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

ADAM BADIS, ANGELICA REYES, and
MONICA MELISSA GUTIERREZ,
individually, and on behalf of other
members of the general public similarly
situated;

Plaintiffs,

vs.

COPAN DIAGNOSTICS INC., a New York
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: CVRI2203991

Honorable Harold W. Hopp
Department 1

CLASS ACTION

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: June 6, 2025
Time: 8:30 a.m.
Department: 1

Complaint Filed: September 14, 2022

Trial Date: None Set

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Attorneys for Plaintiff,
Adam Badis, Angelica Reyes, and Monica Melissa Gutierrez and the Class

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 Adam Badis (“Plaintiff Badis”) and co-counsel with counsel for Plaintiffs Angelica Reyes and Monica Melissa Gutierrez (collectively with Plaintiff Badis, the “Plaintiffs”) 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 January 15, 2025, in Department 1 of the above-entitled Court, the Honorable Harold W. Hopp preliminarily approved the Joint Stipulation of Class Action Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiffs and Defendant Copan Diagnostics, Inc., (“Defendant,”) (together with Plaintiffs referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiffs Adam Badis, Angelica Reyes, and Monica Melissa Gutierrez as the representatives of the Class (collectively, the “Class Representatives”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC, Collins Kim LLP, and James Hawkins, APLC as counsel for the Class (together, the “Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Class Action and Proposed Settlement (“Class Notice”), Objection Form, and Request for Exclusion Form, adopted the notice, opt-out, objection, and workweek dispute procedures and ordered their implementation. The Court appointed CPT Group, Inc. (“CPT Group”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Class Counsel Award, and Class Representative Enhancement Payments (“Motion for Final Approval”), no Participating Class Member has objected to the Class Settlement, including as to the contemplated request for Class Counsel Award, Class

Representative Enhancement Payments, and Settlement Administration Costs, or the allocation for the PAGA Payment.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above captioned action (“Action”), which was filed on September 14, 2022, prior to and during 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 Badis and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, and trial; the law relating to class certification, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, claims and penalties, and wage-and-hour law and enforcement, Plaintiff Badis’ claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiff Badis were well-suited for class-wide adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Collectively, Class Counsel conducted significant formal and informal discovery and investigation into the facts of the matter, 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. Class Counsel requested and received a large volume of data for purposes of mediation, including timekeeping and payroll data for class members and aggrieved employees, along with relevant policies, agreements, and other documents relevant to the litigation. Class Counsel had the opportunity to interview and obtain information from Plaintiffs and percipient

witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiffs, 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, motion practice, 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, motion-related papers (in connection with, e.g., Defendant's Motion to Strike and Demurrer), 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 responses and objections to written discovery requests and 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 Plaintiffs, 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 class certification, manageability, off-the-clock theory, meal and rest periods, representative Private Attorneys General Act ("PAGA") claims and penalties, wage-and-hour

1 enforcement, Plaintiffs' claims and allegations, and Defendant's defenses thereto, as well as facts
2 discovered.

