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Attorneys for Plaintiff LILLIAN DAVENPORT

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN JOAQUIN

LILLIAN DAVENPORT, on behalf of the
State of California, and others similarly
situated and aggrieved,

Plaintiff,

v.

BROOKDALE SENIOR LIVING
COMMUNITIES, INC., a Delaware
Corporation; EMERITUS CORPORATION,
a Washington Corporation; and DOES 1-
100, inclusive,

Defendants.

Case No.: STK-CV-UOE-2023-0009791

Assigned for All Purposes to:
Hon. Barbara Kronlund
Dept. 10D

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

Date: TBD
Time: 9:00 a.m.
Dept.: 10D

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

3. I believe PAGA Counsel are entitled to reasonable attorneys' fees pursuant to Labor Code section 2699(g)(1) which provides that "[a]ny employee who prevails in any action shall be entitled to an award of reasonable attorney's fees and costs." I believe this amount is reasonable, is well within the range of fees generally sought and approved in other class and representative cases, and is also reasonable based on PAGA Counsel's lodestar.

4. Class Counsel are experienced class action attorneys, have been appointed as class counsel in other class actions, and have a successful track record in litigating class actions.

6. I received my Juris Doctorate from The University of Chicago Law School in 2012.

8. I am an active member of the California Employment Lawyers' Association ("CELA"), one of only a few members of its Reverse Auctions Subcommittee and serve as a

1 mediator between other Plaintiff counsel who bring overlapping class actions. I have also
2 attended various Continuing Legal Education courses pertaining to advocacy on behalf of
3 employees.

4 9. I also created the content for, helped organize, and served as the Moderator for the
5 2023 California Complex Symposium Wage and Hour/PAGA Section, a Continuing Legal
6 Education seminar and forum featuring four respected Judges serving in the Complex Divisions
7 of their respective county Superior Courts. In addition, my firm served as a sponsor of that event.

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

15 11. My firm has the experience, resources, and means necessary to allow us to provide
16 adequate representation as Class Counsel to all class members in this litigation. With
17 approximately 30 attorneys, as well as supporting staff consisting of paralegals and legal
18 assistants, my office has the capacity to represent hundreds of thousands of class members, bring
19 forth efficient resolution of class actions and PAGA actions, engage in complex litigation, file
20 contested motions for class certification, and engage in trial practice.

21 12. My office has filed contested motions for class certification in the past and have
22 been appointed Class Counsel by the Superior Court of California in the past for purposes of
23 certifying a class for settlement purposes. Some examples of Actions in which I was appointed
24 Class Counsel include:

- 25 • *Santoyo v. Consolidated Foundries, Inc.*, Case No. BC612298, California Superior
26 Court, County of Los Angeles, Honorable Judge Ann I. Jones, presiding;
- 27 • *Arendorff v. Stanley Steamer International, Inc.*, Case No. BC681368, California
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1 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos, presiding;
2 • *Barreto v. Don Roberto Jewelers, Inc.*, Case No. BC495451, California Superior Court,
3 County of Los Angeles, Honorable Ann I. Jones, presiding;
4 • *Junior Amilcar Laguna Gonzalez v. Takaaki Koyama*, Case No. BC641998, Los Angeles
5 Superior Court, Honorable Elihu M. Berle, presiding;
6 • *Rios v. Nongshim America, Inc.*, Case No. CIVDS1807390, California Superior Court,
7 County of San Bernardino, Honorable David S. Cohn, presiding;
8 • *Stoddard v. Molded Fiber Glass – West*, Case No. 1517758, California Superior Court,
9 County of San Bernardino, Honorable David S. Cohn, presiding;
10 • *Mata v. Sahara Scaffold, Inc.*, Case No. CIVDS1810785, California Superior Court,
11 County of San Bernardino, Honorable David S. Cohn, presiding;
12 • *Carrasco v. Pure Dental Solutions*, Case No. BC645995, Los Angeles Superior Court,
13 Honorable Kenneth R. Freeman, presiding;
14 • *Gonzalez v. Gochez, et al.*, Case No. BC648729, Los Angeles Superior Court, Honorable
15 Maren Nelson, presiding;
16 • *Montoya v. Superior Paving Co.*, Case No. CIVDS1833422, County of San Bernardino,
17 Honorable David S. Cohn, presiding;
18 • *Lopez v. Norred & Associates, Inc.*, Case No. CIVDS1824109, California Superior
19 Court, County of San Bernardino, David S. Cohn, presiding;
20 • *Noyola v. Lacren, LLC*, Case No. BC717024, California Superior Court, County of Los
21 Angeles, Hon. Anthony Mohr, presiding;
22 • *Luciano, et al. v. O'Tasty Foods, Inc., et al.*, Case No. BC711988, California Superior
23 Court, County of Los Angeles, Honorable Maren Nelson, presiding;
24 • *Gordon v. Hospice Source, LLC*, Case No. 34-2018-00250022-CU-OE-GDS, California
25 Superior Court, County of Sacramento, Honorable Christopher E. Krueger, presiding;
26 • *Barragan v. Refrigeration Supplies Distributor*, Case No. 19STCV09312, California
27 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
28

