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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

JOSHUA WOLFE, VERONICA TOPETE,
individually, and on behalf of other members
of the general public similarly situated and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiffs,

vs.

SOUTH COAST BAKING, LLC, a California
limited liability company; SOUTH COAST
BAKING COMPANY, an unknown business
entity; RISE BAKING COMPANY, an
unknown business entity; RISE BAKING
COMPANY, LLC, a Delaware Limited
Liability Company; RISE BAKING
ARTISAN BREAD, LLC, a Delaware
Limited Liability Company; RISE BAKING
SWEET GOODS, LLC, a Delaware Limited
Liability Company; BRILL, INC., a Delaware
Limited Liability Company; and DOES 1
through 100, inclusive,

Defendants.

Case No. CIVSB2224856

Honorable Christian Towns
Department S26

CLASS ACTION

**DECLARATION OF ARMAN
MARUKYAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, PLAINTIFFS'
COUNSEL AWARD, AND
ENHANCEMENT PAYMENTS**

Date: April 22, 2025
Time: 8:30 a.m.
Department: S26

Complaint Filed: October 27, 2022
FAC Filed: April 17, 2024
Trial Date: None Set

DECLARATION OF ARMAN MARUKYAN

I, Arman Marukyan, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Joshua Wolfe (“Plaintiff Wolfe”) and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On October 22, 2024, in Department S26 of the above-entitled Court, the Honorable Christian Towns preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs Joshua Wolfe and Veronica Topete (together, “Plaintiff”), and Defendants South Coast Baking, LLC, Rise Baking Company, LLC, Rise Baking Artisan Bread, LLC, Rise Baking Sweet Goods, LLC, and Brill, Inc. (“Defendants”) (together with Plaintiffs, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Joshua Wolfe and Veronica Topete as the representatives of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC and Corsner Legal, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action and Representative Action Settlement (“Notice Packet”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Plaintiffs’ Counsel Award, and Enhancement Payment (“Motion for Final Approval”), no Settlement Class Members have objected to the Class Settlement, the contemplated request for Plaintiffs’ Counsel Award, Enhancement Payment, and Administration Costs, or the allocation for PAGA Penalties.

WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in this matter since prior to its commencement on October 27, 2022. Since joining forces with Crosner Legal, PC, who was pursuing a separate action on behalf of Plaintiff Topete, we have worked cooperatively with them to strategize and prosecute the cases, and our work with them has been a coordinated and combined effort. Together, Lawyers *for* Justice, PC and Crosner Legal, PC are referred to as “Class Counsel.”

5. 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 Plaintiff Wolfe and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour law and enforcement, Plaintiff Wolfe’s claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiff Wolfe were well-suited for class-wide adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendants in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel conducted significant litigation, formal and informal discovery, and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and was 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 the mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiffs and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiffs, Defendants, and other sources. Class Counsel also developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with

1 mediation and settlement negotiations and met and conferred with Defendants' counsel on
2 numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery
3 and the production of information, documents, and data in the course of litigation and in
4 connection with mediation and settlement negotiations, and settlement. Other work performed
5 by Class Counsel included, and was not limited to, case strategy and analysis; researching,
6 drafting, reviewing, and/or revising the pleadings, the mediation brief, and settlement documents;
7 and preparing for and attending court proceedings, mediation, and settlement negotiations, among
8 other tasks.

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

22 8. After conducting significant investigation of the facts and law during the
23 prosecution of the cases, counsel for the Parties engaged in extensive settlement negotiations to
24 try to resolve the cases. These efforts included participating in a formal, full-day mediation
25 conducted by Lynn Frank, Esq., a well-regarded mediator experienced in handling complex labor
26 and employment matters. During all settlement discussions, the Parties conducted their
27 negotiations at arm's length in an adversarial position. In the course of mediation and settlement
28 discussions, the Parties exchanged information, 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 and trial, the law relating to class certification, manageability, off-the-clock theory, rounding, meal and rest periods, representative PAGA claims, and wage-and-hour laws and enforcement, as well as the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. 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 and prevail on the merits, 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 the case 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 the case, and the real possibility of no monetary recovery after years of litigation.

