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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

JOHNNY ELIJA STINSON, as an aggrieved employee, and on behalf of all other aggrieved employees under the Labor Code Private Attorneys General Act of 2004,

Plaintiff,

v.

PERFECT 85 DEGREES C, INC., a California corporation; and DOES 1 through 100, inclusive,

Defendants.

CASE NO.: 24CV070989

[Assigned for all purposes to the Hon. Keith Fong in Dept 517]

DECLARATION OF DAVID D. BIBIYAN IN SUPPORT OF PLAINTIFFS' MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT

DECLARATION OF DAVID D. BIBIYAN

1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California and I am the principal of Bibiyan Law Group, P.C., counsel of record for Plaintiff Johnny Elija Stinson ("Plaintiff Stinson") and Arturo Gandara ("Plaintiff Gandara" together referred to as "Plaintiffs") and all others aggrieved. As such, I am familiar with the file in this matter and, if called as a witness, I could and would competently testify to the following facts of my own personal knowledge.

2. I submit this declaration in support of Plaintiffs' Motion for Approval of Representative Action Settlement. I believe that the Settlement is fair, reasonable and adequate in light of the probable outcome of further litigation relating to liability and damages issues.

Plaintiffs' Counsel's Requested Fees and Costs are Reasonable

3. I believe Plaintiffs' Counsel is entitled to reasonable attorneys' fees pursuant to Labor Code section 2699(g)(1) which provides that "[a]ny employee who prevails in any action shall be entitled to an award of reasonable attorney's fees and costs." Plaintiffs thus request only thirty-five (35%) of the Gross Settlement Amount in fees, which, unless and until escalated pursuant to the Parties' PAGA Settlement Agreement, amounts to $87,500.00. I believe this amount is reasonable, is well within the range of fees generally sought and approved in other class and representative cases and is also reasonable based on Plaintiffs' Counsels' lodestar.

Litigation Experience

4. I am an experienced class action attorney, have been appointed as class counsel in other class actions and have a successful track record in litigating class and representative actions.

5. I graduated with a Bachelor of Arts degree from the University of California, Los Angeles in 2009.

6. I received my Juris Doctorate from The University of Chicago Law School in 2012.

7. After practicing for several years as a member of Cohen & Lord, P.C., practicing in an amorphous range of civil litigation on behalf of both plaintiff and defendants, I opened up a law firm in 2014 with a concentration in representation of employees against employers to recover unpaid wages and vindicate harassment, discrimination and retaliation in various contexts.

8. I am an active member of the California Employment Lawyers' Association ("CELA"). I am one of its founding members and actively remain a member of its Reverse Auctions Subcommittee; in doing so, I serve as a mediator between other plaintiffs' counsel who bring overlapping class actions. I have also attended various Continuing Legal Education courses pertaining to advocacy on behalf of employees.

9. I also created the content for, helped organize, and served as the Moderator for the 2023 California Complex Symposium Wage and Hour/PAGA Section, a Continuing Legal Education seminar and forum featuring four respected Judges serving in the Complex Divisions of their respective county Superior Courts. In addition, my firm served as a sponsor of that event.

10. Not only have I practiced almost exclusively in this field for years and have contributed to the legal education curriculum for attorneys practicing within it, I am also a published author in the Daily Journal as a contributor in the Wage and Hour and PAGA context, including, in December 15, an article entitled: "PAGA: What's Gone, What's Left and What's Next." I have also been a quoted source in multiple other publications, including in article published by Bloomberg Law dated November 1, 2023 entitled: "Adidas, Home Depot Sued in Test Cases on Job Ad Pay Transparency."

11. My firm has the experience, resources, and means necessary to allow us to provide adequate representation as PAGA Counsel to all aggrieved employees in this litigation. With approximately 30 attorneys, as well as supporting staff consisting of paralegals and legal assistants, my office has the capacity to represent hundreds of thousands of class members, bring forth efficient resolution of class actions and PAGA actions, engage in complex litigation, file contested motions for class certification, and engage in trial practice.

12. My office has filed contested motions for class certification in the past and have been appointed Class Counsel by the Superior Court of California in the past for purposes of certifying a class for settlement purposes. Some examples of Actions in which I was appointed Class Counsel for include:

- *Santoyo v. Consolidated Foundries, Inc.,* Case No. BC612298, California Superior Court, County of Los Angeles, Honorable Judge Ann I. Jones, presiding;

• *Arensdorff v. Stanley Steemer International, Inc.*, Case No. BC681368, California Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos, presiding;

• *Barreto v. Don Roberto Jewelers, Inc.*, Case No. BC495451, California Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;

• *Junior Amilcar Laguna Gonzalez v. Takaaki Koyama,* Case No. BC641998, Los Angeles Superior Court, Honorable Elihu M. Berle, presiding;

• *Rios v. Nongshim America, Inc.*, Case No. CIVDS1807390, California Superior Court, County of San Bernardino, Honorable David S. Cohn, presiding;

• *Stoddard v. Molded Fiber Glass – West,* Case No. 1517758, California Superior Court, County of San Bernardino, Honorable David S. Cohn, presiding;

• *Mata v. Sahara Scaffold, Inc.*, Case No. CIVDS1810785, California Superior Court, County of San Bernardino, Honorable David S. Cohn, presiding;

• *Carrasco v. Pure Dental Solutions*, Case No. BC645995, Los Angeles Superior Court, Honorable Kenneth R. Freeman, presiding;

• *Gonzalez v. Gochez, et al.*, Case No. BC648729, Los Angeles Superior Court, Honorable Maren Nelson, presiding;

• *Montoya v. Superior Paving Co.*, Case No. CIVDS1833422, County of San Bernardino, Honorable David S. Cohn, presiding;

• *Lopez v. Norred & Associates, Inc.,* Case No. CIVDS1824109, California Superior Court, County of San Bernardino, David S. Cohn, presiding;

• *Noyola v. Lacren, LLC,* Case No. BC717024, California Superior Court, County of Los Angeles, Hon. Anthony Mohr, presiding;

