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Attorneys for Plaintiff Naron Triplett¹ and the Class

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

VANESSA HERNANDEZ, LAVONTRA
BREAUX, NARON TRIPLETT, and
NATALIE FLORES, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiffs,

vs.

PANDORA JEWELRY LLC, a Maryland
limited liability company; PANDORA
VENTURES, LLC, a Maryland limited liability
company; and DOES 1-10, inclusive.

Defendants.

Case No.: 24STCV04554
[Related Case Nos.: 23SMCV04825;
24SMCV00844; 24STCV04697; and
24STCV15396]

Honorable Carolyn B. Kuhl
Department 12

CLASS ACTION

**DECLARATION OF SELENA
MATAVOSIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 5, 2026
Time: 11:30 a.m.
Department: 12

¹ The Motion to be Relieved as Counsel for Plaintiff Naron Triplett that was filed on May 10, 2026 was heard by the Court and denied on April 9, 2026 in the related case *Naron Triplett v. Pandora Ventures, LLC, et al.*, Superior Court of California for the County of Los Angeles, Case No. 24STCV04697.

DECLARATION OF SELENA MATAVOSIAN

I, Selena Matavosian, 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 Naron Triplett (“Plaintiff Triplett”)² and the Class in the above-captioned action, as well as the action entitled *Naron Triplett v. Pandora Ventures, LLC, et al.*, Superior Court of California for the County of Los Angeles, Case No. 24STCV04697 (“Triplett Class Action”) and the action entitled *Naron Triplett v. Pandora Ventures, LLC, et al.*, Superior Court of California for the County of Los Angeles, Case No. 24SMCV00844 (“Triplett PAGA Action”) (the Triplett Class Action and Triplett PAGA Action are together referred to as the “Triplett Actions”). 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.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On December 11, 2025, in Department 12 of the above-entitled Court, in the above-captioned action, the Honorable Carolyn B. Kuhl preliminarily approved the Class Action and PAGA Settlement and Release Agreement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff Triplett, Plaintiff Lavontra Breaux (“Plaintiff Breaux”), Plaintiff Natalie Flores (“Plaintiff Flores”), and Plaintiff Vanessa Hernandez (“Plaintiff Hernandez”) (collectively, “Plaintiffs”), and Defendants Pandora Jewelry, LLC and Pandora Ventures, LLC (together, “Defendants”) (collectively with Plaintiffs, the “Parties”). For purposes of the Settlement, the Court conditionally certified the Class, appointed Plaintiffs as the representatives of the Class (“Class Representatives”), and appointed and designated Lawyers *for* Justice, PC, Sullivan & Yaeckel Law Group, APC, Bokhour Law Group, P.C., Falakassa Law, P.C., and Bibiyan Law Group, P.C as counsel for the Class (collectively, “Class Counsel”).

3. The Court approved and ordered the mailing of the Court-approved Notice of Class and PAGA Action Settlement (“Class Notice”), and adopted the notice, opt-out, and

² See Footnote 1.

objection procedures, and ordered their implementation. The Court appointed ILYM Group, Inc. (“ILYM Group” or “Settlement Administrator”) to serve as the third-party settlement administrator and to handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement (“Motion for Final Approval”), two (2) Class Members have submitted objections with respect to the Settlement.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers for Justice, PC have been actively performing work in this matter since prior to the commencement of the Triplett Actions, which were commenced by Plaintiff Triplett on February 23, 2024. On May 8, 2024, the Court consolidated the Triplett Class Action and Triplett PAGA Action, and deemed the Triplett Class Action as the lead case. On August 4, 2025, the Court deemed the following actions as related: the Triplett Class Action, the Triplett PAGA Action, the action entitled *Lavontra Breaux v. Pandora Ventures, LLC*, Superior Court of California for the County of Los Angeles, Case No. 23SMCV04825 (“Breaux Action”), which was commenced on October 13, 2023, the above-captioned action entitled *Vanessa Hernandez v. Pandora Ventures, LLC*, Superior Court of California for the County of Los Angeles, Case No. 24STCV04554 (“Hernandez Action”), which was commenced on February 23, 2024, and the action entitled *Kristine Ghukasyan v. Pandora Ventures, LLC, et al.*, Superior Court of California for the County of Los Angeles, Case No. 24STCV15396 (“Ghukasyan Action”), which was commenced on June 20, 2024. The Triplett Class Action, Triplett PAGA Action, Breaux Action, Hernandez Action, and the action entitled *Natalie Flores v. Pandora Ventures, LLC*, Superior Court of California for the County of Orange County, Case No. 30-2024-01377405-CU-OE-CXC (“Flores Action”), which was commenced on February 2, 2024 (collectively, the “Settled Actions”) were mediated and resolved. On November 13, 2025, Plaintiffs filed a First Amended Complaint in the above-captioned Hernandez Action, thereby consolidating all the claims, parties, and allegations asserted in the Settled Action into a single consolidated complaint.