3 9. After conducting significant investigation of the facts and law during the
4 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to
5 try to resolve the case, including private mediation conducted by Lisa Klerman, a well regarded
6 mediator experienced in handling complex labor and employment matters. In the course of the
7 mediation and settlement negotiations, the Parties were at arm's length in an adversarial position,
8 exchanged significant documents and data, and discussed various aspects of the case, including
9 and not limited to, the risks and delays of further litigation, the risks and expenses to the Parties
10 of proceeding with class certification, representative adjudication, and trial; the law relating to
11 class certification, manageability, off-the-clock theory, meal and rest periods (including *inter*
12 *alia*, on premises breaks), expense reimbursements, recordkeeping and wage statement
13 requirements, representative PAGA claims and penalties, and wage-and-hour law and
14 enforcement; Plaintiffs' claims and allegations, and Defendant's defenses thereto; as well as the
15 evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at
16 a settlement that was acceptable to all Parties was not easy. Defendant contended that
17 individualized questions of fact predominate over any common issues, and these issues would
18 pose challenges to class certification and representative adjudication. Defendant and its counsel
19 felt strongly about Defendant's ability to avoid class certification and prevail on the merits, while
20 Plaintiffs and Class Counsel believed that they would be able to obtain class certification and
21 prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that this
22 matter was well-suited for settlement given the legal issues relating to Plaintiffs' principal
23 claims, as well as the costs and risks to the Parties that would attend further litigation. These
24 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 seek attorneys' fees in the amount of \$408,550.00, approximately thirty-three percent (33%) of the Gross Settlement Amount of \$1,235,000.00. Pursuant to the contingency-fee agreements entered into by and between Plaintiff Badis and Lawyers *for* Justice PC, Plaintiff Badis agreed to a contingency fee of at least forty percent (40%) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel have shown; (4) the results that Class Counsel have achieved throughout the litigation; (5) the value of the settlement that Class Counsel have achieved in this matter; and (6) the other cases that Class Counsel have turned down in order to devote their time and efforts to this case. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery including a Gross Settlement Amount of \$1,235,000.00, supports 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 have 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 **123.20 hours** performing tasks 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. The \$850 blended rate x 123.20 hours supports a base lodestar value for my firm of at least \$104,720.00. 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, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a

1 relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered
2 millions of dollars on behalf of thousands of individuals in California.

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

27 16. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
28 received his Bachelor of Arts degree from University of California, Los Angeles and graduated

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

17. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions

1 regarding Private Attorneys General Act claims and employer efforts to compel arbitration of
2 such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017)
3 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB,*
4 *N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions,
5 including and not limited to working on cases to obtain class certification through contested
6 motion practice and working on cases in the post-certification stage (e.g., post-certification
7 discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with
8 co-counsel in a case involving a certified class consisting of approximately 2,600 individuals).
9 She has extensive experience with class action and/or representative action settlements, and has
10 handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby
11 Aiwazian's supervision, Lawyers for Justice, PC has handled the class certification and court
12 approval process for hundreds of class action and/or representative action matters that have
13 successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers
14 Association and, on several occasions, has been a speaker regarding topics in wage and hour law
15 at the organization's continuing legal education events.

16 18. I, Vartan Madoyan, am a Member of Lawyers for Justice, PC. I received my
17 Bachelor of Arts degree in Economics from the University of California, San Diego in 2007, and
18 a Juris Doctor degree from Loyola Law School in 2011, graduating with Cum Laude and Order
19 of the Coif honors. I am admitted to practice before all courts in the State of California and all
20 U.S. District Courts in California. I externed for the Honorable Victoria S. Kaufman of the
21 United States Bankruptcy Court, Central District of California, from June 2009 to August 2009. I
22 externed for the Honorable Gary A. Feess of the United States District Court, Central District of
23 California, from January 2010 to May 2010. From 2011 through and including the present, I
24 have practiced almost exclusively on complex wage and hour class action and PAGA action
25 matters in California. From October 2011 to June 2013, I was an Associate at Littler
26 Mendelson's Century City, California office, working for one of the largest employer-side labor
27 and employment law firms in the United States. From July 2013 to March 2014, I was an
28 Associate at Sheppard, Mullin, Richter & Hampton's Century City, California office. From

March 2014 to July 2023, I worked as an Associate and then as Counsel at Baker Hostetler LLP's Los Angeles office. From August 2023 to the present, I have been a Member of Lawyers for Justice, PC. I have taken and defended dozens of depositions and have successfully handled motion practice in class action and PAGA cases regarding discovery (including and not limited to motions regarding class contact information), class certification (both contested class certification and stipulated class certification), dispositive motions, arbitration agreements, coordination, and intervention. I have successfully handled a complex wage and hour class action and PAGA case through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange County Superior Court, Case No. 30-2013 00692890. I have also successfully handled briefing on appeal regarding employer efforts to compel arbitration. *TitleMax of Cal. v. Pena*, California Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28, 2023) (unpublished decision). Further, I have extensive experience with settlements of class actions and PAGA actions and have handled and supervised this process in over one hundred and fifty (150) cases.

