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Attorneys for Plaintiff
DESIREE GARCIA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN LUIS OBISPO

DESIREE GARCIA, individually, and on
behalf of other members of the general
public similarly situated, and as an
aggrieved employee and Private Attorney
General;

Plaintiffs,

vs.

SESLOC FEDERAL CREDIT UNION, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 22CV-0295

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: February 27, 2025

Time: 9:00 AM

Dept.: 2

Complaint filed: June 8, 2022

Trial Date: None Set

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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 Desiree Garcia (“Plaintiff”). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and if called as a witness, I could and would competently testify thereto.

2. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating this matter since its inception in June 2022, when Lawyers *for* Justice, PC filed Plaintiff's complaint.

4. Before initiating the Action, 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 Plaintiff and attorneys at our firm, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, off-the-clock theory, rounding, meal and rest periods, wage-and-hour enforcement, reimbursement of business-related expenses, Plaintiff's claims and allegations, and potential defenses. After conducting initial investigation, Lawyers *for* Justice, PC determined that Plaintiff's claims 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 non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses.

1 5. Collectively, Class Counsel investigated the veracity, strength, and scope of the claims
2 and were preparing the Action for class certification and trial prior to reaching the Settlement. Class
3 Counsel conducted significant discovery and investigation into the facts of the case, exchanging a volume
4 of information, documents, and data in the course of litigation and mediation and settlement negotiations.
5 Class Counsel reviewed and analyzed a volume of information, documents, and data obtained from
6 Plaintiff, Defendant, and other sources. Class Counsel researched applicable law, developed liability and
7 damages valuation models in connection with mediation and settlement negotiations, and met and
8 conferred with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the
9 pleadings, case management, informal discovery, and production of various information, documents, and
10 data in the course of litigation and in connection with the mediation and settlement negotiations. Other
11 work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting,
12 reviewing, and revising pleadings, motion-related papers, and the mediation brief; preparing and appearing
13 for court proceedings; and preparing for and attending mediation and engaging in extensive settlement
14 negotiations, among other tasks.

15 6. As outlined herein and in other declarations filed concurrently in support of the Motion,
16 the parties have conducted significant informal discovery and investigation in the Action. Class Counsel
17 analyzed a volume of information, documents, and data obtained from Plaintiff, Defendant, or other
18 sources. The information, documents, and data provided a critical understanding of the nature of the work
19 performed by the Class Members and Aggrieved Employees, as well as Defendant's operations and
20 employment policies, practices, and procedures, and were used in analyzing liability, damages, and
21 valuation issues in connection with all phases of litigation, and ultimately with the mediation and
22 settlement negotiation process. Class Counsel also performed significant research into the applicable law,
23 which is evolving as it relates class certification, off-the-clock theory, rounding, meal and rest periods,
24 reimbursement of business-related expenses, representative PAGA claims, wage-and-hour enforcement,
25 Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.
26 Accordingly, sufficient investigation and review of information have taken place in order for the parties to
27 be adequately informed of the nature and extent of the claims, and to enable all parties to fully evaluate
28 the Settlement for its fairness, adequacy, and reasonableness.

1 7. After conducting significant investigation of the facts and law during the prosecution of
2 the case, the Parties engaged in extensive settlement negotiations to try to resolve the Action. These efforts
3 included participating in a formal, full-day private mediation conducted by well-respected mediator Eve
4 Wagner, Esq. During all settlement discussions, the parties conducted their negotiations at arm's length
5 in an adversarial position. With the assistance of the mediator, the Parties ultimately agreed to a settlement
6 that is now memorialized in the Settlement Agreement.

7 8. At all times, Defendant maintained that it had complied with California wage and hour
8 laws. Similarly, if this matter had not resolved, Plaintiff was prepared to vigorously litigate this dispute
9 including through class certification and trial. The proposed Settlement was reached at the end of a process
10 that was neither fraudulent nor collusive. To the contrary, counsel for the Parties advanced their respective
11 positions throughout the settlement negotiations.

12 9. Defendant also felt strongly that the alleged claims were not appropriate for class
13 certification and had obtained evidence that they contended supported their alleged defenses. Defendant
14 claimed there were substantial problems with respect to proceeding forward with Plaintiff's claims on
15 either a PAGA or class basis. Despite these obstacles, Class Counsel were able to use their substantial
16 experience in complex wage and hour litigation to convince Defendant to ultimately settle rather than
17 proceed with further litigation. Rather than accept a proposal below the range that might be expected for
18 a class settlement such as this, Class Counsel negotiated a settlement which will provide substantial value
19 to the class members. This settlement, against experienced defense counsel and despite the existence of
20 defenses to class certification, was made possible as a result of Class Counsel's expertise.

