Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Settlement Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MONTEREY

RAFAEL LIRA CUPA, 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;

Plaintiff,

vs.

ORGANICGIRL, LLC, a California limited liability company; and DOES 1 through 100, inclusive,

Defendants.

Case No. 23CV003744

Honorable Ian A. Rivamonte
Department 14

CLASS ACTION

DECLARATION OF YASMIN HOSSEINI IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, CLASS COUNSEL'S ATTORNEYS' FEES AND EXPENSES, AND ENHANCEMENT PAYMENT

Date:	November 13, 2026
Time:	8:30 a.m.
Department:	14
Complaint Filed:	November 15, 2023
Trial Date:	None Set

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

DECLARATION OF YASMIN HOSSEINI

I, Yasmin Hosseini, 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 Rafael Lira Cupa ("Plaintiff") and the Settlement Class in the above-captioned action. 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 May 12, 2026, in Department 14 of the above-entitled Court, the Honorable Ian A. Rivamonte preliminarily approved the Joint Stipulation of Settlement and Release of Class Action and PAGA Actions, Amendment No.1 to the Joint Stipulation of Settlement and Release of Class Action and PAGA Actions, and Amendment No. 2 to the Joint Stipulation of Settlement and Release of Class Action and PAGA Actions (collectively, "Settlement," "Agreement," or "Settlement Agreement") entered into between Plaintiff and Defendant organicgirl, LLC, ("Defendant") (together with Plaintiff referred to as the "Parties") and conditionally certified the Settlement Class for settlement purposes. The Court provisionally appointed Plaintiff Rafael Lira Cupa as the representative of the Settlement Class ("Class Representative"). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Settlement Class ("Class Counsel").

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement ("Notice Packet"), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Apex Class Action Administration, LLC ("Apex") to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Class Counsel's Attorneys' Fees and Expenses, and Enhancement Payment ("Motion for Final Approval"), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Class Counsel's Attorneys' Fees and Expenses,

Enhancement Payment, and Administration Expenses, or the allocation for the PAGA Payment.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above captioned action entitled *Cupa v. organicgirl, LLC*, Monterey County Superior Court, Case No. 23CV003744 ("Action"), which was filed on November 15, 2023.

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

7. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing the case for class certification and trial, prior to reaching the Settlement. The Parties exchanged thousands of pages of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. The volume of records and documents that Class Counsel reviewed and analyzed included, and were not limited to: employment records of Plaintiff, a detailed sampling of Plaintiff's, Settlement Class Members', and PAGA Members' timekeeping, payroll, and reimbursement data, Defendant's

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

Employee Handbook and wage and hour policies (including, but not limited to, Defendant's California Meal Periods Policy and Rest Periods Policy, Overtime Policy, Dress Code Policy, Expenses Policy, and Timekeeping Policy), earning statements, company policy acknowledgments and forms (including, but not limited to, Defendant's Handbook/Policy Employee Acknowledgment, Employee Acknowledgement of Receipt of the Meal Periods Policy and Rest Periods Policy, First Meal Period Waiver Form, and Second Meal Period Waiver Form), internal memorandum, job descriptions, and other operations and employment policies, practices, and procedures documents, among other information and documents. Class Counsel had the opportunity to interview and obtain information from Plaintiff and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. Class Counsel developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, motion practice, formal and informal discovery, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation briefing and supporting materials, and settlement documents; drafting and propounding multiple sets of formal written discovery requests on Defendant; reviewing Defendant's responses and objections to written discovery requests and deposition notices, and preparing for and taking the deposition of Defendant's person most knowledgeable; and preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

8. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating this matter, mediation, and extensive settlement negotiations. Class Counsel analyzed a volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources that provided a critical

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

understanding of the nature of the work performed by the Settlement Class Members and PAGA Members, as well as Defendant's organizational structure and their operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing liability, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiations process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest periods, representative PAGA claims and penalties, wage-and-hour enforcement, arbitration agreements, regular rate, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

9. After conducting significant investigation of the facts and law during the prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the case. These efforts included participating in a mediation session conducted by Daniel J. Turner, Esq. ("Mediator"), a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of the mediation and settlement negotiations, the Parties exchanged documents and data, and discussed various aspects of the case, including and not limited to, the risks and delays of further litigation, the risks and expenses to the Parties of proceeding with class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, regular rates of pay, meal and rest periods (including *inter alia*, on premises breaks), business expense reimbursements, recordkeeping and wage statement requirements, arbitration agreements, representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendant and its counsel

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

felt strongly about Defendant's ability to avoid class certification prevail on the merits and, while Plaintiff and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the Mediator's evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation.