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6. Lawyers *for* Justice, PC has fully and actively participated in the litigation process throughout the pendency of the Triplett Actions. Lawyers *for* Justice, PC eventually joined forces with Sullivan & Yaeckel Law Group, APC, counsel for Plaintiff Breaux, Bokhour Law Group, P.C. and Falakassa Law, P.C., counsel for Plaintiff Flores, and Bibiyan Law Group, P.C., counsel for Plaintiff Hernandez, and since then have been working cooperatively and in a coordinated fashion to pursue the cases and reach an outstanding settlement recovery.

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

8. After conducting significant investigation of the facts and law during the prosecution of the cases, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in a formal mediation session conducted on April 2, 2025, by mediator Steve Serratore, Esq., a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position.

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ATTORNEYS' FEES REQUESTED BY CLASS COUNSEL

9. By way of the accompanying Motion for Final Approval, Class Counsel seek attorneys' fees in the amount of \$949,905.00, which is 33.33% of the Gross Fund Value of \$2,850,000.00.

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

11. The nature of the work performed, skill exercised, and the outcome in this matter support the percentage fee sought. This matter involves an outstanding monetary recovery involving a Gross Fund Value of \$2,850,000.00—with a Net Fund Value of approximately at least \$1,480,145.00 to be paid to Participating Class Members (with gross Individual Settlement Payments averaging approximately \$545.37), payment of \$71,250.00 to Aggrieved Employees (with gross Individual PAGA Payments averaging approximately \$31.84), and payment of \$213,750.00 to the State of California.

12. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, it should be noted that Class Counsel have incurred many hours of work in connection with prosecuting the cases, such that the requested award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **205.80 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT A"** is an Attorney Task and Time Chart for Lawyers *for* Justice, PC that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC, and the time incurred by them in performing those services. These hours include work done by several other attorneys at Lawyers *for* Justice, PC. Also, 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.

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

18 **EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC**

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

1 administrative, and other overtime exemptions to the State of California and federal overtime
2 compensation requirements, PAGA claims, and sister statutes under federal law. During a
3 relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered
4 millions of dollars on behalf of thousands of individuals in California.

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

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

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

1 certification and stipulated class certification), arbitration agreements, coordination, and
2 intervention. She has successfully handled briefing and oral arguments on appeal and obtained
3 notable decisions regarding Private Attorneys General Act claims and employer efforts to compel
4 arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App.,
5 Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11,
6 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has significant experience with
7 class actions, including and not limited to, working on cases to obtain class certification through
8 contested motion practice and working on cases in the post-certification stage (e.g., post-
9 certification discovery, appeal, statistical sampling and pilot study, and trial preparation in
10 conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600
11 individuals). She has extensive experience with class action and/or representative action
12 settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin
13 Aiwasian, and Arby Aiwasian's supervision, Lawyers *for* Justice, PC has handled the class
14 certification and court approval process for hundreds of class action and/or representative action
15 matters that have successfully resolved. Joanna Ghosh is a member of the California Employment
16 Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and
17 hour law at the organization's continuing legal education events.

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

Association, and Iranian American Bar Association.

19. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Science degree from California State University, Northridge in 2019, and was the recipient of the Wildman Schumacher Scholarship. I earned a Juris Doctor degree from Southwestern Law School in 2022, and I was the recipient of the Witkin Award for Academic Excellence. I was admitted to practice law in California in 2022. I am admitted to practice before all courts of the State of California and all U.S. Federal District Courts in the State of California. I have worked on many wage-and-hour class action and PAGA representative cases, and my work on these cases has included, *inter alia*, researching and drafting pleadings and motion-related papers, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, performing claims evaluation and analysis, and making court appearances.

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

20. 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 cases. The Settlement provides for reimbursement of Class Counsel's litigation costs and expenses of up to \$75,000.00. Lawyers *for* Justice, PC seeks reimbursement of **\$11,266.64** in litigation costs and expenses incurred in this matter, as reflected in "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

21. I submit that the Settlement is fair, reasonable, and adequate and should be granted final approval by the Court.

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

Executed on this 13th day of May 2026, at Glendale, California.



