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

JESSE JOERGER, 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.

IES RESIDENTIAL, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive ,

Defendants.

Case No.: CVRI2205490

Honorable Harold W. Hopp
Department 1

CLASS ACTION

**DECLARATION OF JOANNA GHOSH IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
CLASS REPRESENTATIVE
ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and Enhancement
Award; Declaration of Class Representative
(Jesse Joerger); Declaration of Settlement
Administrator (Taylor Mitzner); and
[Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: April 3, 2024
Time: 8:30 a.m.
Department: 1

Complaint Filed: December 16, 2022
FAC Filed: October 9, 2023
Trial Date: None Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, 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 Jesse Joerger (“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 November 9, 2023, in Department 1 of the above-entitled Court, the Honorable Harold W. Hopp granted preliminary approval of the Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant IES Residential, Inc. (“Defendant”) (together with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Jesse Joerger as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), Exclusion Form, and Objection Form, adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. On November 30, 2023, Defendant provided Phoenix the Class Data. On December 14, 2023, Phoenix mailed the Class Notice, Exclusion Form, and Objection Form via first class mail, in English and Spanish, to the Class Members. Phoenix also informed the Parties’ counsel that the escalator clause in the Settlement Agreement was triggered as a result of the total Workweek count for the Class Period being 8,889 Workweeks. Paragraph 6.f of the Settlement Agreement defines the “Class Period” as the “time period from October 6, 2018 to the date the Court grants Preliminary Approval,” i.e. November 9, 2023, or “an earlier date pursuant to

Paragraph 35 of this Agreement (if applicable).” Paragraph 35 of the Settlement Agreement contains an escalator clause, providing in part that “[i]f it is determined that the total number of Workweeks for the Class during the Class Period exceeds 7,825 by more than ten percent (10%) (i.e. exceeds 8,608),” then, at Defendant’s option either the Gross Settlement Amount will be increased by 1% for every 1% increase in Workweeks over the 10% threshold, or the Class Period and PAGA Period will end on the day before the Workweeks reach 8,608 Workweeks. Defendant elected to increase the Gross Settlement Amount pursuant to the escalator clause, which increased the Gross Settlement Amount from \$547,000.00 to \$566,643.07.

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

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers for Justice, PC have been actively engaged in litigating the above-captioned action since prior to its commencement on December 16, 2022.

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 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 class certification, off-the-clock theory, meal and rest periods, wage-and-hour law and enforcement, Plaintiff’s claims and allegations, and potential defenses. After conducting initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiff were well-suited for class-wide adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses.

1 7. Class Counsel conducted significant investigation and informal discovery
2 regarding the facts of the case, to assess the veracity, strength, and scope of the claims, and was
3 preparing the matter for class certification and trial prior to reaching the Settlement. The Parties
4 exchanged a large volume of information, documents, and data throughout the course of litigation
5 and in connection with mediation and settlement negotiations. Class Counsel reviewed and
6 analyzed information, documents, and data obtained from Plaintiff, Defendant, and other sources.
7 The information, documents, and data reviewed and analyzed by Class Counsel included, and
8 were not limited to, Plaintiff's employment records, a detailed sampling of Plaintiff's, class
9 members', and aggrieved employees' timekeeping, payroll, and reimbursement data, Defendant's
10 Employee Handbook and wage and hour policies, earning statements, company policy
11 acknowledgements, internal memoranda, job descriptions, and other operations and employment
12 policies, practices, and procedures documents among other information and documents. Class
13 Counsel developed damages, violation, and penalties valuation models in connection with
14 mediation and settlement negotiations, and met and conferred with Defendant's counsel on
15 numerous occasions, e.g., to discuss issues relating to the pleadings, case management, motion
16 practice, informal discovery, and production of documents and data in the course of litigation and
17 mediation and settlement negotiations. Other work performed by Class Counsel included, and
18 was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings,
19 motion-related papers, mediation brief, and settlement-related papers; and preparing for and
20 attending court proceedings and mediation and settlement negotiations, among other tasks.

