

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Vartan Madoyan (SBN 279015)
Helene Mayer (SBN 332975)
LAWYERS for JUSTICE, PC
450 North Brand Boulevard, Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

HENRY CORLEW, 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.

SUPERIOR DUCT FABRICATION, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 22STCV13075

Honorable Timothy Patrick Dillon
Department 15

CLASS ACTION

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
CLASS COUNSEL FEES PAYMENT,
CLASS COUNSEL LITIGATION EXPENSE
PAYMENT, AND ENHANCEMENT
AWARD**

Date: May 14, 2026
Time: 10:00 a.m.
Department: 15

Complaint Filed: April 18, 2022
FAC Filed: September 4, 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 Henry Corlew (“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 November 17, 2025, in Department 15 of the above-entitled Court, the Honorable Timothy Patrick Dillon preliminarily approved the Class Action and PAGA Settlement Agreement (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Superior Duct Fabrication, Inc., (“Defendant,”) (Plaintiff and Defendant are referred to together as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Henry Corlew 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 Phoenix Settlement Administrators (“Phoenix”) 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, Class Counsel Fees Payment, Class Counsel Litigation Expense Payment, and Enhancement Award (“Motion for Final Approval”), no Participating Class Member has objected to the Class Settlement, the contemplated request for the Class Counsel Fees Payment, Class Counsel Litigation Expense Payment, Enhancement Award, and Administration Expenses Payment, or the allocation for the PAGA Penalties.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers for Justice, PC have been actively performing work in the above captioned action entitled *Henry Corlew v. Superior Duct Fabrication, Inc.*, Los Angeles County Superior Court, Case No. 22STCV13075 (“Action”), which was filed on April 18, 2022, 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, the law relating to, off-the-clock theory, meal and rest periods, state wage-and-hour law and enforcement, as well as the evidence produced and analyzed, the possibility of appeals, and later PAGA representative actions as the complaint was amended to assert a PAGA claim, among other things. After conducting an initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiff were well-suited for class-wide (and later representative) adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group: all current and former hourly-paid or non-exempt employees who worked for Superior Duct Fabrication, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses, during the Class Period and PAGA Period.

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 the mediation and settlement negotiations. The volume of records and documents that Class Counsel reviewed and analyzed included, and were not limited to: a sampling of Class Members’ time and payroll data, Plaintiff’s personnel records, Defendant’s Employee Handbook, earning statements, Pay Summaries, Notice to Employee as to Change in Relationship, Separation Notice, Employment

Application, Timecard Reports, company policy acknowledgements, job descriptions, Defendant's operations and employment practice, policies, and procedures, among other information and documents. Class Counsel had the opportunity to interview and obtain information from Plaintiff and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. Class Counsel developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, formal and informal discovery, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, the mediation briefing and supporting materials, and settlement documents; drafting and propounding multiple sets of formal written discovery requests on Defendant and notices of depositions of Defendant's persons most knowledgeable designees; reviewing Defendant's objections deposition notices; and preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

8. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating this matter, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature of the work performed by the Class Members and Aggrieved Employees, as well as Defendant's organizational structure and their operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing liability, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiations process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to off-the-clock theory, meal and rest periods, PAGA representative actions, and state

1 wage-and-hour enforcement, as well as the evidence produced and analyzed; and the possibility
2 of appeals, among other things.

