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Attorneys for Plaintiff and the Class

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

VANCE COAR, individually, and on behalf
of other members of the general public
similarly situated, and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

HOTEL EQUITIES GROUP, LLC, a Georgia
limited liability company; and DOES 1
through 100, inclusive,

Defendants.

Case No. BCV-22-100229

Honorable Bernard C. Barmann, Jr.
Department H

CLASS ACTION

**DECLARATION OF YASMIN HOSSEINI
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND
ENHANCEMENT AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and Enhancement
Award; Declaration of Class Representative
(Vance Coar); Declaration of Settlement
Administrator (Jarrod Salinas); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: March 14, 2025
Time: 8:30 a.m.
Department: H

Complaint Filed: January 26, 2022
FAC Filed: May 7, 2024
Trial Date: None Set

DECLARATION OF YASMIN HOSSEINI

I, Yasmin Hosseini, 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 Vance Coar (“Plaintiff” or “Class Representative”) 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 December 5, 2024, in Department H of the above-entitled Court, the Honorable Bernard C. Barmann, Jr., preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Hotel Equities Group, LLC (“Defendant”) (together with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Vance Coar as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Award (“Motion for Final Approval”), no Settlement Class Members have opted-out or objected to the Class Settlement, the contemplated request for Attorneys’ Fees and Costs, Enhancement Award, and Settlement Administration Costs, or allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

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WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above-captioned action since prior to its commencement on January 26, 2022.

5. Before initiating the matter, Lawyers *for* Justice, PC conducted investigation and research into the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour law and enforcement and penalties, Plaintiff's claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that Plaintiff's claims 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.

6. Class Counsel conducted significant litigation and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and was 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 had the opportunity to interview and obtain information from Plaintiff and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. The volume of data and documents that Class Counsel reviewed and analyzed included and was not limited to: Plaintiff's personnel records, Defendant's Handbook, job description, earning statements, among other information and documents. Class Counsel also developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with 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, 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, the mediation brief, and settlement documents; and preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

7. As outlined herein, the Parties have conducted significant investigation and informal discovery during the course of litigating the case, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature of the work performed by the Class Members and PAGA Group Members, as well as Defendant's 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 negotiation 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 PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered. Accordingly, sufficient investigation and review of information have taken place in order for the parties to be adequately informed of the nature and extent of the claims, and to enable all parties to fully evaluate the Settlement for its fairness, adequacy, and reasonableness.

8. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the case. These efforts included participating in a formal, full-day mediation conducted by Steven Rottman, Esq., a well-regarded mediator experienced in handling complex labor and employment matters. In the course of mediation and settlement discussions, the Parties exchanged information, documents, and data, and discussed various aspects of the case, including

1 and not limited to, the risks and delays of further litigation, the risks and expenses to the Parties
2 of proceeding with class certification and/or representative adjudication and trial, the law relating
3 to class certification, manageability, off-the-clock theory, meal and rest periods, and
4 representative PAGA claims, and wage-and-hour law and enforcement, as well as the evidence
5 produced and analyzed, and the possibility of appeals, among other things. During all settlement
6 discussions, the Parties conducted their negotiations at arm's length in an adversarial position.
7 Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended that
8 individualized questions of fact predominate over any common issues, and these issues would
9 pose challenges to class certification and representative adjudication. Defendant and its counsel
10 felt strongly about Defendant's ability to avoid class certification and prevail on the merits, while
11 Plaintiff and Class Counsel believed that they would be able to obtain class certification and
12 prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that the
13 case was well-suited for settlement given the legal issues relating to Plaintiff's principal claims,
14 as well as the costs and risks to the Parties that would attend further litigation. These risks of
15 further litigation include, and are not limited to, a determination that the claims are unsuitable for
16 class treatment and/or representative adjudication, class de-certification after certification of a
17 class, allowing a jury to decide the claims asserted in the case, and the real possibility of no
18 monetary recovery after years of litigation. The Settlement takes into account the strengths and
19 weaknesses of each side's position and the uncertainty of how the case might have concluded at
20 certification, trial, and/or appeals.

