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Attorneys for Plaintiff

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

NATALI GODINEZ ZUNIGA,
individually, and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

CROWN DODGE, a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 2023CUOE017631

Honorable Charmaine H. Buehner
Department 44

**DECLARATION OF RYAN SLINGER IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT AGREEMENT**

Date: July 1, 2026
Time: 1:30 p.m.
Department: 44

Complaint Filed: December 11, 2023
Trial Date: None Set

DECLARATION OF RYAN SLINGER

I, Ryan Slinger, 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 Natali Godinez Zuniga (“Plaintiff”). The facts set forth in this declaration are within my personal knowledge or based on information and belief and, if called as a witness, I could and would competently testify thereto.

LITIGATION AND REPRESENTATIVE AND CLASS ACTION EXPERIENCE

2. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is 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. Lawyers *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. 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.

3. 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

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

16 4. Arby Aiwazian is a Member and Shareholder of Lawyers for Justice, PC. He
17 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
18 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
19 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to
20 the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate
21 District. From approximately August 2008 to approximately December 2008, he served as a
22 Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals
23 for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to
24 practice before all courts of the State of California and all United States District Courts in the
25 State of California. He has worked on many wage-and-hour class action and representative
26 action cases, taking the lead in taking and defending depositions, arguing motions, and attending
27 mediations. He has played an integral role in preparing matters for class certification, including
28 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, including and not limited to, those listed in paragraph 7 herein. He has handled over one hundred and fifty (150) mediations and has worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

5. 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 argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration of PAGA 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 have handled this process in over five hundred (500) cases. Under her, Edwin

1 Aiwazian, and Arby Aiwazian's supervision, Lawyers *for* Justice, PC has handled the class
2 certification and court approval process for hundreds of class action and/or representative action
3 matters that have successfully resolved. She is a member of the California Employment Lawyers
4 Association and, on several occasions, has been a speaker regarding topics in wage and hour
5 law at the organization's continuing legal education events.

6 6. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree
7 from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law
8 School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice
9 before all courts of the State of California. I have worked on many wage-and-hour class action
10 and PAGA representative cases, and my work on these cases has included preparing pleadings
11 and motions, making court appearances, and drafting and finalizing settlement agreements.

12 **WORK PERFORMED BY LAWYERS *FOR* JUSTICE, PC**

13 7. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in this
14 litigation from the inception of the above-captioned action, which was filed on December 11,
15 2023. Lawyers *for* Justice, PC has fully and actively participated in the litigation process
16 throughout the pendency of the litigation. Before initiating the above-captioned litigation,
17 Lawyers *for* Justice, PC conducted extensive litigation and research into the facts and
18 circumstances underlying the pertinent factual and legal issues and applicable law. This
19 required thorough discussions and interviews between attorneys at our firm and Plaintiff, and
20 research into the various legal issues involved in the case, namely, the current state of the law
21 as it applied to wage-and-hour enforcement, PAGA, manageability, Plaintiff's allegations,
22 potential defenses, Defendant Crown Dodge's ("Defendant") business, and its operations and
23 employment policies, practices, and procedures.

24 8. Lawyers *for* Justice, PC joined forces with counsel Sweeny Law, PC (together,
25 Lawyers *for* Justice, PC and Sweeny Law, PC are referred to as "Plaintiff's Counsel") to pursue
26 the case. The work of the firms has been a coordinated and combined effort. Ultimately, the
27 efforts of Plaintiff and Plaintiff's Counsel have resulted in a settlement recovery.

