

1 ZACK I. DOMB, SBN 265185
E-Mail zack@dombrauchwerger.com
2 DEVIN RAUCHWERGER, SBN 274234
E-Mail devin@dombrauchwerger.com
3 **DOMB & RAUCHWERGER LLP**
1055 East Colorado Blvd., Fifth Floor
4 Pasadena, California 91106
Telephone: (213) 537-9225
5

6 JOANNA GHOSH, SBN 272479
E-Mail: joanna@calljustice.com
7 ELIZABETH PARKER-FAWLEY, SBN 301592
E-Mail: elizabeth@calljustice.com
8 **LAWYERS for JUSTICE, PC**
450 N Brand Blvd, Ste 900
9 Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021
10

11 Attorneys for Plaintiff
Julia Blake and the Proposed Class
12

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF SAN DIEGO**

15 JULIA HUNTER, individually, and on behalf
of other members of the general public
16 similarly situated;

17 Plaintiff,

18 vs.

19 LASER ELECTRIC, INC., a California
corporation; and DOES 1 through 100,
20 inclusive,

21 Defendants.
22

Case No.: 37-2022-00039496-CU-OE-CTL

**DECLARATION OF ELIZABETH PARKER-
FAWLEY IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT**

Hearing Information:

Date: March 13, 2026
Time: 9:00 AM
Dept.: C-60
Judge: Hon. Matthew C. Braner

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27

I, Elizabeth Parker-Fawley, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of the State Bar of California, the California Lawyers Association, and the Los Angeles County Bar Association. I am a member of the Los Angeles County Bar Association's *Lawyers for Justice*, PC, attorneys of record for Plaintiff Julia Blake (formerly known as Julia Hunter "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.

EXPERIENCE AND ADEQUACY OF LAWYERS for JUSTICE, PC

2. 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 on 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. Below is a summary of the experience and qualifications of attorneys at Lawyers *for* Justice, PC (additional staff have also worked on the matter).

3. Edwin Aiwezian is the 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 education and 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

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

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

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

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

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

4 6. I am the Senior Director of Litigation at Lawyers for Justice, PC. I earned my Bachelor of
5 Arts in History at Chapman University in 2011 and my Juris Doctor from the UCLA School of Law in
6 2014. In December 2014, I obtained a license to practice law from the California State Bar. I am admitted
7 to practice in all courts in the State of California, as well as the Central, Southern, Northern, and Eastern
8 District Courts of California and the Ninth Circuit Court of Appeal. Since December 2014, I have worked
9 at Lawyers for Justice, PC, and my practice has almost exclusively focused on the prosecution of
10 employment class actions and representative actions, handling cases in all stages of litigation from initial
11 pleadings to assisting with class action trial matters, attending mediations, and preparing class action
12 settlements. I oversee approximately twenty-five attorneys working on hundreds of employment class
13 actions and representative actions and provided internal training for our litigation practice group and post-
14 bar law clerks. I review and advise attorneys on work product and practices, provide training, and
15 supervise cases from their inception to final accounting. I am a member of the California Lawyers
16 Association Labor & Employment Group.

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

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

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

25 b) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
26 and-hour class action against a national retailer of household items involving allegations of
27 misclassification of the "Assistant Store Manager" position. On October 28, 2010, the court granted

1 final approval of the class action settlement. The Los Angeles County Superior Court Case Number is
2 BC413498.

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

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

12 e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-
13 hour class and PAGA representative action against a bank, involving allegations of misclassification of
14 the “Assistant Branch Manager” position. On August 27, 2013, the court granted final approval of the
15 class and PAGA representative action settlement. The Kern County Superior Court Case Number is S-
16 1500-CV-273194-LHB.

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

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

27 h) LFJ, in association with co- counsel therein, represented the plaintiff in a wage-

1 and-hour class and PAGA representative action against a national retailer of household items, on behalf
2 of hourly-paid or non-exempt employees. On May 27, 2015, the court granted final approval of the class
3 and PAGA representative action settlement. The San Francisco County Superior Court Case Number is
4 CGC-13-532344.

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

10 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
11 and-hour class and PAGA representative action against a national retailer of upscale hardware and home
12 furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted final approval of
13 the class and PAGA representative action settlement. The Los Angeles County Superior Court Case
14 Numbers are BC516795 and JCCP4794, and the Judicial Council Coordination Proceeding Number is
15 4794.

