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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

LOLITA GALVAN, 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.

INLAND RESPITE, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: CVRI2103857

Honorable Harold W. Hopp
Department 1

CLASS ACTION & PAGA

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS FEES AND COSTS, AND
CLASS REPRESENTATIVE
ENHANCEMENT AWARD**

Date: December 19, 2025
Time: 8:30 a.m.
Department: 1

Complaint Filed: August 24, 2021
FAC Filed: December 16, 2024
Trial Date: None Set

DECLARATION OF VARTAN MADOYAN

I, Vartan Madoyan, 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 Lolita Galvan (“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. On July 7, 2025, in Department 1 of the above-entitled Court, the Honorable Harold W. Hopp preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Inland Respite Inc., (“Defendant,”) (together with Plaintiff, referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Lolita Galvan 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 (“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 and PAGA Settlement, Attorney’s Fees and Costs, and Class Representative Enhancement Award (“Motion for Final Approval”), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Attorney’s Fees and Costs, Class Representative Enhancement Award, and Settlement Administration Costs, or the allocation for the PAGA Amount.

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WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above captioned action, which was filed on August 24, 2021, since prior to its commencement.

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, including 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 later PAGA 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 within the State of California who performed for Defendant at any time during the Class Period, 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 a large volume of information, documents, and data throughout the course of the litigation and in connection with multiple mediation sessions and settlement negotiations. The volume of records and documents that Class Counsel reviewed and analyzed included, and were not limited to: employment records of Plaintiff, a detailed sampling of Plaintiff's, Class Members', and aggrieved employees' timekeeping, and payroll data, Defendant's Employee Handbook(s) and wage and hour policies (including, but not limited to,

1 Defendant's California Meal Periods Policy and Rest Periods Policy, Overtime Policy, Cell
2 Phone Policy, Dress Code Policy, and Timekeeping Policy), earning statements, company policy
3 acknowledgments and forms (including, but not limited to, Defendant's Handbook/Policy
4 Employee Acknowledgment, and On-Duty Meal Period Agreement), internal memorandum, job
5 descriptions, and other operations and employment policies, practices, and procedures
6 documents, among other information and documents. Class Counsel had the opportunity to
7 interview and obtain information from Plaintiff and percipient witnesses, and reviewed and
8 analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and
9 other sources. Class Counsel developed liability, damages, violation, and penalties valuation
10 models in the course of litigation and in connection with the mediations and settlement
11 negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to
12 discuss issues relating to the pleadings, case management, motion practice, formal and informal
13 discovery, and the production of information, documents, and data in the course of litigation and
14 in connection with multiple mediation sessions and settlement negotiations, and ultimately the
15 settlement. Other work performed by Class Counsel included, and was not limited to, case
16 strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-
17 related papers, the mediation briefings and supporting materials, and settlement documents;
18 drafting and propounding multiple sets of formal written discovery requests on Defendant
19 (Requests for Production (Set One), Special Interrogatories (Sets One and Two), Form
20 Interrogatories (Set One), Request For Production (Set One)) and notices of depositions of
21 Defendant's persons most knowledgeable designees; reviewing Defendant's responses and
22 objections to written discovery requests and deposition notices; and preparing for and attending
23 court proceedings, two mediations, and settlement negotiations, among other tasks.

24 8. As outlined herein, the Parties have conducted significant investigation and
25 formal and informal discovery during the course of litigating this matter, mediations, and
26 extensive settlement negotiations. Class Counsel analyzed thousands of pages of information,
27 documents, and data obtained from Plaintiff, Defendant, and other sources that provided a
28 critical understanding of the nature of the work performed by the Class Members and PAGA

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

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

1 prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that this
2 matter was well-suited for settlement given the legal issues relating to Plaintiff's principal
3 claims, as well as the costs and risks to the Parties that would attend further litigation. These
4 risks of further litigation include, and are not limited to, a determination that the claims are
5 unsuitable for class treatment, class de-certification after certification of a class, allowing a jury
6 to decide the claims asserted in this matter, and the real possibility of no monetary recovery after
7 years of litigation.