21 8. As outlined herein, the Parties have conducted significant informal discovery and
22 investigation during the course of litigating the case and mediation and settlement negotiations.
23 Class Counsel analyzed thousands of pages of information, documents, and data obtained from
24 Plaintiff, Defendant, and other sources. The information, documents, and data that were
25 considered provided a critical understanding of the nature of the work performed by the Class
26 Members and PAGA Aggrieved Employees, as well as Defendant's operations and employment
27 policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and
28 other valuation issues in connection with the mediation and settlement negotiation process. Class

Counsel also performed research regarding applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, rounding, regular rates of pay, meal and rest periods (including, *inter alia*, on premises breaks), piece-rate compensation, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered. Accordingly, sufficient research, investigation, and review and analysis of information have taken place in order for the Parties to be adequately informed of the nature and extent of the claims and to enable the Parties to fully evaluate the Settlement for its fairness, adequacy, and reasonableness.

9. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the case. These efforts included participating in a formal, full-day mediation conducted by Hon. S. James Otero (Ret.), a well-regarded mediator experienced in mediating 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 mediation and settlement negotiations, the Parties exchanged information, documents, and data, and discussed all aspects of the case, including and not limited to, the risks and delays of further litigation, the risks to the Parties of proceeding with class certification and trial, the law relating to class certification, manageability, off-the-clock theory, rounding, regular rates of pay, meal and rest periods (including, *inter alia*, on premises breaks), piece-rate compensation, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, wage-and-hour law and enforcement, 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 representative adjudication and prevail on the merits, 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 the case was well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, 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 the case, 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 \$198,325.07 which is thirty-five percent (35%) of the escalated Gross Settlement Amount of \$566,643.07. 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. Lawyers *for* Justice, PC has no fee-splitting agreement with any other attorney or law firm regarding this case.

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 the case; and (6) the other cases that Class Counsel has turned down in order to devote its time and efforts to this matter. The nature of the work performed, skill exercised, and the outcome in this matter support the percentage fee sought and the application of a lodestar multiplier.

12. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case 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 **377.40 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" 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 in performing those services. The hours

attributable to Lawyers *for* Justice, PC include work done by several attorneys. Additionally, separate from the hours of work referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The attorneys identified below have worked on this case, and they have performed their work in this matter exclusively on a contingency basis.

LAWYERS for JUSTICE, PC – Attorney Hours, Rates, and Lodestar						
Attorney	Title	CA Bar No.	Admit Year	Rate	Total Hours	Lodestar
Edwin Aiwazian	Managing Attorney & Shareholder	232943	2004	\$1,495	108.40	\$162,058.00
Arby Aiwazian	Shareholder	269827	2010	\$1,295	65.50	\$84,822.50
Joanna Ghosh	Managing Attorney	272479 (CA); 518149 (NY)	2010 (CA); 2013 (NY)	\$1,295	41.00	\$53,095.00
Jacob Karczewski	Attorney	268295	2009	\$850	5.90	\$5,015.00
Vartan S. Madoyan	Attorney	279015	2011	\$850	80.60	\$68,510.00
Elizabeth M. R-H Parker-Fawley	Attorney	301592	2014	\$850	5.80	\$4,930.00
Aliza Grossman	Attorney	311067	2016	\$850	54.50	\$46,325.00
Arman Marukyan	Attorney	327150	2019	\$725	4.50	\$3,262.50
Eli Drummond	Attorney	348281	2023	\$575	11.20	\$6,440.00
Total:					377.40	\$434,458.00

14. The billing rates for each of the attorneys listed above, who worked on this matter, are reasonable and commensurate with the individual backgrounds, training, and experience of the attorneys, in litigating complex wage-and-hour actions, and in particular, employment class actions and representative actions. The work performed in this 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, support a reasonable blended hourly rate of compensation of at least \$800 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 \$800 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and/or representative action cases: final approval of the class and representative

1 action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court
2 Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved
3 compensation at the rate of \$936.47 per hour; final approval of the class and representative action
4 settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No.
5 BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved
6 compensation at the rate of \$919.57 per hour; final approval of the class and representative action
7 settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
8 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved
9 compensation at the rate of \$855.96 per hour; final approval of the class and representative action
10 settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case
11 No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved
12 compensation at the rate of \$831.38 per hour; and final approval of the class and representative
13 action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County
14 Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of
15 attorneys' fees involved compensation at the rate of \$845.64 per hour.