- 1 • *Ramirez v. Acre Gourmet, Inc.*, Case No. CGC-19-575117, California Superior Court,
2 County of San Francisco, Honorable Andrew Y.S. Cheng, presiding;
- 3 • *Villafuerte v. Bay Alarm Company*, Case No. BC689110, California Superior Court,
4 County of Los Angeles, Honorable Amy D. Hogue, presiding;
- 5 • *Cazares v. Areas USA LAX, LLC*, Case No. 19STCV08209, California Superior Court,
6 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
- 7 • *Magana v. Castlerock Environmental, Inc., et al.*, Case No. 19STCV38353, California
8 Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;
- 9 • *Chilel v. Sushi California, Inc.*, Case No. 19STCV08209, California Superior Court,
10 County of Los Angeles, Honorable Ann I. Jones, presiding;
- 11 • *Malone v. Orange Courier, Inc., et al.*, Case No. 30-2016-00763474, California Superior
12 Court, County of Orange, Honorable Glenda Sanders, presiding;
- 13 • *Rivera v. Talamo Food Services, Inc.*, Case No. 19CV355856, California Superior Court,
14 County of Santa Clara, Honorable Patricia M. Lucas, presiding;
- 15 • *Olguin v. Cal Central Harvesting, Inc.*, Case No. 18CV03860, California Superior Court,
16 County of Santa Barbara, Honorable James F. Rigali, presiding;
- 17 • *Pence v. Sober Living by the Sea, Inc.*, Case No. 2018-00988742, California Superior
18 Court, County of Orange, Honorable Randall J. Sherman, presiding;
- 19 • *Franco v. Vincent Rags, Inc.*, Case No. 20STCV07768, California Superior Court,
20 County of Los Angeles, Honorable Ann I. Jones, presiding;
- 21 • *Cabral v. Miller Castings, Inc.*, Case No. 19STCV39556, California Superior Court,
22 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
- 23 • *Bolanos v. Texas Roadhouse, Inc.*, Case No. 19STCV39556, California Superior Court,
24 County of Los Angeles, Honorable Sunshine Sykes, presiding;
- 25 • *Rodriguez v. Scott A. Humphreys, Inc.*, Case No. 30-2021-01184556-CU-OE-CXC,
26 California Superior Court, County of Ventura, Honorable Matthew P. Guasco, presiding; and
- 27 • *Torres v. Primal Pet Foods, Inc.* Case No. FCS054783, California Superior Court,
28

