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Attorneys for Plaintiff and the Class

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

LESLEY MUNOZ, 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;
GIOVANI ESTRELLA, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiffs,

vs.

UKA’S BIG SAVER FOODS, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 19STCV24268

Honorable Carolyn Kuhl
Department SSC-12

CLASS ACTION

**DECLARATION OF BRIAN J. ST. JOHN
IN SUPPORT OF PLAINTIFF’S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
COUNSEL FEES PAYMENT, CLASS
COUNSEL LITIGATION EXPENSES
PAYMENT, AND CLASS
REPRESENTATIVE SERVICE
PAYMENT**

Date: April 15, 2025
Time: 10:30 a.m.
Department: SSC-12

Complaint Filed: July 12, 2019
FAC Filed: October 26, 2020
SAC Filed: October 30, 2024
Trial Date: None Set

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1. I am an attorney duly licensed to practice law before all courts of the State of California and all United States District Courts in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Lesley Munoz (“Plaintiff”) in the above-captioned consolidated case. 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 thereto.

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1 for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, et
2 seq. (“PAGA”).

3 **WORK PERFORMED BY CLASS COUNSEL**

4 4. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating
5 the above-captioned action since prior to its commencement on July 12, 2019.

6 5. Before initiating the matter, Lawyers *for* Justice, PC conducted extensive investigation
7 and research into the facts and circumstances underlying the pertinent factual and legal issues and
8 applicable law. This required thorough discussions and interviews between attorneys at our firm and
9 Plaintiff and research into the various legal issues involved in the case, namely, the current state of the
10 law as it applied to class certification, representative PAGA claims, off-the-clock theory, meal and
11 rest periods, wage-and-hour enforcement, Plaintiff’s claims and damages, and Defendant’s defenses.
12 After conducting initial investigation, Lawyers *for* Justice, PC determined that Plaintiff’s claims were
13 well-suited for class-wide and representative adjudication, owing to what appeared to be a common
14 course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt
15 employees of Defendant within the State of California, who were not properly compensated for, *inter*
16 *alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses

17 6. The Parties conducted significant formal and informal discovery and investigation into
18 the facts of the case, to assess the veracity, strength, and scope of the claims, and Class Counsel worked
19 on preparing the matter for class certification and trial, prior to reaching the Settlement. The Parties
20 exchanged information, documents, and data in the course of litigation and in connection with the
21 mediation and settlement negotiations. Class Counsel reviewed and analyzed information, data, and
22 documents obtained from Plaintiff, Defendant, and other sources. The volume of data and documents
23 that Class Counsel reviewed and analyzed included and was not limited to: Plaintiff’s employment
24 records, a detailed sampling of Plaintiff’s and other Class Members’ time data and pay records,
25 Defendant’s Employee Handbook, Defendant’s operations and employment practices, forms,
26 procedures, and policies (including, and not limited to, Meal and Rest Policy, Overtime Policy,
27 Timekeeping Policy, and Expense Reimbursement Request Form), among other information and
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1 documents. Class Counsel had the opportunity to interview Plaintiff and other Class Members to
2 gather information regarding the facts and circumstances surrounding Plaintiff's and putative class
3 members' employment and to identify potential witnesses. Class Counsel also developed damages,
4 violation, and penalties valuation models in connection with the mediation and settlement
5 negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss
6 issues relating to the pleadings, case management, formal and informal discovery, motion practice,
7 and production of documents and data in the course of litigation and mediation and settlement
8 negotiations, and mediation and settlement negotiations. Other work that Class Counsel has performed
9 includes, and is not limited to, case strategy and analysis; drafting, reviewing, and revising the
10 pleadings, the mediation brief, and motion-related papers; claims assessment; preparing for and
11 attending court proceedings; and preparing for and participating in mediation and settlement
12 negotiations, among other tasks.

13 7. As outlined herein, the Parties have conducted significant investigation and formal and
14 informal discovery during the course of litigating the case, mediation, and extensive settlement
15 negotiations. Class Counsel analyzed thousands of pages of information, documents, and data obtained
16 from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature of the
17 work performed by the Class Members and Aggrieved Employees, as well as Defendant's operations
18 and employment policies, practices, and procedures. The information, documents, and data were used
19 in analyzing liability, damages, penalties, and other valuation issues in connection with all phases of
20 the litigation, and ultimately, in connection with the mediation and settlement negotiation process.
21 Class Counsel also performed significant research regarding applicable law, which is evolving as it
22 relates to class certification, manageability, off-the-clock theory, meal and rest periods, representative
23 PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiff's claims and allegations,
24 and Defendant's defenses thereto, as well as facts discovered

