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aaroeste@lelawfirm.com

Attorneys for PLAINTIFF AVERY L. JOSEPH,
on behalf of himself and other aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SOLANO

AVERY L. JOSEPH, on behalf of himself and
other aggrieved employees,

Plaintiff,

vs.

US AIR CONDITIONING DISTRIBUTORS,
LLC; and DOES 1 to 100, inclusive,

Defendants.

CASE NO.: CU23-06070

PAGA ACTION

*[Assigned for all purposes to the
Honorable Christine A. Carringer, Dept. 12]*

**[REVISED PROPOSED] ORDER
GRANTING PLAINTIFF'S MOTION FOR
APPROVAL OF A PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT AND JUDGMENT
THEREON**

*[Filed pursuant to the Court Order issued on
June 18, 2025]*

Hearing Information:

Date: June 18, 2025

Time: 8:30 a.m.

Dept.: 12

1 The Court, having reviewed and considered Plaintiff AVERY L. JOSEPH's ("Plaintiff")
2 Motion for Approval of the Private Attorneys General Act ("PAGA") Settlement and all documents
3 submitted in support of the motion, **HEREBY ORDERS AND ENTERS JUDGMENT AS**
4 **FOLLOWS:**

5 1. The Court hereby grants Plaintiff's Motion for Approval of PAGA Settlement. For
6 purposes of this Final Order and Judgment ("Order"), the Court adopts all defined terms as used in
7 the Settlement Agreement. A copy of the Settlement Agreement is attached as **Exhibit 1** to the
8 Declaration of Alexander J. Aroeste in Support of Plaintiff's Motion for Approval of PAGA
9 Settlement and is made part of this Order.

10 2. The Court has jurisdiction over all claims asserted in the Action, Plaintiff, the Aggrieved
11 Employees, and Defendant. The Aggrieved Employees consist of all current and former hourly non-
12 exempt employees who worked in California for Defendant at any time from October 12, 2022,
13 through September 24, 2024. ("PAGA Period").

14 3. Pursuant to the California Private Attorneys General Act of 2004 ("PAGA"), Labor Code
15 section 2699, *et seq.*, the Court approves the Settlement and finds that it is fair and reasonable and provides
16 genuine and meaningful relief consistent with the underlying purpose of PAGA to benefit the public.

17 4. The Court finds that notice of the Settlement was provided to the Labor and Workforce
18 Development Agency ("LWDA"), as required by Labor Code § 2699(1)(2).

19 5. The Court approves the terms set forth in the Settlement Agreement and finds that the
20 Settlement Agreement is, in all respects, fair, adequate, and reasonable and directs the Parties to
21 effectuate the Settlement Agreement according to its terms. The Court finds that the Settlement
22 Agreement has been reached as a result of informed and non-collusive arm's-length negotiations.
23 The Court further finds that the Parties were able to reasonably evaluate their respective positions.
24 The Court also finds that settlement now will avoid additional and potentially substantial litigation
25 costs, as well as delay and risks if the Parties were to continue to litigate the case.

26 6. The Settlement Agreement is not an admission by Defendants or by any other of the
27 Released Parties, nor is this Order a finding of the validity of any allegations or of any wrongdoing
28 by any Defendants or any other Released Parties. Neither this Order, the Settlement Agreement, nor

any document referred to herein, nor any action taken to carry out the Settlement Agreement, may be construed as, or may be used as, an admission of any fault, wrongdoing, omission, concession, or liability whatsoever by or against Defendants or any of the other Released Parties.

7. Defendant shall fully fund the Gross Settlement Amount by transmitting the funds to the Administrator no later than thirty (30) days after the Effective Date of the Settlement.

8. The entire Net Settlement Amount (the remainder of the Settlement Amount after deducting Plaintiff's counsel's fees (\$85,000.00) and costs (\$18,303.83), and the costs of administration (\$2,750.00) from the \$340,000.00 Settlement Sum) shall be allocated for payment of civil penalties and shall be distributed 75% (\$175,459.63) to the LWDA and 25% (\$58,486.54) to the Aggrieved Employees.

