of depositions and successfully handled
7 motion practice in class action cases regarding discovery (including and not limited to, regarding
8 class contact information), class certification (both contested class certification and stipulated
9 class certification), arbitration agreements, coordination, and intervention. She has successfully
10 handled briefing and oral argument on appeal and obtained notable decisions regarding the
11 Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v.*
12 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal.,
13 May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175
14 (2019). She has significant experience with class actions, including and not limited to working
15 on cases to obtain class certification through contested motion practice and working on cases in
16 the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and
17 pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified
18 class consisting of approximately 2,600 individuals). She also has extensive experience with
19 class action and/or representative action settlements, and has handled this process in over three
20 hundred (300) cases. Under Edwin Aiwazian, Arby Aiwazian, and her supervision, Lawyers *for*
21 Justice, PC has handled the class certification and court approval process for hundreds of class
22 action and/or representative action matters that have successfully resolved. She is a member of
23 the California Employment Lawyers Association and, on several occasions, has been a speaker
24 regarding topics in wage and hour law at the organization's continuing legal education events.

25 18. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts
26 degree in Economics from the University of California, San Diego in 2007, and a Juris Doctor
27 degree from Loyola Law School in 2011, graduating with Cum Laude and Order of the Coif
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honors. I am admitted to practice before all courts in the State of California and all U.S. District Courts in California. I externed for the Honorable Victoria S. Kaufman of the United States Bankruptcy Court, Central District of California, from June 2009 to August 2009. I externed for the Honorable Gary A. Feess of the United States District Court, Central District of California, from January 2010 to May 2010. From 2011 through and including the present, my practice consisted almost exclusively of complex wage and hour class action and PAGA action matters in California. From October 2011 to June 2013, I was an Associate at Littler Mendelson's Century City, California office, working for one of the largest employer-side labor and employment law firms in the United States. From July 2013 to March 2014, I was an Associate at Sheppard, Mullin, Richter & Hampton's Century City, California office. From March 2014 to July 2023, I worked as an Associate and then as Counsel at Baker Hostetler LLP's Los Angeles office. From August 2023 to the present, I have been a Member of Lawyers *for* Justice, PC. I have taken and defended dozens of depositions and have successfully handled motion practice in class action and PAGA cases regarding discovery (including and not limited to motions regarding class contact information), class certification (both contested class certification and stipulated class certification), dispositive motions, arbitration agreements, coordination, and intervention. I have successfully handled a complex wage and hour class action and PAGA case through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange County Superior Court, Case No. 30-2013-00692890. I also successfully handled briefing on appeal regarding employer efforts to compel arbitration. *TitleMax of Cal. v. Pena*, California Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28, 2023) (unpublished decision). Further, I have extensive experience with settlements of class actions and PAGA actions and have handled and supervised this process in over one hundred (100) cases.

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

19. 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

1 granted final approval of the class and PAGA representative action settlement. The Kern County
2 Superior Court Case Number is S-1500-CV-273194-LHB.

3 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
4 wage-and-hour class and PAGA representative action against a national wholesale distributor of
5 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
6 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
7 representative action settlement. The Sacramento County Superior Court Case Number is 34-
8 2012-00136285.

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

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

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

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

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

8 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
9 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
10 involving allegations of misclassification of the “Department Manager” position. On August 12,
11 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
12 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
13 County Superior Court Case Number is RG13680477.

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

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

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

1 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
2 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
3 the employer's motion to compel arbitration, which resulted in a published opinion by the
4 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
5 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
6 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
7 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
8 5046.

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

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

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

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

2 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
3 representative action against a food company on behalf of non-exempt employees. On June 30,
4 2017, the court granted final approval of the class and PAGA representative action settlement.
5 The Sacramento County Superior Court Case Number is 34-2015-00175871.

6 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
7 representative action against a chocolate company on behalf of non-exempt employees. On July
8 19, 2017, the court granted final approval of the class and PAGA representative action
9 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

24 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a
25 wage-and-hour class and PAGA representative action against a property management company
26 on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
27 approval of the class and PAGA representative action settlement. The Los Angeles County
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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 BC498401.

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

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

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

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

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

6 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
7 wage-and-hour class and PAGA representative action against a national retailer of apparel and
8 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted
9 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the
10 court granted final approval of the class and PAGA representative action settlement. The
11 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

17 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
18 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
19 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
20 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
21 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
22 approval of the PAGA representative action settlement. The San Diego County Superior Court
23 Case Number is 34-2016-00005578-CU-OE-CTL.