25 8. After conducting significant investigation of the facts and law during the prosecution
26 of the case, counsel for the parties engaged in mediation and extensive settlement negotiations to try
27 to resolve the case. These efforts included participating in mediation conducted by Eve Wagner, Esq.,
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1 a well-regarded mediator who is experienced in mediating complex labor and employment matter.
2 During all settlement discussions, the parties conducted their negotiations at arm's length in an
3 adversarial position. In the course of mediation and settlement negotiations, the parties discussed and
4 considered all aspects of the case, including the risks and delays of further litigation, the risks to the
5 parties of proceeding with class certification, and/or trial, the law relating to class certification, off-
6 the-clock theory, meal and rest periods, PAGA representative claims, and wage-and-hour
7 enforcement, as well as the evidence produced and analyzed, and the possibility of appeals, among
8 other things. Arriving at a settlement that was acceptable to the parties was not easy. After conducting
9 extensive investigations and settlement negotiations, and with the aid of the mediator's evaluation, the
10 parties have agreed to resolve the case given the legal issues relating to Plaintiff's principal claims, as
11 well as the costs and risks to both sides that would attend further litigation, and the real possibility of
12 no recovery after years of litigation.

13 9. By way of the accompanying motion for final approval of the Settlement, Class
14 Counsel seek attorneys' fees in the amount of \$147,500.00, which is one-third (1/3) of the Gross
15 Settlement Amount of \$442,500.00. Pursuant to the contingency-fee agreement entered into by and
16 between Plaintiff and Lawyers *for* Justice, PC, Plaintiff has agreed to a contingency fee of at least one-
17 third (1/3) of the recovery.

18 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took
19 in commencing and/or pursuing the case; (2) the time, effort, and expense that Class Counsel dedicated
20 to the case; (3) the skill and determination that Class Counsel have shown; (4) the substantial results
21 that Class Counsel have achieved throughout the litigation of the case; (5) the value of the settlement
22 that Class Counsel have achieved; and (6) the other case that Class Counsel have turned down in order
23 to devote their time and efforts to the case.

24 11. While not necessarily required to be demonstrated because the percentage fee is proper
25 for this settlement, Class Counsel have incurred many hours of work in connection with prosecuting
26 the cases, such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys
27 at Lawyers *for* Justice, PC have spent a total of **425.80 hours** performing tasks and obtaining recovery
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1 in this matter. Attached hereto as “**EXHIBIT A**” is an Attorney Task and Time Chart that sets forth
2 in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC, and the time
3 incurred in performing those services. The hours attributable to Lawyers *for* Justice, PC include work
4 done by several attorneys at Lawyers *for* Justice, PC. Additionally, separate from the hours of work
5 referenced herein and in the attached chart, Lawyers *for* Justice, PC had litigation support personnel
6 actively engaged in assisting with the prosecution of this matter.

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

23 **EXPERIENCE AND ADEQUACY OF**

24 **LAWYERS *for* JUSTICE, PC**

25 13. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
26 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
27 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is
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1 attorney of record in dozens of employment-related putative class actions in both state and federal
2 courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on
3 litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative
4 actions. The firm has successfully litigated cases involving nearly every aspect of California wage
5 and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks
6 and/or premiums wages for same, timely payment of wages, provision of compliant wage statements,
7 reimbursement of business expenses, executive, administrative, and other overtime exemptions to the
8 State of California and federal overtime compensation requirements, PAGA claims, and sister statutes
9 under federal law. Lawyers *for* Justice, PC has recovered (sometimes in association with other law
10 firms) millions of dollars on behalf of thousands of individuals in California.

11 14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice, PC.
12 He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a
13 Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive
14 formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution
15 as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as
16 a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a
17 Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he
18 studied Legal Writing at Harvard University. From approximately September 2002 to approximately
19 December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United
20 States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately
21 August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court
22 of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice
23 law from the California State Bar. Since in or around October of 2008, through his work at Lawyers
24 *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment
25 class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
26 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
27 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.

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

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

26 16. Joanna Ghosh is a Senior Member of Lawyers *for* Justice, PC. She received a Bachelor
27 of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree
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1 from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University
2 Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since
3 2013) and is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy
4 Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended
5 dozens of depositions and successfully handled motion practice in class action cases regarding
6 discovery (including and not limited to, regarding class contact information), class certification (both
7 contested class certification and stipulated class certification), arbitration agreements, coordination,
8 intervention. She has successfully handled briefing and oral argument on appeal and obtained notable
9 decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration of
10 PAGA claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal., May 24, 2017) 9
11 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied, cert. denied (U.S., Dec. 11, 2017) and *ZB,*
12 *N.A. v. Superior Court* (2019) 8 Cal.5th175. She also has extensive experience with class action and/or
13 representative action settlements. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, the
14 firm has handled the class certification and court approval process for hundreds of class action and/or
15 representative action matters that have successfully resolved. She is a member of the California
16 Employment Lawyers Association.