3 9. After conducting significant investigation and discovery of the facts and law
4 during the prosecution of this matter, counsel for the Parties engaged in extensive settlement
5 negotiations to try to resolve the case. These efforts included participating in a mediation session
6 conducted by Steven Rottman, Esq., a well-regarded mediator experienced in mediating complex
7 wage and hour actions. During all settlement discussions, the Parties conducted their
8 negotiations at arm's length in an adversarial position. In the course of the mediation and
9 settlement negotiations, the Parties exchanged a large volume of documents and data, and
10 discussed various aspects of the case, including and not limited to, the risks and delays of further
11 litigation, the risks and expenses to the Parties of proceeding with class certification,
12 representative adjudication, the law relating to class certification, off-the-clock theory, regular
13 rates, meal and rest periods, PAGA representative claims and penalties, and wage-and-hour law
14 and enforcement; Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as
15 the evidence produced and analyzed; and the possibility of appeals, among other things.
16 Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended
17 that individualized questions of fact predominate over any common issues, and these issues
18 would pose challenges to class certification and representative adjudication. Defendant and its
19 counsel felt strongly about Defendant's ability to avoid class certification and prevail on the
20 merits and, while Plaintiff and Class Counsel believed that they would be able to obtain class
21 certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately
22 agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiff's
23 principal claims, as well as the costs and risks to the Parties that would attend further litigation.
24 These risks of further litigation include, and are not limited to, a determination that the claims are
25 unsuitable for class treatment and/or representative adjudication, class de-certification after
26 certification of a class, allowing a jury to decide the claims asserted in this matter, and the real
27 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 \$396,000.00, which is thirty-three percent (33%) of the Total Settlement Amount of \$1,200,000.00. 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 thirty-three percent (33%) 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 the case. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving an Total Settlement Amount of \$1,200,000.00 (with a Net Settlement Amount of approximately at least \$648,857.70 to be paid to Participating Class Members (with gross Individual Class Payments averaging approximately more than \$1,257.48), payment of \$30,000.00 to Aggrieved Employees (with Individual PAGA Payments averaging approximately \$84.27) and payment of \$90,000.00 to the State of California)—support the percentage fee sought.

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

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

EXPERIENCE AND ADEQUACY OF LAWYERS for JUSTICE, PC

14. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive,

1 administrative, and other overtime exemptions to the State of California and federal overtime
2 compensation requirements, PAGA claims, and sister statutes under federal law. During a
3 relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered
4 millions of dollars on behalf of thousands of individuals in California.

5 15. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice,
6 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
7 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
8 extensive formal training in dispute resolution and negotiation from the Straus Institute for
9 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
10 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
11 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
12 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
13 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
14 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
15 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
16 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
17 Appellate District. In December of 2004, he obtained a license to practice law from the
18 California State Bar. Since in or around October of 2008, through his work at Lawyers *for*
19 Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment
20 class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
21 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
22 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.
23 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
24 has successfully litigated cases involving the executive, administrative, and other overtime
25 exemptions to the State of California and federal overtime compensation requirements. Under
26 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
27 contested motion practice in approximately sixteen (16) cases in the last decade, and litigated
28 over 1,000 class action or representative action cases.

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

20 17. Joanna Ghosh is a Senior Partner and Managing Member of Lawyers *for* Justice,
21 PC. She received a Bachelor of Arts degree from California State University, Los Angeles in
22 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris
23 Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in
24 California (since 2010) and in New York (since 2013) and She is also admitted to practice in all
25 U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of
26 California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and
27 successfully handled motion practice in class action cases regarding discovery (including and not
28 limited to, regarding class contact information), class certification (both contested class

certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin 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. I, Vartan Madoyan, 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 with 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. Feess 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 2013, I was an Associate at Littler Mendelson's Century City, California office, working for one of the largest employer-side labor

1 and employment law firms in the United States. From July 2013 to March 2014, I was an
2 Associate at Sheppard, Mullin, Richter & Hampton's Century City, California office. From
3 March 2014 to July 2023, I worked as an Associate and then as Counsel at Baker Hostetler
4 LLP's Los Angeles office. From August 2023 to the present, I have been a Member of Lawyers
5 for Justice, PC. I have taken and defended dozens of depositions and have successfully handled
6 motion practice in class action and PAGA cases regarding discovery (including and not limited
7 to motions regarding class contact information), class certification (both contested class
8 certification and stipulated class certification), dispositive motions, arbitration agreements,
9 coordination, and intervention. I have successfully handled a complex wage and hour class
10 action and PAGA case through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*,
11 Orange County Superior Court, Case No. 30-2013-00692890. I also successfully handled
12 briefing on appeal regarding employer efforts to compel arbitration. *TitleMax of Cal. v. Pena*,
13 California Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28,
14 2023) (unpublished decision). Further, I have extensive experience with settlements of class
15 actions and PAGA actions and have handled and supervised this process in over 100 cases.