24 jj) LFJ, in association with co-counsel therein, represented the plaintiff in a
25 wage-and-hour class and PAGA representative action against a large national drug testing
26 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
27 plaintiff's motion for class certification and certified a class. On October 28, 2022, the court
28

1 granted final approval of the class and PAGA representative action settlement. The San Diego
2 County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

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

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

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

26 oo) LFJ represents the plaintiffs in a wage-and-hour class action against a
27 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for
28

the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The Los Angeles County Superior Court Case Number is BC707670.

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

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS FOR JUSTICE, PC

20. To date, Class Counsel has borne all the risks and costs of litigation and will not receive any compensation until recovery is obtained in the Action. Lawyers for Justice, PC seeks reimbursement of \$10,848.83 in litigation costs and expenses incurred in the Action, as reflected in "EXHIBIT B" attached hereto. My firm's expenses were reasonable and necessary in the prosecution of the Action and to obtain the Settlement, and is less than the maximum amount allocated under the Settlement Agreement.

INCENTIVE AWARD TO PLAINTIFF

21. In recognition of Plaintiff's effort and work serving as the Class Representative and PAGA Representative, the Settlement provides an Incentive Award in the amount of \$10,000.00 to Plaintiff. The requested Incentive Award is fair and appropriate. Plaintiff 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. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would facilitate the pursuit of the case. Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing her work experiences with Defendant, and gathering and reviewing documents. Plaintiff also agreed to a general release in exchange for an Incentive Award. Accordingly, it is appropriate for Plaintiff to receive \$10,000.00 as a reasonable Incentive Award for her service in the case, in addition to her individual settlement payments.

22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interest of Plaintiff, Class Members, 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 14th day of March 2025, at Glendale, California.

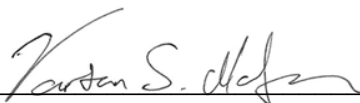

Vartan Madoyan

EXHIBIT A

ASHLEY DENNIS V. BRIDGE PROPERTY MANAGEMENT CO.
Alameda County Superior Court, Case No. RG20063553

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Ashley Dennis (“Plaintiff”) during the Case	39.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and Percipient Witnesses	10.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft Plaintiff’s Class Action Complaint for Damages (filed on June 4, 2020)	9.60
Review Court’s Notice of Hearing (issued on June 17, 2020)	0.10
Review Court’s Order Re: Continuing Complex Determination Hearing (issued on July 28, 2020)	0.10
Review Court’s Order Re: Continuing Complex Determination Hearing (issued on August 25, 2020)	0.10
Review Court’s Order Re: Continuing Complex Determination Hearing (issued on September 29, 2020)	0.10
Draft Plaintiff’s Case Management Statement (filed on October 5, 2020)	1.10
Draft Plaintiff’s Notice of Posting Jury Fees (filed on October 8, 2020)	0.10

Review Court's Order Re: Granting Complex Designation and Notice of Assignment of Judge for All Purposes (issued on October 20, 2020)	0.10
Review and Analyze Defendant Bridge Property Management Company's ("Defendant") Answer to Plaintiff's Class Action Complaint for Damages (served on October 26, 2020), and Research Affirmative Defenses in Defendant's Answer	2.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (filed on November 3, 2020)	1.50
Review Court's Order Re: Case Management Conference (issued on November 10, 2020)	0.10
Review Court's Order Re: Case Management Conference (issued on January 12, 2021)	0.10
Review Defendant's Substitution of Attorney (served on January 26, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on April 2, 2021)	1.20
Review Court's Order to Continue Case Management Conference (issued on April 2, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (submitted on September 13, 2021)	1.10
Review Court's Order to Continue Case Management Conference (issued on September 14, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Report and Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (submitted on October 19, 2021)	1.10
Review Court's Order to Continue Case Management Conference (issued on October 19, 2021)	0.10
Review Court's Minute Order Regarding Case Management Conference (issued on October 26, 2021)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on December 3, 2021)	1.20
Review Court's Order to Continue Case Management Conference (issued on December 8, 2021)	0.10
Draft Notice of Entry of Judgment or Order (filed on December 10, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on January 18, 2022)	1.10
Review Court's Order to Continue Case Management Conference (issued on January 19, 2022)	0.10
Draft Notice of Entry of Judgment or Order (filed on February 8, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement; Notice of Settlement (filed on April 14, 2022)	1.30
Review Court's Minute Order and Case Management Conference Order (issued on April 26, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (filed on August 16, 2022)	1.30
Review Court's Minute Order Re: Case Management Conference (issued on August 23, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on December 13, 2022)	1.10
Review Court's Minute Order Re: Case Management Conference (issued on December 20, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on March 10, 2023)	1.10