9. The Net Settlement Amount shall be distributed to Aggrieved Employees pro rata based on the number of pay periods worked by each Aggrieved Employee for Defendant during the PAGA Period, according to the terms of the Settlement Agreement. "Aggrieved Employee" means all current and former hourly non-exempt employees who worked in California for Defendant during the PAGA Period. "PAGA Period" means the period from October 12, 2022, through September 24, 2024.

10. To the extent that there is any remainder in the Net Settlement Amount, such remainder shall be distributed to Aggrieved Employees pro rata based on the number of pay periods worked by each Aggrieved Employee for Defendant during the PAGA Period.

11. The Settlement Administrator shall distribute funds pursuant to the procedure described in the Settlement Agreement.

12. The Court hereby confirms Lavi & Ebrahimian, LLP as PAGA Counsel.

13. The Court hereby confirms Simpluris, Inc. as the Settlement Administrator and confirms that costs in the amount of \$2,750.00 for administration of the settlement are reasonable. A declaration from Simpluris that includes the bid prepared for Simpluris providing this cost amount is attached herein as **Exhibit 1**.

1 14. The Court hereby awards to PAGA Counsel attorneys' fees in the amount of 25% of
2 the Settlement Amount, which is \$85,000.00 in attorneys' fees and attorneys' costs of \$18,303.83.
3 A cost calculation totaling this amount is attached herein as **Exhibit 2**.

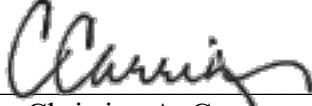
4 15. All settlement checks will remain valid for 180 days. Those funds represented by un-
5 cashed checks which remain outstanding 180 days after mailing of the Settlement checks by the
6 Settlement Administrator will be voided. The Administrator will cancel all the checks not cashed by
7 the void date. For any Aggrieved Employee whose Individual PAGA Payment check is uncashed
8 and cancelled after the void date, the Administrator shall transmit the funds represented by such
9 checks to the California Controller's Unclaimed Property Fund in the name of the Aggrieved
10 Employee.

11 16. The Court further orders, adjudges and decrees that upon Approval by the Court of
12 this Settlement and Defendant's full funding of the entire Gross Settlement Amount, all Aggrieved
13 Employees (including Plaintiff) and the State of California (including the LWDA) are deemed to
14 release, on behalf of themselves and their respective former and present representatives, agents,
15 attorneys, heirs, administrators, successors, and assigns, the Released Parties from all claims arising
16 at any time during the PAGA Period, that are or were asserted in the Action, or that are based upon,
17 related to, or arise in any way from the facts set forth in the Action, wage and hour claims which were
18 or reasonably could have been alleged in the complaint, including but not limited to claims for overtime
19 wages, failure to provide meal and rest periods, meal and rest period penalties, failure to timely pay
20 wages, unpaid wages, violations of Labor Code section 226 (filing to provide accurate and complete
21 wage statements), Labor Code section 203 (waiting time penalties), Labor Code Section 226 (wage
22 statements), and all PAGA Claims exhausted per Plaintiff's letter to the LWDA, dated October 12,
23 2023.

24 17. The Settlement Administrator shall file a final report by _____, indicating the
25 total amount paid to the LWDA and the Aggrieved Employees and confirming that uncashed funds
26 have been distributed.

1 18. Pursuant to Code of Civil Procedure section 664.6, the Court shall retain jurisdiction
2 with respect to the interpretation, implementation, and enforcement of the Settlement and all order
3 and judgment entered in connection therewith.

4
5 Dated: **06/25/2025**



Hon. Christine A. Carringer,
Solano County Superior Court Judge

“EXHIBIT 1”

Joseph Lavi, Esq. (SBN 209776)
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Alexander J. Aroeste, Esq. (SBN 332653)

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Attorneys for Plaintiff AVERY L. JOSEPH,
on behalf of himself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SOLANO

AVERY L. JOSEPH, on behalf of himself and
others similarly situated,

Plaintiff,

vs.

US AIR CONDITIONING DISTRIBUTORS,
LLC; and DOES 1 to 100, inclusive,

Defendants.

