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Attorneys for Plaintiff Victor Enriquez and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE

VICTOR ENRIQUEZ, 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,

v.

GLOBAL EXPERIENCE SPECIALISTS, INC., a Nevada corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 23STCV21231

Honorable Elihu M. Berle
Department 6

CLASS ACTION

DECLARATION OF YASMIN HOSSEINI IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT, CLASS COUNSEL FEES PAYMENT, CLASS COUNSEL LITIGATION EXPENSES PAYMENT, AND CLASS REPRESENTATIVE SERVICE PAYMENT

Date:	December 16, 2026
Time:	9:00 a.m.
Department:	6
Complaint Filed:	September 1, 2023
FAC Filed:	April 28, 2026
Trial Date:	None Set

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DECLARATION OF YASMIN HOSSEINI

I, Yasmin Hosseini, 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 Victor Enriquez ("Plaintiff") 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 August 21, 2026, in Department 6 of the above-entitled Court, the Honorable Elihu M. Berle preliminarily approved the First Amended Class Action and PAGA Settlement Agreement ("Settlement," "Agreement," or "Settlement Agreement") entered into between Plaintiff and Defendant Global Experience Specialists, Inc. ("Defendant") (together with Plaintiff referred to as the "Parties"), and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Victor Enriquez as the representative of the Class ("Class Representative"). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class ("Class Counsel").

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

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment ("Motion for Final Approval"), no Participating Class Member has objected to the Class Settlement, the contemplated request for Class Counsel Fees Payment and Class Counsel Litigation Expenses Payment, Class Representative Service Payment, and Administration Expenses Payment, or the allocation for the PAGA Penalties.

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WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in this matter since prior to its commencement on September 1, 2023.

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

7. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and was preparing the case for class certification and trial, prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. The volume of data and documents that Class Counsel reviewed and analyzed included, and were not limited to: Plaintiff's employment records, a detailed sampling of Class Members' time and pay data, various collective bargaining agreements governing the terms and conditions of employment for the putative class, earning statements, internal memoranda, and Defendant's operations and employment practices, forms, procedures, and policies, among other information and documents. Class Counsel had the

opportunity to interview and obtain information from Plaintiff and percipient witnesses. Class Counsel developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, formal and informal discovery, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, the mediation briefing and supporting materials, and settlement documents; drafting and propounding multiple sets of formal written discovery requests on Defendant (specifically, Requests for Production of Documents (Set One), Special Interrogatories (Sets One and Two), Requests for Admission (Set One), and Form Interrogatories – General (Set One)) and noticing the depositions of Defendant's Person Most Knowledgeable designees, along with accompanying requests for production of documents; and preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

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

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facts discovered.

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

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of $262,350.00, which is thirty-three percent (33%) of the Gross

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Settlement Amount of $795,000.00—this amount is less than the percentage fee provided for by the Settlement (i.e., up to $278,250.00, which is 35% of the Gross Settlement Amount). The difference of $15,900.00 will be part of the Net Settlement Amount, which will be distributed to the Participating Class Members in accordance with the Settlement. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this case. The nature of the work performed, skill exercised, and the outcome in this matter, which involves an outstanding monetary recovery involving a Gross Settlement Amount of $795,000.00 (with a Net Settlement Amount of approximately at least $399,772.25 to be paid to Participating Class Members (with gross Individual Class Payments averaging approximately more than $89.06) and payment of $60,000.00 to the State of California)—support the percentage fee sought and the application of a lodestar multiplier.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **309.20 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

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

EXPERIENCE AND ADEQUACY OF

LAWYERS *for* JUSTICE, PC

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

thousands of individuals in California.

15. Edwin Aiwazian is the Chief Executive Officer of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in many cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000 class action or representative action cases.

16. Arby Aiwazian is a Senior Partner of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles, and graduated magna cum

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

17. Joanna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010), in New York (since 2013), and in Washington (since 2026), and she is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, U.S. District Court for the Western District of Washington, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully

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

18. I am a member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from Pepperdine University School of Law in 2017. I was admitted to practice law in California in 2019. I was admitted to practice before all courts of the State of California and all federal district courts in the State of California. I have worked on many wage and hour class action and PAGA representative matters, and her work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation and analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, I represented filmmakers and talent, negotiating and structuring various types of agreements on their behalf. I am a member of the California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian American Bar Association.

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LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS *for* JUSTICE, PC

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to $25,000.00. Lawyers *for* Justice, PC seeks reimbursement of **$17,927.75** in litigation costs and expenses incurred in the matter, as reflected in **"EXHIBIT 2"** attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. The cost savings of $7,072.25 will be part of the Net Settlement Amount, which will be distributed to the Participating Class Members in accordance with the Settlement.