16 **EXPERIENCE AND ADEQUACY OF**

17 **LAWYERS for JUSTICE, PC**

18 15. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the
19 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
20 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC
21 is attorney of record in dozens of employment-related putative class actions in both state and
22 federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who
23 focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA")
24 representative actions. The firm has successfully litigated cases involving nearly every aspect of
25 California wage and hour law, including payment of overtime and minimum wages, provision of
26 meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of
27 compliant wage statements, reimbursement of business expenses, executive, administrative, and
28 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.

16. Below is a summary of the experience and qualifications of attorneys at Lawyers *for* Justice, PC who have most recently performed work in this matter. Additional attorneys and non-attorney staff have also worked on the matter.

17. 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. Together with other attorneys at the firm, and in some 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

1 approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or
2 representative action cases.

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

23 19. Vartan S. Madoyan is a Member of Lawyers *for* Justice, PC. He received his
24 Bachelor of Arts degree in Economics from the University of California, San Diego in 2007, and
25 a Juris Doctor degree from Loyola Law School in 2011, graduating with Cum Laude and Order
26 of the Coif honors. He is admitted to practice before all courts in the State of California and all
27 U.S. District Courts in California. He externed for the Honorable Victoria S. Kaufman of the
28 United States Bankruptcy Court, Central District of California, from June 2009 to August 2009.

He 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, he has practiced almost exclusively on complex wage and hour class action and PAGA action matters in California. From October 2011 to June 2013, he 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, he was an Associate at Sheppard, Mullin, Richter & Hampton's Century City, California office. From March 2014 to July 2023, he worked as an Associate and then as Counsel at Baker Hostetler LLP's Los Angeles office. From August 2023 to the present, he has been a Member of Lawyers for Justice, PC. He has taken and defended dozens of depositions and has 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. He has 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. He 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, he has extensive experience with settlements of class actions and PAGA actions and has handled and supervised this process in over seventy-five (75) cases.

20. Aliza Grossman is a Member of Lawyers for Justice, PC. She exclusively advocates for workers in complex wage-and-hour class and representative actions. She received her Bachelor of Arts degree from University of California, Berkeley in 2013, a Juris Doctor degree from Loyola Law School in 2016, and a Master of Arts degree from Loyola Marymount University in 2017. She was admitted to practice law in California in November of 2016. Prior to joining Lawyers for Justice, PC, she represented injured workers at a reputable workers' compensation firm for approximately six years. At Lawyers for Justice, PC, she has worked on

1 many complex wage-and-hour class and representative action cases, focusing on claims
2 evaluation and analysis and mediation. She has handled over twenty-five (25) mediations, and
3 has successfully negotiated the settlement of over a dozen cases.

4 21. I am a Managing Member of Lawyers *for* Justice, PC. I received a Bachelor of Arts
5 degree from California State University, Los Angeles in 2006, a Master of Science degree from
6 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University
7 Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since
8 2013) and am admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy
9 Court for the Central District of California, and the U.S. Supreme Court. I have taken and
10 defended dozens of depositions and successfully handled motion practice in class action cases
11 regarding discovery (including and not limited to, regarding class contact information), class
12 certification (both contested class certification and stipulated class certification), arbitration
13 agreements, coordination, and intervention. I have successfully handled briefing and oral
14 argument on appeal and obtained notable decisions regarding the Private Attorneys General Act
15 and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9
16 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied
17 (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th 175 (2019). I have significant
18 experience with class actions, including and not limited to working on cases to obtain class
19 certification through contested motion practice and working on cases in the post-certification
20 stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial
21 preparation in conjunction with co-counsel in a case involving a certified class consisting of
22 approximately 2,600 individuals). I also have extensive experience with class action and/or
23 representative action settlements, and have handled this process in over three hundred (300) cases.
24 Under Edwin Aiwazian, Arby Aiwazian, and my supervision, Lawyers *for* Justice, PC has
25 handled the class certification and court approval process for hundreds of class action and/or
26 representative action matters that have successfully resolved. I am a member of the California
27 Employment Lawyers Association.