• *Luciano, et al. v. O'Tasty Foods, Inc., et al.*, Case No. BC711988, California Superior Court, County of Los Angeles, Honorable Maren Nelson, presiding;

• *Gordon v. Hospice Source, LLC,* Case No. 34-2018-00250022-CU-OE-GDS, California Superior Court, County of Sacramento, Honorable Christopher E. Krueger, presiding;

• *Barragan v. Refrigeration Supplies Distributor*, Case No. 19STCV09312, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;

- *Ramirez v. Acre Gourmet, Inc.,* Case No. CGC-19-575117, California Superior Court, County of San Francisco, Honorable Andrew Y.S. Cheng, presiding;
- *Villafuerte v. Bay Alarm Company*, Case No. BC689110, California Superior Court, County of Los Angeles, Honorable Amy D. Hogue, presiding;
- *Cazares v. Areas USA LAX, LLC,* Case No. 19STCV08209, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
- *Magana v. Castlerock Environmental, Inc., et al*., Case No. 19STCV38353, California Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;
- *Chilel v. Sushi California, Inc.*, Case No. 19STCV08209, California Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;
- *Malone v. Orange Courier, Inc., et al.,* Case No. 30-2016-00763474, California Superior Court, County of Orange, Honorable Glenda Sanders, presiding;
- *Rivera v. Talamo Food Services, Inc.,* Case No. 19CV355856, California Superior Court, County of Santa Clara, Honorable Patricia M. Lucas, presiding;
- *Olguin v. Cal Central Harvesting, Inc.,* Case No. 18CV03860, California Superior Court, County of Santa Barbara, Honorable James F. Rigali, presiding;
- *Pence v. Sober Living by the Sea, Inc.,* Case No. 2018-00988742, California Superior Court, County of Orange, Honorable Randall J. Sherman, presiding;
- *Franco v. Vincent Rags, Inc.,* Case No. 20STCV07768, California Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;
- *Cabral v. Miller Castings, Inc.*, Case No. 19STCV39556, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
- *Bolanos v. Texas Roadhouse, Inc.*, Case No. 19STCV39556, California Superior Court, County of Los Angeles, Honorable Sunshine Sykes, presiding;
- *Rodriguez v. Scott A. Humphreys, Inc.*, Case No. 30-2021-01184556-CU-OE-CXC, California Superior Court, County of Ventura, Honorable Matthew P. Guasco, presiding; and
- *Torres v. Primal Pet Foods, Inc.* Case No. FCS054783, California Superior Court, County of Solano, Honorable Wendy G. Getty, presiding;

• *Hanson v. Zapata Nuccio, Inc.,* Case No. 20STCV28951, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;

• *Molina v. Avibank Mfg, Inc.,* Case No. 20STCV03910, California Superior Court, County of Los Angeles, Honorable John P. Doyle, presiding;

• *Cetina v. Lawry's Restaurants, Inc.,* Case No. 19STCV05201, California Superior Court, County of Los Angeles, Honorable Amy D. Hogue, presiding;

• *Luna v. Pronto California General Agency, LLC,* Case No. 19STCV39951, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;

• *Alvarez v. Kazak-Mars, Inc.,* Case No. 20STCV42587, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;

• *Noe v. My Pillow, Inc.* Case No. CIVDS 2011360, California Superior Court, County of San Bernardino, Honorable David Cohn, presiding;

• *Nunez v. 2751 West Coast Acquisition Company*, Case No. 30-2020-01145215-CU-OE-CXC, California Superior Court, County, County of Orange, Honorable Randall J. Sherman, Presiding;

• *Smith v. McMillen Enterprises, Inc.*, Case No. CV-20-002938, California Superior Court, County of Stanislaus, Honorable John R. Mayne, presiding;

• *Turner v. Plant Prefab Inc., et al.*., Case No. CIVDS2017517, California Superior Court, County of San Bernardino, Honorable David Cohn, presiding;

• *Duran v. Fresh Select, LLC,* Case No. VCU284892, California Superior Court, County of Tulare, Honorable Bret Hillman, presiding;

• *Reynoso, et al. v. Cream of the Crop AG Service, Inc.,* Case No. VCU278847, California Superior Court, County of Tulare, Honorable Bret Hillman, presiding;

• *Michel v. Universal Waste Systems, Inc.*, Case No. 19STCV46181, California Superior Court, County of Los Angeles, Honorable David S. Cunningham presiding;

• *Jungers v. U.S. Borax Inc., et al.,* Case No. BCV-21-10003, California Superior Court, County of Kern, Honorable Bernard C. Barmann Jr. presiding;

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• *Fortune v. Amoroso Limited Partnership, et al..,* Case No. 20STCV25874, California Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;

• *Montoya, et al. v. Remo, Inc.* Case No. 20STCV34614, California Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

• *Rincon, et al. v. New-Indy Tripaq, LLC, et al..* Case No. 20STCV17118, California Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

• *De Leon, et al. v. Wismettac Asian Foods, Inc.* Case No. 19STCV18172, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

• *Tapia v. Mercer Foods, Inc.* Case No. CV-21-000020, California Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;

• *Molina v. Reser's Fine Foods, Inc.* Case No. 37-2021-00013052-CU-OECTL, California Superior Court, County of San Diego, Honorable Eddie C. Sturgeon presiding;

• *Reyes v. Imperial Sprinkler Supply, Inc.* Case No. 30-2020-01167748-CU-OE-CXC, California Superior Court, County of Los Angeles, Honorable Peter Wilson presiding;

• *Zavala, et al. v. PLS Check Cashers, Inc.* Case No. 20STCV42586, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

• *Paz v. Hill Brothers Chemical Company.* Case No. 20STCV48279, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

• *Garcia v. Inwesco Incorporated.* Case No. 20STCV46833, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

• *Guevara v. J&K Culver, LLC, et al.* Case No. 19STCV39951, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