21 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
22 Attorneys' Fees in the amount of \$437,500.00, which is thirty-five percent (35%) of the
23 Maximum Settlement Amount of \$1,250,000.00. Pursuant to the contingency-fee agreement
24 entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee
25 of at least thirty-five percent (35%) of the recovery.

26 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
27 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
28 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class

Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter.

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case 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 **290.10 hours** performing tasks and obtaining recovery in this matter. 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 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.

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

1 Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees
2 involved compensation at the rate of \$855.96 per hour.

3 **EXPERIENCE AND ADEQUACY OF**
4 **LAWYERS *for* JUSTICE, PC**

5 13. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
6 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
7 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC
8 is attorney of record in dozens of employment-related putative class actions in both state and
9 federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who
10 focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA")
11 representative actions. The firm has successfully litigated cases involving nearly every aspect of
12 California wage and hour law, including payment of overtime and minimum wages, provision of
13 meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of
14 compliant wage statements, reimbursement of business expenses, executive, administrative, and
15 other overtime exemptions to the State of California and federal overtime compensation
16 requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has
17 recovered (sometimes in association with other law firms) millions of dollars on behalf of
18 thousands of individuals in California.

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

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

16. 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 is 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 claims and employer efforts to compel arbitration of such claims, e.g., *Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and has handled this process in three hundred (300) cases. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, Lawyers *for* Justice, PC has handled the class certification and court approval process for

1 hundreds of class action and/or representative action matters that have successfully resolved. She
2 is a member of the California Employment Lawyers Association and, on several occasions, she
3 has been a speaker regarding topics in wage and hour law at the organization's continuing legal
4 education events.

5 17. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree
6 from University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from
7 Pepperdine University School of Law in 2017. I was admitted to practice law in California in
8 2019. I was admitted to practice before all courts of the State of California and all federal district
9 courts in the State of California. I have worked on many wage and hour class action and PAGA
10 representative matters, and my work has included, *inter alia*, researching and drafting pleadings,
11 administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement
12 agreements, engaging in motion practice, claims evaluation and analysis, and making court
13 appearances. Prior to working at Lawyers *for* Justice, PC, I represented filmmakers and talent,
14 negotiating and structuring various types of agreements on their behalf. I am a member of the
15 California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian
16 American Bar Association.

17 **LITIGATION COSTS AND EXPENSES INCURRED BY**
18 **LAWYERS FOR JUSTICE, PC**

19 18. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation
20 and will not receive any compensation until recovery is obtained in this matter. Lawyers *for*
21 Justice, PC seeks reimbursement of **\$15,018.21** in litigation costs and expenses incurred in the
22 case, as reflected in "EXHIBIT B" attached hereto. These expenses were reasonable and
23 necessary in the prosecution of the case and to obtain the Settlement.

24 **ENHANCEMENT AWARD TO PLAINTIFF**

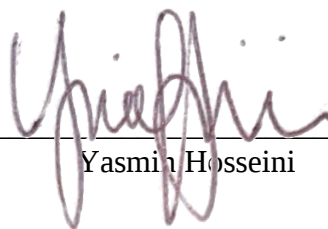
25 19. In recognition of his efforts and work serving as the Class Representative, the
26 Settlement provides for an Enhancement Award in the amount of \$10,000.00 to Plaintiff. The
27 requested Enhancement Award is fair and appropriate. Plaintiff spent a substantial amount of
28 time and effort to produce relevant documents and information and provided facts and evidence

1 to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed
2 him and actively tried to obtain and provide information that would facilitate the pursuit of the
3 case. Plaintiff spent numerous hours speaking with Class Counsel about his claims, describing
4 his work experiences with Defendant, and gathering and reviewing documents. Accordingly, it is
5 appropriate for Plaintiff to receive \$10,000.00 as a reasonable Enhancement Award for his
6 services in the case, in addition to his individual settlement payment.

7 20. I submit that the Settlement is fair, reasonable, and adequate, and in the best
8 interests of Plaintiff, Class Members, PAGA Group Members, and the State of California.