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$400,000.00, which is one-third (1/3) of the Maximum Settlement Amount of \$1,200,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff Wolfe and Lawyers *for* Justice, PC, Plaintiff Wolfe has agreed to a contingency fee of at least one-third (1/3) of the recovery.

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

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Lawyers for Justice, PC has incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **204 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred 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.

12. 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; and 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.

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

13. 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 attorney of record in dozens of 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. Lawyers *for* Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

14. 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

1 Appellate District. In December of 2004, he obtained a license to practice law from the California
2 State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he
3 has almost exclusively focused on the prosecution of consumer and employment class actions.
4 While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken
5 or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for
6 deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with
7 other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully
8 litigated cases involving the executive, administrative, and other overtime exemptions to the State
9 of California and federal overtime compensation requirements. Under his supervision, Lawyers
10 *for* Justice, PC has successfully obtained class certification by contested motion practice in
11 approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or
12 representative action cases.

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

1 representative cases have resulted in settlements that have been granted court approval, including
2 and not limited to, those listed in paragraph 18 herein. He has handled over one hundred and fifty
3 (150) mediations and worked on over two hundred and fifty (250) class action or representative
4 action cases which have resulted in settlement.

5 16. Joanna Ghosh is a Senior Member of Lawyers for Justice, PC. She received a
6 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
7 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
8 Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010)
9 and in New York (since 2013) and is also admitted to practice in all U.S. District Courts in
10 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
11 Court. She has taken and defended dozens of depositions and successfully handled motion
12 practice in class action cases regarding discovery (including and not limited to, regarding class
13 contact information), class certification (both contested class certification and stipulated class
14 certification), arbitration agreements, coordination, and intervention. She has successfully
15 handled briefing and oral argument on appeal, and obtained notable decisions regarding the
16 Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v.*
17 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal.,
18 May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th 175
19 (2019). She also has extensive experience with class action and/or representative action
20 settlements. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, the firm has handled
21 the class certification and court approval process for hundreds of class action and/or
22 representative action matters that have successfully resolved. She is a member of the California
23 Employment Lawyers Association.

24 17. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree
25 from Loyola Marymount University, Los Angeles in 2015 and earned my Juris Doctor degree
26 from Pennsylvania State University, Penn State Law in 2019. I was admitted to practice law in
27 California in 2019. I am admitted to practice before all courts of the State of California and all
28 federal district courts in the State of California. During my employment with Lawyers for Justice,

PC, I have worked on over one hundred (100) wage-and-hour class actions and PAGA representative actions, and my work has included, inter alia: researching and drafting pleadings; administrative notice exhaustion; drafting, negotiating, and finalizing stipulations and settlement agreements; taking and defending depositions; propounding and responding to written discovery; engaging in motion practice (including and not limited to, motions to compel arbitration, motions to compel discovery responses, motions for summary judgment and/or adjudication, and motions to remand); claims evaluation and analysis; making court appearances; and attending mediation. I have also successfully handled briefing and oral argument in the California Courts of Appeal. I am a member of the California Employment Lawyers Association, and California Lawyers Association's Labor and Employment Section and Litigation Section

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

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

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

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

c) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national property management company involving allegations of misclassification of the "Property Manager" position. On May 23, 2012, the court

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1 granted final approval of the class action settlement. The Los Angeles County Superior Court
2 Case Number is BC430918.

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

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

13 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
14 wage-and-hour class and PAGA representative action against a national wholesale distributor of
15 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
16 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
17 representative action settlement. The Sacramento County Superior Court Case Number is 34-
18 2012-00136285.