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

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

26 m) LFJ represented the plaintiff in a PAGA representative action against a real estate
27 and property management company, on behalf of non-exempt employees. On November 4, 2016, the

1 court granted approval of the PAGA representative action settlement. The Orange County Superior Court
2 Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

12 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative action,
13 successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer's
14 motion to compel arbitration, which resulted in a published opinion by the California Court of Appeal in
15 favor of employees. *Roberto Betancourt v. Prudential Overall Supply* (Cal. App. 4th Dist., Mar. 7, 2017)
16 9 Cal.App.5th 439, review denied, cert. denied (U.S. Supreme Court Docket No. 17-254). The Riverside
17 County Superior Court Case Numbers are RIC1503952 and RICJCCP5046, and the Judicial Council
18 Coordination Proceeding Number is 5046.

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

23 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
24 and-hour class and PAGA representative action against a manufacturer of food service industry supplies
25 on behalf of non-exempt employees. On April 14, 2017, the court granted final approval of the class and
26 PAGA representative action settlement. The Orange County Superior Court Case Number is 30-2015-
27 00810013-CU-OE-CXC.

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

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

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

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

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

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

26 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
27 and-hour class and PAGA representative action against a bank on behalf of non-exempt employees.

1 On December 11, 2017, the court granted final approval of the class and PAGA representative action
2 settlement. The Los Angeles County Superior Court Case Number is BC569646.

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

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

12 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-
13 hour class action against a container manufacturer, on behalf of non-exempt employees. On October 15,
14 2018, the court granted the plaintiff's motion for class certification. The Tulare County Superior Court
15 Case Number is VCU264528.

16 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative
17 action against a behavioral health service provider on behalf of non-exempt employees. On November
18 13, 2018, the court granted final approval of the class and PAGA representative action settlement. The
19 Alameda County Superior Court Case Number is RG16811450.

20 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a PAGA
21 representative action against a global provider of products and services to the energy industry, on behalf
22 of hourly-paid and non-exempt employees. On November 19, 2018, the court granted approval of the
23 PAGA representative action settlement. The Kern County Superior Court Case Number is S-1500-CV-
24 280215-SDC.

25 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-
26 hour class action against a parking company on behalf of non-exempt employees. On September 3, 2019,
27 the court granted the plaintiff's motion for class certification and certified a class. The Santa Clara

County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding Number is 4886.

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

gg) 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 apparel and fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a notable decision from the California Supreme Court clarifying the law regarding PAGA claims, *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval of the PAGA representative action settlement. The San Diego County Superior Court Case Number is 34-2015-00175330.

jj) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class and PAGA representative action against a large national drug testing laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the plaintiff's motion for class

certification and certified a class. The San Diego County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

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

mm) 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.

nn) 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.

SUMMARY OF WORK PERFORMED

8. Several attorneys at Lawyers for Justice, PC have worked on this matter since the inception of Plaintiff's claims. Lawyers for Justice, PC and Domb & Rauchwerger LLP (collectively referred to as "Class Counsel") have worked cooperatively to achieve a global settlement resolution of the claims filed by Plaintiff.

1 9. On October 3, 2022, Plaintiff filed the above-entitled civil complaint alleging ten causes
2 of action for: (1) failure to pay overtime pursuant to Labor Code sections 510 and 1198; (2) failure to
3 provide meal period premiums in violation of sections 226.7 and 512(a); (3) failure to provide rest period
4 premiums in violation of section 226.7; (4) failure to pay minimum wages pursuant to sections 1194, 1197,
5 and 1197.1; (5) failure to timely pay wages upon termination in violation of sections 201 and 202; (6)
6 failure to timely pay wages during employment in violation of section 204; (7) failure to provide accurate
7 and itemized wage statements in violation of section 226(a); (8) failure to keep requisite payroll records
8 in violation of section 1174(d); (9) failure to reimburse business expenses in violation of sections 2800
9 and 2802; and (10) violations of California Business and Professions Code §§ 17200, et seq. On September
10 7, 2023, Plaintiff submitted a letter to the Labor and Workforce Development Agency alleging various
11 violations of the California Labor Code. On September 11, 2024, the Parties submitted a Stipulation for
12 Leave to File Plaintiff's First Amended Complaint ("FAC"), which deemed the complaint filed as of the
13 date the Court signed the order on September 20, 2024. (The FAC is the "Operative Complaint").