Case No. CU23-06070

*[Assigned for all purposes to the
Honorable Christine A. Carringer, Dept. 12]*

**DECLARATION OF DENISE ISLAS ON
BEHALF OF SIMPLURIS INC.**

Action Filed: December 18, 2023

1 I, Denise Islas, declare as follows:

2 1. I am employed as a Senior Director of Client Services for Simpluris Inc.
3 (“Simpluris”). I am over 18 years of age, and I am authorized to make this declaration on behalf
4 of Simpluris and myself. This declaration is based on my own personal knowledge.

5 2. Simpluris is prepared and fully capable of serving as the Administrator for this class
6 settlement.

7 3. Simpluris has extensive experience in class action settlements, providing services
8 in cases involving antitrust, securities fraud, property damage, employment discrimination,
9 employment wage and hour, product liability, insurance, and consumer issues. Our expertise
10 includes pre-settlement consultation, data management, legal notification, call center support,
11 claims processing, and tax reporting.

12 4. Simpluris has delivered notification and/or claims administration services in more
13 than 9,000 cases. Over the past 18 years, we have administered approximately \$8 billion in
14 settlements. A true and correct copy of Simpluris’ company resume (“Simpluris Resume”) is
15 attached hereto as Exhibit A.

16 5. Simpluris is deeply committed to safeguarding the security of our data and
17 information, as well as that of the Parties. To demonstrate this commitment, a true and correct
18 copy of our SOC 2 Compliance certification is attached hereto as Exhibit B.

19 6. Simpluris maintains insurance coverage of \$3,000,000 to protect against data
20 breaches, defalcation of funds, or other instances of misfeasance.

21 7. Simpluris has no conflicts of interest with any named parties.

22 8. Simpluris has never had any financial interest in, nor affiliation with, the parties or
23 counsel in this matter. Furthermore, Simpluris has no actual or potential conflicts of interest with
24 any Class Members.

25 9. In managing the notice of class settlement and the distribution of funds, Simpluris
26 estimates the administrative costs to be \$4,814. As a courtesy to the client, Simpluris is offering a
27 discount of \$2,064, reducing the fixed expected administration cost to \$2,750. This estimate is
28

1 based on a class size of approximately 305 members. If the scope of work increases or decreases
2 significantly, Simpluris will inform the parties and request approval of an adjustment. A true and correct
3 copy of Simpluris' bid for administering this matter, including a detailed, itemized breakdown of
4 the tasks and the basis for the fee calculation, is attached hereto as Exhibit C.

5
6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct and that this declaration is executed on this 20th day of March, 2025
8 in Costa Mesa, California.

9 

10 Denise Islas
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EXHIBIT A

Simpluris, an award winning claims administrator, has administered over 9,000 matters, managed over \$9 billion in settlement funds, and provided its services for over 15 years. Our beginning-to-end services include complete project management, mailings & notification campaigns, contact center, legal intake, data management, disbursements & tax reporting, among others.

Services

Class Action Administration

Simpluris class action and claims administration offers comprehensive settlement planning, execution, and reporting. When you bring a case to Simpluris, our team reviews each matter independently. Our subject matter experts leverage their experience to develop a settlement framework designed to meet the unique aspects of your matter. We take a consultative approach to address your challenges and support preliminary hearing preparation.

Mass Arbitration Administration

Simpluris can provide the technology and operational fulfillment resources needed to manage mass arbitrations from intake to payment in a cost-effective and efficient manner. At Simpluris, we pride ourselves on having an average of 93.5% signed releases. We have experience administering some of the largest mass arbitration cases, including Uber, Lyft, Instacart, Grubhub, Postmates, and DoorDash. Simpluris delivers solutions for matters of any size and complexity.

Regulatory Remediation

Whether internally initiated or formally required by a consent order, Simpluris aids respondents in meeting critical obligations and deadlines. Simpluris is prepared to plan and execute remediation actions tailored to your institution's size and needs. As a third-party administrator, we understand the importance of swift remediation and provide "white glove" customer service from planning, to execution, through final reporting.