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

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

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

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

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

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

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

n) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a full-service bank, on behalf of

1 non-exempt employees. On November 18, 2016, the court granted final approval of the class and
2 PAGA representative action settlement. The San Francisco County Superior Court Case Number
3 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

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

8 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
9 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
10 the employer's motion to compel arbitration, which resulted in a published opinion by the
11 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
12 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
13 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
14 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
15 5046.

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

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

26 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a lumber and hardware company
28 on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the

1 class and PAGA representative action settlement. The Orange County Superior Court Case
2 Number is 30-2014-00747750-CU-OE-CXC.

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

8 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
9 representative action against a food company on behalf of non-exempt employees. On June 30,
10 2017, the court granted final approval of the class and PAGA representative action settlement.
11 The Sacramento County Superior Court Case Number is 34-2015-00175871.

12 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
13 representative action against a chocolate company on behalf of non-exempt employees. On July
14 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
15 The Alameda County Superior Court Case Number is RG15764300.

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

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

25 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
27 employees. On December 11, 2017, the court granted final approval of the class and PAGA

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representative action settlement. The Los Angeles County Superior Court Case Number is BC569646.

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

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

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

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

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

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

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

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

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

22 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
23 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
24 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
25 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
26 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
27 approval of the PAGA representative action settlement. The San Diego County Superior Court
28 Case Number is 37-2016-00005578-CU-OE-CTL.

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

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

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

20 mm) LFJ, in association with co-counsel therein, represented the plaintiffs in a
21 wage-and-hour class action against manufacturer and supplier of power products and services on
22 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
23 motion for class certification and certified a class. On August 27, 2021, the court granted final
24 approval of the class action settlement. The San Diego County Superior Court Case Number is
25 37-2015-00025968-CU-OE-CTL.

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

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

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

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$9,491.68** in litigation costs and expenses incurred in the case, as reflected in "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFFS

20. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for an Enhancement Payment in the amount of \$10,000.00 each to Plaintiffs Joshua Wolfe and Veronica Topete (\$20,000.00 total). The requested Enhancement Payment is fair and appropriate. Plaintiffs spent a substantial amount of time and effort to produce relevant documents and information and provided facts and evidence to support the prosecution of the claims. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would facilitate the pursuit of the cases. Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their work experiences with Defendants, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs to receive \$10,000.00 each as a reasonable Enhancement Payment for their services in the cases, in addition to their individual settlement payments.

1 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
2 interests of Plaintiffs, Class Members, PAGA Employees, and the State of California.

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

5 Executed this 28th day of March 2025, at Glendale, California.

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Arman Marukyan

EXHIBIT A

JOSHUA WOLFE, ET AL. V. SOUTH COAST BAKING, LLC, ET AL. (“WOLFE ACTION”)
San Bernardino Superior Court Case No. CIVSB2224856

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Joshua Wolfe (“Plaintiff Wolfe”) during the Case	42
Investigate, Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	1
Review and Analyze Court Filings in <i>Veronica Topete v. South Coast Baking, LLC, et al.</i> , Orange County Superior Court Case No. 30-2023-01312362-CU-OE-CXC (“Topete Action”)	2.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Wolfe’s Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff Wolfe’s Class Action Complaint for Damages (filed on October 27, 2022) (Wolfe Action)	7.50
Review and Analyze Court’s Initial Case Management Conference Order and Guidelines for the Complex Litigation Program (filed on March 10, 2023) (Wolfe Action)	1.50
Review and Analyze Defendants South Coast Baking, LLC, South Coast Baking Company, and Rise Baking Company’s (“Defendants”) Answer to Plaintiff Joshua Wolfe’s Complaint (served on May 5, 2023), and Research Affirmative Defenses in Defendants’ Answer (Wolfe Action)	1
Draft Plaintiff Wolfe’s Notice of Posting Jury Fees (filed on May 16, 2023) (Wolfe Action)	0.20