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

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

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

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

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

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

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

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

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

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

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

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

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

Council Coordination Proceeding Number is 4794.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1 BC498401.

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

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

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

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

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

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

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

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

9 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
10 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
11 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
12 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
13 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
14 approval of the PAGA representative action settlement. The San Diego County Superior Court
15 Case Number is 34-2015-00175330.

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

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

28 ///

1 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class action against manufacturer and supplier of power products and services on
3 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
4 motion for class certification and certified a class. On August 27, 2021, the court granted final
5 approval of the class action settlement. The San Diego County Superior Court Case Number is
6 37-2015-00025968-CU-OE-CTL.

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

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

16 **LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL**

17 23. To date, Class Counsel has borne all of the risks and costs of litigation and will not
18 receive any compensation until recovery is obtained in this case. Lawyers *for* Justice, PC seeks
19 reimbursement of **\$15,000.00** in litigation costs and expenses incurred in this matter, pursuant to
20 the Settlement Agreement. As reflected in "**EXHIBIT B**" attached hereto, Lawyers *for* Justice,
21 PC has incurred no less than \$15,315.00 in litigation costs and expenses in this matter. These
22 expenses were reasonable and necessary in the prosecution of the case and to obtain the
23 Settlement.

24 **CLASS REPRESENTATIVE ENHANCEMENT PAYMENT TO PLAINTIFF**

25 24. In recognition of his efforts and work serving as the Class Representative, the
26 Settlement provides for an enhancement payment in the amount of \$9,000.00 to Plaintiff. The
27 requested enhancement payment is fair and appropriate. Plaintiff spent a substantial amount of
28 time and effort to produce relevant documents and information, and provided facts and evidence

necessary 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 facilitate the pursuit of the case. Plaintiff spent numerous hours speaking with Class Counsel about his claims, describing his work experiences with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff to receive \$9,000.00 as a reasonable enhancement payment for his services in the case, in addition to his individual settlement payment.

25. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiff, Class Members, PAGA Aggrieved 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 7th day of March 2024, at Glendale, California.



Joanna Ghosh

EXHIBIT A

JESSE JOERGER V. IES RESIDENTIAL, INC.
Riverside County Superior Court, Case No. CVRI2205490

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts With a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality • Edwin Aiwazian – 4.10 hours • Arby Aiwazian – 3.30 hours	7.40
Pre-Lawsuit Investigation of the Merits of Plaintiff Jesse Joerger’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members • Edwin Aiwazian – 3.50 hours • Arby Aiwazian – 2.70 hours	6.20
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant IES Residential, Inc. (“Defendant”) With Respect to Plaintiff and the Putative Class Members • Edwin Aiwazian – 3.70 hours • Arby Aiwazian – 2.90 hours	6.60
Pre-Notice Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California With Respect to Plaintiff and the Aggrieved Employees • Edwin Aiwazian – 1.50 hours • Arby Aiwazian – 3.70 hours	5.20

Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant With Respect to Plaintiff and the Aggrieved Employees • Edwin Aiwanian – 1.90 hours • Arby Aiwanian – 3.70 hours	5.60
Legal Research and Analysis of Latest Decisions Regarding Time Rounding Practices, Off-the-Clock Theory, Regular Rates of Pay, Piece-Rate Compensation, Meal and Rest Breaks, On-Premises Rest Breaks, Expense Reimbursements, Recordkeeping and Wage Statement Compliance, Class Certification, Representative PAGA Actions, and Manageability in California, Including All New and Relevant DLSE Materials • Edwin Aiwanian – 3.20 hours • Elizabeth M. R-H Parker-Fawley – 3.70 hours	6.90
Investigation of Defendant, Defendant's Products and Services, Defendant's Business Relationships, and the Industry/Market in Which Defendant Operates • Edwin Aiwanian – 2.40 hours • Arby Aiwanian – 1.10 hours	3.50
Investigation of Defendant's Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees • Edwin Aiwanian – 1.40 hours • Arby Aiwanian – 1.10 hours • Elizabeth M. R-H Parker-Fawley – 0.80 hour	3.30
Investigation of Defendant's Executives, Officers, and Leadership With a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity; and Research and Analysis of Defendant's Litigation History Involving Wage-and Hour Issues and Other Related Employment Issues • Edwin Aiwanian – 2.10 hours • Elizabeth M. R-H Parker-Fawley – 1.30 hours	3.40

Analysis of Competitors in Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures With the Policies, Practices, and Procedures of Defendant's Competitors • Edwin Aiwazian – 1.20 hours • Arby Aiwazian – 2.70 hours	3.90
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Layout, Configuration, and Any Differences Between Them to Assess Whether Individual Issues Predominate Over Common Issues • Edwin Aiwazian – 2.20 hours • Arby Aiwazian – 1.20 hours • Jacob Karczewski – 2.10 hours	5.50
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other Postings and Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would Be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks • Edwin Aiwazian – 5.70 hours	5.70
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations Throughout California Where Putative Class Members Aggrieved Employees Worked • Edwin Aiwazian – 2.40 hours • Arby Aiwazian – 1.10 hours	3.50

Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Overtime Compensation, Off-the-Clock Work, Reporting Time Pay, Piece-Rate Compensation, Non-Productive Time, Timekeeping, Rounding, Auto-Deduction of Time, Meal Breaks, Rest Breaks, On-Premises Breaks, Non-Discretionary Bonus/Incentive/Performance/Commission/Shift Differential Pay, Regular Rate Compensation, Traveling Between Locations and Work Sites, Use of Personal Cell Phones and Data, Travel Costs and/or Use of Personal Vehicles, Work Attire/Dress Code/Uniform, Footwear, Equipment, Supplies, Tools, PPE, Reimbursement of Business-Related Expenses, and Recordkeeping and Wage Statements • Edwin Aiwanian – 5.10 hours • Arby Aiwanian – 3.20 hours • Jacob Karczewski – 3.80 hours • Aliza Grossman – 5.30 hours	17.40
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Timekeeping, Payroll, GSP/Logistics, Project Management, Customer Relations Management, Communications, Information and Technology, Controlled Access, Security, and Surveillance Systems, With a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks • Edwin Aiwanian – 1.90 hours • Arby Aiwanian – 2.30 hours	4.20
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, and Compliant Policies • Edwin Aiwanian - 4.60 hours • Arby Aiwanian – 1.90 hours	6.50

Research and Investigation Re: Post- <i>Duran v. U.S. Bank</i> Trial Manageability Issues, Including Research Regarding Which Experts to Retain and for What Purpose • Edwin Aiwanian – 3.50 hours • Arby Aiwanian – 1.40 hours	4.90
Research and Investigation Re: Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members’ and Aggrieved Employees’ Work • Edwin Aiwanian – 5.80 hours	5.80
Review Register of Actions, Docket, and Papers Filed in <i>Raul Farias Onofre, et al. v. IES Residential, Inc.</i> , Riverside County Superior Court, Case No. CVRI220491(“Onofre Action”) • Joanna Ghosh – 0.80 hour • Vartan S. Madoyan – 0.90 hour • Eli Drummond – 0.70 hour	2.40
Meet and Communicate with Plaintiff During the Pendency of the Case • Edwin Aiwanian – 4.50 hours • Arby Aiwanian – 5.60 hours • Vartan S. Madoyan – 2.50 hours • Aliza Grossman – 16.50 hours • Eli Drummond – 7.40 hours	36.50
Investigate, Meet, Communicate With, and/or Conduct Interviews of Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses • Edwin Aiwanian – 6.70 hours • Arby Aiwanian – 3.80 hours	10.50
Pleadings and Court Filings	
Draft Plaintiff’s Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (Filed on December 16, 2022) • Edwin Aiwanian – 7.60 hours	7.60