Selena Matavosian

EXHIBIT A

NARON TRIPLETT V. PANDORA VENTURES, LLC ET AL.
Los Angeles County Superior Court Case No. 24STCV04697 (“Class Action”)
Los Angeles County Superior Court Case No. 24SMCV00844 (“PAGA Action”)

VANESSA HERNANDEZ V. PANDORA VENTURES, LLC
Los Angeles County Superior Court Case No. 24STCV04554 (“Hernandez Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Naron Triplett (“Plaintiff Triplett”)	17.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	12.50
Review and Analyze Court Filings in <i>Vanessa Hernandez v. Pandora Ventures, LLC</i> , Los Angeles County Superior Court, Case No. 24STCV04554 (i.e., Hernandez Action), <i>Lavontra Breaux v. Pandora Jewelry, LLC</i> , Los Angeles County Superior Court, Case No. 23SMCV04825, and <i>Natalie Flores v. Pandora Ventures, LLC</i> , Orange County Superior Court, Case No. 30-2024-01377405-CU-OE-CXC	3.10
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Triplett’s Class Claims, Conduct Legal Research and Analysis Regarding the Claims, and Draft, Review, and/or Revise Plaintiff Triplett’s Class Action Complaint for Damages (filed on February 23, 2024) (Class Action)	7.50
Investigate the Merits of Plaintiff Triplett’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff Triplett’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on February 23, 2024) (PAGA Action)	6.90

Review Court's Notice of Case Assignment Unlimited Civil Case and Alternative Dispute Resolution (ADR) Information Package (filed on February 23, 2024) (Class Action)	0.30
Review Court's Notice of Case Assignment Unlimited Civil Case and Alternative Dispute Resolution (ADR) Information Package (filed on February 23, 2024) (PAGA Action)	0.30
Review Court's Notice of Case Management Conference (filed on February 27, 2024) (PAGA Action)	0.10
Review Court's Minute Order Re: Newly Filed Case and Initial Status Conference Order (Complex Litigation Program) (filed on March 5, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Amendment to Complaint (Fictitious/Incorrect Name) (filed on March 27, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Amendment to Complaint (Fictitious/Incorrect Name) (filed on March 27, 2024) (PAGA Action)	0.20
Review Court's Order Re: Amendment to Complaint (Fictitious/Incorrect Name) (filed on March 29, 2024) (Class Action)	0.10
Review Court's Order Re: Amendment to Complaint (Fictitious/Incorrect Name) (filed on April 3, 2024) (PAGA Action)	0.10
Review Defendants Pandora Ventures, LLC and Pandora Jewelry, LLC's (together, "Defendants") Notice of Appearance (filed on April 10, 2024) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Initial Case Management Conference (filed on April 30, 2024) (Class Action)	1.60
Draft, Review, and/or Revise Plaintiff Triplett's Notice of Posting Jury Fees (filed on April 30, 2024) (Class Action)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Consolidate Cases; [Proposed] Order (filed on May 6, 2024) (Class Action)	1.30
Review Court's Minute Order Re: Initial Status Conference (filed on May 7, 2024) (Class Action)	0.20
Review Court's Order Re: Joint Stipulation to Consolidate Cases (filed on May 8, 2024) (Class Action)	0.20

Review and Analyze Defendants' Answer to Plaintiff Triplett's Class Action Complaint, and Research Affirmative Defenses in Defendants' Answer (filed on May 29, 2024) (Class Action)	1.20
Draft, Review, and/or Revise Plaintiff Triplett's Notice of Entry of Judgment or Order (filed on May 30, 2024) (Class Action)	0.10
Review Defendants' Notice of Related Case (filed on June 6, 2024) (Class Action)	0.20
Review Court's Minute Order Re: Court Order (filed on June 24, 2024) (Class Action)	0.20
Review Defendants' Notice of Payment of Complex Fee (filed on June 28, 2024) (PAGA Action)	0.10
Review Defendants' Substitution of Attorney – Civil (Without Court Order) (filed on August 14, 2024) (Class Action)	0.20
Review Defendants' Substitution of Attorney – Civil (Without Court Order) (filed on August 14, 2024) (PAGA Action)	0.20
Review Defendants' Notice of Related Case (filed on September 23, 2024) (Class Action)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Further Status Conference Statement (filed on September 23, 2024) (Class Action)	1.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Stipulation to Stay Actions and Continue Status Conference Pending Mediation; [Proposed] Order (filed on September 23, 2024) (Class Action)	1.20
Review Court's Order Re: Stipulation to Stay Actions and Continue Status Conference Pending Mediation (filed on September 30, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Triplett's Notice of Change of Address or Other Contact Information (filed on February 6, 2025) (Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Post Mediation Status Conference Statement and Notice of Settlement, and Stipulation Vacating Motion for Class Certification and Associated Deadlines; [Proposed] Order (filed on April 28, 2025) (Class Action)	1.20