16 **LITIGATION COSTS AND EXPENSES INCURRED BY**

17 **LAWYERS for JUSTICE, PC**

18 19. To date, Class Counsel has borne all of the risks and costs of litigation and will
19 not receive any compensation until recovery is obtained in this matter. The Settlement provides
20 for reimbursement of litigation costs and expenses of up to \$25,000.00. Lawyers for Justice, PC
21 seeks reimbursement of **\$17,642.30** in litigation costs and expenses incurred in the matter, as
22 reflected in **"EXHIBIT 2"** attached hereto. These expenses were reasonable and necessary in
23 the prosecution of the matter and to obtain the Settlement. The cost savings of \$7,357.70 will be
24 part of the Net Settlement Amount, which will be distributed to the Participating Class Members
25 in accordance with the Settlement.

26 **ENHANCEMENT AWARD TO PLAINTIFF**

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

1 claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 5.1 of the
2 Settlement Agreement), the Settlement provides for an Enhancement Award, in the amount of up
3 to \$7,500.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing his
4 employment with Class Counsel, gathering and providing relevant documents and information,
5 and providing facts and evidence to support the prosecution of the claims. Plaintiff was available
6 whenever Class Counsel needed him and actively tried to obtain and provide information that
7 would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive
8 \$7,500.00 as a reasonable Enhancement Award for his broader waiver and release of claims and
9 services performed in this matter, in addition to his individual settlement payment(s).

10 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
11 interests of Plaintiff, the Class, the Aggrieved Employees, and the State of California.

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

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

15
16 

17 Vartan Madoyan
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 1

HENRY CORLEW V. SUPERIOR DUCT FABRICATION, INC.
Los Angeles County Superior Court Case No. 22STCV13075 (“State Action”)
United States District Court, Central District of California Case No. 2:22-cv-04466-JLS-E (“Federal Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Henry Corlew (“Plaintiff”)	14.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	5.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Claims, Conduct Legal Research and Analysis Regarding Class Claims, and Draft, Review, and/or Revise Plaintiff’s Class Action Complaint for Damages (filed on April 18, 2022) (State Action)	7.50
Review Court’s First Amended General Order, Notice of Case Assignment Unlimited Civil Case, and Alternative Dispute Resolution (ADR) Information Packet (filed on April 18, 2022) (State Action)	0.30
Review Court’s Minute Order Re: Court Order Regarding Newly Filed Class Action and Initial Status Conference Order (Complex Litigation Program) (filed on May 3, 2022) (State Action)	0.40
Draft, Review, and/or Revise Plaintiff’s Initial Status Conference Report (filed on June 29, 2022) (State Action)	1.20
Review Defendant’s Notice to State Court and Plaintiff of Defendant’s Filing of Notice of Removal (filed on June 30, 2022) (State Action)	0.10
Review Court’s Notice of Assignment to United States Judges, Notice to Parties of Court-Directed ADR Program, Notice to Counsel Re Consent to Proceed Before a United States Magistrate Judge, and Initial	0.50

Standing Order for Civil Cases Assigned to Judge Josephine L. Staton (filed on June 30, 2022) (Federal Action)	
Draft, Review, and/or Revise Plaintiff's Notices of Appearance or Withdrawal of Counsel (filed on June 30, 2022) (Federal Action)	0.20
Meet and Confer with Superior Duct Fabrication, Inc.'s ("Defendant") Counsel, and Draft, Review, and/or Revise Stipulation to Extend Time to Respond to Initial Complaint by 30 Days (L.R. 8-3) (filed on July 6, 2022) (Federal Action)	1.10
Review Court's Minute Order Re: Court Order Re: Notice of Removal to Federal Court (filed on July 7, 2022) (State Action)	0.10
Review Defendant's Notice of Ruling Re: Order Re: Notice of Removal to Federal Court (filed on July 7, 2022) (State Action)	0.10
Draft, Review, and/or Revise Plaintiff's Certification and Notice of Interested Parties (filed on October 5, 2022) (Federal Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Removal to Federal Court (filed on October 7, 2022) (State Action)	0.10
Review Defendant's Notice of Ruling Re: Order Re: Non-Appearance Case Review Re: Status of Removal to Federal Court (served on October 17, 2022) (State Action)	0.10
Review Defendant's Notice of Appearance or Withdrawal of Counsel (served on October 27, 2022) (Federal Action)	0.10
Review Court's Notice of Remand from Federal Court (filed on December 27, 2022) (State Action)	0.10
Review Court's Minute Order Re: Court Order Re: Order of Remand and Re-Setting Initial Status Conference (filed on January 25, 2023) (State Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Initial Case Management Conference Statement (filed on March 17, 2023) (State Action)	1.40
Review Court's Case Management Order, Minute Order Re: Initial Status Conference, and Order Authorizing Electronic Service (filed on March 24, 2023) (State Action)	0.50