CLASS REPRESENTATIVE SERVICE PAYMENT TO PLAINTIFF

20. In recognition of his efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as his broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 5.1 of the Settlement Agreement), the Settlement provides for a Class Representative Service Payment, in the amount of up to $10,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing his employment with Class Counsel, gathering, and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive $10,000.00 as a reasonable Class Representative Service Payment for his broader waiver and release of claims and services performed in this matter, in addition to his individual settlement payment(s).

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

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

Executed this 9th day of October 2026, at Glendale, California.



Yasmin Hosseini

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EXHIBIT 1

VICTOR ENRIQUEZ V. GLOBAL EXPERIENCE SPECIALISTS, INC.
Los Angeles County Superior Court Case No. 23STCV21231 ("Class Action")

VICTOR ENRIQUEZ V. GLOBAL EXPERIENCE SPECIALISTS, INC.
Los Angeles County Superior Court Case No. 23STCV21241 ("PAGA Action")

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS *for* JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Victor Enriquez ("Plaintiff")	20.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	13.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff's Class Action Claims, Conduct Legal Research and Analysis Regarding Class Action Claims, and Draft, Review, and/or Revise Plaintiff's Class Action Complaint for Damages (filed on September 1, 2023) (Class Action)	7.50
Investigate the Merits of Plaintiff's Private Attorneys General Act ("PAGA") Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on September 1, 2023) (PAGA Action)	6.80
Review Court's Notice of Case Assignment and First Amended General Order (filed on September 1, 2023) (Class Action)	0.30
Review Court's Notice of Case Assignment and First Amended General Order (filed on September 1, 2023) (PAGA Action)	0.30

Review Court's Minute Order Re: Initial Status Conference Order and Initial Status Conference Order (filed on September 7, 2023) (Class Action)	0.40
Review Court's Notice of Case Management Conference (filed on September 8, 2023) (PAGA Action)	0.10
Review Defendant Global Experience Specialists, Inc.'s ("Defendant") Notice of Appearance and Posting of Complex Fees (served on October 25, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Statement (filed on November 13, 2023) (Class Action)	1.50
Draft, Review, and/or Revise Plaintiff Victor Enriquez's Notice of Posting Jury Fees (filed on November 13, 2023) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Ruling Re: Lifting of Discovery Stay and Setting Status Conference on February 20, 2024 (filed on November 20, 2023) (Class Action)	0.30
Review Court's Minute Order Re: Initial Status Conference (filed on November 20, 2023) (Class Action)	0.20
Review Court's Order Authorizing Electronic Service (Case Anywhere) (filed on November 22, 2023) (Class Action)	0.10
Draft, Review, and/or Revise Plaintiff's Request for Dismissal, Declaration of Talar DerOhannessian in Support Thereof, and [Proposed] Order (submitted on November 29, 2023) (Class Action)	1.30
Draft, Review, and/or Revise Request for Dismissal (submitted on November 29, 2023) (PAGA Action)	0.20
Review Court's Order for Dismissal (filed on November 29, 2023) (PAGA Action)	0.20
Review Court's Order Granting Request for Dismissal (filed on December 1, 2023) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Dismissal and Proof of Service (filed on December 5, 2023) (Class Action)	0.10
Review and Analyze Defendant's Answer and Affirmative Defenses to Plaintiff's Class Action Complaint for Damages, and Research Affirmative Defenses in Defendant's Answer (served on December 18, 2023) (Class Action)	1.20

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; [Proposed] Order (submitted on February 14, 2024) (Class Action)	1.20
Review Court's Minute Order Re: Status Conference (filed on February 20, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Enriquez's Notice of Ruling Continuing Status Conference to August 6, 2024 (filed on February 20, 2024) (Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Post-Mediation Status Conference; [Proposed] Order (submitted on July 30, 2024) (Class Action)	1.20
Review Court's Order to Continue Post-Mediation Status Conference (filed on July 31, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Stipulation to Continue Post-Mediation Status Conference (filed on August 1, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Post-Mediation Status Conference; [Proposed] Order (submitted on November 18, 2024) (Class Action)	1.20
Review Court's Minute Order Re: Post-Mediation Status Conference (filed on November 25, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 23, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Minute Order Re: Post-Mediation Status Conference (filed on February 5, 2025) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; [Proposed] Order (submitted on February 21, 2025) (Class Action)	1.20
Review Court's Order to Continue Status Conference (filed on February 24, 2025) (Class Action)	0.20

Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Continue Status Conference (filed on February 24, 2025) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; [Proposed] Order (submitted on June 6, 2025) (Class Action)	1.20
Review Court's Minute Order Re: Status Conference (filed on June 16, 2025) (Class Action)	0.20
Review Court's Order to Continue Status Conference (filed on June 17, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Continue Status Conference (filed on June 24, 2025) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; [Proposed] Order (submitted on July 9, 2025) (Class Action)	1.20
Review Court's Order to Continue Status Conference (filed on July 15, 2025) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on July 15, 2025) (Class Action)	0.80
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Continue Status Conference (filed on July 17, 2025) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; [Proposed] Order (submitted on August 6, 2025) (Class Action)	1.20
Review Court's Order to Continue Status Conference (filed on August 11, 2025) (Class Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Continue Status Conference (filed on August 13, 2025) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; [Proposed] Order (submitted on October 22, 2025) (Class Action)	1.20
Review Court's Order to Continue Status Conference (filed on October 28, 2025) (Class Action)	0.20

Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation to Continue Status Conference (filed on October 29, 2025) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; [Proposed] Order (submitted on January 13, 2026) (Class Action)	1.20
Review Court's Minute Order Re: Status Conference (filed on January 20, 2026) (Class Action)	0.20
Draft, Review, and/or Revise Notice Regarding January 20, 2026 Status Conference (filed on January 30, 2026) (Class Action)	0.10
Draft, Review, and/or Revise Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698 Et Seq. (filed on April 28, 2026); Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation and [Proposed] Order Granting Plaintiff Leave to File First Amended Complaint (submitted on April 22, 2026) (Class Action)	3.50
Review Court's Order Granting Plaintiff Leave to File First Amended Complaint and Order Continuing Deadline to File Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on April 27, 2026) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Plaintiff Leave to File First Amended Complaint (filed on April 28, 2026) (Class Action)	0.10
Review and Analyze Defendant's Answer and Affirmative Defenses to Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, and Research Affirmative Defenses in Defendant's Answer (served on May 19, 2026) (Class Action)	0.80
Appearances	
Prepare for and Remotely Attend Initial Status Conference (November 20, 2023) (Class Action)	0.80
Prepare for and Remotely Attend Status Conference (February 20, 2024) (Class Action)	0.50
Prepare for and Remotely Attend Post-Mediation Status Conference (November 25, 2024) (Class Action)	0.80
Prepare for and Remotely Attend Status Conference (June 16, 2025) (Class Action)	0.70

Prepare for and Remotely Attend Status Conference (January 20, 2026) (Class Action)	1.20
Prepare for and Remotely Attend Motion for Preliminary Approval of Class Action and PAGA Settlement Hearing (June 9, 2026) (Class Action)	1.10
Prepare for and Remotely Attend Motion for Preliminary Approval of Class Action and PAGA Settlement Hearing (August 12, 2026) (Class Action)	1.10
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Victor Enriquez (served on December 12, 2022)	1.40
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Global Experience Specialists, Inc., and Requests for Production of Documents (Wage and Hour Practices; noticed for February 2, 2024) (served on December 15, 2023) (Class Action)	1.20
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Defendant Global Experience Specialists, Inc. (served on December 15, 2023) (Class Action)	4.50
Review and Analyze Defendant's Notice of Deposition of Plaintiff Victor Enriquez (noticed for February 29, 2024) (served on January 3, 2024) (Class Action)	0.60
Review and Analyze Defendant's Form Interrogatories – General (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) to Plaintiff (served on January 3, 2024) (Class Action)	1.30
Review and Analyze Defendant's Objections to Plaintiff's Notice of Taking Deposition of the Person Most Knowledgeable with Request for Production of Documents (served on January 26, 2024) (Class Action)	1.10
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Victor Enriquez under the Private Attorneys General Act (served on June 28, 2023)	4.50

Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendant's Counsel	16.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (approximately 11,700 pages), and Other Sources Prior to Mediation	65.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations (submitted on May 12, 2025)	37.50
Attend Mediation Session (May 16, 2025; via Zoom Video Conference)	13.50
Engage in Additional Settlement-Related Discussions (May 2025 – July 2025)	8.50
Review and/or Analyze Mediator's Proposal (issued July 9, 2025; accepted July 11, 2025)	1.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on April 27, 2026), and Draft, Review, and/or Revise Court-Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	16.50
Draft, Review, Revise, Negotiate, and Finalize First Amended Class Action and PAGA Settlement Agreement (executed on July 10, 2026), and Draft, Review, and/or Revise Court-Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	1.10
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	6.50
Law and Motion	
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation to Continue Plaintiff's Filing Deadline for the Motion for Preliminary Approval and the Hearing on Plaintiff's Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on February 26, 2026) (Class Action)	1.20
Review Court's Order to Continue Plaintiff's Filing Deadline for the Motion for Preliminary Approval and the Hearing on Plaintiff's Motion for Preliminary Approval (filed on March 5, 2026) (Class Action)	0.20

Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Stipulation to Continue Plaintiff's Filing Deadline for the Motion for Preliminary Approval and the Hearing on Plaintiff's Motion for Preliminary Approval (filed on March 11, 2026) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation to Continue Deadline to File Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement; [Proposed] Order Thereon (submitted on April 23, 2026) (Class Action)	1.10
Review Court's Order to Continue Deadline to File Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on April 27, 2026) (Class Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Stipulation to Continue Deadline to File Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on April 28, 2026) (Class Action)	0.10
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Selena Matavosian in Support Thereof, Declaration of Plaintiff Victor Enriquez in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on April 28, 2026) (Class Action)	17.50
Review Court's Notice Re: Continuance of Hearing and Order (filed on June 5, 2026) (Class Action)	0.20
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on June 9, 2026) (Class Action)	0.20
Draft, Review, and/or Revise Notice Regarding June 9, 2026 Hearing on Motion for Preliminary Approval of Settlement (filed on June 15, 2026) (Class Action)	0.40
Draft, Review, and/or Revise Declaration of Ryan Slinger in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on July 16, 2026) (Class Action)	4.50
Draft, Review, and/or Revise Supplemental Declaration of Ryan Slinger in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on July 30, 2026) (Class Action)	0.30
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on August 12, 2026) (Class Action)	0.20

Draft, Review, and/or Revise [Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (submitted on August 14, 2026) (Class Action)	0.30
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on August 21, 2026) (Class Action)	0.20
Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment; Memorandum of Points and Authorities in Support Thereof, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Final Approval Order and Judgment (Class Action)	20.50
Total Hours:	309.20

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Enriquez vs. Global Experience Specialists, Inc.

Date	Payee	Expense Description	Amount
11/9/2022	U.S. Postmaster	Postage	$15.70
9/5/2023	Legal Document Server, Inc.	Attorney Service	$115.88
9/5/2023	Los Angeles Superior Court	Complex Filing Fee	$1,000.00
9/5/2023	Los Angeles Superior Court	Complaint Filing Fee	$435.00
9/19/2023	ProLegal	Attorney Service	$130.33
10/13/2023	Legal Document Server, Inc.	Attorney Service	$141.15
11/13/2023	Legal Document Server, Inc.	Attorney Service	$26.58
11/13/2023	Los Angeles Superior Court	Jury Fee	$150.00
11/14/2023	Legal Document Server, Inc.	Attorney Service	$16.15
11/21/2023	Legal Document Server, Inc.	Attorney Service	$32.30
11/30/2023	Legal Document Server, Inc.	Attorney Service	$16.15
12/5/2023	Legal Document Server, Inc.	Attorney Service	$16.15
2/3/2024	Case Anywhere LLC	Attorney Service	$155.19
2/12/2024	Judicate West	Mediation Fee	$6,375.00
2/14/2024	Legal Document Server, Inc.	Attorney Service	$17.54
2/14/2024	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
2/20/2024	Legal Document Server, Inc.	Attorney Service	$16.15
5/5/2024	Case Anywhere LLC	Attorney Service	$165.00
7/30/2024	Legal Document Server, Inc.	Attorney Service	$17.54
7/30/2024	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
8/1/2024	Legal Document Server, Inc.	Attorney Service	$16.15
8/1/2024	Case Anywhere LLC	Attorney Service	$153.00
11/4/2024	Case Anywhere LLC	Attorney Service	$153.00
11/18/2024	Legal Document Server, Inc.	Attorney Service	$19.09
11/18/2024	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
1/24/2025	Legal Document Server, Inc.	Attorney Service	$18.70
2/3/2025	Case Anywhere LLC	Attorney Service	$165.00
2/5/2025	Legal Document Server, Inc.	Attorney Service	$18.70
2/21/2025	Legal Document Server, Inc.	Attorney Service	$20.09
2/21/2025	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
2/24/2025	Legal Document Server, Inc.	Attorney Service	$18.70
3/5/2025	Case Anywhere LLC	Attorney Service	$67.00
4/4/2025	Case Anywhere LLC	Attorney Service	$49.00
5/2/2025	Case Anywhere LLC	Attorney Service	$49.00
5/16/2025	Aliza Grossman	Travel Reimbursement	$85.99
6/2/2025	Case Anywhere LLC	Attorney Service	$49.00
6/6/2025	Legal Document Server, Inc.	Attorney Service	$20.09
6/6/2025	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
6/24/2025	Legal Document Server, Inc.	Attorney Service	$18.70

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Enriquez vs. Global Experience Specialists, Inc.