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS FOR JUSTICE, PC

19. To date, Class Counsel have borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to \$55,000.00. Lawyers for Justice, PC seeks reimbursement of **\$7,127.33** in litigation costs and expenses incurred in the matter, as reflected in **"EXHIBIT 2"** attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. Any cost savings after reimbursing the costs of Class Counsel will be part of the Net Settlement Amount, which will be distributed to the Participating Class Members in accordance with the Settlement.

CLASS REPRESENTATIVE ENHANCEMENT PAYMENT TO PLAINTIFF BADIS

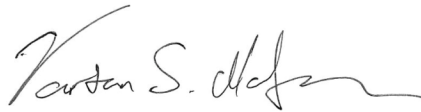
20. In recognition of his efforts and work spearheading the prosecution of this matter and serving as the Class Representatives, as well as his broader individual waiver and release of claims with a California Civil Code Section 1542 waiver, the Settlement provides for

1 Enhancement Payment in the amount of up to \$7,500.00 to Plaintiff Badis. Plaintiff Badis spent
2 a substantial amount of time and effort discussing his employment with Class Counsel, gathering
3 and providing relevant documents and information, and providing facts and evidence to support
4 the prosecution of the claims. Plaintiff Badis was available whenever Class Counsel needed him
5 and actively tried to obtain and provide information that would help obtain a recovery in this
6 matter. Accordingly, it is appropriate for Plaintiff Badis to receive \$7,500.00, as a reasonable
7 Class Representative Enhancement Payment for his broader waiver and release of claims and
8 services performed in this matter, in addition to his individual settlement payments as a class
9 member and/or aggrieved employee.

10 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
11 interests of Plaintiffs, the Class, 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 on May 13, 2025, at Glendale, California.

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17 Vartan Madoyan
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EXHIBIT 1

ADAM BADIS, ET AL. V. COPAN DIAGNOSTICS, INC.
Riverside County Superior Court, Case No. CVRI2203991

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Adam Badis (“Plaintiff Badis”) During the Case	15.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	18.50
Review and Analyze Court Filings in <i>Wayne Douglas Gillette v. Copan Diagnostics, Inc.</i> , Riverside County Superior Court, Case No. CVRI210528; <i>Monica Melissa Gutierrez v. Copan Diagnostics, Inc.</i> , Riverside County Superior Court, Case No. CVRI2305684 (Class Action); and <i>Monica Melissa Gutierrez v. Copan Diagnostics, Inc.</i> , Riverside County Superior Court, Case No. CVRI2306963 (PAGA Action)	3.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Badis’ Claims, Conduct Legal Research and Analysis of Claims, and Draft, Review and/or Revise Plaintiff Badis’ Class Action Complaint for Damages (filed on September 14, 2022)	8.50
Review Court’s Notice of Case Management Conference and Notice of Department Assignment (issued on September 21, 2022)	0.10
Review Court’s Class Action Management Order #1 (issued on September 22, 2022)	0.10
Draft, Review and/or Revise Plaintiff’s Case Management Statement (filed on November 14, 2022)	0.90
Draft, Review, and/or Revise Plaintiff Notice of Posting Jury Fees (filed on November 14, 2022)	0.10