1 County of Solano, Honorable Wendy G. Getty, presiding;
2 • *Hanson v. Zapata Nuccio, Inc.*, Case No. 20STCV28951, California Superior Court,
3 County of Los Angeles, Honorable Elihu M. Berle, presiding;
4 • *Molina v. Avibank Mfg, Inc.*, Case No. 20STCV03910, California Superior Court,
5 County of Los Angeles, Honorable John P. Doyle, presiding;
6 • *Cetina v. Lawry's Restaurants, Inc.*, Case No. 19STCV05201, California Superior Court,
7 County of Los Angeles, Honorable Amy D. Hogue, presiding;
8 • *Luna v. Pronto California General Agency, LLC*, Case No. 19STCV39951, California
9 Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;
10 • *Alvarez v. Kazak-Mars, Inc.*, Case No. 20STCV42587, California Superior Court,
11 County of Los Angeles, Honorable Elihu M. Berle, presiding;
12 • *Noe v. My Pillow, Inc.* Case No. CIVDS 2011360, California Superior Court, County of
13 San Bernardino, Honorable David Cohn, presiding;
14 • *Nunez v. 2751 West Coast Acquisition Company*, Case No. 30-2020-01145215-CU-
15 OE-CXC, California Superior Court, County, County of Orange, Honorable Randall J. Sherman,
16 Presiding;
17 • *Smith v. McMillen Enterprises, Inc.*, Case No. CV-20-002938, California Superior Court,
18 County of Stanislaus, Honorable John R. Mayne, presiding;
19 • *Turner v. Plant Prefab Inc., et al.*, Case No. CIVDS2017517, California Superior Court,
20 County of San Bernardino, Honorable David Cohn, presiding;
21 • *Duran v. Fresh Select, LLC*, Case No. VCU284892, California Superior Court, County
22 of Tulare, Honorable Bret Hillman, presiding;
23 • *Reynoso, et al. v. Cream of the Crop AG Service, Inc.*, Case No. VCU278847, California
24 Superior Court, County of Tulare, Honorable Bret Hillman, presiding;
25 • *Michel v. Universal Waste Systems, Inc.*, Case No. 19STCV46181, California Superior
26 Court, County of Los Angeles, Honorable David S. Cunningham presiding;
27 • *Jungers v. U.S. Borax Inc., et al.*, Case No. BCV-21-10003, California Superior Court,
28

1 County of Kern, Honorable Bernard C. Barmann Jr. presiding;
2 • *Fortune v. Amoroso Limited Partnership, et al.*, Case No. 20STCV25874, California
3 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;
4 • *Montoya, et al. v. Remo, Inc.* Case No. 20STCV34614, California Superior Court,
5 County of Los Angeles, Honorable Maren Nelson presiding;
6 • *Rincon, et al. v. New-Indy Tripaq, LLC, et al.* Case No. 20STCV17118, California
7 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;
8 • *De Leon, et al. v. Wismettac Asian Foods, Inc.* Case No. 19STCV18172, California
9 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
10 • *Tapia v. Mercer Foods, Inc.* Case No. CV-21-000020, California Superior Court,
11 County of Stanislaus, Honorable Sonny S. Sandhu presiding;
12 • *Molina v. Reser's Fine Foods, Inc.* Case No. 37-2021-00013052-CU-OECTL, California
13 Superior Court, County of San Diego, Honorable Eddie C. Sturgeon presiding;
14 • *Reyes v. Imperial Sprinkler Supply, Inc.* Case No. 30-2020-01167748-CU-OE-CXC,
15 California Superior Court, County of Los Angeles, Honorable Peter Wilson presiding;
16 • *Zavala, et al. v. PLS Check Cashers, Inc.* Case No. 20STCV42586, California Superior
17 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
18 • *Paz v. Hill Brothers Chemical Company.* Case No. 20STCV48279, California Superior
19 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
20 • *Garcia v. Inwesco Incorporated.* Case No. 20STCV46833, California Superior Court,
21 County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
22 • *Guevara v. J&K Culver, LLC, et al.* Case No. 19STCV39951, California Superior Court,
23 County of Los Angeles, Honorable Elihu M. Berle presiding;
24 • *Hamilton v. Michael Kors Stores, Inc. et al.*, Case No. 19STCV37061, California
25 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
26 • *Arzooian v. A&M Administration, LLC, et al.* Case No. 21STCV05576, California
27 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
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- 1 • *Santos, et al. v. Maruzen of America, Inc.*, Case No. 19STCV37662, California Superior
2 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
- 3 • *Schaffino v. M.O. Dion & Sons., Inc., et al.*, Case No. 20STCV38023, California Superior
4 Court, County of Los Angeles, Honorable Gail Killefer presiding;
- 5 • *Moreno v. Santa Paula Post Acute, LLC, et al.* Case No. 21STCV12533, California
6 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;
- 7 • *Singer v. Desert Area Resources and Training*, Case No. BCV-21-101093, California
8 Superior Court, County of Kern, Honorable Thomas S. Clark presiding;
- 9 • *Clarizio v. Guard-Systems, Inc.*, Case No. 21STCV28667, California Superior Court,
10 County of Los Angeles, Honorable Armen Tamzarian presiding;
- 11 • *Guzman v. Freschco Painters, Inc.*, Case No. 21STCV04683, California Superior Court,
12 County of Los Angeles, Honorable Lawrence P. Riff presiding;
- 13 • *Koutny v. PAE Aviation and Technical Services, LLC*, Case No. 21C-0106, California
14 Superior Court, County of Kings, Honorable Melissa R. D’Morias presiding;
- 15 • *Rodriguez v. Pacifica Trucks, LLC*, Case No. 20STCV37576, California Superior Court,
16 County of Los Angeles, Honorable Stuart Rice presiding;
- 17 • *Ramos v. AEGIS Treatment Centers, LLC*, Case No. 20STCV41429, California Superior
18 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- 19 • *Valdez v. Integrated Building Services, Inc.* Case No. 20STCV37793, California Superior
20 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- 21 • *Harris v. America One Security, Inc.* Case No. 21STCV01399, California Superior
22 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
- 23 • *Moreno v. M&J Seafood Company, Inc.* Case No. 22STCV03341, California Superior
24 Court, County of Los Angeles, Honorable William F. Highberger presiding;
- 25 • *Corrales v. Q&B Foods, Inc.* Case No. 20STCV40885, California Superior Court,
26 County of Los Angeles, Honorable Elihu Berle presiding;
- 27 • *Arteaga v. Demolition Specialist, Inc.* Case No. RIC2001133, California Superior Court,
28

