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Attorneys for Plaintiff Diana Rodriguez

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA**

DIANA RODRIGUEZ, 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.

VISITING NURSE & HOSPICE CARE, an
unknown business entity; VISITING NURSE
& HOSPICE CARE OF SANTA
BARBARA, a California corporation; VNA
HEALTH, an unknown business entity;
PERSONAL CARE SERVICES, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 22CV05104

Honorable Donna D. Geck
Department 4

CLASS ACTION

**DECLARATION OF DANIEL BASS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
COUNSEL FEES PAYMENT,
LITIGATION EXPENSES, AND CLASS
REPRESENTATIVE SERVICE PAYMENT**

Date: July 10, 2026
Time: 10:00 a.m.
Department: 4

Complaint Filed: December 21, 2021
FAC Filed: February 6, 2025
Trial Date: None Set

DECLARATION OF DANIEL BASS

I, Daniel Bass, 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 Diana Rodriguez (“Plaintiff”) and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. In the order dated February 20, 2026, the Honorable Donna D. Geck preliminarily approved the Class Action and PAGA Settlement and Release Agreement (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Visiting Nurse & Hospice Care of Santa Barbara, (“Defendant,”) (together with Plaintiff referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Diana Rodriguez as the representative of the Class (“Class Representative”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement and Hearing Date for Final Court Approval (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris”) 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 Fees Payment, litigation expenses, and Class Representative Service Payment (“Motion for Final Approval”), no Participating Class Member has objected to the Class Settlement, the contemplated request for Class Counsel Fees Payment, litigation expenses, Class Representative Service Payment, Administration Costs, or the allocation for the PAGA Penalties.

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WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in this matter since prior to its commencement on December 21, 2021.

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, meal and rest periods, 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 or 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 business expenses.

7. Collectively, 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, Class Members, and aggrieved employees timekeeping, payroll, and reimbursement data, Defendant's Employee Handbook and wage and hour policies (including, but not limited to, Defendant's Non-Work Related Activity Agreement, Professional Standard for Dress and Hygiene Policy, Overtime policy, Punctuality and Attendance policy, and Timekeeping Requirements), earning

1 statements, timecard information, company policy acknowledgments and forms (including, but not
2 limited to, Defendant's Statement of Acknowledgment of Updated Employee Handbook, Employee
3 Acknowledgement of Receipt of the Paid Sick Leave Policy, and status forms), internal memorandum,
4 job descriptions, and other operations and employment policies, practices, and procedures documents,
5 among other information and documents. Class Counsel had the opportunity to interview and
6 obtain information from Plaintiff and identify witnesses, and reviewed and analyzed a volume of
7 information, data, and documents obtained from Plaintiff, Defendant, and other sources. Class
8 Counsel developed liability, damages, violation, and penalties valuation models in the course of
9 litigation and in connection with the mediation and settlement negotiations, and met and
10 conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the
11 pleadings, case management, motion practice, formal and informal discovery, and the production
12 of information, documents, and data in the course of litigation and in connection with mediation
13 and settlement negotiations, and settlement. Other work performed by Class Counsel included,
14 and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or
15 revising the pleadings, motion-related papers, the mediation briefing and supporting materials,
16 and settlement documents; drafting and propounding multiple sets of formal written discovery
17 requests on Defendant and notices of depositions of Defendant's person(s) most qualified
18 designees; reviewing Defendant's responses and objections to written discovery requests and
19 deposition notices; and preparing for and attending court proceedings, mediation, and settlement
20 negotiations, among other tasks.

21 8. As outlined herein, the Parties have conducted significant investigation and
22 formal and informal discovery during the course of litigating this matter, mediation, and
23 extensive settlement negotiations. Class Counsel analyzed thousands of pages of information,
24 documents, and data obtained from Plaintiff, Defendant, and other sources that provided a
25 critical understanding of the nature of the work performed by the Class Members and Aggrieved
26 Employees, as well as Defendant's organizational structure and Defendant's operations and
27 employment policies, practices, and procedures. The information, documents, and data were used
28 in analyzing liability, damages, penalties, and other valuation issues in connection with all

1 phases of the litigation, and ultimately, in connection with the mediation and settlement
2 negotiations process. Class Counsel also performed significant research into the applicable law,
3 which is evolving as it relates to class certification, manageability, off-the-clock theory, regular
4 rate, rounding, meal and rest periods, representative PAGA claims and penalties, wage-and-hour
5 enforcement, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts
6 discovered.