Review Court's Minute Order Re: Continuing Case Management Conference (issued on November 17, 2022)	0.10
Review Court's Minute Order Re: Hearing Off Calendar (issued on November 21, 2022)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Continuance of Hearing (filed on November 22, 2022)	0.10
Research, Draft, Review and/or Revise Plaintiff Badis's First Amended Class Action Complaint for Damages (filed on December 15, 2022)	3.60
Review Peremptory Challenge of Defendant Copan Diagnostics, Inc. ("Defendant") (served on December 21, 2022)	0.10
Review Court's Notice of Court's Ruling Re: Denial of Defendant's Peremptory Challenge (issued on December 22, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review and/or Revise Joint Stipulation and [Proposed] Order to Continue Case Management Conference (served on December 22, 2022)	0.60
Review Court's Joint Stipulation and Order to Continue Case Management Conference and Minute Order Re: Continuance of Case Management Conference (issued on December 23, 2022)	0.10
Review Peremptory Challenge of Defendant Copan Diagnostics, Inc. (served on December 23, 2022)	0.10
Review Court's Notice of Case Reassignment for All Purposes (issued on December 27, 2022)	0.10
Review Court's Minute Order Re: Hearing Off Calendar (issued on December 30, 2022)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Case Reassignment and Notice of Continuance of Case Management Conference (filed on January 4, 2023)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order to Extend Time for Defendant to File Responsive Pleading (served on January 12, 2023)	0.60
Review Court's Joint Stipulation and Order to Extend Time for Defendant to File Responsive Pleading (issued and signed on January 23, 2023)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on February 1, 2023)	1.40
Draft, Review, and/or Revise Plaintiff's Notice of Association of Counsel (filed on February 6, 2023)	0.10
Review Defendant's Notice of Related Case (served on February 6, 2023)	0.10
Review Court's Minute Order Re: Case Management Conference (issued on February 8, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Report on Notice of Related Cases (submitted on March 29, 2023)	0.10
Review Court's Minute Order Re: Case Management Conference and Order Appointing Court Approved Reporter as Official Reporter Pro Tempore (issued on April 5, 2023)	0.10
Review and Analyze Defendant Copan Diagnostics, Inc.'s Answer to Plaintiff's First Amended Class Action Complaint for Damages (served on May 9, 2023), and Research Affirmative Defenses in Defendant's Answer	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (submitted on May 26, 2023)	0.10
Review Court's Notice of Department Change for All Purposes (issued on May 31, 2023)	0.10
Review Court's Minute Order Re: Case Management Conference (issued on June 5, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation and Protective Order – Confidential Designation Only (submitted on June 9, 2023)	0.10
Review Court's Stipulation and Protective Order – Confidential Designation Only (issued on June 15, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (submitted on July 7, 2023)	0.10
Review Court's Minute Order Re: Continuing Case Management Conference (issued on July 11, 2023)	0.10

Review Court's Minute Order Re: Continuing Case Management Conference and Order to Show Cause Re: Sanctions and Court's Notice of Order to Show Cause Hearing (issued on August 28, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Advance or Continue October 17, 2023 Case Management Conference and Order to Show Cause for Failure to Submit Case Management Conference Report; [Proposed] Order (submitted on September 13, 2023)	0.10
Review Court's Order Granting Joint Stipulation to Advance or Continue and Joint Stipulation to Advance or Continue October 17, 2023 Case Management Conference and Order to Show Cause for Failure to Submit Case Management Conference Report, and Court's Minute Order Re: Continuing Case Management Conference (issued on September 13, 2023)	0.10
Draft, Review, and/or Revise Plaintiffs' Proposed Second Amended Class Action Complaint for Damages (filed on December 15, 2023), and Meet and Confer with Defendant's Counsel and Draft, Review, and/or Revise Stipulation to Permit Filing of Second Amended Complaint and Order (filed on October 31, 2023)	0.10
Review Court's Stipulation to Permit Filing of Second Amended Complaint and Order (issued on November 9, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (submitted on December 7, 2023)	0.10
Review Court's Minute Order Re: Case Management Conference (issued on December 15, 2023)	0.10
Review and Analyze Defendant Copan Diagnostics, Inc.'s Answer to Plaintiff's Second Amended Class Action Complaint for Damages (served on January 17, 2024), and Research Affirmative Defenses in Defendant's Answer	0.90
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (submitted on February 27, 2024)	0.10
Review Court's Minute Order Re: Continuing Case Management Conference (issued on February 27, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (submitted on March 15, 2024)	0.10