Legal Corporate Services

Simpluris' services scale and adapt to meet our client's challenges. We excel at comprehensive settlement administration and remediation; however, we understand that our client's needs include a combination of many legal corporate services. No matter how simple or complex, we ask you to bring us your unique challenges so we may develop a custom solution to fit your needs.

Data Security

Simpluris is committed to the security and overall protection of its customer's data and information. We maintain SOC 1 and SOC 2 certification which requires us to adhere to strict policies and procedures surrounding information security including processing and storage of confidential customer data. Simpluris has and maintains a comprehensive, written Information Security Program that complies with all applicable laws and regulations (e.g. HIPAA, Gramm-Leach-Bliley Act, MA 201 CMR 17.00).

Executive Team

Simpluris' history is rooted in class action settlement administration and our management team's experiences are vast and diverse. The Simpluris executive leadership team boasts more than 100 years of experience in corporate, financial and legal administration, including:

- Executive management of the largest legal administration operation in the world that produced 200+ million notifications, 10+ million claims and \$5+ billion funds disbursed per year on average.
- A few of the most notable matters our leadership team has presided over include the largest data breach responses, corporate restructures and antitrust settlement administrations in US history.
- Oversight of the largest consent orders handed down from OCC, DOJ, CFPB & FTC over the last decade.
- Fostering hundreds of client relationships with the premier government entities, law firms and financial institutions in the world.

The Simpluris executive team - Kevin Lee, President & CEO; Doug Norman, SVP Business Operations; Zach Hoffman, Founder, CTO; Patrick Ivie, CRO; Wes Alford, SVP; and Paul Saroj, SVP - are experienced industry experts. Leveraging our past experiences, Simpluris is prepared to handle matters of every scope and scale.

Technology

From Simpluris' inception, our founders had a vision to develop a single comprehensive platform, purpose-built to serve the legal administration industry. Today, our proprietary technology platform, named Cadence, increases data security, mitigates errors caused by siloed databases, and speeds processes by improving transparency and collaboration between departments. Cadence is an innovative and evolving administration engine that sets our case management apart from all other legal administrators. From data ingestion, noticing, and claims processing, through disbursement, taxation, and final reporting, our project management processes are conducted inside Cadence. We see the future of legal tech evolving and are continuously developing our solutions to meet the administration needs of tomorrow.

Client Service

The Simpluris administration team is best known for their dedication to delivering premium service. When you partner with Simpluris, you work alongside a dedicated client service representative. This Simpluris team member will guide you through the settlement life cycle. Your client service representative is your administration conductor, adjusting the tempo as your case progresses. With a comprehensive view of your matter, your client service representative can respond swiftly to changes in your case, proactively notify you of upcoming milestones, and most importantly, be accountable for the successful completion of your matter.

Our team is available any time of day with offices across the nation, including two corporate hubs in Costa Mesa, CA and Orlando, FL.



(800) 779-2104
3194-C Airport Loop Dr.,
Costa Mesa, CA 92626
simpluris.com



EXHIBIT B



Data Security and Technology

800-779-2104
3194-C Airport Loop Dr., Costa Mesa, CA 92626
inquiries@simpluris.com | simpluris.com



Simpluris utilizes purpose-built proprietary software as well as industry best-of-breed technologies to administer complex matters with accuracy, efficiency, security, scalability, and cost-effectiveness. Our technology stack has been built from the ground up to meet the needs of complex matters including class action and mass arbitration settlements, government regulatory orders, corporate remediations and other mass legal administration engagements.

To fulfill the needs of these matters, Simpluris must be nimble while meeting rigorous security requirements and high-quality standards. Our in-house technologies are continuously refined, tuned, and improved throughout Simpluris' tenure.

Our technology team and entire business prioritize security as one of our major tenants to ensure our client's data remains secure and protected. To protect your data, Simpluris utilizes industry best practice tools and techniques including providing an encrypted secure file transfer (i.e. SFTP) platform for exchanging sensitive documents; encrypting all data at every level possible including encryption in transit, at rest, at hard-disk/block level, database level, and client/network layer; utilization of multi-factor authentication for all employee access; and extensive, ongoing required employee training to ensure our people understand the latest security threats & prevention techniques, and general best practices.