7 9. After conducting significant investigation of the facts and law during the
8 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to
9 try to resolve the case. These efforts included participating in a mediation session conducted by
10 Henry Bongiovi, Esq., a well regarded mediator experienced in handling complex labor and
11 employment matters. During all settlement discussions, the Parties conducted their negotiations
12 at arm's length in an adversarial position. In the course of the mediation and settlement
13 negotiations, the Parties exchanged documents and data, and discussed various aspects of the
14 case, including and not limited to, the risks and delays of further litigation, the risks and
15 expenses to the Parties of proceeding with class certification, representative adjudication, and
16 trial; the law relating to class certification, manageability, off-the-clock theory, rounding, regular
17 rates of pay, meal and rest periods (including *inter alia*, on premises breaks), expense
18 reimbursements, recordkeeping and wage statement requirements, representative PAGA claims
19 and penalties, and wage-and-hour law and enforcement; Plaintiff's claims and allegations, and
20 Defendant's defenses thereto, as well as the evidence produced and analyzed; and the possibility
21 of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was
22 not easy. Defendant contended that individualized questions of fact predominate over any
23 common issues, and these issues would pose challenges to class certification and representative
24 adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class
25 certification prevail on the merits and, while Plaintiff and Class Counsel believed that they
26 would be able to obtain class certification and prevail at trial. With the aid of the mediator's
27 evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the
28 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.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$279,999.60, which is forty percent (40%) of the Gross Settlement Amount of \$699,999.00. 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 forty percent (40%) 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. 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 \$699,999.00 (with a Net Settlement Amount of at least \$374,499.40 to be paid to Participating Class Members and gross Individual Settlement Shares averaging approximately more than \$591.62), payment of \$3,750.00 to Aggrieved Employees (with Individual PAGA Payments averaging approximately \$10.86), and payment of \$11,250.00 to the State of California—support the percentage fee sought and the application of a lodestar multiplier.

12. 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 **299.30 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"**

1 is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services
2 provided by attorneys at Lawyers for Justice, PC and the time incurred by them in performing
3 those services. These hours include work done by several attorneys at Lawyers for Justice, PC.
4 Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had
5 litigation support personnel actively engaged in assisting with the prosecution of this matter.

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

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

24 14. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the
25 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
26 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC
27 is the attorney of record in well over a dozen employment-related putative class actions in both
28 state and federal courts in the State of California. Lawyers for Justice, PC is comprised of

1 attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General
2 Act (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly
3 every aspect of California wage and hour law, including payment of overtime and minimum
4 wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of
5 wages, provision of compliant wage statements, reimbursement of business expenses, executive,
6 administrative, and other overtime exemptions to the State of California and federal overtime
7 compensation requirements, PAGA claims, and sister statutes under federal law. During a
8 relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered
9 millions of dollars on behalf of thousands of individuals in California.

10 15. Edwin Aiwarzian is a Managing Partner and CEO of Lawyers for Justice, PC. He
11 received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a
12 Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
13 extensive formal training in dispute resolution and negotiation from the Straus Institute for
14 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
15 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
16 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
17 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
18 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
19 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
20 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
21 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
22 Appellate District. In December of 2004, he obtained a license to practice law from the
23 California State Bar. Since in or around October of 2008, through his work at Lawyers *for*
24 Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment
25 class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
26 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
27 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.
28 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he

1 has successfully litigated cases involving the executive, administrative, and other overtime
2 exemptions to the State of California and federal overtime compensation requirements. Under
3 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
4 contested motion practice in approximately sixteen (16) cases in the last decade, and litigated
5 over 1,000 class action or representative action cases.

6 16. Arby Aiwarzian is a Senior Partner of Lawyers *for* Justice, PC. He received his
7 Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum
8 laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From
9 approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
10 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
11 From approximately August 2008 to approximately December 2008, he served as a Judicial
12 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the
13 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
14 before all courts of the State of California and all United States District Courts in the State of
15 California. He has worked on many wage-and-hour class action and representative action cases,
16 taking the lead in taking and defending depositions, arguing motions, and attending mediations.
17 He has played an integral role in preparing matters for class certification, including and not
18 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
19 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
20 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
21 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
22 representative action cases have resulted in settlements that have been granted court approval.
23 He has handled over one hundred and fifty (150) mediations and worked on over two hundred
24 and fifty (250) class action or representative action cases which have resulted in settlement.