• *Hamilton v. Michael Kors Stores, Inc. et al.,* Case No. 19STCV37061, California Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;

• *Arzooian v. A&M Administration, LLC, et al.* Case No. 21STCV05576, California Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;

• *Santos, et al. v. Maruzen of America, Inc.,* Case No. 19STCV37662, California Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;

• *Schaffino v. M.O. Dion & Sons., Inc., et al.,* Case No. 20STCV38023, California Superior Court, County of Los Angeles, Honorable Gail Killefer presiding;

• *Moreno v. Santa Paula Post Acute, LLC, et al.* Case No. 21STCV12533, California Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;

• *Singer v. Desert Area Resources and Training,* Case No. BCV-21-101093, California Superior Court, County of Kern, Honorable Thomas S. Clark presiding;

• *Clarizio v. Guard-Systems, Inc.,* Case No. 21STCV28667, California Superior Court, County of Los Angeles, Honorable Armen Tamzarian presiding;

• *Guzman v. Freschco Painters, Inc.,* Case No. 21STCV04683, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Koutny v. PAE Aviation and Technical Services, LLC,* Case No. 21C-0106, California Superior Court, County of Kings, Honorable Melissa R. D'Morias presiding;

• *Rodriguez v. Pacifica Trucks, LLC,* Case No. 20STCV37576, California Superior Court, County of Los Angeles, Honorable Stuart Rice presiding;

• *Ramos v. AEGIS Treatment Centers, LLC,* Case No. 20STCV41429, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

• *Valdez v. Integrated Building Services, Inc.* Case No. 20STCV37793, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

• *Harris v. America One Security, Inc.* Case No. 21STCV01399, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Moreno v. M&J Seafood Company, Inc.* Case No. 22STCV03341, California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;

• *Corrales v. Q&B Foods, Inc.* Case No. 20STCV40885, California Superior Court, County of Los Angeles, Honorable Elihu Berle presiding;

• *Arteaga v. Demolition Specialist, Inc.* Case No. RIC2001133, California Superior Court, County of Riverside, Honorable Harold Hopp presiding;

• *Vigil, et al. v. Capstone Turbine Corporation,* Case No. 20STCV32123, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Ramirez v. Sea-Win, Inc.* Case No. 21STCV22026, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Ortega Chavez v. Winpak Lane, Inc.* Case No. CIVSB2207313, California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;

• *Garcia v. American Licorice Company.* Case No. RG21107049, California Superior Court, County of Alameda, Honorable Brad Seligman presiding;

• *Madrono v. Vitale Nursing, Inc, et al.,* Case No. 21STCV09845, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding; and

• *Orellana v. Advanced Building Maintenance.* Case No. 34-2020-00286791-CU-OE-GDS, California Superior Court, County of Sacramento, Honorable Jill Talley presiding.

• *Aguilar v. Bioness, Inc., et al., Case* No. 21STCV41702, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Antoine v. Pinky Beverly Hills, LLC., et al. Case No. 19STCV44856,* California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Phambui v. Fashion Marketing and Merchandising Group, Inc., et al. Case No. 21STCV06634,* Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;

• *Ortega Chavez v. Winpak Lane, Inc., et al. Case No. CIVSB2202274,* California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;

• *Carrasco v O.H. Barkhordar D.D.S., Inc., et al. Case No. 22STCV21188,* California Superior Court, County of Los Angeles, Honorable Lawrence Riff presiding;

• *Correia v. Gallo Glass Company, et al. Case No. CV-21-006459,* California Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;

• *Davis v. Beeline Import and Services, LLC, et al. Case No. CIVSB2119287,* California Superior Court, County of San Bernardino, Honorable David Cohn presiding;

• *Angel Lopez v Innovative Coatings Technology Corporation dba Incotec, et al. Case No. 30-2020-01173245-CU-OE-CXC,* California Superior Court, County of Orange, Honorable Lon Hurwitz presiding;

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- *Lopez v UPM, Inc., et al. Case No. 20STCV36695,* California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
- *Moreno v. Infiniti Group LLC*., et al. Case No. CIVSB2223551, California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;
- *Kelley v. Applus Technologies, Inc., et al. Case No. CIVSB2204889,* California Superior Court, County of San Bernardino, honorable Jessica Morgan presiding;
- *Hernandez v Bromley Foods, Inc., et al. Case No. 56-2021-00561326-CU-OE-VTA*, California Superior Court, County of Ventura, Honorable Henr Walsh presiding;
- *Heredia v. Alan Smith Pool Plastering, Inc., et al. Case No. 30-2020-01163609-CU-OE-CXC*, California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;
- *Martinez Guzman v Freshco Painters Inc., et al. Case No. 21STCV04683,* California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
- *Gomez Mireles v. USG Ceilings Plus, LLC., et al. Case No. 21STCV45606*, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Garzon v. Mobile Hi-Tech Wheels, LLC., et al., Case No. 21STCV15396*, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Dethrasavong v. ASI Computer Technologies, Inc., et al.* Case No. 20STCV32312, California Superior Court, County of Contra Costa, Honorable Kenneth R. Freeman presiding;
- *Lopez v. Waldorf Astoria Management LLC., et al.* Case No. 20STCV17212, California Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;
- *Viveros v. Mission Produce, Inc., et al.* Case No. 20STCV15737, California Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
- *Flores v. United Maintenance Company, Inc.,* et al. Case No. 21STCV07008, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Blandi v. Francesca Restaurant, LLC., et al.* Case No. 37-2022-00049034-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Marcella O. McLaughling presiding;
- *Lopez Cabrera v. South Valley Almond Company, LLC, et al.* Case No. BCV-2-100722, California Superior Court, County of Kern, Honorable Bernard C. Barmann, Jr. presiding;