Review Court's Minute Order Re: Continuing Case Management Conference (issued on March 20, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (submitted on May 14, 2024)	0.10
Review Court's Minute Order Re: Continuing Case Management Conference (issued on May 16, 2024)	0.10
Review Notice of Change or Address or Other Contact Information (served on May 29, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (submitted on July 15, 2024)	0.10
Review Court's Minute Order Re: Continuing Case Management Conference (issued on July 19, 2024)	0.10
Draft, Review, and/or Revise Plaintiffs' Proposed Third Amended Class and Representative Action Complaint for Damages (filed on December 18, 2024), and Meet and Confer with Defendant's Counsel and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order to Consolidate Cases for Settlement Approval and for Leave to File a Consolidated Complaint for Settlement Purposes (filed on September 16, 2024)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on September 16, 2024)	0.10
Review Court's Minute Order Re: Leave to Amend, and Court's Order Granting Joint Stipulation and [Proposed] Order to Consolidate Cases for Settlement Approval and for Leave to File a Consolidated Complaint for Settlement Purposes (issued on September 18, 2024)	0.10
Review Court's Minute Order Re: Case Management Conference (issued on September 23, 2024)	0.10
Review Court's Minute Order Re: Case Management Conference (issued on December 5, 2024)	0.10
Review Court's Minute Order Re: Case Management Conference (issued on January 25, 2025)	0.10
Draft Plaintiff's Notice of Change of Address or Other Contact Information (filed on January 30, 2025)	0.10

Appearances	
Prepare for and Remotely Attend the Case Management Conference (February 8, 2023)	0.90
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval (January 15, 2025)	0.80
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 Adam Badis (served on June 17, 2022)	2.40
Draft, Review, and/or Revise Plaintiff Badis' Form Interrogatories – General (Set One), Special Interrogatories (Set One), and Request for Production of Documents (Set One) to Defendant Copan Diagnostics Inc. (served on April 6, 2023)	0.20
Draft, Review, and/or Revise Plaintiff Badis' Notice of Deposition of Defendant Copan Diagnostics Inc.'s Person Most Knowledgeable and Request for Production of Documents (Job Duties and Wage and Hour Practices; May 30, 2023, via Remote Video Conferencing) (served on April 6, 2023)	0.10
Review and Analyze Defendant Copan Diagnostics, Inc.'s Responses to Plaintiff Badis' Special Interrogatories (Set One) (served on May 19, 2023)	0.50
Review and Analyze Defendant Copan Diagnostics, Inc.'s Requests for Production of Documents to Plaintiff Adam Badis (Set One) (served on July 20, 2023)	0.10
Draft, Review, and/or Revise <i>Belaire-West</i> Privacy Notice (English and Spanish) and Opt-Out Postcard	0.20
Review and Analyze Defendant's Notice of Deposition of Plaintiff Adam Badis and Request for Production of Documents (October 14, 2023; via Videoconference) (served on September 11, 2023)	0.10
Review and Analyze Defendant Copan Diagnostics, Inc.'s Objections and Response to Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Copan Diagnostics, Inc. and Requests for Production of Documents (served on September 28, 2023)	0.40
Review and Analyze Defendant's Amended Notice of Deposition of Plaintiff Adam Badis and Request for Production of Documents (December 19, 2023; via Videoconference) (served on November 9, 2023)	0.10