14 10. My office investigated the veracity, strength, and scope of the claims, and worked on
15 preparing Plaintiff's action for class certification and trial, prior to reaching a settlement in this action.
16 Plaintiff's action has involved extensive and ongoing investigations, research, and informal discovery into
17 legal and factual issues. My office obtained information from Plaintiff, reviewed and analyzed a volume
18 of information, documents, and data obtained from Plaintiff, Defendant, and other sources, researched
19 applicable law, and undertook analyses and calculations of the value of claims, damages, and penalties
20 exposure. My office requested and received a volume of data for purposes of the mediation, including
21 timekeeping and payroll data for class members, along with relevant policies, agreements, and other
22 documents relevant to the litigation. My office met and conferred with Defendant's counsel on numerous
23 occasions, e.g., to discuss issues relating to the pleadings, case management, formal and informal
24 discovery and data, and production of information, documents, and data in the course of litigation and
25 mediation. Other work that my office performed included, and was not limited to, case strategy and
26 analysis; drafting, reviewing, and revising pleadings; case management; claims assessment and
27 evaluation; and preparing for and attending court proceedings, mediation, and settlement negotiations.

1 11. The parties engaged in formal discovery. Prior to mediation, my office propounded Special
2 Interrogatories (Sets One and Two), Form Interrogatories – General (Set One), and Requests for
3 Production of Documents (Set One). My office engaged in meet and confer efforts with Defendant on
4 numerous occasions, resulting in the production of hundreds of pages of documents. In addition, Plaintiff
5 conducted the depositions of Defendant's' persons most knowledgeable regarding Defendant's
6 organizational structure and wage and hour practices: Denise Hartnett, Emily Hartnett, and Jack Larabee.

7 12. As outlined herein, the parties have conducted significant investigation and informal
8 discovery during the course of litigation and mediation. Prior to the first day of mediation, Defendants
9 provided our offices with a sampling of timekeeping and pay data for approximately 20% of the
10 Class. We also informally requested and received further class data for purposes of the mediation,
11 including the number of Class Members, total Workweeks worked by the Class Members during the Class
12 Period, applicable meal and rest period policies and practices, time keeping policies and practices,
13 timekeeping and pay records, applicable expense reimbursement policies and practices, and other
14 documents relevant to the litigation. Class Counsel analyzed hundreds of pages of information,
15 documents, and data obtained from Plaintiff, Defendant, and other sources. This information, documents,
16 and data provided a critical understanding of the nature of the work performed by class members,
17 timekeeping and payroll records for a significant sampling of class members, as well as Defendant's
18 operations and employment policies, practices, and procedures, and other employment records which were
19 used in analyzing liability, damages, and penalties valuation issues in connection with litigation, and
20 ultimately, in connection with the mediation and settlement negotiation process. Accordingly, sufficient
21 investigation and review of information has taken place in order for the parties to be adequately informed
22 of the nature and extent of the claims, and to enable all parties to fully evaluate the settlement for its
23 fairness, adequacy, and reasonableness.

24 13. In addition to the above referenced efforts, the Parties held numerous meetings and
25 informal conferences prior to the mediation wherein we exchanged information, additional class data, and
26 theories of the case. The Parties also submitted detailed mediation briefs, which outlined the Parties'
27 respective positions in the case.

1 14. On October 13, 2023, the Parties participated in a full-day mediation with the Honorable
2 Raul Ramirez (Ret.). Judge Ramirez was agreed to by the Parties based on his excellent skills and
3 experience as a mediator and Judge in wage-and-hour class actions such as this one. The Parties did not
4 resolve the matter at mediation; however, Judge Ramirez continued to assist the parties over the next
5 several months in helping to resolve the case. The Parties finally reached an agreement on March 22,
6 2024. Thereafter, in approximately April 2024, my office consulted with and associated in as co-counsel
7 the firm of Domb & Rauchwerger LLP to help facilitate moving the action towards approval and final
8 resolution, which led to the long-form Settlement Agreement that is now presented to the Court for
9 preliminary approval.

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

12 Executed on February 19, 2026 at Glendale, California.

13 

14 _____
Elizabeth Parker-Fawley

15
16
17
18
19
20
21
22
23
24
25
26
27