Review and Analyze Notices Re: Case Management Conference, Class Action Case Management Conference, Department Assignment, and Complex Case Assignment (Filed on December 23, 2022) Edwin Aiwarzian – 0.30 hour	0.30
Meet and Confer With Defendant’s Counsel and Draft Stipulation and Proposed Order to Continue February 21, 2023 Case Management Conference (Filed on February 8, 2023) Eli Drummond – 1.10 hours	1.10
Review Notice of Related Case (Filed on February 17, 2023) Eli Drummond – 0.20 hour	0.20
Review and Analyze Defendant’s Answer to the Complaint and Research Affirmative Defenses in Answer (Filed on March 9, 2023) Edwin Aiwarzian – 1.40 hours	1.40
Meet and Confer With Defendant’s Counsel and Draft Joint Stipulation to Continue Case Management Conference (Filed on May 24, 2023) Aliza Grossman – 0.80 hour	0.80
Meet and Confer With Defendant’s Counsel and Draft Joint Notice of Settlement (Filed on June 20, 2023) Aliza Grossman – 0.20 hour	0.20
Meet and Confer With Defendant’s Counsel and Draft Joint Stipulation to Continue Case Management Conference Order (Filed on June 28, 2023) Aliza Grossman – 0.80 hour	0.80

Draft First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (Filed on October 9, 2023), and Meet and Confer With Defendant's Counsel and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; Propose Order Thereon (Filed on October 2, 2023) • Joanna Ghosh – 1.40 hours • Vartan S. Madoyan – 4.80 hours	6.20
Review and Analyze Defendant's Answer to First Amended Complaint and Research Affirmative Defenses in Answer (Filed on October 25, 2023) • Edwin Aiwazian – 0.60 hour • Vartan S. Madoyan – 0.50 hour	1.10
Appearances	
Prepare for and Attend Hearing on Motion to Consolidate or, in the Alternative, to Intervene, in Related Case No. CVRI2205490 (Held on October 2, 2023) • Joanna Ghosh – 2.50 hours • Vartan S. Madoyan – 2.30 hours	4.80
Prepare for and Attend Hearing on Motion for Preliminary Approval of Class Action Settlement (Held on November 1, 2023) • Joanna Ghosh – 2.20 hours • Vartan S. Madoyan – 3.70 hours	5.90
Prepare for and Attend Hearing on Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Class Representative Enhancement Payment (Anticipated) • Joanna Ghosh – 1.10 hours • Vartan S. Madoyan – 1.50 hours	2.60

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (Served on September 22, 2022) Edwin Aiwazian – 1.90 hours	1.90
Review and Analyze Documents Produced by Defendant in Response to Request for Personnel Files, Pay Stubs, and Time Records for Plaintiff Jesse Joerger (Served on August 30, 2022) Edwin Aiwazian – 2.80 hours	2.80
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency re: Claims of Plaintiff for Penalties Under California Labor Code section 2698, <i>et seq.</i> (Served on June 27, 2023) Arman Markuyan – 4.50 hours	4.50
Mediation/Settlement	
Review and Analyze Documents, Data, and Information Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation, and Prepare Valuation Models - Edwin Aiwazian – 13.50 hours - Arby Aiwazian – 14.80 hours - Aliza Grossman – 14.40 hours	42.70
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting Mediation Brief, and Compiling Mediation Exhibits in Support of Plaintiff's Mediation Brief (Submitted on May 30, 2023) - Edwin Aiwazian – 4.10 hours - Arby Aiwazian – 8.50 hours - Aliza Grossman – 11.50 hours	24.10

