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Attorneys for Plaintiffs and the Settlement Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

MARCELL NEWHOUSE, individually, and
on behalf of other members of the general
public similarly situated; and ABIGAIL
CRISTOBAL, on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiffs,

v.

OWENS CORNING INSULATING
SYSTEMS, LLC, a Delaware limited liability
company; OWENS CORNING SALES, LLC,
a Delaware limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 22CV397048

Honorable Theodore C. Zayner
Department 19

CLASS ACTION

**DECLARATION OF HELENE MAYER IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENTS**

Date: October 1, 2025
Time: 1:30 p.m.
Department: 19

Complaint Filed: April 9, 2022
FAC Filed: June 11, 2024
Trial Date: None Set

DECLARATION OF HELENE MAYER

I, Helene Mayer, 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 Plaintiffs Marcell Newhouse and Abigail Cristobal (together, the “Plaintiffs”) and the Settlement Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On April 2, 2025, in Department 19 of the above-entitled Court, the Honorable Theodore C. Zayner preliminarily approved the Class and PAGA Action Settlement Agreement and Release (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiffs and Defendants Owens Corning Insulating Systems, LLC and Owens Corning Sales, LLC, (together, the “Defendants,”) (together with Plaintiffs referred to as the “Parties”) and conditionally certified the Settlement Class for settlement purposes. The Court provisionally appointed Plaintiffs Marcell Newhouse and Abigail Cristobal as the representatives of the Settlement Class (together, the “Class Representatives”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Settlement Class (“Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Pendency of Class Action, Preliminary Approval of Settlement, and Hearing for Final Approval (“Notice Packet”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Class Representative Enhancement Payments (“Motion for Final Approval”), no Participating Settlement Class Member has objected to the Class Settlement, the contemplated request for Attorneys’ Fees and Costs, Class Representative

Enhancement Payments, and Settlement Administration Costs, or the allocation for the PAGA Settlement Amount.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in this matter since prior to its commencement on April 9, 2022.

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

7. Collectively, Class Counsel conducted significant formal and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing the case for class certification and trial, prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with multiple mediations and settlement negotiations. The volume of records and documents that Class Counsel reviewed and analyzed included, and were not limited to: Plaintiffs' and other Class Members' time data and pay records, Defendants' Employee Handbook, company policy acknowledgments, forms, procedures, and policies, among other information and documents. Class Counsel had the

1 opportunity to interview and obtain information from Plaintiffs and percipient witnesses,
2 reviewed and analyzed a volume of information, data, and documents obtained from Plaintiffs,
3 Defendants, and other sources, and obtained declarations from putative class members and aggrieved
4 employees;. Class Counsel developed liability, damages, violation, and penalties valuation
5 models in the course of litigation and in connection with the mediations and settlement
6 negotiations, and met and conferred with Defendants' counsel on numerous occasions, e.g., to
7 discuss issues relating to the pleadings, formal and informal discovery, case management,
8 Defendants' removal to federal court, motion practice (including motion to remand to state court),
9 discovery, and production of information, documents, and data in the course of litigation and in
10 connection with the mediations and settlement negotiations, and settlement. Other work performed
11 by Class Counsel included, and was not limited to, case strategy and analysis; legal research;
12 researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the
13 mediation briefing and supporting materials, and settlement documents; drafting and
14 propounding multiple sets of formal written discovery requests on Defendants and notices of
15 depositions of Defendants' persons most knowledgeable designees; and preparing for and/or
16 attending court proceedings, multiple mediations, and settlement negotiations, among other
17 tasks.

18 8. As outlined herein, the Parties have conducted significant investigation and
19 formal and informal discovery during the course of litigating this matter, mediations, and
20 extensive settlement negotiations. Class Counsel analyzed a large volume of information,
21 documents, and data obtained from Plaintiffs, Defendants, and other sources that provided a
22 critical understanding of the nature of the work performed by the Settlement Class Members and
23 PAGA Settlement Members, as well as Defendants' organizational structure and their operations
24 and employment policies, practices, and procedures. The information, documents, and data were
25 used in analyzing liability, damages, penalties, and other valuation issues in connection with all
26 phases of the litigation, and ultimately, in connection with the mediations and settlement
27 negotiations process. Class Counsel also performed significant research into the applicable law,
28 which is evolving as it relates to class certification, off-the-clock theory, meal and rest periods,

representative PAGA claims and penalties, wage-and-hour enforcement, regular rate, waivers, Plaintiffs' claims and allegations, and Defendants' defenses thereto, as well as facts discovered.