Meet and Confer with Defendants' Counsel, and draft Joint Initial Case Management Conference Statement (filed on May 17, 2023) (Wolfe Action)	1.50
Review and Analyze Defendants' Notice of Remote Appearance and [Proposed] Order Regarding Remote Appearance (served on May 18, 2023) (Wolfe Action)	0.20
Draft Plaintiff Wolfe's Notice of Remote Appearance (filed on May 19, 2023) (Wolfe Action)	0.20
Review and Analyze Court's Minute Order Regarding Complex Case Management Conference (filed on May 23, 2023) (Wolfe Action)	0.10
Review and Analyze Defendants' Substitution of Attorney (served on May 30, 2023) (Wolfe Action)	0.20
Review and Analyze Defendants' Notice of Related Case (served August 11, 2023) (Wolfe Action)	0.50
Review and Analyze Defendants' Notice of Related Case (served August 17, 2023) (Topete Action)	0.10
Meet and Confer with Defendants' Counsel, and draft Joint Initial Case Management Conference Statement (filed on November 15, 2023) (Wolfe Action)	0.50
Review and Analyze Court's Minute Order Regarding Further Case Management Conference and Court's Courtroom Rules, Trial Orders, and Sua Sponte Rulings (filed on November 27, 2023) (Wolfe Action)	0.50
Meet and Confer with Defendants' Counsel, and draft Joint Stipulation for Leave for Plaintiff to File a First Amended Complaint and Proposed Order Thereon (served on February 6, 2024) (Wolfe Action)	2.50
Review and Analyze Court's Order for Leave for Plaintiff to file a First Amended Complaint (filed on April 9, 2024) (Wolfe Action)	0.20

Meet and Confer with Plaintiff Veronica Topete's ("Plaintiff Topete") Counsel, and draft Plaintiff Wolfe and Plaintiff Topete's (together as "Plaintiffs") First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, et seq. (filed on April 17, 2024) (Wolfe Action)	5.50
Review and Analyze Defendants' Answer to Plaintiffs' First Amended Complaint (served on May 15, 2024) (Wolfe Action)	0.50
Meet and Confer with Plaintiff Topete's Counsel, and draft First Amended Summons (filed on May 17, 2024) (Wolfe Action)	0.50
Draft Plaintiff Wolfe's Notice of Change of Address or Other Contact Information (filed on January 27, 2025) (Wolfe Action)	0.30
Review and Analyze Defendants' Notice of Withdrawal of Counsel (served on February 13, 2025) (Wolfe Action)	0.20
Appearances	
Prepare for and Telephonically Attend Case Management Conference (May 23, 2023) (Wolfe Action)	1.60
Prepare for and Telephonically Attend Further Case Management Conference (November 27, 2023)	1
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (October 22, 2024)	2.10
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Plaintiffs' Counsel Award, and Enhancement Payments (April 22, 2025) (Anticipated)	2

Discovery and Deposition	
Draft Letter to Defendant South Coast Baking, LLC Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Joshua Wolfe (served on August 9, 2022)	0.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Joshua Wolfe (served on August 29, 2022)	1
Draft Plaintiff Wolfe's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant South Coast Baking, LLC (served on June 6, 2023) (Wolfe Action)	4.50
Draft Plaintiff Wolfe's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant South Coast Baking Company (served on June 6, 2023) (Wolfe Action)	0.50
Draft Plaintiff Wolfe's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Rise Baking Company (served on June 6, 2023) (Wolfe Action)	0.50
Draft Plaintiff Wolfe's Notice of Deposition of Person Most Knowledgeable at Defendant South Coast Baking, LLC and Requests for Production of Documents (Organizational Structure; July 5, 2023) (served on June 6, 2023) (Wolfe Action)	1.50
Draft Plaintiff Wolfe's Notice of Deposition of Person Most Knowledgeable at Defendant South Coast Baking, LLC and Requests for Production of Documents (Job Duties; July 6, 2023) (served on June 6, 2023) (Wolfe Action)	2