Review Court's Order Re: Joint Post Mediation Status Conference Statement and Notice of Settlement, and Stipulation Vacating Motion for Class Certification and Associated Deadlines (filed on May 1, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Triplett's Notice of Entry of Judgment or Order (filed on May 8, 2025) (Class Action)	0.10
Review Court's Minute Order Re: Court Order Re: Related Cases 24STCV04554, 23SMCV04825, 24STCV04697, 24SMCV00844, 24STCV15396 (filed on August 4, 2025) (Hernandez Action)	0.20
Draft, Review, and/or Revise Plaintiffs Vanessa Hernandez, Lavontra Breaux, Natalie Flores, and Naron Triplett (collectively, "Plaintiffs") First Amended Complaint (filed on November 13, 2025); Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order to Allow Plaintiffs to File a First Amended Complaint (filed on October 28, 2025) (Hernandez Action)	0.90
Review Court's Order Re: Joint Stipulation to Allow Plaintiffs to File a First Amended Complaint (filed on November 13, 2025) (Hernandez Action)	0.10
Review Plaintiff Vanessa Hernandez's Notice of Change of Service List (filed on March 30, 2026) (Hernandez Action)	0.10
Appearances	
Prepare for and Remotely Attend Initial Status Conference Hearing (May 7, 2024) (Class Action)	0.60
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (October 29, 2025) (Class Action)	1.30
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (December 11, 2025) (Class Action)	1.30
Prepare for and Remotely Attend Hearing on Lawyers <i>for</i> Justice, PC's Motion to be Relieved as Counsel (April 9, 2026) (Class Action)	1.10
Discovery and Deposition	

Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Triplett (served on November 20, 2023)	3.40
Draft Plaintiff Triplett's Notice of Deposition of Person Most Knowledgeable at Defendant Pandora Ventures, LLC and Requests for Production of Documents (Organizational Structure; Noticed for July 23, 2024) (served on June 5, 2024) (Class Action)	1.20
Draft Plaintiff Triplett's Notice of Deposition of Person Most Knowledgeable at Defendant Pandora Ventures, LLC and Requests for Production of Documents (Wage and Hour Practices; July 24, 2024) (served on June 5, 2024) (Class Action)	1.40
Draft Plaintiff Triplett's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Pandora Ventures, LLC (served on June 5, 2024) (Class Action)	4.50
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Triplett for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (served on December 19, 2023)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendants' Counsel	17.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Other Plaintiffs' Counsel	11.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources Prior to Mediation	32.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting, Reviewing, and/or Revising the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations	25.50
Attend Mediation Session (April 2, 2025; via Zoom Video Conference)	8.50

Review and Analyze Mediator's Proposal (issued on April 2, 2025; accepted on April 4, 2025)	1.20
Draft, Review, Revise, Negotiate, and/or Finalize Class Action and PAGA Settlement and Release Agreement (fully executed on September 29, 2025), and Draft, Review, and/or Revise Notice of Class and PAGA Action Settlement	7.50
Communicate with Settlement Administrator, Monitor Notice Administration Process, and Review Weekly Reports	5.50
Law and Motion	
Review Declaration of David D. Bibiyan and Declaration of Erick K. Yaeckel, and Research, Draft, Review, and/or Revise Plaintiffs' Notice of Unopposed Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Selena Matavosian in Support Thereof, Declaration of Plaintiff Naron Triplett in Support Thereof, and [Proposed] Order Thereon (filed on October 1, 2025) (Hernandez Action)	5.50
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on October 29, 2025) (Class Action)	0.20
Review Plaintiffs' Amended Notice of Unopposed Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Eric K. Yaeckel in Support Thereof, Declaration of Natalie Flores in Support Thereof, Declaration of Mehrdad Bokhour in Support Thereof, Declaration of Lavontra Breaux in Support Thereof, Declaration of Joshua Falakassa in Support Thereof, Declaration of Vanessa Hernandez in Support Thereof, and [Proposed] Order Thereon (filed on December 1, 2025) (Hernandez Action)	2.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement and Order Granting Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (filed on December 11, 2025) (Hernandez Action)	0.20
Draft, Review, and/or Revise Notice of Motion and Motion to be Relieved as Counsel, Declaration in Support Thereof, and [Proposed] Order Thereon (filed on March 10, 2026) (Class Action)	1.10
Review Court's Minute Order Re: Hearing on Motion to be Relieved as Counsel (filed on April 9, 2026) (Class Action)	0.30