Review and Analyze Defendant's Answer to Complaint, and Research Affirmative Defenses in Defendant's Answer (filed on April 24, 2023) (State Action)	1.30
Meet and Confer with Defendant's Counsel and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order Regarding Agreement to Mediate and Continue Plaintiff's Motion for Class Certification Deadline (submitted on June 28, 2023) (State Action)	1.50
Review Court's Order Regarding Agreement to Mediate and Continue Plaintiff's Motion for Class Certification Deadline (filed on July 11, 2023) (State Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Regarding Agreement to Mediate and Continue Plaintiff's Motion for Class Certification Deadline (filed on July 17, 2023) (State Action)	0.10
Meet and Confer with Defendant's Counsel and Draft, Review, and/or Revise Joint Stipulation to Vacate Plaintiff's Deadline to File Motion for Class Certification; [Proposed] Order (submitted on November 17, 2023) (State Action)	1.30
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on November 17, 2023) (State Action)	0.80
Review Court's Order to Vacate Plaintiff's Deadline to File Motion for Class Certification (filed on December 18, 2023) (State Action)	0.30
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Vacate Plaintiff's Deadline to File Motion for Class Certification (filed on December 20, 2023) (State Action)	0.10
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 September 4, 2024); and 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 August 27, 2024) (State Action)	3.50
Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed on September 3, 2024) (State Action)	0.20

Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Plaintiff Leave to File First Amended Complaint (filed on September 4, 2024) (State Action)	0.10
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on March 19, 2025) (State Action)	0.10
Appearances	
Prepare for and Remotely Attend Initial Status Conference (March 24, 2023) (State Action)	0.60
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (October 27, 2025) (State Action)	1.10
Discovery and Deposition	
Draft, Review, and/or Revise Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Henry Corlew (served on August 18, 2021)	1.90
Draft, Review, and/or Revise Follow-up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Henry Corlew (served on November 16, 2021)	1.70
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Henry Corlew (served on December 6, 2021)	3.80
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for May 2, 2023) (served on March 28, 2023) (State Action)	1.20
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for May 3, 2023) (served on March 28, 2023) (State Action)	1.30
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 (served on March 28, 2023) (State Action)	4.50

Review and Analyze Defendant's Objections to Plaintiff's Notice of Taking Deposition of the Person Most Knowledgeable with Request for Production of Documents (Organizational Structure) (served on April 28, 2023) (State Action)	0.90
Review and Analyze Defendant's Objections to Plaintiff's Notice of Taking Deposition of the Person Most Knowledgeable with Request for Production of Documents (Wage and Hour Practices) (served on April 28, 2023) (State Action)	1.10
Letters and Correspondence	
Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Henry Corlew 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	17.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	78.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations (submitted on August 9, 2023)	35.50
Attend Mediation Session (August 16, 2023; via Zoom Video Conference)	13.50
Review and/or Analyze Mediator's Proposal (accepted August 24, 2023)	1.50
Draft, Review Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action Settlement (executed on November 14, 2023)	2.90
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on June 26, 2024) and Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	20.50