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

11 Executed this 20th day of February 2025, at Glendale, California.

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Yasmin Hosseini

EXHIBIT A

VANCE COAR V. HOTEL EQUITIES GROUP, LLC
Kern Superior Court Case No. BCV-22-100229

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Vance Coar (“Plaintiff”) during the Case	50.10
Investigate, Communicate with, and/or Interview Putative Class Members, PAGA Group Members and Percipient Witnesses	8.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff’s Class Action Complaint for Damages (filed on January 26, 2022)	7.50
Review Court’s Notice of Assignment to Judge for All Purposes, Notice of Order to Show Cause Re: CRC Rule 3.110, and Notice of Case Management Conference (filed on February 3, 2022)	0.10
Review and Analyze Defendant’s Answer to Plaintiff’s Class Action Complaint (served on March 7, 2022), and Research Affirmative Defenses in Defendant’s Answer	2.20
Review Court’s Notice of Insufficient Fees (filed on March 8, 2022)	0.10
Draft Plaintiff’s Notice of Posting Jury Fees (filed on May 26, 2022)	0.10
Review Defendant’s Case Management Statement (served on July 12, 2022)	0.20

Draft Plaintiff's Case Management Statement (filed on July 12, 2022)	0.90
Review Court's Minute Order Re: Case Management Conference (filed on July 27, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Further Case Management Conference; [Proposed] Order (submitted on January 11, 2023)	1.30
Review Court's Order Granting Joint Stipulation to Continue Further Case Management Conference (filed on January 23, 2023)	0.10
Draft Notice of Entry of Order Granting Joint Stipulation to Continue Further Case Management Conference (filed on February 17, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Conditional Settlement (filed on March 15, 2023)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Further Case Management Conference; [Proposed] Order (submitted on March 15, 2023)	1.30
Review Court's Order Granting Joint Stipulation to Continue Further Case Management Conference (filed on March 24, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Further Case Management Conference Statement (filed on August 2, 2023)	1.10
Review Court's Minute Order Re: Further Case Management Conference (filed on August 18, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Further Case Management Conference Statement (filed on November 1, 2023)	1.10
Review Court's Minute Order Re: Further Case Management Conference (filed on November 16, 2023)	0.10

Research and Draft Plaintiff's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, <i>Et. Seq.</i> (filed on May 7, 2024); Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order Thereon (submitted on December 29, 2023)	3.50
Review Court's Order Granting Joint Stipulating Granting Plaintiff Leave to File First Amended Complaint (filed on January 3, 2024)	0.10
Review Court's Minute Order Re: Further Case Management Conference (filed on January 18, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Further Case Management Conference Statement (filed on February 14, 2024)	1.10
Review Court's Minute Order Re: Further Case Management Conference (filed on February 28, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (filed on May 17, 2024)	1.40
Review Defendant's Answer to Plaintiff's Unverified First Amended Complaint (served on May 30, 2024)	2.20
Review Court's Minute Order Re: Further Case Management Conference (filed on May 30, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (filed on July 31, 2024)	1.40
Review Court's Minute Order Re: Further Case Management Conference (filed on August 15, 2024)	0.10
Review Court's Minute Order Re: Further Case Management Conference (filed on November 14, 2024)	0.10
Draft Plaintiff's Notice Regarding November 14, 2024 Case Management Conference (filed on December 9, 2024)	0.20

Appearances	
Prepare for and Telephonically Attend Case Management Conference (July 27, 2022)	0.80
Prepare for and Telephonically Attend Case Management Conference (August 18, 2023)	0.80
Prepare for and Telephonically Attend Case Management Conference (November 16, 2023)	0.80
Prepare for and Telephonically Attend Case Management Conference (February 28, 2024)	0.50
Prepare for and Telephonically Attend Case Management Conference (May 30, 2024)	0.80
Prepare for and Telephonically Attend Further Case Management Conference (August 15, 2024)	0.40
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement and Release (October 17, 2024)	1.50
Prepare for and Telephonically Attend Case Management Conference (November 14, 2024)	1.00
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Vance Coar (served on October 20, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Vance Coar	3.50
Letters and Correspondence	
Draft Notice of California Labor and Workforce Development Agency Re: Claims of Plaintiff Vance Coar for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> ("PAGA") (served on November 30, 2023)	4.50

Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	17.80
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	60.20
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on January 3, 2023)	25.60
Attend Mediation Session (January 10, 2023; via Video Conference)	9.50
Engage in Additional Settlement-Related Discussions	3.50
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding – Class Action Settlement (fully executed on March 31, 2023)	4.50
Draft, Review, Revise, Negotiate, and/or Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (fully executed on August 6, 2024), and Notice of Class Action Settlement	17.30
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	5.70
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement and Release, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Plaintiff in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement and Release (filed on September 6, 2024)	19.50

Draft Plaintiff's Re-Notice of Motion for Preliminary Approval of Class Action and PAGA Settlement and Release (filed on September 30, 2024)	0.60
Review Defendant's Non-Opposition to and Joinder In Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement and Release (served on October 2, 2024)	0.10
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement and Release (filed on October 17, 2024)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on October 17, 2024)	0.10
Draft Notice of Entry of Judgment or Order Granting Preliminary Approval of Class Action and PAGA Settlement and Release (filed on October 28, 2024)	0.10
Draft [Proposed] Amended Order Granting Preliminary Approval of Class Action and PAGA Settlement and Release (submitted on November 13, 2024)	0.50
Review Court's Amended Order Granting Preliminary Approval of Class Action and PAGA Settlement and Release (filed on December 5, 2024)	0.20
Draft Notice of Entry of Judgment or Order Granting Preliminary Approval of Class Action and PAGA Settlement and Release (filed on December 13, 2024)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Notice and Settlement Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Award, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on February 20, 2025) (Anticipated)	21.50
Total Hours:	290.10

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Coar vs. Hotel Equities Group, LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/20/2021	U.S. Postmaster	Postage	\$7.38
2/3/2022	ProLegal	Attorney Service	\$176.50
2/3/2022	Legal Document Server, Inc.	Attorney Service	\$82.91
2/3/2022	Kern County Superior Court	Complex Filing Fee	\$1,000.00
2/3/2022	Kern County Superior Court	Complex Filing Fee	\$435.00
3/11/2022	Legal Document Server, Inc.	Attorney Service	\$11.00
3/16/2022	Legal Document Server, Inc.	Attorney Service	\$29.50
5/25/2022	Steven J. Rottman, LLC	Mediation Fee	\$12,500.00
5/27/2022	Legal Document Server, Inc.	Attorney Service	\$24.87
5/27/2022	Kern County Superior Court	Jury Fee	\$150.00
7/7/2022	CourtCall, LLC	Attorney Service	\$94.00
7/12/2022	Legal Document Server, Inc.	Attorney Service	\$15.50
1/21/2023	Legal Document Server, Inc.	Attorney Service	\$16.85
1/21/2023	Kern County	Stipulation & Order Fee	\$20.00
3/9/2023	Legal Document Server, Inc.	Attorney Service	\$15.50
3/21/2023	Legal Document Server, Inc.	Attorney Service	\$16.85
3/21/2023	Kern County Superior Court	Stipulation Fee	\$20.00
8/2/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
11/1/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
11/30/2023	U.S. Postmaster	Postage	\$10.69
11/30/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
1/2/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
1/2/2024	Kern County Superior Court	Stipulation & Order Fee	\$20.00
2/15/2024	Legal Document Server, Inc.	Attorney Service	\$15.55
5/8/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
5/16/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
5/20/2024	Legal Document Server, Inc.	Attorney Service	\$31.40
7/13/2024	Legal Document Server, Inc.	Attorney Service	\$15.50
8/1/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
9/11/2024	Legal Document Server, Inc.	Attorney Service	\$19.87
9/11/2024	Kern County Superior Court	Motion Fee	\$60.00
10/1/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
10/31/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
11/21/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
12/9/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
Total:			<u>\$15,018.21</u>