Data Security

Certifications and Attestations

Simpluris maintains a comprehensive information security program to ensure the highest level of care and concern is taken to protect our company and customers' information assets. Simpluris is annually audited by third-party providers for security policy and procedure review to ensure compliance with all necessary controls and requirements.

- SOC 1 Type 1
- SOC 2 Type 1
- SOC 2 Type 2
- HIPAA
- Penetration Testing
- Vulnerability Management

Information Security Program

Simpluris maintains a written Information Security Program (ISP) designed to: (a) ensure the security, privacy and confidentiality of client and investor information; (b) protect against any reasonably anticipated threats or hazards to the security or integrity of client information; and (c) protect against unauthorized access to, use, deletion, or modification of investor information.





Simpluris Information Security Policy Document Index

Acceptable Use Policy

Password Policy

Patch Management / Update Policy

Privacy Policy (Internal)

Change Management Policy

Data Retention Policy

Software Development Lifecycle Policy

HIPAA Security Rule

Wireless Access Policy

Mobile Device Policy

Network Firewall Policy

Antivirus and Malware Policy

Physical Security Policy

Business Continuity Plan

Risk Assessment & Treatment

Roles & Permissions Matrix

HIPAA Oversight Policy

System & Network Configuration Policy

Internal Controls Policy

Information Classification & Handling Policy

Access Control Policy

Audit Policy

Backup Policy

Removable Media Policy

Disaster Recovery Policy

HIPAA Assigned Responsibility

Server Security Policy

Incident Response Policy

Vendor Management Policy

Risk Management Policy

Systems, Processes & Tools



Penetration testing



SIEM, firewall, VPN endpoint, data loss prevention, intrusion prevention



Cloud email security service



Endpoint security



Cloud-hosted email & security



Cloud-hosted endpoint management



IT & development ticketing & documentation



Vulnerability management



Cloud-hosted identity management, storage solutions, MFA, endpoint management



Amazon AWS (EC2, EBS, CloudWatch)
Cloud-hosted virtual servers, file storage, identity management, WAF, website hosting

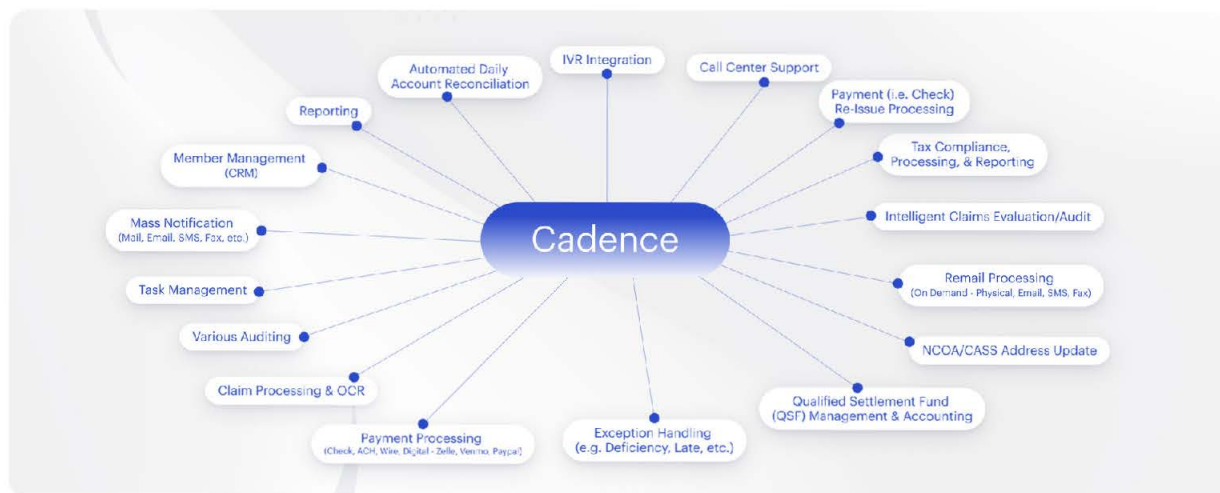


Our Technology Solutions



Cadence

Cadence™, our internally developed complex administration management tool, acts as a single centralized platform for the entire lifecycle of a project. Cadence uses security best practices including a role-based permission model, encryption at rest and in transit, and database and disk encryption. Our internal features include built-in integrated data and address augmentation (NCOA, CASS, Skip Tracing), address validation built-in, deep auditing and logging, maker/checker type validation steps and checkpoints to enforce accuracy and security, and prevent fraud and mistakes.