8 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks
9 attorneys' fees in the amount of \$1,496,250.00, which is thirty-five percent (35%) of the Total
10 Settlement Amount of \$4,275,000.00. Pursuant to the contingency-fee agreement entered into by
11 and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least
12 thirty-five percent (35%) of the recovery.

13 11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
14 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
15 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
16 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
17 has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order
18 to devote their time and efforts to this case. The nature of the work performed, skill exercised,
19 and the outcome in this matter which involves an outstanding monetary recovery involving an
20 Total Settlement Amount of \$4,275,000.00 (with a Net Settlement Amount of approximately at
21 least \$2,512,649.54 to be paid to Settlement Class Members (with Individual Settlement
22 Payments averaging approximately more than \$357.11), payment of \$53,437.50 to PAGA Group
23 Members (with Individual PAGA Payment averaging approximately \$12.38) and payment of
24 \$160,312.50 to the State of California)—support the percentage fee sought.

25 12. While not necessarily required to be demonstrated because a percentage fee is
26 proper for this settlement, it should be noted that Class Counsel has incurred many hours of work
27 in connection with prosecuting this matter such that the award of attorneys' fees is also justified
28 under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **441.90**

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

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

24 **EXPERIENCE AND ADEQUACY OF**

25 **LAWYERS *for* JUSTICE, PC**

26 14. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
27 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
28 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC

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

15. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert

witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers for Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000 class action or representative action cases.

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

17. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of

Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) 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 Aiwasian, and Arby Aiwasian'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. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree in Economics from the University of California, San Diego in 2007, and a Juris Doctor degree from Loyola Law School in 2011, graduating Cum Laude and Order of the Coif honors. I am admitted to practice before all courts in the State of California and all U.S District Courts in

California. I externed for the Honorable Victoria S. Kaufman of the United States Bankruptcy Court, Central District of California, from June 2009 to August 2009. I externed for the Honorable Gary A. Fess of the United States District Court, Central District of California, from January 2010 to May 2010. From 2011, through and including the present, my practice consisted almost exclusively of complex wage and hour class action and PAGA action matters in California. From October 2011 to June 2012, I was an associated at Littler Mendelson's Century City, California office working for one of the largest employer-side labor and employment law firms in the United States. From July 2013 to March 2014, I was an Associate at Sheppard, Mullin, Richter & Hampton's Century City, California office. From March 2014 to July 2023, I worked as an Associate and then as Counsel at Baker Hostetler LLP's Los Angeles office. From August 2023 to the present, I have been a Member of Lawyers for Justice, PC. I have taken and defended dozens of depositions and have successfully handled motion practice in class action and PAGA cases regarding discovery (including and not limited to motions regarding class contact information), dispositive motions, arbitration agreements, coordination, and intervention. I have successfully handled a complex wage and hour class action and PAGA case through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange County Superior Court, Case No. 30-2013-00692890. I also successfully handled briefing on appeal regarding employer efforts to compel arbitration. *Titlemax of Cal. V. Pena*, California Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28, 2023)(unpublished decision). Further, I have extensive experience with settlements of class actions and PAGA actions and have handled and supervised this process in over one hundred (100) cases.

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS FOR JUSTICE, PC

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to \$15,000.00. Lawyers for Justice, PC seeks reimbursement of **\$9,350.46** in litigation costs and expenses incurred in the matter, as

1 reflected in “EXHIBIT 2” attached hereto. These expenses were reasonable and necessary in
2 the prosecution of the matter and to obtain the Settlement.

3 **CLASS REPRESENTATIVE ENHANCEMENT AWARD TO PLAINTIFF**

4 20. In recognition of her efforts and work spearheading the prosecution of this matter
5 and serving as the Class Representative, as well as her broader individual waiver and release of
6 claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 32 of the
7 Settlement Agreement), the Settlement provides for a Class Representative Enhancement Award,
8 in the amount of up to \$15,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and
9 effort discussing her employment with Class Counsel, gathering and providing relevant
10 documents and information, and providing facts and evidence to support the prosecution of the
11 claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain
12 and provide information that would help obtain a recovery in this matter, and ultimately her
13 efforts led to a very substantial settlement sum. Accordingly, it is appropriate for Plaintiff to
14 receive \$15,000.00 as a reasonable Class Representative Enhancement Award for her broader
15 waiver and release of claims and services performed in this matter.