28 9. After engaging in extensive investigations, formal and informal discovery, highly

1 contested motion practice, and exchange of information, data, and documents, the Parties
2 participated in extensive settlement discussions and negotiations to try to resolve the above-
3 captioned lawsuit. These efforts included participating in a formal mediation on June 13, 2025,
4 conducted by James "J.J." Johnston, Esq., a well-respected mediator experienced in mediating
5 complex labor and employment matters. With the aid of the mediator, the Parties reached the
6 Settlement described herein. In the course of mediation and settlement discussions, the parties
7 discussed all aspects of the case, including the risks and delays of further litigation and
8 proceeding with trial, as well as the law relating to representative PAGA actions, various off-
9 the-clock theories, regular rate theory, meal and rest periods, business expense reimbursement,
10 wage statement penalties, waiting time penalties, and other wage-and-hour enforcement issues,
11 the evidence produced and analyzed, and the possibility of bifurcation of discovery and/or trial
12 and appeals, among other things, Plaintiff's claims, and Defendant's defenses, as well as facts
13 discovered. During all settlement discussions, the parties conducted their negotiations at arm's
14 length in an adversarial position.

15 10. Prior to reaching the Settlement, the parties investigated the veracity, strength, and
16 scope of the PAGA claim and allegations, and were preparing for trial. Plaintiff conducted
17 significant investigation and formal and informal discovery and exchange of information,
18 documents, and data regarding the facts of the case, including and not limited to, the review,
19 consideration, and analysis of a volume of information, documents, and data obtained from
20 Plaintiff, Defendant, and other sources. Plaintiff's Counsel propounded multiple sets of formal
21 written discovery requests onto Defendant (specifically, Requests for Production of Documents
22 (Set One), Special Interrogatories (Sets One and Two), and Form Interrogatories – General (Set
23 One)), and reviewed Defendant's responses thereto. Additionally, Plaintiff's Counsel noticed
24 the depositions of Defendant's Person Most Knowledgeable designees regarding organizational
25 structure and wage and hour practices, along with requests for production of documents. The
26 information, documents, and data that were reviewed and analyzed by Plaintiff's Counsel
27 included, and were not limited to: Plaintiff's employment records, Aggrieved Employees' time
28 and payroll data, company policies, internal memoranda, company policy acknowledgements,

Defendant's operations and employment practices, Defendant's forms, procedures, and policies, among other information and documents. Counsel for the parties undertook significant investigation and evaluation of the PAGA claim and related allegations, including, and not limited to, calculating the potential monetary recovery under PAGA. Other work performed by Plaintiff's Counsel included, but was not limited to: meeting and conferring with Defendant's counsel regarding the pleadings, case management, discovery, mediation, and settlement negotiations, among other issues; case strategy and analysis; researching, drafting, reviewing, and revising pleadings, court filings, motion-related papers (e.g., settlement approval motion papers), briefs for settlement negotiations and mediation, and the settlement agreement; propounding written discovery requests and notices of depositions of Defendant's persons most knowledgeable designees; claims evaluation and analysis; preparing for and participating in settlement negotiations and the mediation; and appearing for court proceedings. Counsel for the parties have further invested time to research the applicable law, which is evolving as it relates to representative PAGA actions, various off-the-clock theories, regular rate theory, meal and rest periods, business expense reimbursement, wage statement penalties, waiting time penalties, and other wage-and-hour enforcement issues, the evidence produced and analyzed, and the possibility of bifurcation of discovery and/or trial and appeals, among other things, Plaintiff's claims, and Defendant's defenses, as well as facts discovered.

ATTORNEYS' FEES REQUESTED BY PLAINTIFF'S COUNSEL

11. As set forth more fully in the accompanying Motion, Plaintiff's Counsel seek attorneys' fees in the amount of \$94,000.00, which represents approximately forty percent (40%) of the Total Settlement Amount. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Plaintiff's Counsel, Plaintiff has agreed to a contingency-fee of at least forty percent (40%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Plaintiff's Counsel took in commencing the case; (2) the time, effort, and expense that Plaintiff's Counsel dedicated to the case; (3) the skill and determination that Plaintiff's Counsel has shown; (4) the results that Plaintiff's Counsel has achieved throughout the litigation; (5) value of the settlement that Plaintiff's Counsel has achieved in the case; and (6) the other

cases that Plaintiff's Counsel has turned down in order to devote its time and efforts to this case.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Plaintiff's Counsel have performed many hours of work in connection with prosecuting this matter such that the requested attorneys' fees award is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **68.20 hours** performing tasks to obtain a recovery on behalf of Plaintiff, the State of California, and the Aggrieved Employees. Attached hereto as "**EXHIBIT A**" 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 in performing those services. These hours include work done by several attorneys at the firm. 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 the case.