Review Court's Minute Order Re: Case Management Conference (issued on March 17, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on June 6, 2023)	1.10
Review Court's Minute Order Re: Case Management Conference (issued on June 13, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on August 31, 2023)	1.20
Review Court's Minute Order Re: Case Management Conference (issued on September 12, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on December 8, 2023)	1.10
Review Court's Order to Continue Case Management Conference (issued on December 12, 2023)	0.10
Draft Notice of Entry of Judgment or Order (filed on December 12, 2023)	0.10
Review Notice of Case Reassignment (issued on March 5, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on March 5, 2024)	0.90
Review Court's Minute Order Re: Case Management Conference (issued on March 12, 2024)	0.10
Review Court's Notice of Case Reassignment (issued on March 27, 2024)	0.10
Draft Plaintiff's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq (filed on May 8, 2024), Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff's Leave to File First Amended Complaint; [Proposed] Order Thereon (submitted on April 11, 2024)	5.80

Review Court's Order Granting Plaintiff's Leave to File Amended Complaint (issued on April 15, 2024)	0.10
Draft Notice of Entry of Judgment or Order (filed on April 24, 2024)	0.10
Review Court's Own Motion Re: Case Management Rescheduling (issued on May 15, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on June 14, 2024)	0.90
Review General Order (Case Management Order) (issued on June 21, 2024)	0.10
Review Defendant's Answer to Plaintiff's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq (filed on June 28, 2024), and Research Affirmative Defenses in Answer	1.30
Draft Notice of Entry of Judgment or Order (filed on October 15, 2024)	0.10
Appearances	
Prepare for and Remotely Attend Case Management Conference (January 12, 2021)	0.50
Discovery and Deposition	
Draft Letter to Bridge Housing Corporation Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ashley Dennis (served on December 31, 2019)	1.90
Draft Follow-Up Letter to Bridge Housing Corporation Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ashley Dennis (served on February 21, 2020)	1.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ashley Dennis	4.10

Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on October 29, 2020)	4.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; December 1, 2020) (served on October 29, 2020)	1.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; December 2, 2020) (served on October 29, 2020)	1.70
Draft Plaintiff's Special Interrogatories (Set Three) to Defendant (served on November 1, 2022)	0.50
Review Defendant's Responses to Plaintiff's Special Interrogatories (Set Three) (served on November 29, 2022)	0.50
Draft, Review, and Revise Belaire-West Privacy Notice and Postcard, Negotiate with Defendant's Counsel Regarding Same, and Communicate With and Obtain Bids from Third-Party Administrators Regarding Same (December 2022 – January 2023)	2.80
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff under the Private Attorneys General Act (served on May 23, 2023)	4.80
Draft Correspondence to, Meet and Confer with, and Respond to Correspondence from, Defendant's Counsel	19.50
Mediation/Settlement	
Review and Analyze Extensive Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	48.50

Prepare for Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages and Penalties Analysis/Calculations (submitted on September 9, 2021)	36.50
Attend Mediation Session (September 16, 2021; Zoom Video Conference)	8.50
Review and Analyze Mediator's Proposal	2.50
Continue to Engage in Settlement Negotiations	5.40
Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed on May 25, 2022)	3.60
Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement Agreement and Release (executed on April 24, 2024), and Draft Notice of Class Action Settlement and Hearing Date for Final Court Approval	18.20
Review, Revise, Negotiate, and Finalize Amended Joint Stipulation of Class Action and PAGA Settlement Agreement and Release (executed on September 23, 2024)	2.20
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	7.50
Law and Motion	
Research and Draft Plaintiff's Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Vartan Madoyan in Support Thereof, Declaration of Plaintiff in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on July 1, 2024)	18.80
Review Court's Minute Order Regarding Motion for Preliminary Approval (issued on July 30, 2024)	0.10