- *Guillermo Cruz v. Alma Family Services*, et al. Case No. 21STCV18156, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Davood v. NKSFB, LLC, et al.* Case No. 22STCV17305, California Superior Court, County of Los Angeles, Honorable Christopher K. Lui presiding;
- *Ferrer v. Ineos USA, LLC., et al.,* Case No. 21STCV28076, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Portillo Sanchez v. Paragon Services Janitorial Orange County, LLC, et al.* Case No. 20STCV38562, California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
- *Trigueros Garcia v. Highland Plastics, Inc., et al.,* Case No. CVRI2202836, California Superior Court, County of Riverside, Honorable Harold Hopp presiding;
- *Magana Ramirez v. 360 Support Services, et al.* Case No. 22STCV20456, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
- *Morales v. Baldy's Restaurant Group, LLC.,* et al. Case No. 20STCV36535, California Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
- *Gonzales v. El Monte Rents, Inc., et al.* Case No. 21STCV10209, California Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
- *Gonzalez v. Total Education Solutions, Inc., et al.* Case No. 20STCV37984, California Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;
- *Helaire v. Smithfield Packaged Meats Corp, et al.* Case No. JCCP5244, California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;*Hernandez v. Central Valley Recovery Services, et al.* Case No. VCU290220, California Superior Court, County of Tulare, Honorable Brett Hillman presiding;
- *Hernandez v. SC Commercial, LLC, et al.* Case No. 30-2020-01166961-CU-OE-CXC, California Superior Court, County of Orange, Honorable Lon Hurwitz presiding;
- *Hines v. Constellis Integrated Risk Management Services, et al.* Case No. 20STCV26962, California Superior Court, County of Los Angeles, Honorable Christopher K. Lui presiding;

- *Moya v. Valassis Direct Mail, Inc., et al.* Case No. 21STCV09412, California Superior Court, County of Los Angeles, Honorable Stuart Rice presiding;
- *Jordan v. The Martin-Brower Company, LLC, et al.,* Case No. 21STCV41435, California Superior Court, County of Los Angeles, honorable Stuart Rice presiding;
- *Juarez v. Calmet Services, Inc., et al.* Case No. 21STCV33668, California Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding*;*
- *Mcintosh v. WWL Vehicle Services Americas Inc., et al.* Case No. 56-2022-00562544-CU-OE-VTA, California Superior Court, County of Ventura, Honorable Benjamin Coats presiding;
- *Mendoza v. Amusement Industry, Inc., et al.* Case No. 21STCV09790, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Moore v. Dnata US Inflight Catering LLC, et al.* Case No. CGC-20-586512, California Superior Court, County of San Francisco, Honorable Curtis Karnow presiding;
- *Peterson v. Sorenson Engineering, Inc., et al.* Case No. CIVDS2023994, California Superior Court, County of San Bernardino, Honorable David Cohn presiding;
- *Torres v. Laurel Avenue, LLC, et al.* Case No. CIVSB2202708, California Superior Court, County of San Bernardino, Honorable David Cohn presiding;
- *Nunley v. Cardinal Logistics Management Corporation et al.* Case No. CIVSB2210430, California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;
- *Pastrana v. National Sign & Marketing Corporation et al.* Case No. CIVSB2118749, California Superior Court, County of San Bernardino, Honorable David Cohn presiding;
- *Pineda v. Grand Life, Inc., et al.* Case No. 21STCV28066, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Pattingale v.* Laird Family Estate, LLC et al. Case No. 22CV000048, California Superior Court, County of Napa, Honorable Cynthia P. Smith presiding;
- *Ramirez v. Sea Win, Inc., et al.* Case No. 21STCV22026, California Superior Court, County of Los Angeles, Honorable Lawerence P. Riff presiding;

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- *Reategui v. Cal Building & Maintenance Industries, Inc.,* Case No. 20STCV39648, California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
- *Rodriguez v. ACRA Aerospace, LLC, et al.* Case No. 30-2020-01171360-CU-OE-CXC, California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;
- *Rodriguez v. Ultra Pro International LLC, et al.* Case No. 21STCV11250, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Ruiz v. Kleen Harvest, Inc., et al.* Case No. 21CV002319, California Superior Court, County of Monterey, Honorable Thomas W. Wills presiding;
- *Roberto Ruiz v. Protech Delivery and Installation et al.* Case No. 21STCV07001, California Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
- *Russell v. CIMC Reefer Trailer, Inc., et al.* Case No. RIC2001777, California Superior Court, County of Riverside, Honorable Harld Hopp presiding;
- *Russell v. Staffmark Investment LLC, et al.* Case No. CVRI12103921, California Superior Court, County of Riverside, Honorable Harold Hopp presiding;
- *Quintanilla et al. v. Chrome Hearts LLC, et al.* Case No. 21STCV43180, California Superior Court, County of Los Angeles, Honorable Elihu B. Berle presiding;
- *Taat v. Acell, Inc., et al.* Case No. 37-2022-00005437-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Matthew C. Braner presiding;
- *Todd v. Motivate, LLC, et al.* Case No. CGC-23-605052, California Superior Court, County of San Francisco, Honorable Anne- Christine Massullo presiding;
- *Turner Sr., v. The Sidewalk Café, Inc., et al.* Case No. 21STCV10154, California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
- *Vargas-Flores v. Harbor Bay Club, Inc., et al.* Case No. 21CV002396, California Superior Court, County of Alameda, Honorable Michael Markman presiding;
- *Vasquez v. Liquid Technologies, Inc., et al.* Case No. CIVDS2023892, California Superior Court, County of San Bernardino, Honorable Joseph Ortiz presiding;
- *Vasquez et al. v. Kingswood LLC, et al.,* Case No. 20STCV32123, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Sandoval Villafana v. Satco, Inc., et al.* Case No. 21STCV17085, California Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;

• *Williams v. Marrs Services, Inc., et al.* Case No. 21STCV23775, California Superior Court, County of Los Angeles, Honorable Stuart M. Stuart presiding;

• *Low v. Triple Canopy, Inc., et al.* Case No. 37-2023-0007078-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Carolyn Caietti presiding;

• *Camacho v. Premium Electric Corp, et al.* Case No. 22STCV26878, California Superior Court, County of Los Angeles, Honorable David S. Cunningham presiding;