Coordinate Settlement Administration with Settlement Administrator, Review Weekly Reports, Monitor Settlement Administration Process, and/or Respond to Inquiries	7.50
Law and Motion	
Review and Analyze Defendant's Notice of Removal, Declaration of Lonnie D. Giamela in Support Thereof, Declaration of Lacey Radcliffe in Support Thereof, Civil Cover Sheet, Notice of Interested Parties, and Corporate Disclosure (filed on June 30, 2022) (Federal Action)	2.10
Review and Analyze Defendant's Notice of Motion and Motion to Dismiss Plaintiff's Complaint Pursuant to Fed. R. Civ. P. 12(b)(6), Memorandum of Points and Authorities in Support Thereof, Request for Judicial Notice in Support Thereof, and [Proposed] Order Regarding Defendant's Motion to Dismiss Plaintiff's Complaint Pursuant to Fed. R. Civ.P. 12(b)(6) (filed on August 2, 2022) (Federal Action)	1.90
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion to Remand Pursuant to 28 U.S.C. § 1447, Motion to Remand Pursuant to 28 U.S.C. § 1447; Memorandum of Points and Authorities in Support Thereof, Declaration of Arman Marukyan in Support Thereof, and [Proposed] Order Granting Plaintiff's Motion to Remand Pursuant to 28 U.S.C. § 1447 (filed on October 5, 2022) (Federal Action)	18.50
Review and Analyze Defendant's Memorandum of Points and Authorities in Opposition to Plaintiff's Motion to Remand and Evidentiary Objections to Declaration of Arman Marukyan in Support of Plaintiff's Motion to Remand (filed on October 14, 2022) (Federal Action)	3.10
Research, Draft, Review, and/or Revise Plaintiff's Opposition to Defendant's Motion to Dismiss, Declaration of Arman Marukyan in Support Thereof, and [Proposed] Order Denying Defendant's Motion to Dismiss Plaintiff's Complaint Pursuant to Fed. R. Civ. P. 12(B)(6) (filed on October 14, 2022) (Federal Action)	16.50
Review and Analyze Defendant's Reply in Support of Motion to Dismiss Plaintiff's Complaint Pursuant to Fed. R. Civ. P. 12(B)(6), Declaration of Lonnie D. Giamela in Support Thereof, Exhibit A, Exhibit B, Exhibit C, and Exhibit D (filed on October 21, 2022) (Federal Action)	1.90
Review Court's Minute Order Re: (In Chambers) Order Continuing Hearing on Defendant's Motion to Dismiss (Doc. 11) (filed on October 25, 2022) (Federal Action)	0.20

Review Court's Minute Order Re: (In Chambers) Order Re: Briefing Schedule on Plaintiff's Motion to Remand (Doc. 13) (filed on November 2, 2022) (Federal Action)	0.20
Research, Draft, Review, and/or Revise Plaintiff's Reply in Support of Plaintiff's Motion to Remand and Supplemental Declaration of Arman Marukyan in Support Thereof (filed on November 9, 2022) (Federal Action)	12.80
Review and Analyze Court's Minute Order Re: (In Chambers) Order: (1) Granting in Part and Denying in Part Plaintiff's Motion to Remand (Doc. 13); and (2) Denying in Part and Granting in Part Defendant's Motion to Dismiss Pursuant to Rule 12(B)(6) (Doc. 11) and Order of Remand (filed on December 21, 2022) (Federal Action)	0.80
Meet and Confer with Defendant's Counsel and Draft, Review, and/or Revise Joint Stipulation to Continue Deadline and Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on August 27, 2024) (State Action)	1.20
Review Court's Order to Continue Deadline and Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on September 3, 2024) (State Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Continue Deadline and Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on September 9, 2024) (State Action)	0.10
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 Helene Mayer in Support Thereof, Declaration of Plaintiff Henry Corlew in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on February 24, 2025) (State Action)	19.50
Review Court's Notice Re: Continuance of Hearing and Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on March 14, 2025) (State Action)	0.20
Review Court's Minute Order Re: Court Order Re: Continuing Hearing on Motion for Preliminary Approval of Settlement (filed on September 5, 2025) (State Action)	0.20