1 County of Riverside, Honorable Harold Hopp presiding;
2 • *Vigil, et al. v. Capstone Turbine Corporation*, Case No. 20STCV32123, California
3 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
4 • *Ramirez v. Sea-Win, Inc.* Case No. 21STCV22026, California Superior Court, County
5 of Los Angeles, Honorable Lawrence P. Riff presiding;
6 • *Ortega Chavez v. Winpak Lane, Inc.* Case No. CIVSB2207313, California Superior
7 Court, County of San Bernardino, Honorable Jessica Morgan presiding;
8 • *Garcia v. American Licorice Company.* Case No. RG21107049, California Superior
9 Court, County of Alameda, Honorable Brad Seligman presiding;
10 • *Madrono v. Vitale Nursing, Inc, et al.*, Case No. 21STCV09845, California Superior
11 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding; and
12 • *Orellana v. Advanced Building Maintenance.* Case No. 34-2020-00286791-CU-OE-
13 GDS, California Superior Court, County of Sacramento, Honorable Jill Talley presiding.
14 • *Aguilar v. Bioness, Inc., et al.*, Case No. 21STCV41702, California Superior Court,
15 County of Los Angeles, Honorable Lawrence P. Riff presiding;
16 • *Antoine v. Pinky Beverly Hills, LLC., et al.* Case No. 19STCV44856, California
17 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
18 • *Phambui v. Fashion Marketing and Merchandising Group, Inc., et al.* Case No.
19 21STCV06634, Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
20 • *Ortega Chavez v. Winpak Lane, Inc., et al.* Case No. CIVSB2202274, California
21 Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;
22 • *Carrasco v O.H. Barkhordar D.D.S., Inc., et al.* Case No. 22STCV21188, California
23 Superior Court, County of Los Angeles, Honorable Lawrence Riff presiding;
24 • *Correia v. Gallo Glass Company, et al.* Case No. CV-21-006459, California Superior
25 Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
26 • *Davis v. Beeline Import and Services, LLC, et al.* Case No. CIVSB2119287, California
27 Superior Court, County of San Bernardino, Honorable David Cohn presiding;
28

1 • *Angel Lopez v Innovative Coatings Technology Corporation dba Incotec, et al. Case No.*
2 *30-2020-01173245-CU-OE-CXC*, California Superior Court, County of Orange, Honorable Lon
3 Hurwitz presiding;