Prepare for and Attend Pre-Mediation Conference With Mediator (June 1, 2023) Aliza Grossman – 2.90 hours	2.90
Remotely Attend Mediation Session (Zoom Video Conference on June 5, 2023) - Arby Aiwazian – 7.70 hours - Aliza Grossman – 2.40 hours	10.10
Review, Analyze, and Accept Confidential Mediator’s Proposal (Issued on June 9, 2023; Modified on June 13, 2023; and Accepted on June 14, 2023) - Arby Aiwazian – 1.10 hours - Aliza Grossman – 1.50 hours	2.60
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (Fully Executed on September 29, 2023) and Notice of Class Action Settlement, Objection Form, and Exclusion Form - Joanna Ghosh – 5.10 hours - Vartan S. Madoyan – 10.80 hours	15.90
Monitor Settlement Administration Process and Review Weekly Reports from Settlement Administrator - Joanna Ghosh – 1.70 hours - Vartan S. Madoyan – 2.80 hours	4.50
Law and Motion	
Review and Analyze Raul Farias Onofre and Alan Zamora’s Notice of Motion and Motion to Consolidate or, in the Alternative, to Intervene, in Related Case No. CVRI2205490, Declaration of Lenden F. Webb in Support Thereof, and Declaration of Brooke B. Nevels in Support of an Order Shortening Time on a Motion to Consolidate (Served on September 7, 2023) (Onofre Action) - Joanna Ghosh – 1.50 hours - Vartan S. Madoyan – 1.80 hours	3.30

Review and Analyze Raul Farias Onofre and Alan Zamora’s (Second) Notice of Motion and Motion to Consolidate or, in the Alternative, to Intervene, in Related Case No. CVRI2205490 (Served on September 13, 2023) • Joanna Ghosh – 0.10 hour • Vartan S. Madoyan – 0.10 hour	0.20
Review and Analyze Defendant’s Opposition to Motion to Consolidate or, in the Alternative, to Intervene, in Related Case CVRI2205490 and Declaration of Jesse C. Ferrantella in Support Thereof (Filed on September 18, 2023) (Onofre Action) • Joanna Ghosh – 1.10 hours • Vartan S. Madoyan – 1.30 hours	2.40
Research and Draft Plaintiff’s Joinder to Defendant’s Opposition to Motion to Consolidate or, in the Alternative, to Intervene in Related Case No. CVRI2205490 and Declaration of Joanna Ghosh in Support Thereof (Filed on September 20, 2023) (Onofre Action) • Joanna Ghosh – 5.90 hours • Vartan S. Madoyan – 7.80 hours	13.70
Analyze Raul Farias Onofre and Alan Zamora’s Reply to Motion to Consolidate or, in the Alternative, to Intervene, in Related Case No. CVRI2205490 (Filed on September 25, 2023) (Onofre Action) • Joanna Ghosh – 1.10 hours • Vartan S. Madoyan – 1.30 hours	2.40
Review Declaration of Michael Moore on Behalf of Phoenix Class Action Settlement Administration, and Research and Draft Plaintiff’s Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement, Declaration of Vartan S. Madoyan in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (Filed on October 2, 2023) • Joanna Ghosh – 3.70 hours • Vartan S. Madoyan – 17.50 hours	21.20

Review Deputy Clerk's Notice of Hearing (Civil) (Filed on October 3, 2023) • Vartan S. Madoyan – 0.10 hour	0.10
Draft Notice of Continuance of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (Filed on October 9, 2023) • Vartan S. Madoyan – 0.10 hour	0.10
Review Defendant's Opposition to Plaintiffs' Motion to Consolidate or, in the Alternative, to Intervene in related Case No. CVRI2205490 (Served on October 12, 2022) • Vartan S. Madoyan – 0.10 hour	0.10
Review and Analyze Raul Farias Onofre and Alan Zamora's Objection and Opposition to Joerger's Motion for Preliminary Approval of Class Action and PAGA Settlement and Declaration of Lenden F. Webb in Support Thereof (Filed on October 19, 2023) • Joanna Ghosh – 1.70 hours • Vartan S. Madoyan – 1.50 hours	3.20
Draft Plaintiff's Reply in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement and Response to Raul Farias Onofre and Alan Zamora's Objection and Opposition to Motion for Preliminary Approval of Class Action and PAGA Settlement and (Filed on October 25, 2023) • Joanna Ghosh – 5.60 hours • Vartan S. Madoyan – 6.30 hours	11.90
Review and Analyze Ruling on Submitted Matter Re: Motion to Consolidate or Intervene (Filed on October 26, 2023) • Joanna Ghosh – 0.20 hour • Vartan S. Madoyan – 0.20 hour	0.40