13. The work performed in this particular case, 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 class and PAGA representative actions, support a reasonable blended hourly rate of compensation of at least \$850 for work performed by Plaintiff's Counsel. 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 wage and hour class action and/or representative action settlements in other 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 an hourly rate of \$936.47; 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 an hourly rate of \$919.57; and 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 an hourly rate of \$855.96.

LITIGATION COSTS AND EXPENSES INCURRED BY PLAINTIFF'S COUNSEL

14. The Settlement provides for reimbursement of litigation costs and expenses of up to \$25,000.00. Lawyers *for* Justice, PC seeks reimbursement of \$13,969.32 for litigation costs and expenses incurred in this case, as reflected in the Case Cost Detail attached hereto as “**EXHIBIT B.**” It should be noted that Plaintiff's Counsel have borne all of the risks and costs of litigation to date and will not receive any compensation until a recovery is obtained in this matter. These costs and expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement.

GENERAL RELEASE FEE TO PLAINTIFF

15. For her broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Section 8(b) of the Settlement Agreement), the Settlement provides a General Release Fee to Plaintiff in the total amount of \$7,500.00 to be paid out of the Total Settlement Amount, subject to approval by the Court. The requested General Release Fee is fair and appropriate. It is also worth noting that Plaintiff has undertaken significant efforts and work to spearhead the pursuit of this matter. By initiating and pursuing this matter, Plaintiff stepped into the shoes of the State of California and undertook the responsibilities of serving in a representative capacity. Plaintiff has spent a substantial amount of time and effort discussing her employment with her counsel, gathering and producing relevant documents and information, and providing the facts and evidence necessary to attempt to prove the allegations. Plaintiff was available whenever her counsel needed her and actively tried to obtain and provide information that would facilitate the pursuit of the PAGA claim. Accordingly, it is appropriate and just for Plaintiff to receive a General Release Fee, in addition any individual penalties payment she will receive as an aggrieved employee.

16. Plaintiff's Counsel submits that the Settlement fulfills the purpose of the PAGA statute, is within the accepted range of recoveries for this type of litigation, and is fair, reasonable, and adequate given the substantial monetary benefits provided for by the Settlement, the strengths and weaknesses of this case, and the inherent delay, costs, risks, and uncertainty associated with continued litigation.

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

3 Executed this 4th day of June, 2026, at Glendale, California.

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5 /s/ Ryan Slinger

6 Ryan Slinger
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EXHIBIT A

NATALI GODINEZ ZUNIGA V. CROWN DODGE
Ventura County Superior Court Case No. 2023-CU-OE-017631

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 Natali Godinez Zuniga (“Plaintiff”)	10.50
Investigate, Communicate with, Interview, and/or Review Communication with Aggrieved Employees and/or Percipient Witnesses	4.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on December 11, 2023)	7.50
Review Court’s Notice of Case Assignment (filed on December 11, 2023)	0.20
Review Court’s Notice of Case Assignment and Mandatory Appearance (filed on December 15, 2023)	0.20
Review and Analyze Defendant Crown Dodge’s (“Defendant”) Answer to Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (served on March 8, 2024), and Research Affirmative Defenses in Defendant’s Answer	1.10
Review Court’s Notice of Continuance (filed on March 19, 2024)	0.20
Draft, Review, and/or Revise Declaration of Lily Pahlevani in Response to Order to Show Cause Hearing for Failure to File Proof of Service (filed on April 17, 2024)	0.60
Draft, Review, and/or Revise Plaintiff’s Case Management Statement (filed on April 17, 2024)	0.90