4 • *Lopez v UPM, Inc., et al. Case No. 20STCV36695*, California Superior Court, County of
5 Los Angeles, Honorable Lawrence P. Riff presiding;

6 • *Moreno v. Infiniti Group LLC., et al. Case No. CIVSB2223551*, California Superior
7 Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;

8 • *Kelley v. Applus Technologies, Inc., et al. Case No. CIVSB2204889*, California Superior
9 Court, County of San Bernardino, honorable Jessica Morgan presiding;

10 • *Hernandez v Bromley Foods, Inc., et al. Case No. 56-2021-00561326-CU-OE-VTA*,
11 California Superior Court, County of Ventura, Honorable Henr Walsh presiding;

12 • *Heredia v. Alan Smith Pool Plastering, Inc., et al. Case No. 30-2020-01163609-CU-OE-*
13 *CXC*, California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;

14 • *Martinez Guzman v Freshco Painters Inc., et al. Case No. 21STCV04683*, California
15 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

16 • *Gomez Mireles v. USG Ceilings Plus, LLC., et al. Case No. 21STCV45606*, California
17 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

18 • *Garzon v. Mobile Hi-Tech Wheels, LLC., et al., Case No. 21STCV15396*, California
19 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

20 • *Dethrasavong v. ASI Computer Technologies, Inc., et al. Case No. 20STCV32312*,
21 California Superior Court, County of Contra Costa, Honorable Kenneth R. Freeman presiding;

22 13. I have also settled matters on a “PAGA Only” basis for aggrieved employees in the
23 past, including in:

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

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

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1 • *Sierra v. Nexem-Allied, LLC*, Case No. 20STCV11281, California Superior Court,
2 County of Los Angeles, Honorable Randolph M. Hammock, presiding;
3 • *Nodal v. Sodexo, Inc.*, Case No. 20STCV40601, California Superior Court, County of
4 Los Angeles, Honorable Lawrence Riff, presiding; and
5 • *Cooper v. Lucas Health Partners*, Case No. 20STCV20050, California Superior Court,
6 County of Los Angeles, Honorable Maren Nelson, presiding;
7 • *Herrera v. Greystar Management, LP, et al.*, Case No. 37-2020-00009672-CU-OE-CTL,
8 California Superior Court, County of San Diego, Honorable Carolyn Caietti, presiding;
9 • *Slater v. Jo-Ann Stores, LLC.*, Case No. 21STCV18454, California Superior Court,
10 County of Los Angeles, Honorable Maurice A. Leiter, presiding;
11 • *Bolanos v. Canoga Park Heating & Air Conditioning, Co., Inc.*, Case No. 21STCV12674,
12 California Superior Court, County of Los Angeles, Honorable Yolanda Orozco, presiding;
13 • *Granados v. Cosmetic Ideas, Inc.* Case No. 21STCV10797, California Superior Court,
14 County of Los Angeles, Honorable Richard L. Fruin, presiding;
15 • *Ruano v. DPC Woodwork, Inc.* Case No. 21STCV00408, California Superior Court,
16 County of Los Angeles, Honorable Jon R. Takasugi presiding;
17 • *Hardy v. Texas Roadhouse Management Corp., et al.* Case No. CIVSB2222259,
18 California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;
19 • *Iraheta v Legacy Farmers, Inc., et al.* Case No. MSC21-00762, California Superior
20 Court, County of Los Angeles, Honorable Charles S. Treat presiding;
21 • *Landin v Central Janitors' Supply Co., Inc., et al.* Case No. CV-21-006391, California
22 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;

23 14. Furthermore, my office has succeeded in certifying classes in contested motions for
24 class certification. Some of the classes and theories we have certified include, without limitation,
25 for failure to pay the regular rate of pay; failing to pay overtime and minimum wages, including,
26 without limitation, for temperature checks; failure to provide meal and rest premiums, including,
27 without limitation, for requiring employees to walk during breaks; failure to timely pay wages
28

1 prior to separation of employment; wage statement violations; and unfair competition. Some
2 examples of matters in which we have done so include, without limitation:

- 3 • *Hernandez, et al. v. C.R. Lawrence Co., Inc.*, Case No. 20STCV32372, California
4 Superior Court, County of Los Angeles, Hon. William Highberger presiding; and
- 5 • *Lopez v. Rolling Hills Country Club*, Case No. 21STCV22636, California Superior
6 Court, County of Los Angeles; Hon. Carolyn B. Kuhl presiding; and
- 7 • *Torres v. Johnston Nurseries, FLP*, Case No. BCV-19-100830 TSC, California Superior
8 Court, County of Kern; Hon. Thomas S. Clark, presiding.