21 10. Plaintiff moves for an award of attorneys' fees to Class Counsel in the amount of
22 \$262,500.00 which is thirty-five percent (35%) of the Gross Settlement Amount of \$750,000.00. Pursuant
23 to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has
24 agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

25 11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in
26 commencing and/or pursuing the Action; (2) the time, effort, and expense that Class Counsel dedicated to
27 the Action; (3) the skill and determination that Class Counsel have shown; (4) the substantial results that
28 Class Counsel have achieved throughout the litigation of the Action; (5) the value of the settlement that

1 Class Counsel have achieved; and (6) the other cases that Class Counsel have turned down in order to
2 devote their time and efforts to the Action.

3 12. Class Counsel risked substantial economic loss by pouring in the number of hours and
4 costs into this case, while having to represent the putative class against a well-known, aggressive, and
5 respected defense firm. The requested fee is well supported as (1) it is consistent with the private
6 marketplace where contingent-fee attorneys are customarily compensated on such a basis; (2) it aligns the
7 interests of class counsel and absent class members in achieving the maximum possible resolution of the
8 case; (3) it encourages the most efficient resolution of the litigation by providing an incentive for valuable
9 and reasonable, settlement, and (4) the result was achieved after extensive litigation and efforts by two
10 class action firms after almost four years.

11 13. While not necessarily required to be demonstrated because the percentage fee from the
12 common fund is proper for this settlement, Class Counsel has incurred many hours of work in connection
13 with prosecuting the Action such that the award of attorneys' fees is also justified under a lodestar analysis.
14 Attorneys at Lawyers *for* Justice, PC have spent a total of **85.60 hours** performing tasks and obtaining
15 recovery in the Action, as reflected in the joint time and task sheet exhibit attached to the Declaration of
16 Heather Davis (filed concurrently with the Motion and with the instant Declaration), which sets forth in
17 detail the nature of the legal services and the time incurred in performing those services by Lawyers *for*
18 Justice, PC, (as well as co-counsel at Protection Law Group). The hours attributable to Lawyers *for*
19 Justice, PC include work done by several other attorneys at the firm and myself. Additionally, separate
20 from the hours of work referenced herein and in the attached chart, Lawyers *for* Justice, PC had litigation
21 support personnel actively engaged in assisting with the prosecution of this matter.

22 14. The work performed in this particular matter, the background of our firm, as well as the
23 individual backgrounds, training, and experience of the attorneys who worked on this Action, in litigating
24 complex wage-and-hour cases, and in particular, employment class actions and representative actions,
25 support a reasonable blended hourly rate of compensation at the rate of at least \$850 per hour for work
26 performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys' fees,
27 compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting
28 approval of settlements in other wage-and-hour class action and/or representative action cases: final

1 approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.*
2 (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of
3 attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and
4 representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior
5 Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved
6 compensation at the rate of \$919.57 per hour; final approval of the class and representative action
7 settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764)
8 was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of
9 \$855.96 per hour.

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

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

25 16. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice, PC. He
26 received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris
27 Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal
28 training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its

1 Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono
2 mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation
3 Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal
4 Writing at Harvard University. From approximately September 2002 to approximately December 2002,
5 he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of
6 Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served
7 as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
8 Appellate District. In December of 2004, he obtained a license to practice law from the California State
9 Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost
10 exclusively focused on the prosecution of consumer and employment class actions. While employed by
11 Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one
12 hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended
13 over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some
14 cases in conjunction with co-counsel, he has successfully litigated cases involving the executive,
15 administrative, and other overtime exemptions to the State of California and federal overtime
16 compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained
17 class certification by contested motion practice in approximately fifteen (15) cases in the last decade and
18 litigated over 1,000 class action or representative action cases.

19 17. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He received
20 his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude.
21 He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May
22 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the
23 California Court of Appeal for the Second Appellate District. From approximately August 2008 to
24 approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw
25 of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California
26 in 2010. He is admitted to practice before all courts of the State of California and all United States District
27 Courts in the State of California. He has worked on many wage-and-hour class action and representative
28 action cases, taking the lead in taking and defending depositions, arguing motions, and attending

1 mediations. He has played an integral role in preparing matters for class certification, including and not
2 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court
3 Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
4 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
5 RG13680477). Under his supervision, dozens of class action or representative cases have resulted in
6 settlements that have been granted court approval, including and not limited to, those listed in paragraph
7 20 herein. He has handled over one hundred and fifty (150) mediations and worked on over two hundred
8 and fifty (250) class action or representative action cases which have resulted in settlement.