Case Website and Claims Portal

Cadence enables the development of claims processing websites specifically tailored for highly scalable and redundant situations using serverless, cloud-based technologies built on top of Amazon AWS. Features include login or authentication, multi-language support, milestones, document sharing, custom online claim forms, e-signature and more. Our case websites are ADA/Section 508 compliant while fully implementing security best practices. We perform encryption of all data, actively monitor and scan all incoming and outgoing data for threats both internal and external, as well as auditing and monitoring all systems for suspicious activity to ensure we are providing the highest possible protection and availability of data assets.

Malware, Fraud, & Data Protection:

Simpluris has built an extensive ecosystem using both custom in-house and off-the-shelf tools to protect our customers, class members, and business from the multitude of today's external security threats. Our highly scalable and redundant claims processing website platform has various malware and fraud prevention technologies integrated including duplicate detection and prevention, fraud prevention, and custom Real Time Claim Validation (RTCV) technology to filter prospective logins/claims based on customer-defined rules. This, in conjunction with our plethora of Gartner magic quadrant best-of-breed malware and ransomware prevention tools, ensures that data is protected whether it's processed through case websites, documents, emails, or any other transmission method. Our security specialists are trained and staffed to monitor our systems, applications, and networks 24/7 for any threats and are ready to respond at a moment's notice.





* Our Team

Simpluris technology professionals include information technology administrators, security specialists, data analysts, database administrators, data engineers, developers, and web designers. They continually monitor and adapt our systems and processes according to business needs and ensure our systems are secure and stabilized against the ever-changing threat landscape, and remain current with the latest in industry best practices. In addition, we provide ongoing employee education and training to inform, test, and verify their knowledge of the latest security threats and mitigation strategies.

Simpluris' history is rooted in class action settlement administration and our management team's experiences are vast and diverse. The Simpluris executive leadership team boasts more than 100 years of experience in corporate, financial and legal administration, including:

- Executive management of the largest legal administration operation in the world that produced 200+ million notifications, 10+ million claims and \$5+ billion funds disbursed per year on average.
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- Oversight of the largest consent orders handed down from OCC, DOJ, CFPB & FTC over the last decade.
- Fostering hundreds of client relationships with the premier government entities, law firms and financial institutions in the world.

The Executive Team



Kevin Lee

Chief Executive Officer & President
klee@simpluris.com



Zach Hoffman

Co-Founder, Chief Technology Officer
zhoffman@simpluris.com



Doug Norman

Senior Vice President, Business Operations
dnorman@simpluris.com



Patrick Ivie

Chief Revenue Officer
pivie@simpluris.com



Wes Alford

Senior Vice President, Client Services
walford@simpluris.com



Paul Saroj

Senior Vice President, Strategic Partnerships
psaroj@simpluris.com



Let's discuss how Simpluris can solve your administration challenges.

Our focus on providing superior customer service, coupled with our experience and ability to create innovative solutions, has given Simpluris a reputation for exceptional settlement administration.

Class Action Administration

Regulatory Remediation

Mass Arbitration Administration

800-779-2104
3194-C Airport Loop Dr., Costa Mesa, CA 92626
inquiries@simpluris.com | simpluris.com

Exhibit C



3194-C Airport Loop Drive
Costa Mesa, CA 92626
800-779-2104
www.simpluris.com

Estimate Number:	20241210-PJI-01	Prepared By:	Patrick Ivie
Estimate Date:	12/10/2024	Telephone Number (mobile):	310.995.6455
Estimate Expiration Date:	3/10/2025	Email:	pivie@simpluris.com