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

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

20 Executed this 25th day of November 2025, at Glendale, California.

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22 Vartan Madoyan
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EXHIBIT 1

LOLITA GALVAN V. INLAND RESPITE, INC.,
Riverside County Superior Court Case No. CVRI2103857

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Lolita Galvan (“Plaintiff”)	29.20
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses to, <i>Inter Alia</i> , Evaluate Class Suitability	18.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Action Claims, Conduct Legal Research and Analysis Regarding Class Claims, and Draft Plaintiff’s Class Action Complaint for Restitution (filed on August 24, 2021)	8.10
Review Court’s Notice of Department Assignment and Notice of Case Management Conference (served on August 25, 2021)	0.10
Review Defendant Inland Respite, Inc.’s (“Defendant”) Notice to Appear Telephonically at Case Management Conference (served on October 21, 2021)	0.10
Review Court’s Minute Order Re: Complex Designation, Notice of Order to Show Cause, and Notice of Status Conference Hearing (served on October 22, 2021)	0.30
Review Court’s Class Action Case Management Order #1 (served on November 4, 2021)	0.60
Review and Analyze Defendant’s Answer to Plaintiff’s Class Action Complaint for Restitution (served on January 11, 2022), and Research Affirmative Defenses in Defendant’s Answer	1.60
Meet and Confer with Defendant’s Counsel, and Draft, Review, and/or Revise Joint Status Report (filed on January 14, 2022)	1.50

Draft Declaration of Harry Erganyan in Response to Order to Show Cause (filed on January 14, 2022)	1.20
Review Court's Notice of Telephonic Appearance (served on January 18, 2022)	0.10
Review Court's Minute Order Re: Status Conference (served on January 21, 2022)	0.10
Review Court's Notice of Department Reassignment for All Purposes (served on April 29, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Report (filed on May 17, 2022)	1.40
Review Court's Minute Order Re: Status Conference Hearing (served on May 24, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; [Proposed] Order (filed on April 13, 2023)	1.10
Review Court's Order to Continue Status Conference and Notice of Court's Ruling (served on April 18, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Report (filed April 18, 2023)	1.10
Review Notice of Court's Ruling (served on April 18, 2023)	0.10
Review Minute Order Re: Status Conference Hearing (served on April 26, 2023)	0.10
Review Court's Notice of Reassignment of Department for All Purposes (served on May 16, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; [Proposed] Order (submitted on August 10, 2023)	1.10
Review Court's Order to Continue Status Conference and Notice of Status Conference Hearing (served August 15, 2023)	0.10
Draft Notice of Entry of Judgment or Order (filed on August 15, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on November 13, 2023)	0.60
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Vacate Status Conference; [Proposed] Order (submitted on November 13, 2023)	0.90

Review Court's Notice of Court Ruling (served on November 15, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; [Proposed] Order (submitted on November 17, 2023)	0.90
Review Court's Order to Continue Status Conference (served on November 27, 2023)	0.10
Draft Notice of Entry of Judgment or Order (filed on November 28, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft. Review, and/or Revise Joint Status Conference Statement (filed on April 26, 2024)	0.80
Review Court's Minute Order Re: Status Conference (served on May 3, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on July 29, 2024)	0.80
Review Court's Minute Order Re: Status Conference (served on August 2, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on October 28, 2024)	0.80
Review Court's Minute Order Re: Status Conference (served on November 1, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order (submitted on December 10, 2024), and Research, Draft, Review, and/or Revise First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, et seq. (filed on December 16, 2024)	6.50
Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (served on December 13, 2024)	0.10
Draft Notice of Entry of Judgment or Order (filed on December 16, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on December 31, 2024)	0.80
Review Court's Minute Order Re: Status Conference (served on January 7, 2025)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on February 4, 2025)	0.80
Review Court's Minute Order Re: Status Conference (served on February 6, 2025)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on March 3, 2025)	0.80
Review Court's Minute Order Re: Status Conference (served on March 7, 2025)	0.10
Review Notice of Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on April 24, 2025)	0.10
Review Defendant's Notice of Remote Appearance (served on May 9, 2025)	0.10
Review Court's Minute Order Re: Status Conference (served on June 11, 2025)	0.10
Draft Notice of Entry of Judgment or Order (filed on July 8, 2025)	0.10
Appearances	
Prepare for and Remotely Attend Hearing on Case Management Conference (May 24, 2022)	0.50
Prepare for, Travel to/from, and Attend Hearing on Case Management Conference (April 26, 2023)	5.80
Prepare for, and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (May 12, 2025)	1.60
Prepare for, and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (June 11, 2025)	0.40
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Lolita Galvan (served on January 12, 2021)	1.90
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Lolita Galvan (served on February 10, 2021)	1.50
Draft Second Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Lolita Galvan (served on March 11, 2021)	1.30