25 17. Joanna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a
26 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
27 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
28 Georgetown University Law Center in 2010. She is admitted to practice in California (since

2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, 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.5th 175. 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 Aiwarzian, and Arby Aiwarzian's supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

18. Brian J. St. John is a Member of Lawyers for Justice, PC. He received his Bachelor's degree from the University of California, San Diego in 2010 and earned his Juris Doctor degree from the University of California, Berkeley, School of Law in 2013. He was admitted to practice law in California in 2015. He is admitted to practice before all courts of the State of California and all federal district courts in the State of California. He has worked on many wage and hour class action and PAGA representative matters, and his work has included,

1 *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting,
2 negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice,
3 claims evaluation and analysis, and making court appearances. Prior to working at Lawyers *for*
4 Justice, PC, he spent several years working for a boutique employment and labor law firm
5 representing employers, and, in 2019 and 2020, he was employed as general counsel for a
6 DMHC licensed discount dental plan

7 19. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Science
8 degree in Psychology from Missouri State University in 2009, and a Juris Doctor degree from
9 Washington University in St. Louis, School of Law in 2012, where I served as a Senior Editor of
10 the Law Review and as a member of the Note Selection Committee. I am admitted to practice
11 before all courts in the State of California, and all U.S. District Courts in California. From 2014
12 through and including the present, my practice consisted almost exclusively of complex wage
13 and hour class action and PAGA action matters in California. I have worked at several plaintiffs'
14 side law firms, and started the employment practice at one of them. I have taken and defended
15 dozens of depositions and have successfully handled motion practice in class action and PAGA
16 cases regarding discovery (including and not limited to motions regarding class contact
17 information), class certification (both contested class certification and stipulated class
18 certification), dispositive motions, arbitration agreements, coordination, and intervention. I have
19 successfully handled a complex wage and hour class action and PAGA case at every step prior to
20 trial. I also successfully handled briefing on appeals, including employer efforts to compel
21 arbitration in *Jones v. UPS Supply Chain Solutions, Inc.*, California Court of Appeals for the
22 First District, Case No. A160726 (Cal. App. Jul 01, 2021) (unpublished decision). Further, I have
23 extensive experience with settlements of class actions and PAGA actions and have handled and
24 supervised this process in over fifty (50) cases.

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

26 20. To date, Class Counsel has borne all of the risks and costs of litigation and will
27 not receive any compensation until recovery is obtained in this matter. The Settlement provides
28 for reimbursement of litigation costs and expenses of up to \$15,000.00. Lawyers *for* Justice, PC

1 incurred \$15,251.74 in litigation costs and expenses for this matter, Lawyers *for* Justice, PC seeks
2 reimbursement of **\$15,000.00** in litigation costs and expenses, as reflected in “**EXHIBIT 2**”
3 attached hereto. These expenses were reasonable and necessary in the prosecution of the matter
4 and to obtain the Settlement. Accordingly, Lawyers *for* Justice, PC seeks reimbursement of the
5 full **\$15,000.00** in litigation costs and expenses allocated by the Settlement.

6 **CLASS REPRESENTATIVE SERVICE PAYMENT TO PLAINTIFF**

7 21. In recognition of her efforts and work spearheading the prosecution of this matter
8 and serving as the Class Representative, as well as her broader individual waiver and release of
9 claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 6.1.1 of the
10 Settlement Agreement), the Settlement provides for a Service Payment, in the amount of up to
11 \$7,500.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing her
12 employment with Class Counsel, gathering and providing relevant documents and information,
13 and providing facts and evidence to support the prosecution of the claims. Plaintiff was available
14 whenever Class Counsel needed her and actively tried to obtain and provide information that
15 would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive
16 \$7,500.00 as a reasonable Class Representative Service Payment for her broader waiver and
17 release of claims and services performed in this matter, in addition to her individual settlement
18 payment(s).

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

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

23 Executed this 16th day of June 2026, at Glendale, California.

24 

25 Daniel Bass
26
27
28

EXHIBIT 1

DIANA RODRIGUEZ V. VISITING NURSE & HOSPICE CARE, ET AL.
Santa Barbara County Superior Court, Case No. 22CV05104