Draft, Review, and/or Revise Notice of Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on September 8, 2025) (State Action)	0.20
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on October 8, 2025) (State Action)	0.20
Draft, Review, and/or Revise Notice of Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on October 8, 2025) (State Action)	0.20
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on October 27, 2025) (State Action)	0.20
Review Declaration of Areen Babajanian in Support of Plaintiff's Motion for Preliminary Approval of Settlement (served on November 12, 2025) (State Action)	0.40
Review Court's Minute Order Re: Non-Appearance Case Review Re: Confirmation Escalator Clause Shall Not Be Triggered (filed on November 14, 2025) (State Action)	0.20
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on November 17, 2025) (State Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement, and Minute Order Re: Non-Appearance Case Review Re: Confirmation Escalator Clause Shall Not Be Triggered (filed on November 19, 2025) (State Action)	0.10
Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expense Payment, and Enhancement Award; Memorandum of Points and Authorities in Support Thereof, Declaration of Vartan Madoyan in Support Thereof, and [Proposed] Final Approval Order and Judgment (State Action)	22.50
Total Hours:	347.10

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Corlew vs. Superior Duct Fabrication, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/18/2021	U.S. Postmaster	Postage	7.00
11/16/2021	U.S. Postmaster	Postage	7.38
4/19/2022	Legal Document Server, Inc.	Attorney Service	\$112.06
4/19/2022	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
4/19/2022	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
6/8/2022	Legal Document Server, Inc.	Attorney Service	\$130.20
6/29/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
1/30/2023	Legal Document Server, Inc.	Attorney Service	\$140.95
3/20/2023	Legal Document Server, Inc.	Attorney Service	\$140.95
3/28/2023	General Logistics Systems US, Inc.	Courier Service	\$23.96
6/20/2023	Steven J. Rottman, LLC	Mediation Fee	\$12,500.00
6/29/2023	Legal Document Server, Inc.	Attorney Service	\$143.15
6/29/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
7/2/2023	Case Anywhere LLC	Attorney Service	\$126.15
7/18/2023	Legal Document Server, Inc.	Attorney Service	\$141.15
9/6/2023	U.S. Postmaster	Postage	\$8.56
9/6/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
10/4/2023	Case Anywhere LLC	Attorney Service	\$141.00
11/20/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
11/20/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
12/20/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
1/4/2024	Case Anywhere LLC	Attorney Service	\$153.00
4/1/2024	Case Anywhere LLC	Attorney Service	\$135.00
7/1/2024	Case Anywhere LLC	Attorney Service	\$135.00
8/26/2024	Legal Document Server, Inc.	Attorney Service	\$23.90
8/27/2024	Legal Document Server, Inc.	Attorney Service	\$51.23
8/27/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$40.00
9/4/2024	Legal Document Server, Inc.	Attorney Service	\$32.30
9/5/2024	Legal Document Server, Inc.	Attorney Service	\$386.15
9/9/2024	Legal Document Server, Inc.	Attorney Service	\$126.15
9/10/2024	Legal Document Server, Inc.	Attorney Service	\$121.95
9/13/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
10/1/2024	Case Anywhere LLC	Attorney Service	\$219.00
1/6/2025	Case Anywhere LLC	Attorney Service	\$135.00
2/5/2025	Case Anywhere LLC	Attorney Service	\$45.00
2/25/2025	Legal Document Server, Inc.	Attorney Service	\$41.57
2/25/2025	Los Angeles Superior Court	Motion Fee	\$60.00
3/5/2025	Case Anywhere LLC	Attorney Service	\$81.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Corlew vs. Superior Duct Fabrication, Inc.

3/20/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
3/24/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
4/4/2025	Case Anywhere LLC	Attorney Service	\$57.00
5/2/2025	Case Anywhere LLC	Attorney Service	\$45.00
6/2/2025	Case Anywhere LLC	Attorney Service	\$45.00
7/1/2025	Case Anywhere LLC	Attorney Service	\$45.00
8/4/2025	Case Anywhere LLC	Attorney Service	\$45.00
9/2/2025	Case Anywhere LLC	Attorney Service	\$45.00
9/10/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
10/1/2025	Case Anywhere LLC	Attorney Service	\$51.00
10/9/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
11/3/2025	Case Anywhere LLC	Attorney Service	\$51.00
11/21/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
12/1/2025	Case Anywhere LLC	Attorney Service	\$51.00
1/2/2026	Case Anywhere LLC	Attorney Service	\$45.00
2/2/2026	Case Anywhere LLC	Attorney Service	\$45.00
Total:			<u>\$17,642.30</u>