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9. After conducting significant investigation of the facts and law during the prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the case. These efforts included participating in two (2) mediation sessions conducted by Hon. Daniel J. Buckley, a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of the mediations and settlement negotiations, the Parties exchanged documents and data, and discussed various aspects of the case, including and not limited to, the risks and delays of further litigation, the risks and expenses to the Parties of proceeding with class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, rounding, regular rates of pay, meal and rest periods (including *inter alia*, on premises breaks), waivers, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiffs' claims and allegations, and Defendants' defenses thereto, as well as the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendants contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendants and their counsel felt strongly about Defendants' ability to avoid class certification prevail on the merits and, while Plaintiffs and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a

jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation.

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10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$490,000.00, which is thirty-five percent (35%) of the Gross Settlement Fund of \$1,400,000.00. Pursuant to the contingency-fee agreements entered into by and between Plaintiffs and Class Counsel, Plaintiffs have agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this case. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Gross Settlement Fund of \$1,400,000.00 (with a Net Settlement Amount of approximately at least \$771,790.19 to be paid to Participating Settlement Class Members (with gross Individual Settlement Payments averaging approximately more than \$1,525.28), payment of \$25,000.00 to PAGA Settlement Members (with Individual PAGA Payment averaging approximately \$130.89) and payment of \$75,000.00 to the State of California)—support the percentage fee sought.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **458.70 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT 1**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC.

Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

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

EXPERIENCE AND ADEQUACY OF

LAWYERS for JUSTICE, PC

14. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General

Act (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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

1 exemptions to the State of California and federal overtime compensation requirements. Under
2 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
3 contested motion practice in approximately sixteen (16) cases in the last decade, and litigated
4 over 1,000 class action or representative action cases.

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

24 17. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
25 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
26 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
27 Georgetown University Law Center in 2010. She is admitted to practice in California (since
28 2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District

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

18. I, Helene Mayer, am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree from University of San Diego in 2017, and I earned my Juris Doctor degree from University of San Diego School of Law in 2020. I was admitted to practice law in California in 2021. 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 wage-and-hour class action and PAGA representative cases, and my work has included, *inter alia*, researching and drafting pleadings and motion-related papers; conducting claims evaluation; administrative

1 notice exhaustion; drafting, negotiating, and finalizing stipulations and settlement agreements;
2 and making court appearances. Prior to working at Lawyers *for* Justice, PC, I worked at law
3 firms focused primarily on family law matters, including, *inter alia*, representing clients in
4 divorce, parentage, child custody, and domestic violence restraining order proceedings;
5 researching and drafting pleadings; negotiating and finalizing marital settlement agreements;
6 engaging in motion practice; and making court appearances.

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

9 19. To date, Class Counsel has borne all of the risks and costs of litigation and will
10 not receive any compensation until recovery is obtained in this matter. The Settlement provides
11 for reimbursement of litigation costs and expenses of up to \$60,000.00. Lawyers *for* Justice, PC
12 seeks reimbursement of **\$15,459.81** in litigation costs and expenses incurred in the matter, as
13 reflected in “**EXHIBIT 2**” attached hereto. These expenses were reasonable and necessary in
14 the prosecution of the matter and to obtain the Settlement. The cost savings of \$44,540.19 will
15 be part of the Net Settlement Amount, which will be distributed to the Participating Settlement
16 Class Members in accordance with the Settlement.

17 **CLASS REPRESENTATIVE ENHANCEMENT PAYMENTS TO PLAINTIFFS**

18 20. In recognition of their efforts and work spearheading the prosecution of this
19 matter and serving as the Class Representatives, as well as their broader individual waiver and
20 release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 59.d.
21 of the Settlement Agreement), the Settlement provides for Class Representative Enhancement
22 Payments in the amount of \$10,000.00 to Plaintiff Newhouse and \$5,000.00 to Plaintiff Cristobal
23 (totaling \$15,000.00). Plaintiffs spent a substantial amount of time and effort discussing their
24 employment with Class Counsel, gathering and providing relevant documents and information,
25 and providing facts and evidence to support the prosecution of the claims. Plaintiffs were
26 available whenever Class Counsel needed them and actively tried to obtain and provide
27 information that would help obtain a recovery in this matter. Plaintiff Newhouse initiated the
28 Action and took on the role of lead Plaintiff, despite the risk of retaliation and reputational harm. Plaintiff

1 Newhouse provided critical facts and information that brought about the Action and ultimately led to the
2 Settlement. Plaintiff Cristobal provided a declaration in support of the second mediation session. She
3 joined the Action and helped to shepherd it through to the end. Importantly, both Plaintiffs have agreed
4 to provide a general release of claims, with a Civil Code Section 1542 waiver, in exchange for their Class
5 Representative Enhancement Payments. Accordingly, it is appropriate for Plaintiffs Newhouse to
6 receive \$10,000.00 and Plaintiff Cristobal to receive \$5,000.00 to, as a reasonable Class
7 Representative Enhancement Payments for their broader waiver and release of claims and
8 services performed in this matter, in addition to their individual settlement payment(s).