9 18. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
10 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree
11 from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University
12 Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013),
13 and is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the
14 Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of
15 depositions and successfully handled motion practice in class action cases regarding discovery (including
16 and not limited to, regarding class contact information), class certification (both contested class
17 certification and stipulated class certification), arbitration agreements, coordination, and intervention. She
18 has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding
19 the Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v.*
20 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24,
21 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). She has
22 significant experience with class actions, including and not limited to working on cases to obtain class
23 certification through contested motion practice and working on cases in the post-certification stage (e.g.,
24 post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in
25 conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600
26 individuals). She also has extensive experience with class action and/or representative action settlements,
27 and has handled this process in over three hundred (300) cases. Under Edwin Aiwazian, Arby Aiwazian,
28 and her supervision, Lawyers *for* Justice, PC has handled the class certification and court approval process

1 for hundreds of class action and/or representative action matters that have successfully resolved. She is a
2 member of the California Employment Lawyers Association and, on several occasions, has been a speaker
3 regarding topics in wage and hour law at the organization's continuing legal education events.

4 19. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree in
5 Economics from the University of California, San Diego in 2007, and a Juris Doctor degree from Loyola
6 Law School in 2011, graduating with Cum Laude and Order of the Coif honors. I am admitted to practice
7 before all courts in the State of California and all U.S. District Courts in California. I externed for the
8 Honorable Victoria S. Kaufman of the United States Bankruptcy Court, Central District of California,
9 from June 2009 to August 2009. I externed for the Honorable Gary A. Feess of the United States District
10 Court, Central District of California, from January 2010 to May 2010. From 2011 through and including
11 the present, my practice consisted almost exclusively of complex wage and hour class action and PAGA
12 action matters in California. From October 2011 to June 2013, I was an Associate at Littler Mendelson's
13 Century City, California office, working for one of the largest employer-side labor and employment law
14 firms in the United States. From July 2013 to March 2014, I was an Associate at Sheppard, Mullin, Richter
15 & Hampton's Century City, California office. From March 2014 to July 2023, I worked as an Associate
16 and then as Counsel at Baker Hostetler LLP's Los Angeles office. From August 2023 to the present, I
17 have been a Member of Lawyers *for* Justice, PC. I have taken and defended dozens of depositions and
18 has successfully handled motion practice in class action and PAGA cases regarding discovery (including
19 and not limited to motions regarding class contact information), class certification (both contested class
20 certification and stipulated class certification), dispositive motions, arbitration agreements, coordination,
21 and intervention. I have successfully handled a complex wage and hour class action and PAGA case
22 through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange County Superior Court,
23 Case No. 30-2013-00692890. I also successfully handled briefing on appeal regarding employer efforts
24 to compel arbitration. *TitleMax of Cal. v. Pena*, California Court of Appeals for the Fifth District, Case
25 No. F084706 (Cal. Ct. App. March 28, 2023) (unpublished decision). Further, I have extensive experience
26 with settlements of class actions and PAGA actions and have handled and supervised this process in over
27 one hundred (100) cases.

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

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

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

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

15 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
16 wage-and-hour class action against a national property management company involving
17 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court
18 granted final approval of the class action settlement. The Los Angeles County Superior Court
19 Case Number is BC430918.

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

25 e) LFJ, in association with co-counsel therein, represented the plaintiff in a
26 wage-and-hour class and PAGA representative action against a bank, involving allegations of
27 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
28

1 granted final approval of the class and PAGA representative action settlement. The Kern County
2 Superior Court Case Number is S-1500-CV-273194-LHB.

3 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
4 wage-and-hour class and PAGA representative action against a national wholesale distributor of
5 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
6 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
7 representative action settlement. The Sacramento County Superior Court Case Number is 34-
8 2012-00136285.

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

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

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

25 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a national retailer of upscale
27 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
28 court granted final approval of the class and PAGA representative action settlement. The Los

1 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
2 Council Coordination Proceeding Number is 4794.