Draft Plaintiff Wolfe's Notice of Deposition of Person Most Knowledgeable at Defendant South Coast Baking Company and Requests for Production of Documents (Organizational Structure; July 10, 2023) (served on June 6, 2023) (Wolfe Action)	0.50
Draft Plaintiff Wolfe's Notice of Deposition of Person Most Knowledgeable at Defendant South Coast Baking Company and Requests for Production of Documents (Job Duties; July 11, 2023) (served on June 6, 2023) (Wolfe Action)	0.50
Draft Plaintiff Wolfe's Notice of Deposition of Person Most Knowledgeable at Defendant Rise Baking Company and Requests for Production of Documents (Organizational Structure; July 12, 2023) (served on June 6, 2023) (Wolfe Action)	0.50
Draft Plaintiff Wolfe's Notice of Deposition of Person Most Knowledgeable at Defendant Rise Baking Company and Requests for Production of Documents (Job Duties; July 13, 2023) (served on June 6, 2023) (Wolfe Action)	0.50
Review and Analyze Defendant South Coast Baking, LLC's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) to Plaintiff Joshua Wolfe (served on June 7, 2023) (Wolfe Action)	2
Review and Analyze Defendants' Notice of Plaintiff Joshua Wolfe's Deposition (served on June 16, 2023) (Wolfe Action)	0.80
Review and Analyze Defendant South Coast Baking, LLC's Objections to Plaintiff Wolfe's Notice of Deposition of Person Most Knowledgeable at Defendant South Coast Baking, LLC and Requests for Production of Documents (Organizational Structure; July 5, 2023) (served on June 27, 2023) (Wolfe Action)	1.50
Review and Analyze Defendant South Coast Baking, LLC's Objections to Plaintiff Wolfe's Second Notice of Deposition of Person Most Knowledgeable at Defendant South Coast Baking, LLC and Requests for Production of Documents (Job Duties; July 6, 2023) (served on June 27, 2023) (Wolfe Action)	2

Review and Analyze Defendant South Coast Baking Company's Objections to Plaintiff Wolfe's Notice of Deposition of Person Most Knowledgeable at Defendant South Coast Baking Company and Requests for Production of Documents (Organizational Structure; July 10, 2023) (served on June 27, 2023) (Wolfe Action)	0.50
Review and Analyze Defendant South Coast Baking Company's Objections to Plaintiff Wolfe's Second Notice of Deposition of Person Most Knowledgeable at Defendant South Coast Baking Company and Requests for Production of Documents (Job Duties; July 11, 2023) (served on June 27, 2023) (Wolfe Action)	0.50
Review and Analyze Defendant Rise Baking Company's Objections to Plaintiff Wolfe's Notice of Deposition of Person Most Knowledgeable at Defendant Rise Baking Company and Requests for Production of Documents (Organizational Structure; July 12, 2023) (served on June 27, 2023) (Wolfe Action)	0.50
Review and Analyze Defendant Rise Baking Company's Objections to Plaintiff Wolfe's Second Notice of Deposition of Person Most Knowledgeable at Defendant Rise Baking Company and Requests for Production of Documents (Job Duties; July 13, 2023) (served on June 27, 2023) (Wolfe Action)	0.50
Draft Plaintiff Joshua Wolfe's Responses to Defendant South Coast Baking, LLC's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) (served on August 4, 2023) (Wolfe Action)	11
Review and Analyze Defendant South Coast Baking, LLC's Responses to Plaintiff Wolfe's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on August 4, 2023) (Wolfe Action)	4.5
Review and Analyze Defendant South Coast Baking Company's Responses to Plaintiff Wolfe's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on August 4, 2023) (Wolfe Action)	1