• *Lopez v. Bachem Americas, Inc., et al.* Case No. 23STCV04258, California Superior Court, County of Los Angeles, Honorable Laura Seigle presiding;

• *Mendoza Cendejas v. E. & J. Gallo Winery, et al.* Case No. CV-22-005396, California Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;

• *Romero v. Armstrong Installation Service, et al.* Case No. 22CV022519, California Superior Court, County of Alameda, Honorable Noel Wise presiding;

• *Perez v. D&G Restaurants, LLC, et al.* Case No. 30-2021-01209638-CU-OE-CXC, California Superior Court, County of Orange, Honorable Peter Wilson presiding;

• *Sarmiento, et al. v. Neil Jones Food Company* Case No. 21CECG03825, California Superior Court, County of Fresno, Hon. Kristi Culver Kapetan presiding; and

• *Garcia v. Nature Fresh Farms, LLC, et al.* Case No. ECU001961, California Superior Court, County of Imperial, Honorable Jeffery B. Jones presiding.

13. I have also settled matters on a "PAGA Only" basis for aggrieved employees in the past, including in:

• *Flores v. Delta Apparel, Inc.*, Case No. BC641499, California Superior Court, County of Los Angeles, Honorable Daniel J. Buckley, presiding;

• *Segura v. CJ Foods Service Holdings USA, LLC*, Case No. 19STCV24918, California Superior Court, County of Los Angeles, Honorable Maureen Duffy-Lewis, presiding;

• *Sierra v. Nexem-Allied, LLC*, Case No. 20STCV11281, California Superior Court, County of Los Angeles, Honorable Randolph M. Hammock, presiding;

• *Nodal v. Sodexo, Inc.,* Case No. 20STCV40601, California Superior Court, County of Los Angeles, Honorable Lawrence Riff, presiding; and

• *Cooper v. Lucas Health Partners,* Case No. 20STCV20050, California Superior Court, County of Los Angeles, Honorable Maren Nelson, presiding;

• *Herrera v. Greystar Management, LP, et al.,* Case No. 37-2020-00009672-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Carolyn Caietti, presiding;

• *Slater v. Jo-Ann Stores, LLC.,* Case No. 21STCV18454, California Superior Court, County of Los Angeles, Honorable Maurice A. Leiter, presiding;

• *Bolanos v. Canoga Park Heating & Air Conditioning, Co., Inc.,* Case No. 21STCV12674, California Superior Court, County of Los Angeles, Honorable Yolanda Orozco, presiding;

• *Granados v. Cosmetic Ideas, Inc.* Case No. 21STCV10797, California Superior Court, County of Los Angeles, Honorable Richard L. Fruin, presiding;

• *Ruano v. DPC Woodwork, Inc.* Case No. 21STCV00408, California Superior Court, County of Los Angeles, Honorable Jon R. Takasugi presiding;

• *Hardy v. Texas Roadhouse Management Corp., et al. Case No. CIVSB2222259,* California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;

• *Iraheta v Legacy Farmers, Inc., et al. Case No. MSC21-00762,* California Superior Court, County of Los Angeles, Honorable Charles S. Treat presiding;

• *Landin v Central Janitors' Supply Co., Inc., et al. Case No. CV-21-006391*, California Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;

• *Bailey v. Cannon Constructors, et al.* Case No. 21STCV38274, California Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;

• *Johns, et al. v. Whelan Security of California, Inc., et al.* Case No. 22STCV68687, California Superior Court, County of Los Angeles, Honorable Laura Seigle presiding;

• *Carrion v. Clutter, Inc., et al.* Case No. 23STCV06709, California Superior Court, County of Los Angeles, Honorable Kerry Bensinger presiding;

• *Delia v. The Irvine Company, LLC, et al.* Case No. 30-2019-01050823-CU-OE-CXC, California Superior Court, County of Orange, Honorable William D. Claster presiding;

- *Landin v. Central Janitor's Supply Co., Inc., et al.* Case No. CV-21-006391, California Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
- *German Vaca et al.*, *v. California Pizza Kitchen, Inc*., et al. Case No. 30-2022-01278828-CU-OE-CXC, California Superior Court, County of Orange, Honorable Randall Sherman presiding;
- *London Young v. Amazon.com LLC, et al.* Case No. 21STCV38280, California Superior Court, County of Los Angeles, Honorable Elaine Lu presiding;
- *Martinez v. Dick's Sporting Goods, Inc., et al. Case No. 22STCV17283, California Superior Court, County of Los Angeles, Honorable Armen Tamzarian presiding;*
- *Latrice Ackles v. Brinker Restaurant Corporation, et al*. Case No. 22STCV19068, California Superior Court, County of Los Angeles, Honorable Gail Killefer presiding; and
- *Ruiz v. Edelbrock Foundry, LLC, et al.* Case No. 20STCV19057, California Superior Court, County of Los Angeles, Honorable David S. Cunningham presiding.

14. Furthermore, my office has succeeded in certifying classes in contested motions for class certification. Some of the classes and theories we have certified include, without limitation, for failure to pay the regular rate of pay; failing to pay overtime and minimum wages, including, without limitation, for temperature checks; failure to provide meal and rest premiums, including, without limitation, for requiring employees to walk during breaks; failure to timely pay wages prior to separation of employment; wage statement violations; and unfair competition. Some examples of matters in which we have done so include, without limitation:

- *Hernandez, et al. v. C.R. Lawrence* Co., Inc., Case No. 20STCV32372, California Superior Court, County of Los Angeles, Hon. William Highberger presiding; and
- *Lopez v. Rolling Hills Country Club*, Case No. 21STCV22636, California Superior Court, County of Los Angeles; Hon. Carolyn B. Kuhl presiding; and
- *Torres v. Johnston Nurseries, FLP,* Case No. BCV-19-100830 TSC, California Superior Court, County of Kern; Hon. Thomas S. Clark, presiding.