17 17. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor's degree from the
18 University of California, San Diego in 2010 and earned my Juris Doctor degree from the University
19 of California, Berkeley, School of Law in 2013. I was admitted to practice law in California in 2015.
20 I am admitted to practice before all courts of the State of California and all federal district courts in
21 the State of California. I have worked on many wage and hour class action and PAGA representative
22 matters, and my work has included, inter alia, researching and drafting pleadings, administrative notice
23 exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in
24 motion practice, claims evaluation and analysis, and making court appearances. Prior to working at
25 Lawyers *for* Justice, PC, I spent several years working for a boutique employment and labor law firm
26 representing employers, and, in 2019 and 2020, I was employed as general counsel for a DMHC
27 licensed discount dental plan.

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

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

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

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

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

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

25 e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-
26 and-hour class and PAGA representative action against a bank, involving allegations of
27 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court granted
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1 final approval of the class and PAGA representative action settlement. The Kern County Superior
2 Court Case Number is S-1500-CV-273194-LHB.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
2 representative action against a chocolate company on behalf of non-exempt employees. On July 19,
3 2017, the court granted final approval of the class and PAGA representative action settlement. The
4 Alameda County Superior Court Case Number is RG15764300.

5 w) LFJ represented the plaintiff in a PAGA representative action, against the parent
6 company of several restaurants, on behalf of hourly-paid, non-exempt employees. On October 18,
7 2017, the court granted approval of the PAGA representative action settlement. The Los Angeles
8 County Superior Court Case Number is BC569664.

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

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

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

22 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
23 and-hour class and PAGA representative action against a global provider of flexible office space
24 solutions. On February 15, 2018, the court granted final approval of the class and PAGA representative
25 action settlement. The Los Angeles County Superior Court Case Number is BC498401.

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

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

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

12 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-
13 and-hour class action against a parking company on behalf of non-exempt employees. On September
14 3, 2019, the court granted the plaintiff's motion for class certification and certified a class. The Santa
15 Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination
16 Proceeding Number is 4886.

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

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

1 hh) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-
2 and-hour class and PAGA representative action against a medical equipment supplier on behalf of
3 non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion for class
4 certification and certified a class. On November 2, 2023, the court granted final approval of the class
5 and PAGA representative action settlement. The San Bernardino County Superior Court Case Number
6 is CIVDS1505744.

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

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

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

26 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
27 and-hour class action against manufacturer and supplier of power products and services on behalf of
28

1 non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion for class
2 certification and certified a class. On August 27, 2021, the court granted final approval of the class
3 action settlement. The San Diego County Superior Court Case Number is 37-2015-00025968-CU-
4 OE-CTL.

5 mm) LFJ represented the plaintiff in a wage-and-hour class action against a
6 nutritional products manufacturer on behalf of non-exempt production line employees. On December
7 13, 2021, the court granted the plaintiff's motion for class certification in part and certified a class. On
8 January 16, 2024, the court granted final approval of the class and PAGA representative action
9 settlement. The Solano County Superior Court Case Number is FCS051001.

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

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

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

26 ///

27 ///

**LITIGATION COSTS AND EXPENSES INCURRED BY
LAWYERS FOR JUSTICE, PC**

19. To date, Class Counsel have borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in the case. Lawyers *for* Justice, PC seeks reimbursement of \$22,384.75 in litigation costs and expenses incurred in the case, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement

CLASS REPRESENTATIVE SERVICE PAYMENT TO PLAINTIFF

20. In recognition of her efforts and work serving as expended in the case and serving as the Class Representative, Plaintiff seeks an Class Representative Service Payment in the amount of \$7,500.00. The requested Class Representative Service Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in providing relevant documents, past employment records, and the facts and evidence necessary to attempt to prove the allegations in the case, including and not limited to, by way of working with Class Counsel to prepare responses to discovery requests that were propounded on her by Defendant. Plaintiff was available whenever her attorneys needed her and actively tried to obtain and provide information that would facilitate the pursuit of the case. Accordingly, it is appropriate for Plaintiff to receive \$7,500.00 as a reasonable Class Representative Service Payment for her services performed in the matter.

21. Class Counsel submits that the Settlement is fair, reasonable, and adequate, and is in the best interest of the Class, 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 21st day of March 2025, at Glendale, California.