Review and Analyze Defendant Rise Baking Company's Responses to Plaintiff Wolfe's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on August 4, 2023) (Wolfe Action)	1
Draft Plaintiff Wolfe's Objections to Notice of Plaintiff Joshua Wolfe's Deposition (served on August 16, 2023) (Wolfe Action)	1
Review and Analyze Documents Produced by Defendant (served on September 6, 2023)	2.5
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency re: Claims of Plaintiff under the Private Attorneys General Act (served on September 14, 2023) (Wolfe Action)	1.50
Draft Correspondence to, and Respond to Correspondence from, Defense Counsel	3
Review and Analyze Defendants' Meet and Confer Letter Regarding Plaintiff Wolfe's Responses to Defendant South Coast Baking, LLC's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) (served on August 24, 2023) (Wolfe Action)	2.5
Draft Plaintiff Wolfe's Letter to Defendants Regarding Mediation (served on August 30, 2023) (Wolfe Action)	1
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff Wolfe, Defendants, and Other Sources Prior to Mediation	9.70
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiffs' Mediation Brief, and Performing Damages Analysis/Calculations (submitted on December 8, 2023)	13.5

Attend Mediation Session (December 12, 2023; via Video Conference)	10
Review, Analyze, Revise, Negotiate, and Finalize Mediator's Proposal (executed December 12, 2023)	2
Draft, Review, Revise, Negotiate, and Finalize Stipulation of Class and Representative Action Settlement and Release of Claims (executed on May 22, 2024), and Draft Notice of Class and Representative Action Settlement	9.80
Coordinate Settlement Administration with Settlement Administrator and Ongoing Monitoring of Settlement Administration and Weekly Reports	2
Law and Motion	
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Arman Marukyan in Support Thereof, Declaration of Plaintiff Wolfe in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement; Review Declaration of Michael Jones in Support Thereof and Declaration of Plaintiff Topete in Support Thereof (filed on July 30, 2024)	14.50
Review and Analyze Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Court's Minute Order Regarding Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on October 22, 2024)	0.10
Draft Notice of Entry of Judgment or Order Regarding Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on October 22, 2024)	0.20

Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Plaintiffs' Counsel Award, and Enhancement Payments, Declaration of Arman Marukyan in Support Thereof, and [Proposed] Final Approval Order and Judgment; Review Declaration of Zachary Crosner in Support Thereof and Declaration of Plaintiff Topete in Support Thereof; and Review Declaration of Settlement Administrator in Support Thereof (filed on March 28, 2025)	16.50
Total Hours:	204

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Wolfe, et al. vs. South Coast Baking, LLC, et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/9/2022	U.S. Postmaster	Postage	\$24.00
10/27/2022	Legal Document Server, Inc.	Attorney Service	\$266.86
10/27/2022	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
10/27/2022	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
3/8/2023	ProLegal	Attorney Service	\$573.75
3/29/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
3/29/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
5/16/2023	Legal Document Server, Inc.	Attorney Service	\$160.43
5/16/2023	San Bernardino Superior Court	Jury Fee	\$150.00
5/17/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
5/19/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
5/24/2023	CourtCall, LLC	Attorney Service	\$72.00
6/7/2023	General Logistics Systems US, Inc.	Courier Service	\$23.86
8/7/2023	General Logistics Systems US, Inc.	Courier Service	\$19.23
8/15/2023	Orange County Superior Court	Document Download Fee	\$10.30
8/16/2023	General Logistics Systems US, Inc.	Courier Service	\$19.31
9/14/2023	U.S. Postmaster	Postage	\$35.08
9/14/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
11/14/2023	Lynn S. Frank	Mediation Fee	\$5,750.00
11/15/2023	Legal Document Server, Inc.	Attorney Service	\$17.09
11/28/2023	CourtCall, LLC	Attorney Service	\$72.00
5/17/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
8/9/2024	Legal Document Server, Inc.	Attorney Service	\$21.37
8/9/2024	San Bernardino Superior Court	Motion Fee	\$60.00
10/23/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
10/24/2024	CourtCall, LLC	Attorney Service	\$72.00
Total:			<u>\$9,491.68</u>