Attorney Contact
Attorney: **Woodard Lee Jones, Esq.**
Firm: Lavi & Ebrahimian, LLP
Email: wjones@lelawfirm.com

Opposing Counsel Contact
Attorney:
Firm:
Email:

Case Name: Avery Joseph v. US Air Conditioning Distributors, LLC
Solano County; Case No. CU23-04692
PAGA Settlement

Assumptions

In addition to the assumptions enumerated below, this estimate assumes that

- (1) Simpluris will receive data in a single, complete file; (2) there will be no substantial change to class size or in response rate;
- (3) administration costs will be paid from the QSF, and (4) Simpluris will submit revisions to this estimate to account for any material changes to scope.

Anticipated Class Size:	305	Undeliverable Rate:	10%
Claims Rate:	n/a	Call Rate:	n/a
Opt-out Rate:	n/a	Average Call Length:	n/a
Language(s) for Communication	EN	Fund Distribution:	Simpluris
Reminder Mailing:	n/a	Number of Distributions:	1
Unclaimed Funds:	TBD	State(s):	CA
Lengths of Administration:	6 Months	Tax Years:	1
		Fund:	\$340,000

Case Setup

- Data compilation: develop case-specific response tracking

Category	Unit Value	# of Units	Total
Project Manager - Case Setup	\$110.00	2	\$220.00
Database Manager - Initial Data Analysis	\$125.00	1	\$125.00
Total:			\$345.00

Award Disbursement

- Establish 26 CFR § 1.468B-1 compliant Qualified Settlement Fund ("QSF")
- Disburse Notice with award payments and tax document
- Conduct regular and annual IRS-mandated QSF reporting and reconciliation (one per calendar year)
- Complete all required filings with state and federal tax authorities

Category	Unit Value	# of Units	Total
Disbursement Data Preparation	\$125.00	2	\$250.00
Disbursement Manager - Data Validation	\$90.00	2	\$180.00
Setup Banking Account/QSF	\$675.00	1	\$675.00
QSF Monthly Maintenance	\$125.00	6	\$750.00
NCOA/CASS/LACS	\$0.14	305	\$42.70
Print & Mail Notice, Check and Tax Documents	\$1.00	305	\$305.00
Postage	\$0.72	305	\$219.60
Process Returned Checks	\$0.20	31	\$6.20
Skip Trace Search Undeliverable Checks	\$0.12	31	\$3.72
Remail Checks (Includes Postage)	\$2.00	31	\$62.00
QSF Reporting and Final Declaration	\$500.00	1	\$500.00
Reissue Checks / Mailing	\$2.50	4	\$10.00
Reissue 1099s	\$2.50	2	\$5.00
Responding to IRS/State/Agency Inquiries	\$75.00	2	\$150.00
QSF Annual Tax Reporting and Reconciliation	\$850.00	1	\$850.00
Distribution Manager	\$90.00	2	\$180.00
Total:			\$4,189.22

Case Completion

- Final audit and review
- Send final declaration and reporting to counsel

Category	Unit Value	# of Units	Total
Data Manager-Final Reporting	\$125.00	1	\$125.00
Clerical-Clean Up Any Misc.	\$45.00	1	\$45.00
Project Manager-Wrap-up Final Issues	\$110.00	1	\$110.00
Total:			\$280.00

Total Estimated Cost of Administration:	\$4,814
Less Client Courtesy Discount:	<u>-\$2,064</u>
Discounted Total:	<u>\$2,750</u>

“Exhibit 2”

LAW OFFICES OF
LAVI & EBRAHIMIAN, LLP
8889 W. OLYMPIC BLVD., SUITE 200
BEVERLY HILLS, CALIFORNIA 90211
TELEPHONE: (310) 432-0000
FACSIMILE: (310) 432-0001
WWW.LELAWFIRM.COM