Review Court's Minute Order Re: Mandatory Appearance CMC/Order to Show Cause Re: Sanctions/Dismissal for Failure to File Proof of Service/Default (filed on May 2, 2024)	0.20
Review Defendant's Notice of Ruling Setting Continued Case Management Conference and Trial Setting Conference (served on May 8, 2024)	0.10
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on July 16, 2024)	0.80
Review Defendant's Case Management Statement (served on July 17, 2024)	0.20
Review Court's Minute Order Re: Case Management Conference Re: Trial Setting Conference (filed on July 31, 2024)	0.20
Draft, Review, and/or Revise Notice of Association of Counsel (filed on August 16, 2024)	0.10
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on February 24, 2025)	0.10
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on February 27, 2025)	0.10
Review Defendant's Case Management Statement (served on February 28, 2025)	0.10
Review Court's Minute Order Re: Case Management Conference Re: Status of Mediation (filed on March 11, 2025)	0.10
Review Court's Notice of Reassignment of Judicial Officer and Change of Hearing Location (filed on July 28, 2025)	0.10
Appearances	
Prepare for and Remotely Attend Initial Case Management Conference (May 2, 2024)	0.90
Prepare for and Remotely Attend Trial Setting Conference (July 31, 2024)	0.50
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Natali Godinez Zuniga (served on August 11, 2023)	2.80

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 April 23, 2024) (served on February 26, 2024)	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; April 24, 2024) (served on February 26, 2024)	1.40
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 February 26, 2024)	4.50
Review and Analyze Defendant's Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on March 10, 2025)	0.50
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Natali Godinez Zuniga under the Private Attorneys General Act (served on October 3, 2023)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendant's Counsel	12.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation, Research Settlement and Merits-Related Issues, Perform Claim Evaluation and Analysis, and Review Plaintiff's Mediation Brief	7.50
Review and Analyze Mediator's Proposal (issued June 13, 2025)	0.40
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding Re: PAGA Representative Action Settlement (executed on February 10, 2026)	0.50

Draft, Review, Revise, Negotiate, and Finalize Private Attorneys General Act Settlement Agreement and Release (executed on April 30, 2026), and Draft, Review, and/or Revise Cover Letter	0.60
Law and Motion	
Draft, Review, and/or Revise Plaintiff's Notice of Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set One), Special Interrogatories (Set Two), Form Interrogatories (Set One), and Requests for Production of Documents (Set One), and Request for Monetary Sanctions (filed on June 12, 2025)	0.20
Review Court's Minute Order Re: Motion to Compel Discovery (filed on July 25, 2025)	0.10
Review Plaintiff's Notice of Motion and Motion for Approval of Private Attorneys General Act Settlement Agreement and Award of Attorneys' Fees and Costs, General Release Fee, and Settlement Administration Costs; Memorandum of Points and Authorities and Research, Draft, Review, and/or Revise Declaration of Ryan Slinger in Support of Plaintiff's Motion for Approval of Private Attorneys General Act Settlement Agreement	2.30
Total Hours:	68.20

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Zuniga vs. Crown Dodge (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/14/2023	U.S. Postmaster	Postage	\$17.12
8/9/2023	U.S. Postmaster	Postage	\$9.73
10/3/2023	U.S. Postmaster	Postage	\$8.80
10/3/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
12/11/2023	Legal Document Server, Inc.	Attorney Service	\$200.23
12/11/2023	Ventura Superior Court	Complaint Filing Fee	\$435.00
1/8/2024	ProLegal	Attorney Service	\$189.40
2/5/2024	Legal Document Server, Inc.	Attorney Service	\$150.00
2/27/2024	General Logistics Systems US, Inc.	Courier Service	\$16.27
4/17/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
4/19/2024	CourtCall, LLC	Attorney Service	\$72.00
7/16/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
7/19/2024	CourtCall, LLC	Attorney Service	\$72.00
8/16/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
12/31/2024	James W. Johnston	Mediation Fee	\$8,750.00
3/3/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
3/4/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
6/18/2025	Legal Document Server, Inc.	Attorney Service	\$22.37
6/18/2025	Ventura Superior Court	Motion Fee	\$60.00
8/1/2025	CPAnalytics	Data Analysis	\$3,390.00
Total:			<u>\$13,969.32</u>