ATTORNEYS' FEES REQUESTED BY CLASS COUNSEL

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of $438,333.33, which is one-third (1/3) of the Gross Settlement Amount of $1,315,000.00. The Net Settlement Amount will be distributed to Participating Settlement Class Members in accordance with the Settlement. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least one-third (1/3) of the recovery.

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

12. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Gross Settlement Amount of $1,315,000.00 (with a Net Settlement Amount of approximately at least $536,884.79 to be paid to Participating Settlement Class Members (with gross Individual Class Payments averaging approximately more than $340.78), payment of $75,000.00 to PAGA Members (with Individual PAGA Payments averaging approximately $77.48) and payment of $225,000.00 to the State of

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

California)—support the percentage fee sought.

13. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **326 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

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

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

EXPERIENCE AND ADEQUACY OF

LAWYERS *for* JUSTICE, PC

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

16. Edwin Aiwazian is a Chief Executive Officer of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second

Appellate District. He was admitted to practice law in California in 2004 and in Washington in 2026. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000 class action or representative action cases.

17. Arby Aiwazian is a Senior Partner of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010 and in Washinton in 2026. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

supervision, dozens of class action or representative action cases have resulted in settlements that have been granted court approval. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

18. Joanna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010), New York (since 2013), and Washington (since 2026), and is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, all U.S. District Courts in Washington, the U.S. District Court for the Southern District of New York, the U.S. District Court for the Eastern District of New York, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, Lawyers *for* Justice, PC has handled the class certification and court approval

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

process for hundreds of class action and/or representative action matters that have successfully resolved. She has been a speaker regarding topics in wage and hour law at the California Employment Lawyers Association's continuing legal education events.

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

CLASS COUNSEL'S ATTORNEYS' EXPENSES INCURRED BY LAWYERS *FOR* JUSTICE, PC

20. 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. The Settlement provides for reimbursement of litigation costs and expenses of up to $16,000.00. Lawyers *for* Justice, PC seeks reimbursement of $13,791.88 in litigation costs and expenses incurred in the matter, as reflected in **"EXHIBIT 2"** attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. The cost savings of $2,208.12 will be part of the Net Settlement Amount, which will be distributed to the Participating Settlement Class Members in accordance with the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

21. In recognition of his efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as his broader individual waiver and release of

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

claims with a California Civil Code Section 1542 waiver (set forth in Section 11.3 of the Settlement Agreement), the Settlement provides for an Enhancement Payment, in the amount of up to $10,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing his employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive $10,000.00 as a reasonable Enhancement Payment for his broader waiver and release of claims and services performed in this matter, in addition to his individual settlement payments.

22. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, the Settlement Class, PAGA Members, and the State of California.

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

Executed this 21st day of October 2026, at Glendale, California.



Yasmin Hosseini

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

EXHIBIT 1

RAFAEL LIRA CUPA V. ORGANICGIRL, LLC
Monterey County Superior Court, Case No. 23CV003744

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS *for* JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Rafael Lira Cupa ("Plaintiff")	13.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	7.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff's Class Action and Private Attorneys General Act ("PAGA") Claims, Conduct Legal Research and Analysis Regarding Class Action and PAGA Claims, and Draft, Review, and/or Revise Plaintiff's Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on November 15, 2023)	8.50
Review Court's Notice of Assignment and Case Management Conference (filed on November 16, 2023)	0.30
Meet and Confer with Defendant Organicgirl, LLC's ("Defendant") Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on March 5, 2024)	1.40
Draft, Review, and/or Revise Plaintiff's Notice of Posting Jury Fees (filed on March 8, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Extend Time to File Responsive Pleading to Plaintiff's Complaint (filed on April 15, 2024)	1.30
Review Court's Order Granting Joint Stipulation to Extend Time to File Responsive Pleading (filed on April 29, 2024)	0.10

Review Defendant's Notice of Entry of Order Granting Joint Stipulation to Extend Time to File Responsive Pleading (served on April 29, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference (submitted on April 29, 2024)	1.30
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (filed on May 1, 2024)	0.10
Review Defendant's Notice of Entry of Order Granting Joint Stipulation to Continue Case Management Conference (served on May 6, 2024)	0.10
Review Court's Notice of Resetting Hearing (filed on June 20, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on July 30, 2024)	1.40
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 15, 2024)	1.50
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement and Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on November 21, 2024)	1.40
Review Court's Order Continuing the Case Management Conference (filed on December 6, 2024)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Entry of Judgment or Order Re: Order Continuing the Case Management Conference (filed on December 9, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference (submitted on March 14, 2025)	1.40
Review Court's Order to Continue Case Management Conference (filed on March 18, 2025)	0.10
Review Court's Notice of Resetting Hearing (filed on May 20, 2025)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on July 28, 2025)	1.20