Review Court's Tentative Ruling Regarding Motion for Preliminary Approval of Class Action Settlement (issued on August 15, 2024)	0.30
Review Court's Minute Order Regarding Hearing on Motion for Preliminary Approval (issued on August 20, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Hearing Date on Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on September 10, 2024)	1.10
Draft Supplemental Declaration of Vartan Madoyan in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement and Amended [Proposed] Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement (submitted on September 23, 2024)	3.70
Review Court's Minute Order Regarding Hearing on Motion for Preliminary Approval of Class Action Settlement (issued on October 1, 2024)	0.10
Review Court's Amended Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement (issued on October 7, 2024)	0.30
Review Declaration of Settlement Administrator, and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Incentive Award, Declaration of Vartan Madoyan in Support Thereof, Declaration of Plaintiff in Support Thereof; and [Proposed] Final Approval Order and Judgment (filed on March 14, 2025)	22.50
Total Hours:	313.80

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Dennis vs. Bridge Property Management Co.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/31/2019	U.S. Postmaster	Postage	\$6.85
2/21/2020	U.S. Postmaster	Postage	\$8.00
6/4/2020	Legal Document Server, Inc.	Attorney Service	\$130.00
6/27/2020	Legal Document Server, Inc.	Attorney Service	\$150.00
8/7/2020	Legal Document Server, Inc.	Attorney Service	\$150.00
9/24/2020	Legal Document Server, Inc.	Attorney Service	\$65.00
10/5/2020	Legal Document Server, Inc.	Attorney Service	\$115.00
10/5/2020	General Logistics Systems US, Inc.	Courier Service	\$29.61
10/7/2020	Legal Document Server, Inc.	Attorney Service	\$130.00
10/8/2020	Legal Document Server, Inc.	Attorney Service	\$130.00
10/8/2020	General Logistics Systems US, Inc.	Courier Service	\$45.06
10/13/2020	Legal Document Server, Inc.	Attorney Service	\$260.00
10/29/2020	General Logistics Systems US, Inc.	Courier Service	\$11.98
11/3/2020	Legal Document Server, Inc.	Attorney Service	\$130.00
4/2/2021	Legal Document Server, Inc.	Attorney Service	\$65.00
4/7/2021	Legal Document Server, Inc.	Attorney Service	\$130.70
4/7/2021	Alameda Superior Court	Stipulation & Order Fee	\$20.00
6/24/2021	First Mediation Corporation	Mediation Fee	\$8,000.00
9/13/2021	One Legal	Attorney Service	\$70.08
9/13/2021	Alameda Superior Court	Stipulation & Order Fee	\$20.00
12/6/2021	Legal Document Server, Inc.	Attorney Service	\$115.00
12/8/2021	Legal Document Server, Inc.	Attorney Service	\$19.80
12/8/2021	Alameda Superior Court	Stipulation & Order Fee	\$20.00
12/10/2021	Legal Document Server, Inc.	Attorney Service	\$18.95
1/20/2022	Legal Document Server, Inc.	Attorney Service	\$18.90
1/20/2022	Alameda Superior Court	Stipulation & Order Fee	\$20.00
2/8/2022	Legal Document Server, Inc.	Attorney Service	\$232.95
4/14/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
8/16/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
12/13/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
3/10/2023	Legal Document Server, Inc.	Attorney Service	\$18.70
5/23/2023	U.S. Postmaster	Postage	\$9.96
5/23/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
6/6/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
8/31/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
12/11/2023	Legal Document Server, Inc.	Attorney Service	\$20.29
12/11/2023	Alameda Superior Court	Stipulation & Order Fee	\$20.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Dennis vs. Bridge Property Management Co.

12/26/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
3/6/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
4/12/2024	Legal Document Server, Inc.	Attorney Service	\$20.29
4/12/2024	Alameda Superior Court	Stipulation & Order Fee	\$20.00
4/25/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
5/8/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
6/14/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
6/24/2024	Alameda Superior Court	Document Download Fee	\$1.00
6/26/2024	Alameda Superior Court	Document Download Fee	\$3.00
7/2/2024	Legal Document Server, Inc.	Attorney Service	\$23.07
7/2/2024	Alameda Superior Court	Motion Fee	\$60.00
7/3/2024	Legal Document Server, Inc.	Attorney Service	\$194.25
9/11/2024	Legal Document Server, Inc.	Attorney Service	\$21.84
9/11/2024	Alameda Superior Court	Stipulation & Order Fee	\$20.00
9/24/2024	Legal Document Server, Inc.	Attorney Service	\$20.45
10/17/2024	Legal Document Server, Inc.	Attorney Service	\$20.45
Total:			\$10,848.83