Brian J. St. John

EXHIBIT A

LESLEY MUNOZ, ET AL. V. UKA'S BIG SAVER FOODS, INC.
Los Angeles Superior Court Case No. 19STCV24268

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Lesley Munoz ("Plaintiff Munoz") during the Case	55.30
Meet and Communicate with Former Plaintiff Giovanni Estrella ("Former Plaintiff Estrella") during the Case	37.50
Investigate, Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	18.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiffs' Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiffs' Class Action Complaint for Damages (filed on July 12, 2019)	7.80
Review Court's Notice of Case Assignment (filed on July 12, 2019)	0.10
Review Court's Minute Order Re: Court Order Regarding Newly Filed Class Action	0.10
Review Defendant Uka's Big Saver Foods, Inc.'s ("Defendant") Notice of Appearance of Counsel for Defendant (served on September 6, 2019)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Initial Status Conference Class Action Response (filed on September 13, 2019)	1.60

Review Court's Minute Order Re: Initial Status Conference (filed on September 9, 2019)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Status Conference Statement (filed on November 13, 2019)	1.20
Meet and Confer with Defendant's Counsel and Draft Joint Status Conference Statement (filed on February 13, 2020)	1.0
Review Court's Minute Order Re: Status Conference (filed on February 18, 2020)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Post-Mediation Status Conference; and [Proposed] Order (filed on July 23, 2020)	1.30
Draft Plaintiffs' Request for Dismissal of First Through Ninth Causes of Action Without Prejudice, Declaration of Edwin Aiwezian in Support Thereof, and [Proposed] Order Dismissing First Through Ninth Causes of Action Without Prejudice (filed on September 17, 2020)	1.50
Meet and Confer with Defendant's Counsel and Draft Joint Post-Mediation Status Conference Statement (filed on September 24, 2020)	1.40
Review Court's Order Dismissing First Through Ninth Causes of Action Without Prejudice (filed on September 25, 2020)	0.10
Review Court's Minute Order Re: Post-Mediation Status Conference (filed on September 28, 2020)	0.10
Review Court's Order Appointing Court Approved Reporter as Official Reporter Pro Tempore (filed on September 28, 2020)	0.10
Research and Draft Plaintiffs' First Amended Class Action Complaint for Damages (filed on October 26, 2020)	3.20

Review Court's Order Appointing Court Approved Reporter as Official Reporter Pro Tempore (filed on January 28, 2021)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Status Conference Statement (filed on May 20, 2021)	1.30
Review Court's Minute Order Re: Further Status Conference (filed on May 27, 2021)	0.10
Review Court's Order Appointing Court Approved Reporter as Official Reporter Pro Tempore (filed on May 27, 2021)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Class Certification Filing Deadline; [Propose] Order (filed on January 26, 2022)	1.20
Review Court's Order Granting Stipulation to Continue Class Certification Filing Deadline (filed on February 4, 2022)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation Re Deadline to File Class Certification Briefs and Scheduling of a Conference With the Court to Discuss a Briefing Schedule and Hearing Date on the Parties' Respective Motions Regarding Class Certification (filed on May 6, 2022)	1.50
Review Court's Order Granting Stipulation Re Deadline to File Class Certification Briefs and Scheduling of a Conference With the Court to Discuss a Briefing Schedule and Hearing Date on the Parties' Respective Motions Regarding Class Certification (filed on May 18, 2022)	0.10
Review Court's Case Anywhere Message Re: Request for Informal Discovery Conference (filed on July 21, 2022)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Informal Discovery Conference Statement (filed August 12, 2022)	1.40
Review Court's Minute Order Re: Informal Discovery Conference (filed on August 16, 2022)	0.10

Review Court's Order Appointing Court Approved Reporter as Official Reporter Pro Tempore (filed on August 16, 2022)	0.10
Review Court's Case Anywhere Message Re: Status Conference (filed on August 18, 2022)	0.10
Review and Analyze Defendant's Answer to Plaintiffs' Unverified First Amended Complaint (served on September 6, 2022), and Research Affirmative Defenses in Defendant's Answer	1.10
Review Court's Case Anywhere Message Re: Request for Informal Discovery Conference (filed on September 12, 2022)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Informal Discovery Conference Statement (filed on September 14, 2022)	1.20
Review Court's Case Anywhere Message Re: Request for Informal Discovery Conference (filed on September 14, 2022)	0.10
Review Court's Minute Order and Nunc Pro Tunc Order Re: Informal Discovery Conference (filed on September 14, 2022)	0.10
Review Court's Order Appointing Official Court Reporter Pro Tempore (filed on September 16, 2022)	0.10
Draft Plaintiffs' Notice of Settlement (filed on October 7, 2022)	0.20
Review Court's Case Anywhere Message Re: Parties' Notice of Settlement (filed on February 10, 2023)	0.10
Review Court's Minute Order Re: Court Order (filed on May 22, 2023)	0.10
Review Court's Minute Order Re: Order to Show Cause Re: Sanctions in the Amount of \$300.00 (filed on July 19, 2023)	0.10
Draft Plaintiffs' Notice of Posting Payment of Sanctions (filed on August 11, 2023)	0.20

Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of the Motion for Preliminary Approval (filed on September 6, 2023)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of the Motion for Preliminary Approval (filed on September 6, 2023)	0.10
Review Court's Minute Order Re: Order to Show Cause Re: Sanctions in the Amount of \$700.00 (filed on October 11, 2023)	0.10
Meet and Confer with Defendant's Counsel to Draft Joint Non-Appearance Case Review Report (filed on December 1, 2023)	1.0
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of the Motion for Preliminary Approval (filed on December 1, 2023)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of the Motion for Preliminary Approval (filed on February 1, 2024)	0.10
Review Court's Minute Order Re: Status Conference Re: Settlement (filed on April 8, 2024)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Hearing and Deadline to File Supplemental Briefing in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (filed on July 31, 2024)	1.10
Review Court's Order Granting Stipulation to Continue Hearing and Deadline to File Supplemental Briefing in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on August 5, 2024)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Hearing and Deadline to File Supplemental Briefing in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (filed on September 13, 2024)	0.80

Review Court's Order Granting Stipulation to Continuing Hearing and Deadline to File Supplemental Briefing in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on September 23, 2024)	0.10
Research and Draft Plaintiff Munoz's Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et. Seq. (filed on October 30, 2024)	1.80
Review Defendant's Notice of Change of Address or Other Contact Information (filed on December 13, 2024)	0.10
Draft Plaintiff Munoz's Notice of Change of Address or Other Contact Information (filed on January 31, 2025)	0.10
Appearances	
Prepare for, Travel to/from, and Attend Initial Status Conference (September 20, 2019)	1.30
Prepare for and Telephonically Attend Status Conference (February 18, 2020)	1.0
Prepare for and Telephonically Attend Post-Mediation Status Conference (September 28, 2020)	1.50
Prepare for and Telephonically Attend Hearing on Motion to Strike (January 28, 2021)	1.90
Prepare for and Telephonically Attend Further Status Conference (May 27, 2021)	0.80
Prepare for and Telephonically Attend Informal Discovery Conference (August 16, 2022)	0.30
Prepare for and Telephonically Attend Informal Discovery Conference (September 16, 2022)	1.0
Prepare for and Telephonically Attend Hearing on Order to Show Cause Re: Sanctions (July 19, 2023)	0.70

Prepare for and Telephonically Attend Hearing on Order to Schow Cause Re: Sanctions (October 11, 2023)	0.50
Prepare for and Telephonically Attend Status Conference Re: Settlement (March 8, 2024)	0.40
Prepare for and Telephonically Attend Hearing on Motion to Be Relieved as Counsel (May 6, 2024)	0.80
Prepare for Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (June 5, 2024)	0.70
Prepare for Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (August 27, 2024)	0.80
Prepare for Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (October 29, 2024)	0.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Munoz (served on October 24, 2018)	1.90
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Munoz (served on November 29, 2018)	1.70
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Munoz (served on December 19, 2018)	1.70
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Munoz (served on January 8, 2019)	1.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Former Plaintiff Estrella (served on February 22, 2019)	1.90

Draft Plaintiff Munoz's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on March 10, 2021)	6.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for April 14, 2021; Job Duties) (served on March 10, 2021)	3.60
Draft Plaintiff Munoz's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for April 13, 2021; Organizational Structure) (served on March 10, 2021)	3.20
Review Defendant's Objections to Plaintiffs' Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (Job Duties) (served on April 7, 2021)	1.10
Review Defendant's Objections to Plaintiffs' Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (Organizational Structure) (served on April 7, 2021)	0.80
Review Defendant's First Set of Special Interrogatories to Former Plaintiff Estrella (Set One) and First Set of Requests for Production of Documents to Former Plaintiff Estrella (Set One) (served on April 12, 2021)	1.20
Review Defendant's First Set of Special Interrogatories to Plaintiff Munoz (Set One) and First Set of Requests for Production of Documents to Plaintiff Munoz (Set One) (served on April 12, 2021)	1.20
Review Defendant's Responses to Plaintiffs' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on May 13, 2021)	1.90
Draft Former Plaintiff Estrella's Response to Defendant's First Set of Special Interrogatories (Set One) and First Set of Requests for Production of Documents (Set One) (served on May 17, 2021)	1.90