7/1/2025	Case Anywhere LLC	Attorney Service	$67.00
7/10/2025	Legal Document Server, Inc.	Attorney Service	$20.09
7/10/2025	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
7/16/2025	Legal Document Server, Inc.	Attorney Service	$18.70
7/18/2025	Legal Document Server, Inc.	Attorney Service	$18.70
7/24/2025	CPAnalytics	Data Analysis	$5,172.50
8/4/2025	Case Anywhere LLC	Attorney Service	$67.00
8/6/2025	Legal Document Server, Inc.	Attorney Service	$20.09
8/6/2025	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
8/13/2025	Legal Document Server, Inc.	Attorney Service	$18.70
9/2/2025	Case Anywhere LLC	Attorney Service	$55.00
10/1/2025	Case Anywhere LLC	Attorney Service	$49.00
10/24/2025	Los Angeles Superior Court	Attorney Service	$20.00
10/24/2025	Legal Document Server, Inc.	Attorney Service	$20.09
10/30/2025	Legal Document Server, Inc.	Attorney Service	$18.70
11/3/2025	Case Anywhere LLC	Attorney Service	$61.00
12/1/2025	Case Anywhere LLC	Attorney Service	$49.00
1/2/2026	Case Anywhere LLC	Attorney Service	$49.00
1/15/2026	Legal Document Server, Inc.	Attorney Service	$21.09
1/15/2026	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
2/2/2026	Legal Document Server, Inc.	Attorney Service	$19.70
2/2/2026	Case Anywhere LLC	Attorney Service	$67.00
2/26/2026	Legal Document Server, Inc.	Attorney Service	$21.09
2/26/2026	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
2/27/2026	Legal Document Server, Inc.	Attorney Service	$105.00
3/2/2026	Case Anywhere LLC	Attorney Service	$61.00
3/12/2026	Legal Document Server, Inc.	Attorney Service	$19.70
4/1/2026	Case Anywhere LLC	Attorney Service	$55.00
4/23/2026	Legal Document Server, Inc.	Attorney Service	$271.09
4/23/2026	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
4/24/2026	Legal Document Server, Inc.	Attorney Service	$21.09
4/24/2026	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
4/29/2026	Legal Document Server, Inc.	Attorney Service	$262.17
4/29/2026	Los Angeles Superior Court	Motion Fee	$60.00
5/1/2026	Legal Document Server, Inc.	Attorney Service	$19.70
5/1/2026	Case Anywhere LLC	Attorney Service	$115.00
5/6/2026	Legal Document Server, Inc.	Attorney Service	$19.70
6/1/2026	Case Anywhere LLC	Attorney Service	$67.00
6/9/2026	Legal Document Server, Inc.	Attorney Service	$19.70
6/16/2026	Legal Document Server, Inc.	Attorney Service	$19.70

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Enriquez vs. Global Experience Specialists, Inc.

7/1/2026	Case Anywhere LLC	Attorney Service	$67.00
7/17/2026	Legal Document Server, Inc.	Attorney Service	$19.70
7/31/2026	Legal Document Server, Inc.	Attorney Service	$19.70
8/1/2026	Case Anywhere LLC	Attorney Service	$67.00
9/1/2026	Case Anywhere LLC	Attorney Service	$61.00
		Total:	**$17,186.72**

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Enriquez vs. Global Experience Specialists (PAGA)

Date	Payee	Expense Description	Amount
6/28/2023	U.S. Postmaster	Postage	$8.37
6/28/2023	Labor & Workforce Development Agency	PAGA Filing Fee	$75.00
9/5/2023	Legal Document Server, Inc.	Attorney Service	$46.38
9/5/2023	Los Angeles Superior Court	Complaint Filing Fee	$435.00
9/19/2023	ProLegal	Attorney Service	$112.33
10/13/2023	Legal Document Server, Inc.	Attorney Service	$16.15
11/30/2023	Legal Document Server, Inc.	Attorney Service	$16.15
1/22/2025	Legal Document Server, Inc.	Attorney Service	$12.95
1/23/2025	Legal Document Server, Inc.	Attorney Service	$18.70
		Total:	**$741.03**