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

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

13 Executed this 8th day of September 2025, at Mooresville, North Carolina.

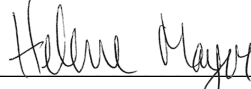
14 
15 _____
16 Helene Mayer

EXHIBIT 1

MARCELL NEWHOUSE, ET AL. V. OWENS CORNING INSULATING SYSTEMS, LLC, ET AL.
Santa Clara County Superior Court, Case No. 22CV397048 (“State Court Action”)
United States District Court, Northern District of California Case No. 4:22-CV-03108-YGR (“Federal Court Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Marcell Newhouse (“Plaintiff Newhouse”) during the Case	14.90
Meet and Communicate with Plaintiff Abigail Cristobal (“Plaintiff Cristobal”) during the Case	13.80
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	10.50
Review and Analyze Court Filings in <i>Ulises Valenzuela, et al. v. Owens Corning Insulating Systems, LLC</i> , Santa Clara County Superior Court, Case No. 22CV403164 (“Valenzuela Action”)	2.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Newhouse’s Class Action Claims, Conduct Legal Research and Analysis of Class Action Claims, and Draft, Review, and/or Revise Plaintiff Newhouse’s Class Action Complaint for Damages (filed on April 19, 2022) (State Court Action)	8.50
Review Court’s Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadline (filed on April 20, 2022) (State Court Action)	0.20

Review and Analyze Defendants Owens Corning Insulating Systems, LLC and Owens Corning Sales, LLC's (together, "Defendants") Civil Cover Sheet and Defendants' Certification of Interested Entities or Persons (served on May 26, 2022) (Federal Court Action)	0.20
Review Court's Case Assignment to Magistrate Judge Susan Van Kleulen (filed on May 26, 2022) (Federal Court Action)	0.10
Review Court's Order Setting Initial Case Management Conference and ADR Deadlines (filed on May 27, 2022) (Federal Court Action)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Stipulation Pursuant to L.R. 6-1(A) to Extend Time for Defendants to Answer or Otherwise Respond to Plaintiff Newhouse's Complaint (filed on June 2, 2022) (Federal Court Action)	1.10
Draft Appearance of Counsel and Consent or Declination to Magistrate Judge Jurisdiction (filed on June 8, 2022) (Federal Court Action)	0.20
Review Defendants' Consent or Declination to Magistrate Judge Jurisdiction (served on June 8, 2022) (Federal Court Action)	0.10
Review Clerk's Notice of Impending Reassignment to a U.S. District Court Judge (filed on June 8, 2022) (Federal Court Action)	0.10
Review Court's Case Reassignment to District Judge; Order Reassigning Case, Notice of Eligibility for Video Recording, Clerk's Notice Setting Case Management Conference; and Standing Order in Civil Cases (filed on June 9, 2022) (Federal Court Action)	0.30
Draft Appearance of Counsel (filed on June 9, 2022) (Federal Court Action)	0.10
Review and Analyze Defendants' Answer to Plaintiff Newhouse's Complaint and Research Affirmative Defenses in Defendants' Answer (served on June 14, 2022) (Federal Court Action)	1.50

Review Court's Notice of Case Management Conference (filed on July 28, 2022) (State Court Action)	0.10
Review Letter from U.S. District Court, Northern District of California, Enclosing Copies of Docket Entries and Remand Order (filed on July 28, 2022) (State Court Action)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on September 8, 2022) (State Court Action)	1.40
Review Court's Notice of Rescheduled Case Management Conference (filed on September 12, 2022) (State Court Action)	0.10
Review Court's Notice of Rescheduled Case Management Conference (filed on December 7, 2022) (State Court Action)	0.10
Review Court's Notice of Rescheduled Case Management Conference (filed on April 3, 2023) (State Court Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Notice of Settlement (filed on April 3, 2023) (State Court Action)	0.50
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on August 18, 2023) (State Court Action)	0.70
Review Court's Notice of Rescheduled Case Management Conference (filed on August 18, 2023) (State Court Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on December 15, 2023) (State Court Action)	0.70
Review Court's Notice of Rescheduled Case Management Conference (filed on December 18, 2023) (State Court Action)	0.10

Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on April 19, 2024) (State Court Action)	0.70
Review Court's Notice of Rescheduled Case Management Conference (filed on April 22, 2024) (State Court Action)	0.10
Research and Draft First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on June 11, 2024), and Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Permit Filing of First Amended Class and Representative Action Complaint; [Proposed] Order (submitted on May 24, 2024) (State Court Action)	1.50
Review Defendants' Notice of Posting First Appearance and Complex Fees (served on May 24, 2024) (State Court Action)	0.10
Review Defendant Owens Corning Sales LLC's Notice of Posting First Appearance Fees (served on June 5, 2024) (State Court Action)	0.10
Review Court's Order to Permit Filing of First Amended Class and Representative Action Complaint (filed on June 11, 2024) (State Court Action)	0.10
Investigate the Merits of Plaintiff Cristobal's PAGA Claim and Legal Research and Analysis of the PAGA Claim Involved(State Court Action)	7.80
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on September 6, 2024) (State Court Action)	0.60
Review Court's Notice of Rescheduled Case Management Conference (filed on September 9, 2024) (State Court Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on January 3, 2025) (State Court Action)	0.60
Draft Notice of Change of Address or Other Contact Information (filed March 26, 2025) (State Court Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on May 20, 2025) (State Court Action)	0.10
Discovery and Deposition	
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Newhouse (served on December 6, 2021)	1.90
Draft Follow-Up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Newhouse (served on February 3, 2022)	2.10
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Newhouse (served on February 7, 2022)	10.20
Draft, Review, and/or Revise Plaintiff Newhouse's Notice of Deposition of Person Most Knowledgeable at Defendant Owens Corning Insulating Systems, LLC and Requests for Production of Documents (Organizational Structure; noticed for March 7, 2023) (served on December 7, 2022) (State Court Action)	1.10
Draft, Review, and/or Revise Plaintiff Newhouse's Notice of Deposition of Person Most Knowledgeable at Defendant Owens Corning Insulating Systems, LLC and Requests for Production of Documents (Wage and Hour Practices; noticed for March 8, 2023) (served on December 7, 2022) (State Court Action)	1.30
Draft, Review, and/or Revise Plaintiff Newhouse's Notice of Deposition of Person Most Knowledgeable at Defendant Owens Corning Sales, LLC and Requests for Production of Documents (Organizational Structure; noticed for March 9, 2023) (served on December 7, 2022) (State Court Action)	1.10

Draft, Review, and/or Revise Plaintiff Newhouse's Notice of Deposition of Person Most Knowledgeable at Defendant Owens Corning Sales, LLC and Requests for Production of Documents (Wage and Hour Practices; noticed for March 10, 2023) (served on December 7, 2022) (State Court Action)	1.30
Draft, Review, and/or Revise Plaintiff Newhouse's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant Owens Corning Insulating Systems (served on December 7, 2022) (State Court Action)	5.10
Draft, Review, and/or Revise Plaintiff Newhouse's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant Owens Corning Sales, LLC (served on December 7, 2022) (State Court Action)	5.20
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Abigail Cristobal under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (served on August 7, 2023)	4.50
Draft Correspondence to, Meet and Confer with, and/or Respond to Correspondence from Defendants' Counsel	24.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants (approximately 3,441 pages), and Other Sources Prior to First Mediation	68.50
Prepare for First Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Mediation Exhibits in Support of the Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on December 5, 2022)	43.50

Attend First Mediation Session (December 5, 2022; In Person)	18.50
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources (Including Obtaining Declarations from Putative Class Members and Aggrieved Employees to Substantiate Claims), Prior to Second Mediation	48.50
Prepare for Second Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Supplemental Mediation Brief and Compiling the Mediation Exhibits in Support of the Supplemental Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on February 28, 2023)	33.50
Attend Second Mediation Session (March 8, 2023; via Videoconference)	17.50
Review and Analyze Mediator's Proposal	1.60
Draft, Review, Revise, Negotiate, and Finalize Confidential Memorandum of Understanding – Class Action Settlement	4.30
Draft, Review, Revise, Negotiate, and Finalize Class and PAGA Action Settlement Agreement and Release (executed on July 23, 2024), and Notice of Pendency of Class Action, Preliminary Approval of Settlement, and Hearing for Final Approval	18.70
Draft, Review, and/or Revise [Revised] Notice of Pendency of Class Action, Preliminary Approval of Settlement, and Hearing for Final Approval	0.60
Coordinate Settlement Administration with Settlement Administrator, Review Weekly Reports, and Ongoing Monitoring of Settlement Administration	7.50