15. Currently, my firm is acting as counsel in dozens of wage and hour class actions and representative PAGA actions.

16. I believe that I am sufficiently experienced and qualified to evaluate the claims alleged in this action and viability of Defendant's defenses.

17. Vedang J. Patel has been a member of my law firm for over four (4) years and served as class counsel on numerous actions on which I was also named class counsel. Prior to working with Bibiyan Law Group, P.C., he practiced law with Murchison & Cumming, LLP on a variety of matter on behalf of defendants. Thereafter, he joined Bibiyan Law Group, P.C., practicing law on behalf of plaintiffs in matters of employment law, and specifically on issue of unpaid wages and class action settlements. He is currently a Partner at Bibiyan Law Group, P.C., and head of the Settlement Department. Among other tasks, he oversees and manages all settlements at Bibiyan Law Group, P.C. He also oversees several attorneys, paralegals, and legal assistants and has overseen the settlement of over one hundred (100) class and PAGA matters while with our office.

18. After a thorough investigation and settlement discussions, I arrived at terms that I viewed was in the best interest of both Plaintiff and Aggrieved Employees.

Plaintiffs' Counsel's Requested Fees and Costs are Reasonable

19. I believe Plaintiffs' Counsel is entitled to recover attorneys' fees and costs. Thus, Plaintiffs request thirty-five percent (35%) of the Gross Settlement Amount, which, unless and until escalated pursuant to the Parties' Settlement Agreement, amounts to $87,500.00. The request of thirty-five percent (35%) of the Gross Settlement Amount is consistent with the fees awarded in other PAGA settlements approved by California courts. The requested fee of only thirty-five percent (35%) of the Gross Settlement Amount is reasonable, is well within the range of fees generally sought and approved in other class and representative cases and is also reasonable based on Plaintiffs' Counsel's lodestar.

20. Plaintiffs' Counsel invested time and resources into litigating this Action, with over $25,523.06 of total costs to date to Bibiyan Law Group P.C. and counting deferred to the end of the case and entirely contingent on the outcome which, as set forth above, the recovery of which was far from certain with much of the litigation still potentially pending.

21. During the period that this Action has been pending, Plaintiffs' Counsel has

advanced all expenses, and has not received any compensation for prosecuting the Action on behalf of the State and other Aggrieved Employees.

An Award of Fees Based on a Percentage of the Common Fund is Appropriate and Reasonable

22. I believe the percentage of attorneys' fees set forth in the Settlement (i.e., thirty-five percent (35%) of the Gross Settlement Amount) is reasonable. I am informed and believe that, historically, courts have awarded percentage fees in the range of 20% to 50% in collective actions, depending on the circumstances of the case.

23. Here, I believe the requested fee is consistent with the fees awarded in other PAGA settlements approved by California courts.

24. Plaintiffs' Counsel invested time and resources into litigating this Action, with $25,523.06 of costs to date and counting, deferred to the end of the case and entirely contingent on the outcome, which, as set forth above, the recovery of which was far from certain with much of the litigation still potentially pending. It has been a long-recognized principle that an attorney merits a significantly larger fee when the compensation is contingent, rather than being fixed on a time or contractual basis. During the period that this Action has been pending, Plaintiffs' Counsel has advanced all expenses and has not received any compensation for prosecuting the Action on behalf of the State and other Aggrieved Employees.

25. I believe the significant outlay of monetary and personnel resources has been completely at risk and wholly dependent upon obtaining a substantial settlement or the imposition of civil penalties at trial. I believe Plaintiffs' Counsel should not be penalized with a lower fee for settling the case prior to trial, because the percentage of the fund method "encourages early settlement, which avoids protracted litigation." Thus, the requested award of attorneys' fees is reasonable under the percentage of the fund method.

The Requested Fees are Also Reasonable Under a Lodestar Crosscheck

26. I understand from my position as principal of Bibiyan Law Group, P.C., my involvement with the case, and information provided by my staff, that Bibiyan Law Group, P.C., will have collectively billed 309.4 hours at customary hourly rates.

27. To summarize Bibiyan Law Group, P.C.'s lodestar request, pursuant to the Declaration of David D. Bibiyan, Plaintiff's Counsel at Bibiyan Law Group, P.C., will have collectively worked approximately 309.4 hours. Bibiyan Law Group, P.C.'s hourly rate in this case for David D. Bibiyan is $1,200 per hour (approx. 7.4 hours); Sarah Cohen is $1,000 per hour (approx. 75 hours); Vedang J. Patel is $800 per hour (approx. 4.7 hours); Lizette Rodriguez is $750 per hour (approx. 35 hours); Randal Oakley is $700 per hour (approx. 14.4 hours); Keaton Mendoza is $450 per hour (approx. 21.8 hours); Michael Braud is $450 per hour (approx. 120 hours); Taylor Ballou is $425 per hour (approx. 2.5 hours); Paralegals are $200 per hour (approx. 16.9 hours); and Legal Assistants are $95 per hour (approx. 11.7 hours). This results in a lodestar of approximately $193,334.50 for Bibiyan Law Group, P.C.

28. At Plaintiffs' Counsel's hourly rates, along with the lodestar amount from D. Law, Inc., this results in a total lodestar amount of $341,636.70. Plaintiffs' Counsel request a fee of thirty-five (35%) of the Gross Settlement Amount, which, unless and until escalated pursuant to the Parties' Settlement Agreement, amounts to $87,500.00.

Plaintiffs' Counsel's Hours Spent on the Case

29. After diligent inquiry of the members of my firm, I can attest that Bibiyan Law Group, P.C., has spent over 309 hours litigating this Action to bring it to resolution, not including time which will be expended monitoring the administration of the settlement and distribution of funds to Aggrieved Employees.