Draft Amended [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (Filed on November 7, 2023) - Joanna Ghosh – 0.10 hour - Vartan S. Madoyan – 0.70 hour	0.80
Review and Analyze Amended Order Granting Preliminary Approval of Class Action and PAGA Settlement (Granted November 9, 2023) - Joanna Ghosh – 0.10 hour - Vartan S. Madoyan – 0.10 hour	0.20
Review Settlement Administrator’s Declaration, and Research, Draft, and Finalize Plaintiff’s Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Attorneys’ Fees and Costs, and Class Representative Enhancement Payment; Declarations of Jesse Joerger and Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (Filed on March 7, 2024) - Joanna Ghosh – 5.10 hours - Vartan S. Madoyan – 12.40 hours	17.50
Total Hours:	377.40

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Joerger v. IES Residential, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/30/2022	U.S. Postmaster	Postage	\$15.70
12/23/2022	Legal Document Server, Inc.	Attorney Service	\$113.43
12/23/2022	Riverside Superior Court	Complaint Filing Fee	\$450.00
12/23/2022	Riverside Superior Court	Complex Filing Fee	\$1,000.00
1/9/2023	Riverside Superior Court	Document Download Fee	\$3.00
2/8/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
5/18/2023	Jams, Inc.	Mediation Fee	\$10,475.00
5/24/2023	Legal Document Server, Inc.	Attorney Service	\$17.14
5/24/2023	Riverside Superior Court	Stipulation Fee	\$20.00
5/25/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
5/26/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
6/21/2023	Riverside Superior Court	Stipulation & Order Fee	\$20.00
6/21/2023	Legal Document Server, Inc.	Attorney Service	\$32.89
7/3/2023	Riverside Superior Court	Document Download Fee	\$1.00
7/6/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
7/12/2023	Riverside Superior Court	Document Download Fee	\$10.50
7/21/2023	Jams, Inc.	Supplemental Mediator's Fee	\$2,000.00
9/15/2023	Riverside Superior Court	Document Download Fee	\$1.00
9/19/2023	Legal Document Server, Inc.	Attorney Service	\$135.00
9/20/2023	Legal Document Server, Inc.	Attorney Service	\$23.90
9/21/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
9/26/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
10/2/2023	General Logistics Systems Inc	Courier Service	\$32.24
10/3/2023	Riverside Superior Court	Motion Fee	\$80.00
10/3/2023	Legal Document Server, Inc.	Attorney Service	\$490.06
10/4/2023	Legal Document Server, Inc.	Attorney Service	\$27.70
10/5/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
10/6/2023	General Logistics Systems Inc	Courier Service	\$32.24
10/9/2023	Riverside Superior Court	Document Download Fee	\$5.00
10/9/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
10/9/2023	General Logistics Systems Inc	Courier Service	\$32.50
10/10/2023	Legal Document Server, Inc.	Attorney Service	\$47.25
10/12/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
10/13/2023	Legal Document Server, Inc.	Attorney Service	\$27.70
10/16/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
10/26/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
10/30/2023	Riverside Superior Court	Document Download Fee	\$21.00
11/7/2023	Legal Document Server, Inc.	Attorney Service	\$11.95

LAWYERS for JUSTICE PC CASE COST DETAIL
Joerger v. IES Residential, Inc.

11/8/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
		Total:	\$15,315.00