Review Court's Order to Continue Case Management Conference (filed on August 1, 2025)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 6, 2025)	1.10
Review Court's Notice of Resetting Hearing (filed on November 24, 2025)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on January 2, 2026)	1.10
Review Court's Minute Order Re: Case Management Conference (filed on January 27, 2026)	0.10
Draft, Review, and/or Revise Plaintiff's Notice Regarding January 27, 2026 Case Management Conference (filed on February 4, 2026)	0.20
Appearances	
Prepare for and Remotely Attend Hearing on Defendant's Motion to Compel Arbitration (March 22, 2024)	1.30
Prepare for and Remotely Attend Case Management Conference (January 27, 2026)	1.30
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (March 27, 2026)	1.90
Prepare for and Remotely Attend Continued Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (May 8, 2026)	0.90
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on August 8, 2023)	2.80
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Defendant (served on January 17, 2024)	5.10

Draft, Review, and/or Revise Plaintiff's Deposition Subpoena for Personal Appearance and Production of Documents and Things to Dianna Skillicorn, and Attachment 3 Thereto (noticed for March 4, 2024) (served on February 22, 2024)	1.50
Review Defendant's Objections to Plaintiff's Deposition Subpoena to Dianna Skillicorn and Request for Production of Documents (served on February 28, 2024)	0.50
Prepare for, Take, and/or Review the Transcript of the Deposition of Dianna Skillicorn (taken on March 4, 2024)	6.50
Review Defendant's Verified Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Admission (Set One) (served on October 3, 2024)	1.50
Review Defendant's Response to Plaintiff's Requests for Production of Documents (Set One) (served on October 11, 2024)	1.30
Review and Analyze Documents Produced by Defendant (served on October 11, 2024)	2.30
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Rafael Lira Cupa under the Private Attorneys General Act (served on September 8, 2023)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendant's Counsel	16.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (approximately 10,540 pages), and Other Sources Prior to Mediation	65.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations (submitted on August 9, 2024)	29.50

Attend Mediation Session with Daniel J. Turner, Esq. (August 16, 2024; Zoom Video Conference)	16.50
Review and/or Analyze Mediator's Proposal (issued on November 16, 2024; accepted on November 19, 2024)	1.50
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding Re: Class Action and PAGA Settlement (executed on November 27, 2024)	3.50
Draft, Review, Revise, Negotiate, and/or Finalize Joint Stipulation of Settlement and Release of Class and PAGA Actions (executed on October 29, 2025) and Draft, Review, and/or Revise Notice of Class Action Settlement	15.50
Draft, Review, Revise, Negotiate, and/or Finalize Amendment No. 1 to Joint Stipulation of Settlement and Release of Class and PAGA Actions (executed on April 24, 2026)	1.50
Draft, Review, Revise, Negotiate, and/or Finalize Amendment No. 2 to Joint Stipulation of Settlement and Release of Class and PAGA Actions (executed on May 8, 2026)	1.10
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	6.50
Law and Motion	
Review and Analyze Defendant's Notice of Motion and Motion to Compel Arbitration, Memorandum of Points and Authorities in Support Thereof, Declaration of Dianna Skillicorn in Support Thereof, and [Proposed] Order Thereon (filed on January 22, 2024)	2.80
Research, Draft, Review, and/or Revise Plaintiff's Opposition to Defendant's Motion to Compel Arbitration, Declaration of Melissa R. Rinehart in Support Thereof, and Plaintiff's Objections to Defendant's Evidence in Support Thereof (filed on March 11, 2024)	22.50
Review and Analyze Defendant's Reply in Support of Motion to Compel Arbitration and Defendant's Responses to Plaintiff's Objections to Evidence (filed on March 15, 2024)	2.10
Review Court's Tentative Ruling Re: Defendant's Motion to Compel Arbitration (issued on March 21, 2024)	0.30