Draft Third Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Lolita Galvan (served on April 22, 2021)	1.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Lolita Galvan	2.90
Draft, Review, and/or Revise Letter Regarding Proposed <i>Belair-West</i> Notice and Allocation of Costs (served on April 13, 2022)	1.40
Draft, Review, and/or Revise Plaintiff's Special Interrogatories (Set One) to Defendant (served on April 13, 2022)	1.10
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on November 9, 2023)	4.40
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for December 5, 2023; Organizational Structure) (served on November 9, 2023)	1.60
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for December 7, 2023; Wage and Hour Practices) (served on November 9, 2023)	1.90
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Lolita Galvan Under the Private Attorneys General Act (served on September 6, 2023)	4.50
Draft Correspondence to, Meet and Confer with, and/or Respond to Correspondence from Defendant's Counsel	28.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation Scheduled for March 10, 2023 (Rescheduled)	24.50
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation Scheduled for July 31, 2023 (Rescheduled)	28.50

Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to October 31, 2023 Mediation	86.50
Prepare for First Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Exhibits in Support of the Mediation Brief, and Performing Damages and Penalties Analyses and Calculations (submitted on October 24, 2023)	38.50
Prepare for and Attend Pre-Mediation Conference Call with Mediator (October 27, 2023)	1.50
Attend First Mediation Session (October 31, 2023; Zoom Video Conference)	20.40
Review and Analyze Financial Document(s) Produced by Defendant (served October 31, 2025)	2.50
Engage in Additional Settlement Discussions and Investigate Defendant's Financial Circumstances and Condition	8.50
Attend Second Mediation Session (November 9, 2023; Zoom Video Conference)	4.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action and PAGA Settlement (fully executed on December 21, 2023)	7.30
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on March 12, 2025), and Draft Notice of Class Action Settlement	16.90
Draft, Review, Revise, Negotiate, and Finalize Addendum to Joint Stipulation of Class Action and PAGA Settlement and Release (executed on May 29, 2025), and Revise Notice of Class Action Settlement	1.60
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	7.50
Law and Motion	
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Plaintiff Lolita Galvan in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on April 18, 2025)	22.30
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (published on May 11, 2025)	0.20

Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on May 12, 2025)	0.20
Draft Declaration of Vartan Madoyan in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement; Review Declaration of Denise Islas (Simpluris) in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on June 4, 2025)	4.10
Review Declaration of April L. Szabo in Support of Motion for Preliminary Approval (served on June 4, 2025)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on June 9, 2025)	0.20
Draft, Review, and/or Revise [Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (submitted on June 10, 2025)	0.80
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (published on June 10, 2025)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement and Court's Minute Order Re: Status Conference Hearing (filed on June 11, 2025)	0.20
Draft, Review, and/or Revise [Further Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (submitted on June 25, 2025)	0.60
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on July 7, 2025)	0.20
Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Class Representative Enhancement Award; Memorandum of Points and Authorities in Support Thereof, Declaration of Vartan Madoyan in Support Thereof, and [Proposed] Final Approval Order and Judgment	21.50
Total Hours:	441.90