Draft Plaintiff Munoz's Response to Defendant's First Set of Special Interrogatories (Set One) and First Set of Requests for Production of Documents (Set One) (served on May 17, 2021)	2.0
Review Defendant's Supplemental Responses to Plaintiffs' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Requests for Production of Documents (Set One) (served on January 27, 2022)	1.20
Review Defendant's Second Set of Requests for Production of Documents to Former Plaintiff Estrella (served on June, 2022)	1.0
Review Defendant's Second Set of Requests for Production of Documents to Plaintiff Munoz (Set Two) (served on June, 2022)	1.0
Review Defendant's Third Set of Requests for Production of Documents to Former Plaintiff Estrella (served on June 14, 2022)	0.80
Review Defendant's Third Set of Requests for Production to Plaintiff Munoz (served on June 14, 2022)	0.80
Draft Former Plaintiff Estrella's Supplemental Responses to Defendant's First Set of Special Interrogatories (Set One) and Second Set of Requests for Production of Documents (Set One) (served on July 6, 2022)	1.10
Draft Former Plaintiff Estrella's Supplemental Responses to Defendant's First Set of Special Interrogatories (Set One) and Second Set of Requests for Production of Documents (Set One) (served on July 6, 2022)	1.10
Draft Former Plaintiff Estrella's Responses to Defendant's Third Set of Requests for Production of Documents (served on July 14, 2022)	0.70
Draft Plaintiff Munoz's Responses to Defendant's Third Set of Requests for Production of Documents (served on July 14, 2022)	0.70

Review Defendant's Notice of Deposition to Former Plaintiff Estrella and Request for Production of Original Documents (noticed for September 14, 2022; served on August 25, 2022)	0.30
Review Defendant's Notice of Deposition to Plaintiff Munoz and Request for Production of Original Documents (noticed for September 19, 2022; served on August 31, 2022)	0.30
Draft Former Plaintiff Estrella's Objections to Defendant's Notice of Taking Deposition of Giovanni Estrella and Request for Production of Documents (served on September 6, 2022)	0.80
Review Defendant's Fourth Set of Request of Production of Documents to Former Plaintiff Estrella (served on September 7, 2022)	0.50
Review Defendant's Fourth Set of Request of Production of Documents to Plaintiff Munoz (served on September 7, 2022)	0.50
Review Defendant's Supplemental Responses to Plaintiffs' Form Interrogatories – General (Set One) (served on September 9, 2022)	0.60
Draft Plaintiff Munoz's Objections to Defendant's Notice of Taking Deposition of Lesley Munoz and Request for Production of Documents (served on September 12, 2022)	1.20
Draft Plaintiff Munoz's Second Set of Supplemental Responses to Defendant's First Set of Special Interrogatories, Set One (served on September 16, 2022)	0.90
Review Defendant's Amended Notice of Taking Deposition of Former Plaintiff Estrella and Request for Production of Original Documents (served on September 21, 2022)	0.30
Draft Former Plaintiff Estrella's Objections to Defendant's Amended Notice of Taking Deposition of Giovanni Estrella and Request for Production of Original Documents (served on September 27, 2022)	1.0
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard, Review and Monitor <i>Belaire-West</i> Administration Process, and Review Non-Opt Out Contact List	1.50

Letters and Correspondence	
Draft Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff under the Private Attorneys General Act (served on July 20, 2023)	4.70
Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	20.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to Mediation	46.50
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages Analysis/Calculations (September 1, 2020)	28.0
Attend Mediation Session (September 3, 2020; Zoom Video Conference)	8.50
Engage in Additional Settlement-Related Discussions and Settlement Negotiations Following Unsuccessful Mediation	22.50
Review and Analyze Mediator's Proposal (accepted on September 27, 2022)	2.50
Draft, Review, Revise, Negotiate, and Finalize Stipulation of Class Action Settlement (executed on May 13, 2024), and Draft Notice of Class Action Settlement	19.50
Draft, Review, Revise, Negotiate, and Finalize Amendment No.1 to Stipulation of Class Action Settlement (executed on August 14, 2024)	1.50
Draft, Review, Revise, Negotiate, and Finalize Amendment No.2 to Stipulation of Class Action Settlement (executed on October 2, 2024)	1.0

Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	4.50
Law and Motion	
Review Defendant's Notice of Motion and Motion to Strike Portions of Plaintiffs' First Amended Complaint, Memorandum of Points and Authorities in Support Thereof, and Declaration of Robert Mussig in Support Thereof (served on November 30, 2020)	1.30
Review Court's Case Anywhere Message Re: Demurrer (filed on December 14, 2020)	0.10
Draft Plaintiffs' Opposition to Defendant's Motion to Strike Portions of Plaintiffs' First Amended Class Action Complaint (filed on January 11, 2021)	3.20
Review Defendant's Reply in Support of Its Motion to Strike Portions of Plaintiffs' First Amended Complaint (served on January 21, 2021)	1.0
Review Court's Minute Order Re: Defendant's Motion to Strike Portions of Plaintiffs' First Amended Complaint (filed on January 28, 2021)	0.10
Draft Plaintiffs' <i>Ex Parte</i> Application for an Order Continuing Deadline to File Plaintiffs' Motion for Class Certification, Declaration of Travis J. Maher in Support Thereof, and [Proposed] Order (filed on September 20, 2022)	3.50
Review Defendant's Opposition to Plaintiffs' <i>Ex Parte</i> Application to Continue Deadline to File Motion for Class Certification, Declaration of Robert Mussig in Support Thereof (filed on September 20, 2022)	1.20
Review Court's Minute Order Re: Court Order Re: Plaintiffs' <i>Ex Parte</i> Application to Continue Deadline to File Motion for Class Certification (filed on September 22, 2024)	0.10
Draft Plaintiffs' Notice of Motion and Motion to Be Relieved as Counsel—Civil, Declaration in Support Thereof, and [Proposed] Order (filed on April 12, 2024)	2.0