Review Court's Minute Order Re: Defendant's Motion to Compel Arbitration (filed on March 22, 2024)	0.10
Draft, Review, and/or Revise Plaintiff's [Proposed] Order Denying Defendant's Motion to Compel Arbitration (submitted on March 25, 2024)	0.30
Review Court's Order Denying Defendant's Motion to Compel Arbitration (filed on April 16, 2024)	0.20
Review and Analyze Defendant's Notice of Demurrer and Demurrer to Plaintiff's Complaint, Memorandum of Points and Authorities in Support Thereof, Declaration of Tashayla Billington in Support Thereof, Request for Judicial Notice in Support Thereof, and [Proposed] Order Thereon (filed on September 25, 2024)	2.10
Research, Draft, Review, and/or Revise Plaintiff's Opposition to Defendant's Demurrer to Plaintiff's Complaint (filed on November 8, 2024)	11.50
Review and Analyze Defendant's Reply in Support of Demurrer and Request for Judicial Notice in Support Thereof (filed on November 15, 2024)	1.80
Review Defendant's Notice of Withdrawal of Hearing on Demurrer to Plaintiff's Complaint (filed on November 20, 2024)	0.20
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Selena Matavosian in Support Thereof, Declaration of Plaintiff in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on February 9, 2026)	19.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement and Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on March 27, 2026)	0.40
Draft, Review, and/or Revise Supplemental Declaration of Selena Matavosian in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement and [Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on April 24, 2026)	4.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on May 7, 2026)	0.20

Draft, Review, and/or Revise Further Supplemental Declaration of Selena Matavosian in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement and [Further Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on May 8, 2026)	2.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on May 8, 2026)	0.20
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on May 13, 2026)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on May 28, 2026)	0.10
Review Declaration of the Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Expenses, and Class Representative Enhancement Payment; Memorandum of Points and Authorities in Support Thereof, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Final Approval Order and Judgment	21.50
Total Hours:	326.00

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Cupa vs. Organicgirl, LLC

Date	Payee	Expense Description	Amount
9/8/2023	U.S. Postmaster	Postage	$8.77
9/8/2023	Labor & Workforce Development Agency	PAGA Filing Fee	$75.00
11/16/2023	Legal Document Server, Inc.	Attorney Service	$115.43
11/16/2023	Monterey Superior Court	Complex Filing Fee	$1,000.00
11/16/2023	Monterey Superior Court	Complaint Filing Fee	$435.00
12/19/2023	ProLegal	Attorney Service	$189.40
1/17/2024	General Logistics Systems US, Inc.	Courier Service	$44.57
1/23/2024	Legal Document Server, Inc.	Attorney Service	$15.55
3/1/2024	Legal Document Server, Inc.	Attorney Service	$157.14
3/4/2024	Esquire Deposition Solutions, LLC	Court Reporter	$805.86
3/4/2024	Esquire Deposition Solutions, LLC	Court Reporter	$1,603.20
3/11/2024	Legal Document Server, Inc.	Attorney Service	$15.55
3/12/2024	Legal Document Server, Inc.	Attorney Service	$41.68
3/12/2024	Monterey Superior Court	Jury Fee	$150.00
3/25/2024	Legal Document Server, Inc.	Attorney Service	$11.95
4/9/2024	Legal Document Server, Inc.	Attorney Service	$15.55
4/30/2024	Legal Document Server, Inc.	Attorney Service	$157.67
7/24/2024	Judicate West	Mediation Fee	$6,375.00
7/29/2024	Legal Document Server, Inc.	Attorney Service	$17.09
7/29/2024	Monterey Superior Court	Stipulation & Order Fee	$20.00
8/26/2024	CPAnalytics	Data Analysis	$2,010.00
9/5/2024	Los Angeles Superior Court	Document Download Fee	$15.60
10/4/2024	Legal Document Server, Inc.	Attorney Service	$17.09
10/4/2024	Monterey Superior Court	Stipulation & Order Fee	$20.00
11/8/2024	Legal Document Server, Inc.	Attorney Service	$157.67
11/13/2024	Legal Document Server, Inc.	Attorney Service	$15.70
12/5/2024	Legal Document Server, Inc.	Attorney Service	$17.09
12/5/2024	Monterey Superior Court	Stipulation & Order Fee	$20.00
12/18/2024	Legal Document Server, Inc.	Attorney Service	$15.70
1/22/2025	General Logistics Systems US, Inc.	Courier Service	$45.35
11/6/2025	Legal Document Server, Inc.	Attorney Service	$16.70
1/2/2026	Legal Document Server, Inc.	Attorney Service	$17.70
2/4/2026	Legal Document Server, Inc.	Attorney Service	$17.45
2/10/2026	Legal Document Server, Inc.	Attorney Service	$21.62
2/10/2026	Monterey Superior Court	Motion Fee	$60.00
3/24/2026	Legal Document Server, Inc.	Attorney Service	$17.45
4/27/2026	Legal Document Server, Inc.	Attorney Service	$17.45
5/12/2026	Legal Document Server, Inc.	Attorney Service	$17.45
5/29/2026	Legal Document Server, Inc.	Attorney Service	$17.45
		Total:	$13,791.88