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

7 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
8 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
9 involving allegations of misclassification of the "Department Manager" position. On August 12,
10 2016, the court granted the plaintiffs' motion for class certification in part and certified a
11 class. On August 6, 2019, the court granted final approval of the class action settlement. The
12 Alameda County Superior Court Case Number is RG13680477.

13 m) LFJ represented the plaintiff in a PAGA representative action against a real
14 estate and property management company, on behalf of non-exempt employees. On November 4,
15 2016, the court granted approval of the PAGA representative action settlement. The Orange
16 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

17 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
18 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of
19 non-exempt employees. On November 18, 2016, the court granted final approval of the class and
20 PAGA representative action settlement. The San Francisco County Superior Court Case Number
21 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

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

26 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
27 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
28 the employer's motion to compel arbitration, which resulted in a published opinion by the

1 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
2 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
3 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
4 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
5 5046.

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

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

16 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
17 wage-and-hour class and PAGA representative action against a lumber and hardware company
18 on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the
19 class and PAGA representative action settlement. The Orange County Superior Court Case
20 Number is 30-2014-00747750-CU-OE-CXC.

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

26 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
27 representative action against a food company on behalf of non-exempt employees. On June 30,
28

1 2017, the court granted final approval of the class and PAGA representative action settlement.
2 The Sacramento County Superior Court Case Number is 34-2015-00175871.

3 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
4 representative action against a chocolate company on behalf of non-exempt employees. On July
5 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
6 The Alameda County Superior Court Case Number is RG15764300.

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

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

16 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
17 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
18 employees. On December 11, 2017, the court granted final approval of the class and PAGA
19 representative action settlement. The Los Angeles County Superior Court Case Number is
20 BC569646.

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

27 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class and PAGA representative action against a global provider of flexible office

1 space solutions. On February 15, 2018, the court granted final approval of the class and PAGA
2 representative action settlement. The Los Angeles County Superior Court Case Number is
3 BC498401.

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

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

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

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

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

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

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

12 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
13 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
14 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
15 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
16 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
17 approval of the PAGA representative action settlement. The San Diego County Superior Court
18 Case Number is 34-2016-00005578-CU-OE-CTL.

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

25 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
27 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the
28 court granted in part the plaintiff's motion for class certification and certified a class. The

1 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
2 Judicial Council Coordination Proceeding Number is 4930.

3 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
4 wage-and-hour class action against manufacturer and supplier of power products and services on
5 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
6 motion for class certification and certified a class. On August 27, 2021, the court granted final
7 approval of the class action settlement. The San Diego County Superior Court Case Number is
8 37-2015-00025968-CU-OE-CTL.

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

13 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
14 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the
15 restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July
16 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The
17 Los Angeles County Superior Court Case Number is BC707670.

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

20 21. To date, Class Counsel have borne all the risks and costs of litigation and will not receive
21 any compensation until recovery is obtained in the Action. Lawyers *for* Justice, PC seeks reimbursement
22 of **\$1,734.08** in litigation costs and expenses incurred in the Action, as reflected in "**EXHIBIT A**" attached
23 hereto. These expenses were reasonable and necessary in the prosecution of the Action and to obtain the
24 Settlement.

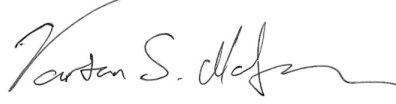
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1 I declare under penalty of perjury under the laws of the United States and the State of
2 California that the foregoing is true and correct. Executed on February 3, 2025, in Glendale,
3 California.

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6 Vartan Madoyan
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EXHIBIT A

LAWYERS *for* JUSTICE PC CASE COST DETAIL
Garcia vs. SESLOC Federal Credit Union

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/16/2021	U.S. Postmaster	Postage	\$7.50
6/9/2022	Legal Document Server, Inc.	Attorney Service	\$111.61
6/9/2022	San Luis Obispo Superior Court	Complaint Filing Fee	\$435.00
6/9/2022	San Luis Obispo Superior Court	Complex Filing Fee	\$1,000.00
7/18/2022	Legal Document Server, Inc.	Attorney Service	\$15.50
9/16/2022	Legal Document Server, Inc.	Attorney Service	\$27.25
9/19/2022	Legal Document Server, Inc.	Attorney Service	\$15.50
9/19/2022	General Logistics Systems US, Inc.	Courier Service	\$22.65
9/26/2022	Legal Document Server, Inc.	Attorney Service	\$15.50
9/7/2023	U.S. Postmaster	Postage	\$8.77
9/7/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
Total:			<u>\$1,734.28</u>