Review and Analyze Defendant Copan Diagnostics, Inc.'s Objections and Response to Plaintiff's Notice of Continued Deposition of Person Most Knowledgeable at Defendant Copan Diagnostics, Inc. and Requests for Production of Documents (served on November 20, 2023)	0.50
Letters and Correspondence	
Draft Correspondence to, Meet and Confer with, and Respond to Correspondence from, Defendant's Counsel and Other Plaintiff's Counsel	19.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to Mediation, and Assist with Claim Evaluation, Analysis Re: Damages and Penalties Exposure, and Preparation for Mediation and Settlement Negotiations	18.50
Review and Analyze Mediator's Proposal (issued on January 18, 2024)	0.20
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding	0.20
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on September 12, 2024), and Draft, Review, and/or Revise [Proposed] Judgment and Order Granting Plaintiff's Motion for Final Approval of Class Settlement and Attorneys' Fees and Costs, Notice of Class Action and Proposed Settlement, Workweeks Dispute Form, Request for Exclusion Form, Objection Form, and [Proposed] Order Re Preliminary Approval of Class and Representative Action Settlement and Provision Class Certification Order	1.10
Draft, Review, Revise, Negotiate, and Finalize Amendment to Joint Stipulation of Class Action and PAGA Settlement and Release (executed November 22, 2024), and Draft, Review, and/or Revises [Proposed] Judgment and Order Granting Plaintiff's Motion for Final Approval of Class Settlement and Attorneys' Fees and Costs, Revised Notice of Class Action and Proposed Settlement and Revised Workweek Dispute Form	0.40
Coordinate Settlement Administration with Settlement Administrator (CPT Group, Inc.), Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries and Submissions	3.50

Law and Motion	
Review and Analyze Defendant Copan Diagnostics, Inc.'s Notice of Demurrer and Demurrer to First Amended Complaint; Memorandum of Points and Authorities; Motion to Strike Portions of the First Amended Complaint; Memorandum of Points and Authorities; Declaration of C. Edward Langhammer, Jr. in Support of Defendant's Demurrer and Motion to Strike Plaintiff's First Amended Complaint, Request for Judicial Notice in Support of Defendant's Demurrer to Plaintiff's First Amended Complaint, [Proposed] Order Sustaining Defendant's Demurrer to Plaintiff's First Amended Complaint, and [Proposed] Order Granting Defendant's Motion to Strike Portions of Plaintiff's First Amended Complaint (served on February 9, 2023)	1.60
Review Court's Notice of Hearing Re: Demurrer as to Cause(s) of Action to First Amended Complaint (issued on February 10, 2023)	0.10
Review Defendant's Notice of Hearing on Demurrer to First Amended Complaint and Motion to Strike Portions of the First Amended Complaint (served on February 17, 2023)	0.10
Review Court's Minute Order Re: Defendant Copan Diagnostics Inc.'s Notice of Demurrer and Demurrer to First Amended Complaint (issued on March 7, 2023)	0.10
Research, Draft, Review, and/or Revise Plaintiff Adam Badis' Opposition to Defendant Copan Diagnostics, Inc.'s Demurrer to First Amended Complaint, and Non-Opposition to Defendant Copan Diagnostics, Inc.'s Motion to Strike Portions of First Amended Complaint (submitted on March 22, 2023)	0.50
Review and Analyze Defendant Copan Diagnostics, Inc.'s Reply to Opposition to Demurrer to Plaintiff's First Amended Complaint and Supplemental Declaration of C. Edward Langhammer, Jr. in Support of Defendant's Demurrer to Plaintiff's First Amended Complaint (served on March 28, 2023)	0.80
Review Court's Minute Order Re: Defendant's Motion to Strike Complaint on First Amended Complaint and Minute Order Re: Defendant's Demurrer as to Cause(s) of Action to First Amended Complaint (issued on April 5, 2023)	0.10
Review Court's Minute Order Re: Motion to Strike Portions of the First Amended Complaint (issued on April 12, 2023)	0.10