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Diana Rodriguez (“Plaintiff”)	14.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	15.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Action Claims, Conduct Legal Research and Analysis Regarding Class Claims, and Draft, Review, and/or Revise Plaintiff’s Class Action Complaint for Damages (filed on December 21, 2022)	7.50
Review Court’s Minute Order Re: Transfer Action to Correct Court Division (filed on December 28, 2022)	0.20
Review Court’s Order and Notice of Case Assignment; Notice of Case Management Conference (filed on December 28, 2022)	0.20
Review and Analyze Defendants Visiting Nurse & Hospice Care, Visiting Nurse & Hospice Care of Santa Barbara, VNA Health, and Personal Care Services (collectively, “Defendants”) Answer to Plaintiff’s Class Action Complaint for Damages (served on February 22, 2023)	1.30
Review Defendants’ Declaration of Prejudice CCP 170.6 (Peremptory Challenge) (served on March 2, 2023)	0.20

Review Court's Order & Notice of Case Re-Assignment; Notice of Rescheduled Hearing/CMC (filed on March 3, 2023)	0.30
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Stipulated Protective Order (submitted on April 10, 2023)	1.40
Review Court's Protective Order (filed on April 11, 2023)	0.20
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on April 27, 2023)	0.80
Draft, Review, and/or Revise Plaintiff's Notice of Posting Jury Fees (filed on April 27, 2023)	0.10
Review Defendants' Case Management Statement (served on May 1, 2023)	0.30
Review Court's Minute Order Re: Case Management Conference (filed on May 12, 2023)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on November 15, 2023)	1.10
Review Court's Order to Continue Case Management Conference (filed on November 17, 2023)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on November 30, 2023)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Stipulated Protective Order (submitted on April 23, 2024)	0.80
Review Court's Protective Order (filed on April 26, 2024)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on May 3, 2024)	0.10
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on May 16, 2024)	0.80

Review Defendants' Case Management Statement (served on May 20, 2024)	0.30
Review Court's Minute Order Re: Case Management Conference (filed on May 31, 2024)	0.20
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on August 29, 2024)	0.70
Review Defendants' Case Management Statement (served on August 29, 2024)	0.30
Review Court's Minute Order Re: Case Management Conference (filed on September 13, 2024)	0.10
Draft, Review, and/or Revise Notice of Settlement of Entire Case (filed on October 7, 2024)	0.40
Draft, Review, and/or Revise Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on February 6, 2025); Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order for Leave to File First Amended Class Action Complaint (submitted on January 24, 2025)	4.10
Review Court's Order for Leave to File First Amended Class Action Complaint (filed on January 27, 2025)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on January 28, 2025)	0.10
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 28, 2025)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Errata and Correction to Plaintiff's Joint Stipulation and [Proposed] Order for Leave to File First Amended Class Action Complaint (submitted on February 5, 2025)	0.40
Appearances	

Prepare for and Remotely Attend Case Management Conference (May 12, 2023)	0.70
Prepare for and Remotely Attend Case Management Conference (May 31, 2024)	0.60
Prepare for and Remotely Attend Case Management Conference (September 13, 2024)	0.50
Prepare for and Remotely Attend Motion for Preliminary Approval of Class Action Settlement (February 6, 2026)	1.10
Discovery and Deposition	
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Diana Rodriguez (served on July 29, 2022)	1.80
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Diana Rodriguez (served on September 26, 2022)	3.60
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Personal Care Services (served on February 24, 2023)	4.50
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Visiting Nurse & Hospice Care of Santa Barbara (served on February 24, 2023)	3.10
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Visiting Nurse & Hospice Care (served on February 24, 2023)	3.10
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant VNA Health (served on February 24, 2023)	3.10

Review and Analyze Defendants' Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on May 1, 2023)	3.80
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Defendant VNA Health's Person Most Knowledgeable and Requests for Production of Documents (noticed for May 29, 2024) (served on April 18, 2024)	1.40
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Defendant Visiting Nurse & Hospice Care's Person Most Knowledgeable and Requests for Production of Documents (noticed for May 30, 2024) (served on April 18, 2024)	1.20
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Defendant Visiting Nurse & Hospice Care of Santa Barbara's Person Most Knowledgeable and Requests for Production of Documents (noticed for May 31, 2024) (served on April 18, 2024)	1.20
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Defendant Personal Care Service's Person Most Knowledgeable and Requests for Production of Documents (noticed for June 3, 2024) (served on April 18, 2024)	1.20
Draft, Review, and/or Revise Plaintiff's First Amended Notice of Deposition of Defendant Visiting Nurse & Hospice Care of Santa Barbara's Person Most Knowledgeable and Requests for Production of Documents (noticed for August 28, 2024) (served on July 23, 2024)	0.90
Draft, Review, and/or Revise Plaintiff's Second Amended Notice of Deposition of Defendant Visiting Nurse & Hospice Care of Santa Barbara's Person Most Knowledgeable and Requests for Production of Documents (noticed for October 29, 2024) (served on August 22, 2024)	0.60
Letters and Correspondence	

Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Diana Rodriguez under the Private Attorneys General Act (served on September 6, 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, Defendants, 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 March 25, 2024)	36.50
Attend Mediation Session (March 26, 2024; Zoom Video Conference)	9.50
Engage in Additional Investigation and Claim Evaluation, and Conduct Additional Settlement Discussions with Defendants' Counsel and Mediator (April 2024 – September 2024)	14.50
Review and/or Analyze Mediator's Proposal (issued September 9, 2024; accepted September 13, 2024)	1.50
Draft, Review, Revise, Negotiate, and/or Finalize Class Action and PAGA Settlement and Release Agreement (executed on April 25, 2025) and Draft, Review, and/or Revise Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	16.50
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	6.50
Law and Motion	

Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Tara Zabehe in Support Thereof, Declaration of Plaintiff Diana Rodriguez in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on September 11, 2025)	18.50
Review Court's Tentative Ruling Re: Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on February 5, 2026)	1.10
Draft, Review, and/or Revise Declaration of Daniel Bass in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on February 5, 2026)	1.80
Review Court's Minute Order Re: Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on February 6, 2026)	0.20
Draft, Review, and/or Revise [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on February 13, 2026)	0.30
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on February 20, 2026)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on February 24, 2026)	0.10
Review Declaration of Settlement Administrator, Research, Review and Draft Plaintiff's Notice of Motion and Motion for Final Approval of Class Action Settlement and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Daniel Bass in Support Thereof, Declaration of Plaintiff Diana Rodriguez in Support Thereof, and [Proposed] Judgment and Order Granting Final Approval of Class Action and PAGA Settlement	20.50
Total Hours:	299.30

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Rodriguez vs. Visiting Nurse & Hospice Care, et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/29/2022	U.S. Postmaster	Postage	\$7.85
9/26/2022	ProLegal	Attorney Service	\$411.54
12/28/2022	Legal Document Server, Inc.	Attorney Service	\$17.00
12/28/2022	Legal Document Server, Inc.	Attorney Service	\$113.86
12/28/2022	Santa Barbara Superior Court	Complex Filing Fee	\$1,000.00
12/28/2022	Santa Barbara Superior Court	Complaint Filing Fee	\$435.00
1/20/2023	ProLegal	Attorney Service	\$486.70
2/19/2023	Legal Document Server, Inc.	Attorney Service	\$34.00
2/24/2023	General Logistics Systems US, Inc.	Courier Service	\$26.19
4/27/2023	Legal Document Server, Inc.	Attorney Service	\$17.20
4/28/2023	Legal Document Server, Inc.	Attorney Service	\$27.63
4/28/2023	Santa Barbara Superior Court	Jury Fee	\$150.00
8/25/2023	General Logistics Systems US, Inc.	Courier Service	\$55.15
9/6/2023	U.S. Postmaster	Postage	\$8.77
9/6/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
11/15/2023	Legal Document Server, Inc.	Attorney Service	\$18.59
11/15/2023	Santa Barbara Superior Court	Stipulation & Order Fee	\$20.00
11/30/2023	Legal Document Server, Inc.	Attorney Service	\$17.10
2/22/2024	Henry Bongiovi	Mediation Fee	\$6,000.00
4/16/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
4/23/2024	Legal Document Server, Inc.	Attorney Service	\$18.59
4/23/2024	Santa Barbara Superior Court	Stipulation & Order Fee	\$20.00
5/3/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
5/16/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
8/29/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
10/7/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
1/27/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
1/28/2025	Legal Document Server, Inc.	Attorney Service	\$36.40
2/5/2025	Legal Document Server, Inc.	Attorney Service	\$31.15
2/7/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
3/10/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
3/12/2025	Legal Document Server, Inc.	Attorney Service	\$36.40
7/18/2025	CPAnalytics	Data Analysis	\$5,862.50
9/11/2025	Legal Document Server, Inc.	Attorney Service	\$30.20
9/11/2025	Santa Barbara Superior Court	Motion Fee	\$90.00
2/6/2026	Legal Document Server, Inc.	Attorney Service	\$24.94
2/13/2026	Legal Document Server, Inc.	Attorney Service	\$24.94
2/25/2026	Legal Document Server, Inc.	Attorney Service	\$24.94
Total:			<u>\$15,251.74</u>