Review Court's Order Granting Attorney's Motion to Be Relieved as Counsel—Civil (filed on May 6, 2024)	0.10
Review Court's Minute Order Re: Hearing on Motion to Be Relieved as Counsel (Giovani Estrella) (filed on May 6, 2024)	0.10
Research and Draft Plaintiff Munoz's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Brian J. St. John in Support Thereof, Declaration of Plaintiff Munoz in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on May 13, 2024)	19.50
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on June 5, 2024)	0.10
Draft Plaintiff Munoz's Supplemental Declaration of Brian J. St. John in Support of Plaintiff's Renewed Motion for Preliminary Approval of Class Action Settlement, [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on August 14, 2024)	2.30
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement Revised (filed on August 27, 2024)	0.10
Review Court's Order Appointing Court Approved Reporter as Official Reporter Pro Tempore (filed on August 27, 2024)	0.10
Draft Plaintiff Munoz's Further Supplemental Declaration of Brian J. St. John in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on October 2, 2024)	1.50
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on October 29, 2024)	0.10

Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement Revised (filed on October 29, 2024)	0.10
Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Award, Declaration of Brian J. St. John in Support Thereof, and [Proposed] Final Approval Order and Judgment; and Review Declaration of Settlement Administrator in Support Thereof (filed on March 21, 2025)	22.50
Total Hours:	425.80

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Munoz vs. Uka's Big Saver Foods, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/30/2018	U.S. Postmaster	Postage	\$13.40
11/1/2018	U.S. Postmaster	Postage	\$6.70
11/29/2018	U.S. Postmaster	Postage	\$14.80
12/19/2018	U.S. Postmaster	Postage	\$7.40
1/8/2019	U.S. Postmaster	Postage	\$32.00
2/22/2019	U.S. Postmaster	Postage	\$6.85
7/12/2019	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
7/12/2019	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
8/7/2019	Legal Document Server, Inc.	Attorney Service	\$110.00
9/6/2019	General Logistics Systems US, Inc.	Courier Service	\$15.68
9/15/2019	General Logistics Systems US, Inc.	Courier Service	\$12.20
9/20/2019	Daniel Kramer	Travel Reimbursement	\$34.64
2/13/2020	Legal Document Server, Inc.	Attorney Service	\$110.00
2/18/2020	Jeffrey Klein	Travel Reimbursement	\$22.49
6/11/2020	Signature Resolution LLC	Mediation Fee	\$6,450.00
7/22/2020	Legal Document Server, Inc.	Attorney Service	\$205.70
7/22/2020	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
8/27/2020	General Logistics Systems US, Inc.	Courier Service	\$22.11
9/17/2020	Legal Document Server, Inc.	Attorney Service	\$205.00
9/17/2020	General Logistics Systems US, Inc.	Courier Service	\$11.98
9/24/2020	Legal Document Server, Inc.	Attorney Service	\$205.00
9/28/2020	Los Angeles Superior Court	Remote Appearance Fee	\$30.00
10/5/2020	Los Angeles Superior Court	Document Download Fee	\$3.00
10/8/2020	Legal Document Server, Inc.	Attorney Service	\$75.00
10/26/2020	Legal Document Server, Inc.	Attorney Service	\$205.00
10/26/2020	General Logistics Systems US, Inc.	Courier Service	\$20.08
12/3/2020	Case Anywhere LLC	Attorney Service	\$104.40
1/11/2021	Legal Document Server, Inc.	Attorney Service	\$175.00
2/2/2021	Los Angeles Superior Court	Remote Appearance Fee	\$30.00
3/4/2021	Case Anywhere LLC	Attorney Service	\$126.00
4/15/2021	General Logistics Systems US, Inc.	Courier Service	\$43.46
4/21/2021	General Logistics Systems US, Inc.	Courier Service	\$17.33
5/20/2021	Legal Document Server, Inc.	Attorney Service	\$175.00
6/1/2021	Los Angeles Superior Court	Remote Appearance Fee	\$15.00
6/3/2021	Case Anywhere LLC	Attorney Service	\$222.00
6/10/2021	Los Angeles Superior Court	Document Download Fee	\$10.80
9/2/2021	Case Anywhere LLC	Attorney Service	\$120.00
12/7/2021	Case Anywhere LLC	Attorney Service	\$120.00
1/26/2022	One Legal	Attorney Service	\$17.27

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Munoz vs. Uka's Big Saver Foods, Inc.