Review Declarations of Tae Kim, James Hawkins, Adam Badis, Angelica Reyes, Monica Melissa Gutierrez, Edward Langhammer, Susan Worthington, and Julie Green, and Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class and Representative Action Settlement, Compliance Chart, Declaration of Vartan Madoyan in Support Thereof, and [Proposed] Order Re: Motion for Preliminary Approval of Class and Representative Action Settlement (filed on November 5, 2024)	4.10
Review Court's Notice of Hearing Re: Hearing on Motion for Preliminary Approval of Class Action Settlement	0.10
Review Further Declaration of Tae Kim in Support of Plaintiffs' Motion for Preliminary Approval of Class and Representative Action Settlement (submitted on November 14, 2024)	0.10
Draft, Review, and/or Revise Supplemental Declaration of Tae Kim in Support of Plaintiffs' Motion for Preliminary Approval of Class and Representative Action Settlement and Amended [Proposed] Order Re: Motion for Preliminary Approval of Class and Representative Action Settlement (submitted November 25, 2024)	0.10
Review Court's Minute Order Re: Hearing on Preliminary Approval of Class Action Settlement (issued on December 5, 2024)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and Representative Action Settlement (issued on January 7, 2025)	0.10
Research, Draft, Review, and/or Revise Plaintiffs' Supplemental Brief in Support of Motion for Preliminary Approval of Class and Representative Action Settlement, Declaration of Tae Kim in Support Thereof, and Amended [Proposed] Order Re: Motion for Preliminary Approval of Class and Representative Action Settlement (submitted on January 8, 2025)	0.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (issued on January 15, 2025)	0.10
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement and Representative Action (issued on January 16, 2025)	0.10

Review Notice of Errata Re: Exhibit to Amended [Proposed] Order, Declaration of Tae Kim in Support of Notice of Errata Re: Exhibit to Amended [Proposed] Order, and Second Amended [Proposed] Order Re: Motion for Preliminary Approval of Class and Representative Action Settlement (served on January 17, 2025)	0.10
Review Court's Second Amended Order Re: Motion for Preliminary Approval of Class and Representative Action Settlement (issued on February 4, 2025)	0.10
Review and Analyze Administrator's Declaration, and Research, Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class and Representative Action Settlement, Declaration of Vartan Madoyan in Support Thereof, and [Proposed] Final Approval Order and Judgment	4.80
Total Hours:	123.20

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Badis vs. Copan Diagnostics, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/27/2022	U.S. Postmaster	Postage	\$7.50
6/3/2022	U.S. Postmaster	Postage	\$7.58
9/21/2022	Legal Document Server, Inc.	Attorney Service	\$113.43
9/21/2022	Riverside Superior Court	Complex Filing Fee	\$1,000.00
9/21/2022	Riverside Superior Court	Complaint Filing Fee	\$450.00
11/9/2022	Legal Document Server, Inc.	Attorney Service	\$15.55
11/14/2022	Legal Document Server, Inc.	Attorney Service	\$25.68
11/14/2022	Riverside Superior Court	Jury Fee	\$150.00
12/6/2022	Legal Document Server, Inc.	Attorney Service	\$15.55
12/16/2022	Legal Document Server, Inc.	Attorney Service	\$15.55
1/5/2023	Legal Document Server, Inc.	Attorney Service	\$31.10
2/1/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
2/7/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
2/8/2023	Riverside Superior Court	Document Download Fee	\$36.50
8/29/2023	Riverside Superior Court	Document Download Fee	\$8.00
9/11/2023	Lisa Klerman	Mediation Fee	\$5,000.00
9/26/2023	Riverside Superior Court	Document Download Fee	\$5.00
11/20/2023	Riverside Superior Court	Document Download Fee	\$39.99
12/21/2023	Riverside Superior Court	Document Download Fee	\$4.00
3/4/2024	Riverside Superior Court	Document Download Fee	\$1.00
12/31/2024	Riverside Superior Court	Document Download Fee	\$4.00
1/23/2025	Riverside Superior Court	Document Download Fee	\$2.00
1/31/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
3/21/2025	Riverside Superior Court	Document Download Fee	\$24.00
3/27/2025	Riverside Superior Court	Document Download Fee	\$110.00
4/8/2025	Riverside Superior Court	Document Download Fee	\$11.50
Total:			<u>\$7,127.33</u>