Law and Motion	
Review and Analyze Defendants' Notice of Removal of Class Action, Declaration of Thomas Huth in Support Thereof, and Declaration of Tiffany Phan in Support Thereof (served on May 26, 2022) (Federal Court Action)	1.40
Review and Analyze Defendants' Notice of Filing of Notice of Removal of Class Action with Superior Court (served on May 27, 2022) (Federal Court Action and State Court Action)	0.20
Research and Draft, Review, and/or Revise Plaintiff Newhouse's Notice of Motion and Motion to Remand; Memorandum of Points and Authorities in Support Thereof, and [Proposed] Order Thereon (filed on June 24, 2022) (Federal Court Action)	17.50
Review Defendants' Non-Opposition to Plaintiff Newhouse's Motion to Remand (served on July 8, 2022) (Federal Court Action)	0.20
Review Court's Order Granting Motion to Remand (filed on July 14, 2022) (Federal Court Action)	0.10
Review Court's Guideline for Motions Relating to Preliminary and Final Approval of Class Actions (retrieved on April 2, 2023) (State Court Action)	0.40
Research and Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Helene Mayer in Support Thereof, Declaration of Abigail Cristobal in Support Thereof, Declaration of Marcell Newhouse in Support Thereof; and [Proposed] Order Thereon (submitted on September 12, 2024) (State Court Action)	19.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on March 11, 2025) (State Court Action)	0.50

Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on March 12, 2025) (State Court Action)	0.30
Draft, Review, and/or Revise Supplemental Declaration of Helene Mayer in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement; and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on March 26, 2025) (State Court Action)	4.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on April 1, 2025) (State Court Action)	0.50
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on April 2, 2025) (State Court Action)	0.30
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on April 23, 2025) (State Court Action)	0.50
Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Class Representative Enhancement Payments, Declaration of Helene Mayer in Support Thereof, Declaration of Marcell Newhouse in Support Thereof, Declaration of Abigail Cristobal in Support Thereof, and [Proposed] Final Approval Order and Judgment (State Court Action)	21.50
Total Hours:	458.70

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Newhouse vs. Owens Corning Insulating Systems, LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/6/2021	U.S. Postmaster	Postage	\$7.38
2/3/2022	U.S. Postmaster	Postage	\$7.58
4/19/2022	Legal Document Server, Inc.	Attorney Service	\$113.66
4/19/2022	Santa Clara Superior Court	Complex Filing Fee	\$1,000.00
4/19/2022	Santa Clara Superior Court	Complaint Filing Fee	\$435.00
4/22/2022	ProLegal	Attorney Service	\$281.80
6/1/2022	Legal Document Server, Inc.	Attorney Service	\$16.80
6/27/2022	Legal Document Server, Inc.	Attorney Service	\$160.00
9/8/2022	Legal Document Server, Inc.	Attorney Service	\$17.55
11/17/2022	Signature Resolution LLC	Mediation Fee	\$7,950.00
11/29/2022	FedEx Express	Courier Service	\$40.35
11/30/2022	FedEx Express	Courier Service	\$43.94
12/5/2022	Brittany Shaw	Travel Reimbursement	\$184.25
12/5/2022	Kyla Buenaventura	Travel Reimbursement	\$65.45
12/7/2022	General Logistics Systems US, Inc.	Courier Service	\$19.67
1/11/2023	Signature Resolution LLC	Second Mediation Fee	\$4,750.00
3/31/2023	Legal Document Server, Inc.	Attorney Service	\$17.55
8/7/2023	U.S. Postmaster	Postage	\$8.56
8/7/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
12/15/2023	Legal Document Server, Inc.	Attorney Service	\$17.67
4/19/2024	Legal Document Server, Inc.	Attorney Service	\$17.75
5/24/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
5/28/2024	Legal Document Server, Inc.	Attorney Service	\$19.14
5/28/2024	Santa Clara Superior Court	Stipulation & Order Fee	\$20.00
6/12/2024	Legal Document Server, Inc.	Attorney Service	\$17.75
9/6/2024	Legal Document Server, Inc.	Attorney Service	\$17.75
9/12/2024	Legal Document Server, Inc.	Attorney Service	\$21.92
9/12/2024	Santa Clara Superior Court	Motion Fee	\$60.00
3/27/2025	Legal Document Server, Inc.	Attorney Service	\$20.20
3/28/2025	Legal Document Server, Inc.	Attorney Service	\$20.20
5/21/2025	Legal Document Server, Inc.	Attorney Service	\$20.94
Total:			<u>\$15,459.81</u>