COSTS AND FEES ADVANCED BY LAVI & EBRAHIMIAN, LLP

DATE	ITEM	COST
	SETTLEMENT AMOUNT	\$340,000.00
N/A	Copying and Scanning	\$25.00
N/A	Mail	\$22.53
	SOLANO SUPERIOR COURT	
10/18/2023	Plaintiff's Summons and Complaint re: Initial Filing Fee (Receipt #: 42589CV) [Class Action]	\$1,435.00
12/29/2023	Plaintiff's Summons and Complaint re: Initial Filing Fee (Receipt #: 54715CV) [PAGA Action]	\$435.00
	DDS LEGAL SERVICES	
01/24/2022	Filing of Summons and Complaint (Invoice #: 457931) [Class Action]	\$248.45
10/30/2023	Process of Service: Summons and Complaint Sub-Served on Gayle Flores on behalf of Defendant US Air Conditioning Distributors, LLC (Invoice #: 460298) [Class Action]	\$64.90
11/01/2023	Court Filing re: Proof of Service of Summons (Invoice #: 464327) [Class Action]	\$104.95
12/29/2023	Filing of Summons and Complaint (Invoice #: 479979) [PAGA Action]	\$148.45
01/19/2024	Process of Service: Summons and Complaint Sub-Served on Gayle Flores on Behalf of Defendant US Air Conditioning Distributors, LLC (Invoice #: 485964)	\$64.90
02/21/2024	Court Filing re: Notice and Acknowledgment of Receipt – Civil (Invoice #: 500368) [PAGA Action]	\$29.95
02/23/2024	Court Filing re: Notice and Acknowledgment of Receipt – Civil (Invoice #: 500916) [PAGA Action]	\$29.95
02/26/2024	Court Filing re: Notice and Acknowledgment of Receipt – Civil (Invoice #: 501745) [PAGA Action]	\$32.90
07/11/2024	Court Filing re: Case Management Statement (Invoice #: 551981) [Class Action]	\$29.95
01/23/2025	Court Filing re: Unilateral Statement re: Review Hearing – Arbitration (Invoice #: 619720) [Class Action]	\$33.45
02/24/2025	Court Filing re: "Plaintiff's Request For Dismissal Of The Class Action Alle-Gations Pursuant To California Rules Of Court Rule 3.770 Without Prejudice"; "Declaration Of Alexander J. Aroeste In	\$33.45

	Support Of Plain-Tiff's Request For Dismissal Of The Class Action Allegations Pursuant To California Rules Of Court Rule 3.770 Without Prejudice"; "[Proposed] Order Granting Plaintiff's Request For Dismissal Of Class Action Allegations Pursuant To California Rules Of Court Rule 3.770 Without Prejudice"; "Proof Of Service (Invoice #: 631037) [Class Action]	
	BARNES DISPUTE RESOLUTION	
04/19/2024	Plaintiff ½ Mediation Fee [Class Action]	\$9,000.00
	BERGER CONSULTING GROUP	
10/09/2024	Data Analysis (Invoice #: 12687) [Class Action]	\$6,490.00
	DEPARTMENT OF INDUSTRIAL RELATIONS	
10/12/2023	Initial PAGA filing fee; PAGA Letter submission (Order #: ORD-000255806)	\$75.00
	Total Costs, fees and expenses	\$18,303.83

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SOLANO

I am an employee in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 8889 W. Olympic Blvd., Suite 200, Beverly Hills, California 90211.

On June 23, 2025, I served the foregoing documents, described as:

1. [REVISED PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR APPROVAL OF A PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT AND JUDGMENT THEREON

on all interested parties as follows:

James A. Bowles, Esq. (SBN 89383) Elissa L. Gysi, Esq. (SBN 281338) HILL, FARRER & BURRILL LLP One California Plaza 300 So. Grand Avenue, 37th Floor Los Angeles, California 90071-3147 Telephone: (213) 620-0460 Facsimile: (213) 624-4840 Emails: jbowles@hillfarrer.com egysi@hillfarrer.com	<i>Attorneys for Defendant:</i> US AIR CONDITIONING DISTRIBUTORS, LLC
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☒ **(BY ELECTRONIC MAIL)** As follows: I caused such documents to be emailed to the attorneys listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ **(STATE)** I declare, under penalty of perjury under the laws of the State of California, that the above is true and correct.

Executed June 23, 2025, at Beverly Hills, California.

/s/ K. Alondra Iglesias
Alondra Iglesias