30. Plaintiffs' Counsel at Bibiyan Law Group, P.C., has spent over 309 hours litigating this Action to bring it to resolution, not including time which will be expended monitoring the administration of the settlement and distribution of funds to Aggrieved Employees. The efforts expended by Plaintiffs' Counsel to achieve this result include, but are not limited to, the following:

- The investigation of the matter, including meeting with Plaintiff, reviewing policies provided by Plaintiff, review of documents in Plaintiff's possession, review and analysis of Plaintiff's personnel files, and exploring Defendant's corporate structure to determine whether any other individuals or entities should be named in the litigation;

- Researching the dockets for other cases filed against Defendant, determining whether they named all allegedly culpable defendants and included all theories available;
- Filing and serving pleadings in the Action;
- Compliance with prerequisites in connection with Plaintiff's cause of action under PAGA;
- Filing and serving of the PAGA Notice;
- Reviewing and analyzing Defendant's Answer to Plaintiff's initial complaint;
- Reviewing and analyzing Defendant's Notice of Related Case and filing Plaintiff's opposition thereto;
- Review and analysis of the Court's Minute Orders, attention to scheduling and delegation of actions in light thereof, drafting and filing Case Management Statements, and preparation for appearance at the Case Management Conferences;
- Meeting and conferring with counsel for Defendant, drafting and filing Joint Statements and Joint Reports in advance of the conferences and hearings held by the Court, and preparation and attendance of the same;
- Propounding of formal discovery, consisting of form interrogatories, special interrogatories, requests for admissions, and requests for production of documents, reviewing and analyzing Defendant's responses thereto, and meeting and conferring with Defendant's counsel for supplemental responses;
- Providing Plaintiff's responses to formal discovery, consisting of form interrogatories, special interrogatories, and requests for production of documents, meeting and conferring with Defendant's counsel for Plaintiff's supplemental responses, and providing supplemental responses to Defendant's discovery;
- Review and analysis of Defendant's purported arbitration agreement, extensive discussions with Defense counsel regarding enforceability of the purported arbitration agreement;
- Reviewing and analyzing Defendant's Motion to Compel Arbitration, drafting and filing Plaintiff's Opposition, and reviewing and analyzing Defendant's Reply;

- Preparing for and defending the full-day session of Defendant's deposition of Plaintiff;
- Obtaining and reviewing informal discovery from Defendant, including time and payroll records for a sampling of the Aggrieved Employees, Defendant's written policies, and other informal discovery produced for Plaintiff to evaluate the claims;
- Discussing the potential merits of mediation, as well as negotiating the parameters thereof and the informal discovery to be exchanged beforehand, which involved various iterations of written correspondence back and forth and several telephone discussions between counsel regarding the potential scope of discovery, as well as the scope of the pleadings;
- Working with opposing counsel and consultants for the receipt of a representative sampling and analyzing the same with the aid of retained expert data consultants and Plaintiff to perform analyses of liability and exposure;
- Selecting a mediator and scheduling a mediation date;
- Preparation of mediation brief, analysis, and damages model in conjunction with expert data consultants, for use at the mediation session;
- Attendance at a full-day mediation session by various attorneys;
- Extensive negotiation of the PAGA Settlement Agreement involving numerous drafts exchanged between counsel for the Parties;
- Drafting and reviewing the Payment Letter to be sent to by the Settlement Administrator to the Aggrieved Employees;
- Communicating with Plaintiff who requested updates or other information regarding this matter;
- Requesting bids from third-party settlement administrators for settlement administration;
- Preparing joint stipulation for leave as well as drafting of the First Amended Complaint in this matter;

- Preparing the Motion for Approval of PAGA Settlement and preparation and attendance at the Motion for Approval of PAGA Settlement hearing;
- Reviewing and analyzing the Settlement Administrator's final report to provide the information necessary for the Court's review of the Motion for Approval of PAGA Settlement; and
- Preparing the instant Motion for Approval of PAGA Settlement.

31. Plaintiffs' Counsel also bears the risk of taking whatever actions are necessary if Defendant fails to pay. Thus, the Court should find that Plaintiffs' Counsel's hours were necessary and reasonable to achieve the excellent result. Plaintiffs' Counsel's hourly rates are in line with, and, in fact, modest, compared with the hourly rates of other counsel in similar actions.

32. And, the over 433.1 total hours expended by the lawyers and staff members of Bibiyan Law Group, P.C., and D. Law Inc., in connection with this Action is only a calculation of efforts made thus far; it does not include the time that will be spent preparing for and attending the approval hearing, reviewing the Settlement Administrator's final calculations and subsequent coordination with the Settlement Administrator to ensure payments to Aggrieved Employees are timely distributed. Thus, Plaintiffs' Counsel request that the Court find that these hours are reasonable in this litigation.

33. The courts are quite liberal in the evidence required to prove an attorney's hours. Detailed time records are not required. An attorney's testimony alone may suffice.

34. Reasonable hours include, in addition to time spent during litigation, the time spent before the action is filed, including time spent interviewing the clients, investigation of the facts and the law, and preparing the initial pleadings.

35. Here, Plaintiffs' Counsel has established by declaration testimony the over 433.1 total hours spent in this case, which suffices for evidentiary purposes.

36. Plaintiffs' Counsel has been representing Plaintiffs for nearly three years, while never receiving any compensation, and expending significant time and resources which could have been directed towards other cases. In agreeing to litigate this case on a contingent fee basis, Plaintiffs' Counsel assumed considerable risk given the uncertain outcome of PAGA actions.

37. Here, no multiplier is necessary as Plaintiffs' Counsel has incurred far more in attorneys' fees than Plaintiffs' Counsel requests in fees from the Gross Settlement Amount. The risk of nonpayment in this Action was particularly acute, too, because litigating a PAGA representative action through trial takes years and requires the investment of tens (if not hundreds) of thousands of dollars and thousands of hours of time. Attorneys willing to undertake this risk deserve a high rate of recovery. Should a multiplier have been requested, it would have been warranted.