Draft, Review, and/or Revise Notice Regarding April 9, 2026 Hearing on Lawyers <i>for</i> Justice, PC's Motion to be Relieved as Counsel for Plaintiff Naron Triplett (filed on April 17, 2026) (Class Action)	0.50
Review Declaration of Settlement Administrator, Declaration of Eric K. Yaeckel, Declaration of David D. Bibiyan, Declaration of Mehrdad Bokhour, and Declaration of Joshua Falakassa, and Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Final Approval of Class Action Settlement, Memorandum of Points and Authorities in Support Thereof, Declaration of Selena Matavosian in Support Thereof, and [Proposed] Order and Final Judgment (filed on May 13, 2026) (Hernandez Action)	6.50
Total Hours:	205.80

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Triplett vs. Pandora Ventures, LLC, et al

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/27/2023	U.S. Postmaster	Postage	\$17.12
2/26/2024	Legal Document Server, Inc.	Attorney Service	\$115.88
2/26/2024	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
2/26/2024	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
3/19/2024	Elite Litigation Support	Attorney Service	\$184.75
3/21/2024	Elite Litigation Support	Attorney Service	\$184.75
3/28/2024	Legal Document Server, Inc.	Attorney Service	\$125.00
3/28/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
4/2/2024	Legal Document Server, Inc.	Attorney Service	\$146.15
4/9/2024	Elite Litigation Support	Attorney Service	\$187.00
4/17/2024	Legal Document Server, Inc.	Attorney Service	\$146.15
4/30/2024	Legal Document Server, Inc.	Attorney Service	\$26.58
4/30/2024	Los Angeles Superior Court	Jury Fee	\$150.00
5/6/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
5/6/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
5/7/2024	Legal Document Server, Inc.	Attorney Service	\$130.00
5/9/2024	Legal Document Server, Inc.	Attorney Service	\$130.00
5/10/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
5/30/2024	Legal Document Server, Inc.	Attorney Service	\$146.15
6/7/2024	General Logistics Systems US, Inc.	Courier Service	\$27.15
6/27/2024	Case Anywhere LLC	Attorney Service	\$125.91
9/4/2024	Case Anywhere LLC	Attorney Service	\$105.84
9/23/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
10/22/2024	Los Angeles Superior Court	Document Download Fee	\$35.00
10/22/2024	Orange County Superior Court	Document Download Fee	\$8.41
10/23/2024	Los Angeles Superior Court	Document Download Fee	\$6.20
12/5/2024	Case Anywhere LLC	Attorney Service	\$153.00
2/7/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
3/5/2025	Case Anywhere LLC	Attorney Service	\$153.00
3/27/2025	Serratore Law Mediation Services LLC	Mediation Fee	\$3,500.00
4/3/2025	Berger Consulting Group, LLC	Data Analysis	\$1,850.33
4/4/2025	Case Anywhere LLC	Attorney Service	\$49.00
4/29/2025	Legal Document Server, Inc.	Attorney Service	\$135.09
4/29/2025	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
5/2/2025	Case Anywhere LLC	Attorney Service	\$61.00
5/9/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
6/2/2025	Case Anywhere LLC	Attorney Service	\$55.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Triplett vs. Pandora Ventures, LLC, et al

7/1/2025	Case Anywhere LLC	Attorney Service	\$49.00
8/4/2025	Case Anywhere LLC	Attorney Service	\$49.00
9/2/2025	Case Anywhere LLC	Attorney Service	\$49.00
10/1/2025	Case Anywhere LLC	Attorney Service	\$49.00
11/3/2025	Case Anywhere LLC	Attorney Service	\$49.00
12/1/2025	Case Anywhere LLC	Attorney Service	\$49.00
1/2/2026	Case Anywhere LLC	Attorney Service	\$49.00
2/2/2026	Case Anywhere LLC	Attorney Service	\$49.00
3/2/2026	Case Anywhere LLC	Attorney Service	\$49.00
4/1/2026	Case Anywhere LLC	Attorney Service	\$193.00
Total:			<u>\$10,166.85</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Triplett vs. Pandora Ventures, LLC, et al. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/19/2023	U.S. Postmaster	Postage	\$17.06
12/19/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
2/27/2024	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
2/27/2024	Legal Document Server, Inc.	Attorney Service	\$46.38
3/12/2024	Los Angeles Superior Court	Document Download Fee	\$2.00
3/15/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
3/19/2024	Elite Litigation Support	Attorney Service	\$152.50
3/21/2024	Elite Litigation Support	Attorney Service	\$152.50
3/28/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
4/2/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
4/9/2024	Elite Litigation Support	Attorney Service	\$154.75
4/19/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
Total:			<u>\$1,099.79</u>