9 15. Currently, my firm is acting as counsel in tens of wage and hour class actions and
10 representative PAGA actions.

11 16. I believe that I am sufficiently experienced and qualified to evaluate the Class
12 Members' claims and viability of Defendant's defenses.

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

15 **The Requested Fees are also Reasonable under a Lodestar Crosscheck**

16 18. I understand from my position as principal of Bibiyan Law Group, P.C., my
17 involvement with the case, and information provided by my staff, that Bibiyan Law Group, P.C.,
18 has collectively billed 219.8 hours. Specifically, David D. Bibiyan billed 34.9.3 hours at his hourly
19 rate of \$1,200. Sarah Cohen billed 24.8 hours at the hourly rate of \$1,000 per hour. Vedang J.
20 Patel billed 44.9 hours at his hourly rate of \$900 per hour. Michael Braud billed 98.6 hours at his
21 hourly rate of \$525 per hour. Blanca Chavez billed 4.5 hours at her hourly rate of \$300 per hour.
22 Paralegals billed 7.9 hours at \$200 per hour. Finally, legal assistants billed 4.2 hours at \$75 per
23 hour. Cumulatively, this amounts to a total lodestar of \$162,100 for Bibiyan Law Group, P.C.

24 **Litigation Expenses Incurred by PAGA Counsel**

25 19. The itemized costs incurred by Bibiyan Law Group, P.C., in the above-referenced
26 matter total \$ 3,216.43. An itemized list of expenses is attached as Exhibit 1.

1 I declare under penalty of perjury under the laws of the state of California that the
2 foregoing is true and correct this 27th day of August 2025 at Los Angeles, California.

3
4 /s/ David D. Bibiyan

David D. Bibiyan

EXHIBIT 1



BIBIYAN LAW GROUP, P.C.

August 27, 2025

DATE	TYPE	PAYABLE TO
9/16/2024	E-Filing	All-N-One Legal Support
7/26/2024	Service of Process	All-N-One Legal Support
7/26/2024	Service of Process	All-N-One Legal Support
7/26/2024	Service of Process	All-N-One Legal Support
7/26/2024	Service of Process	All-N-One Legal Support
7/2/2024	E-Filing	All-N-One Legal Support
6/2/2024	E-Filing	All-N-One Legal Support
5/1/2024	E-Filing	All-N-One Legal Support
4/29/2024	E-Filing	All-N-One Legal Support
3/7/2024	E-Filing	All-N-One Legal Support
1/29/2024	E-Filing	OnCall-Legal
1/10/2024	E-Filing	OnCall-Legal
1/26/2024	E-Service	All-N-One Legal Support
12/28/2023	E-Service	All-N-One Legal Support
12/28/2023	E-Service	All-N-One Legal Support
12/28/2023	E-Service	All-N-One Legal Support
12/28/2023	E-Service	All-N-One Legal Support
2/7/2024	E-Filing	All-N-One Legal Support
11/28/2023	Service of Process	All-N-One Legal Support
11/15/2023	LWDA fee	LWDA
11/15/2023	Postage	United States Postal Service
Various Dates	Photocopies	247 x \$0.20
		Total

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TOTAL AMOUNT	
\$	13.00
\$	51.50
\$	51.50
\$	51.50
\$	87.50
\$	12.45
\$	447.45
\$	12.45
\$	72.45
\$	12.45
\$	44.24
\$	136.24
\$	225.00
\$	51.50
\$	51.50
\$	51.50
\$	93.50
\$	12.45
\$	1,570.00
\$	75.00
\$	43.85
\$	49.40
\$	3,216.43