Plaintiffs Would Have Been Entitled to a Multiplier Based on a Percentage of the Fund to Ensure that the Fee Awarded is Within the Range of Fees Freely Negotiated in the Legal Marketplace in Comparable Litigation

38. A multiplier to reach the fees requested by Plaintiffs' Counsel is more than justified to compensate Plaintiffs' Counsel at a rate reflecting the risk of nonpayment in this matter, as Class Counsel's representation of Plaintiffs were purely on a contingent basis. As set forth herein, the risk of nonpayment in this Action was particularly acute, too. This is because litigating a wage-and-hour representative action through trial takes years and requires the investment of tens (if not hundreds) of thousands of dollars and thousands of hours of time. Attorneys willing to undertake this risk deserve a high rate of recovery.

39. Moreover, wage-and-hour laws are still developing, and change in the law always threaten to wipe out the plaintiffs' attorney. In fact, numerous appellate decisions and decisions of both the California and United States Supreme Courts have attacked the validity of PAGA actions directly relevant to this case, which, as set forth herein, could have significantly affected its value. It is this contingent nature of these cases that justify an award when and if PAGA Counsel are able to obtain a settlement or verdict, because oftentimes no money is recovered in a case, including plaintiffs' counsel's costs, let alone their time.

The Quality of Representation, the Novelty and Complexity of the Issues, and the Results Obtained

40. Plaintiffs' Counsel used a high level of skill in addressing the difficult questions presented in this case, which involved the contested issues regarding: the compliance of various

of Defendant's policies with the Labor Code, including whether all time worked was paid for; whether meal and/or rest breaks were given in compliance with the Labor Code; issues regarding the timeliness of pay, including whether all pay was received by termination or resignation; the sufficiency and accuracy of wage statements (including whether issues therewith, if any, were intentional or injurious); and various other issues. Proof of Plaintiffs' Counsel's skill in this area of law lies in the size of this Settlement and the recoveries of the State and Aggrieved Employees despite Defendant's contentions that Plaintiffs' unpaid wages claims are speculative; Defendant's contention that its meal and rest period policies were compliant; and other hurdles encountered by Plaintiffs' Counsel that were traversed in reaching this Settlement pertaining to evolving case law regarding PAGA actions.

This Litigation Precluded Other Employment by Plaintiffs' Counsel

41. A practitioner can only properly litigate so many cases at one time. The requirements of this case were significant, requiring over 433 hours to be expended to date by Plaintiffs' Counsel, and another twenty-five (25) to fifty (50) hours conservatively expected to be expended in the future in connection with approval, settlement administration, answering questions of Aggrieved Employees, and updates to this Court regarding uncashed checks. Plaintiffs' Counsel was also most definitely precluded from other employment. This factor must also be considered in the application of a multiplier.

Costs Incurred by Plaintiff's Counsel

42. The Settlement provides for reimbursement of Plaintiffs' Counsel's litigation costs in an amount up to $30,000.00. Plaintiffs' Counsel requests only $25,499.06, as total costs incurred. Because these costs are reasonable, Plaintiffs' Counsel requests that the Court approve those costs.

43. The itemized costs incurred by Bibiyan Law Group, P.C., in the above-referenced matter total $25,523.06, as more fully detailed in the Bibiyan Law Group, P.C., List of Expenses attached hereto as Exhibit "1."

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I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct this October 6, 2026, at Los Angeles, California.

/s/ David D. Bibiyan
David D. Bibiyan

EXHIBIT 1

BIBIYAN LAW GROUP, P.C.

David D. Bibiyan
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October 6, 2026

DATE	TYPE	PAYABLE TO	TOTAL AMOUNT	
9/10/2026	Case Document Purchase	Alameda County Superior Court	$	4.00
7/10/2026	E-Filing/E-Service	Steno Agency, Inc.	$	94.95
7/7/2026	E-Filing/E-Service	Steno Agency, Inc.	$	94.95
7/7/2026	E-Filing/E-Service	Steno Agency, Inc.	$	54.95
3/25/2026	Postage	United States Postal Service	$	8.86
3/11/2026	E-Filing/E-Service	Steno Agency, Inc.	$	54.95
3/6/2026	E-Filing/E-Service	Steno Agency, Inc.	$	54.95
1/2/2026	E-Filing/E-Service	Steno Agency, Inc.	$	54.95
10/21/2025	Postage	United States Postal Service	$	10.44
10/20/2025	Service of Process	Lawdience LLC	$	2,500.00
10/10/2025	Data Analysis	Berger Consulting Group, LLC	$	5,602.50
10/6/2025	Case Initiation	JAMS, Inc.	$	411.96
10/3/2025	Case Document Purchase	Alameda County Superior Court	$	7.50
2/10/2025	E-Filing	All-N-One Legal Support	$	38.00
1/14/2025	Mediation	Signature Resolution	$	12,750.00
10/4/2024	E-Filing	All-N-One Legal Support	$	18.00

List of Expenses Items 2024.03.28 - 10/6/2026

9/24/2024	E-Filing	All-N-One Legal Support	$	18.00
9/11/2024	E-Filing	All-N-One Legal Support	$	18.00
8/7/2024	E-Filing	All-N-One Legal Support	$	16.45
8/7/2024	E-Filing	All-N-One Legal Support	$	16.45
7/15/2024	Service of Process	All-N-One Legal Support	$	94.75
4/10/2024	E-Filing	All-N-One Legal Support	$	451.45
3/7/2024	E-Filing	All-N-One Legal Support	$	16.45
11/9/2023	E-Filing	All-N-One Legal Support	$	16.45
11/9/2023	E-Filing	All-N-One Legal Support	$	16.45
10/27/2023	Service of Process	All-N-One Legal Support	$	91.98
9/19/2023	E-Filing	All-N-One Legal Support	$	1,450.95
9/19/2023	Case Initiation	All-N-One Legal Support	$	1,450.95
9/15/2023	LWDA fee	California Labor and Workforce Development Agency	$	75.00
9/15/2023	Postage	United States Postal Service	$	8.77
Various Dates	Photocopies (100 x $0.20)			$20
		Total	$	25,523.06

List of Expenses Items 2024.03.28 - 10/6/2026