2/9/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
3/3/2022	Case Anywhere LLC	Attorney Service	\$138.00
6/2/2022	Los Angeles Superior Court	Document Download Fee	\$5.00
6/6/2022	Case Anywhere LLC	Attorney Service	\$120.00
6/6/2022	General Logistics Systems US, Inc.	Courier Service	\$31.12
6/15/2022	General Logistics Systems US, Inc.	Courier Service	\$46.83
7/13/2022	General Logistics Systems US, Inc.	Courier Service	\$15.38
7/27/2022	General Logistics Systems US, Inc.	Courier Service	\$43.84
8/16/2022	Coalition Court Reporters	Court Reporter	\$93.80
9/19/2022	General Logistics Systems US, Inc.	Courier Service	\$22.79
9/20/2022	Legal Document Server, Inc.	Attorney Service	\$214.00
9/20/2022	Los Angeles Superior Court	Ex Parte Application Fee	\$60.00
9/21/2022	FedEx Express	Courier Service	\$27.58
9/21/2022	Travis Maher	Travel Reimbursement	\$24.50
9/23/2022	General Logistics Systems US, Inc.	Courier Service	\$14.79
9/27/2022	ProLegal	Attorney Service	\$170.93
10/7/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
10/7/2022	Signature Resolution LLC	Supplemental Mediator's Fee	\$6,000.00
10/11/2022	ILYM Group, Inc.	Notice Mailing	\$498.27
12/7/2022	Case Anywhere LLC	Attorney Service	\$186.00
3/2/2023	Case Anywhere LLC	Attorney Service	\$120.00
6/2/2023	Case Anywhere LLC	Attorney Service	\$120.00
7/20/2023	U.S. Postmaster	Postage	\$7.20
7/20/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
8/10/2023	Legal Document Server, Inc.	Attorney Service	\$11.95
8/11/2023	Legal Document Server, Inc.	Attorney Service	\$190.85
8/11/2023	Los Angeles Superior Court	Motion Fee	\$300.00
9/3/2023	Case Anywhere LLC	Attorney Service	\$126.00
11/21/2023	General Logistics Systems US, Inc.	Courier Service	\$15.71
12/4/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
12/6/2023	Legal Document Server, Inc.	Attorney Service	\$205.00
12/7/2023	Case Anywhere LLC	Attorney Service	\$120.00
12/15/2023	General Logistics Systems US, Inc.	Courier Service	\$24.66
12/20/2023	General Logistics Systems US, Inc.	Courier Service	\$20.86
3/5/2024	Case Anywhere LLC	Attorney Service	\$126.00
4/12/2024	Legal Document Server, Inc.	Attorney Service	\$130.00
4/12/2024	General Logistics Systems US, Inc.	Courier Service	\$36.12
4/15/2024	Legal Document Server, Inc.	Attorney Service	\$20.32
4/15/2024	Los Angeles Superior Court	Motion Fee	\$60.00
5/14/2024	Legal Document Server, Inc.	Attorney Service	\$20.32

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Munoz vs. Uka's Big Saver Foods, Inc.

5/14/2024	Los Angeles Superior Court	Motion Fee	\$60.00
5/16/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
5/28/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
5/28/2024	General Logistics Systems US, Inc.	Courier Service	\$50.21
5/29/2024	Legal Document Server, Inc.	Attorney Service	\$224.25
6/5/2024	Case Anywhere LLC	Attorney Service	\$180.00
7/31/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
8/6/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
8/15/2024	Legal Document Server, Inc.	Attorney Service	\$200.90
8/27/2024	Coalition Court Reporters	Court Reporter	\$796.80
9/5/2024	Case Anywhere LLC	Attorney Service	\$156.00
9/13/2024	Legal Document Server, Inc.	Attorney Service	\$127.54
9/13/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
9/23/2024	Legal Document Server, Inc.	Attorney Service	\$13.15
10/2/2024	Legal Document Server, Inc.	Attorney Service	\$178.40
10/30/2024	Legal Document Server, Inc.	Attorney Service	\$35.40
11/1/2024	Legal Document Server, Inc.	Attorney Service	\$17.70
12/6/2024	Case Anywhere LLC	Attorney Service	\$192.00
3/5/2025	Case Anywhere LLC	Attorney Service	\$126.00
Total:			<u>22,384.75</u>