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Galvan vs. Inland Respite, Inc. (Class + PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/12/2021	U.S. Postmaster	Postage	\$6.95
2/10/2021	U.S. Postmaster	Postage	\$7.20
3/11/2021	U.S. Postmaster	Postage	\$7.20
4/22/2021	U.S. Postmaster	Postage	\$7.85
8/25/2021	Legal Document Server, Inc.	Attorney Service	\$64.70
8/25/2021	Riverside Superior Court	Complex Filing Fee	\$1,000.00
8/25/2021	Riverside Superior Court	Complaint Filing Fee	\$450.00
10/7/2021	ProLegal	Attorney Service	\$201.50
12/6/2021	Legal Document Server, Inc.	Attorney Service	\$13.95
1/18/2022	Legal Document Server, Inc.	Attorney Service	\$14.80
1/19/2022	Legal Document Server, Inc.	Attorney Service	\$14.80
1/24/2022	Riverside Superior Court	Document Download Fee	\$5.00
5/10/2022	Legal Document Server, Inc.	Attorney Service	\$14.80
5/17/2022	Legal Document Server, Inc.	Attorney Service	\$14.80
4/13/2023	Riverside Superior Court	Document Download Fee	\$1.00
4/14/2023	Legal Document Server, Inc.	Attorney Service	\$17.14
4/14/2023	Riverside Superior Court	Stipulation Fee	\$20.00
4/18/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
4/26/2023	Alicia Brush	Travel Reimbursement	\$104.83
8/10/2023	Legal Document Server, Inc.	Attorney Service	\$17.14
8/10/2023	Riverside Superior Court	Stipulation Fee	\$20.00
8/15/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
9/6/2023	U.S. Postmaster	Postage	\$8.56
9/6/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
10/2/2023	Signature Resolution LLC	Mediation Fee	\$4,450.00
11/13/2023	Legal Document Server, Inc.	Attorney Service	\$11.95
11/13/2023	Signature Resolution LLC	Supplemental Mediation Fee	\$1,600.00
11/14/2023	Legal Document Server, Inc.	Attorney Service	\$17.14
11/14/2023	Riverside Superior Court	Stipulation & Order Fee	\$20.00
11/17/2023	Legal Document Server, Inc.	Attorney Service	\$17.14
11/17/2023	Riverside Superior Court	Stipulation & Order Fee	\$20.00
11/29/2023	Legal Document Server, Inc.	Attorney Service	\$15.75
4/29/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
7/30/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
10/29/2024	Legal Document Server, Inc.	Attorney Service	\$17.30
12/11/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
12/13/2024	Legal Document Server, Inc.	Attorney Service	\$18.69
12/13/2024	Riverside Superior Court	Stipulation & Order Fee	\$20.00
12/17/2024	Legal Document Server, Inc.	Attorney Service	\$17.30

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Galvan vs. Inland Respite, Inc. (Class + PAGA)

12/19/2024	Legal Document Server, Inc.	Attorney Service	\$34.60
12/20/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
12/31/2024	Legal Document Server, Inc.	Attorney Service	\$17.30
1/2/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
1/23/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
2/4/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
2/5/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
2/6/2025	Riverside Superior Court	Document Download Fee	\$1.00
3/4/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
3/14/2025	Riverside Superior Court	Document Download Fee	\$4.00
4/18/2025	Legal Document Server, Inc.	Attorney Service	\$238.60
4/24/2025	Legal Document Server, Inc.	Attorney Service	\$22.47
4/24/2025	Riverside Superior Court	Motion Fee	\$60.00
4/28/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
5/1/2025	Riverside Superior Court	Document Download Fee	\$1.00
6/10/2025	Legal Document Server, Inc.	Attorney Service	\$193.30
6/11/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
6/11/2025	Riverside Superior Court	Document Download Fee	\$2.00
6/12/2025	Legal Document Server, Inc.	Attorney Service	\$175.00
6/24/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
7/3/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
7/22/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
11/10/2025	Riverside Superior Court	Document Download Fee	\$29.50
Total:			<u>\$9,350.46</u>