

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Selena Matavosian (SBN 348044)
LAWYERS for JUSTICE, PC
450 North Brand Boulevard, Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs Blanca Galeas and Coryn Lewis and the Class
[Additional counsel listed on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

TRACY HOGE, individually, and on behalf of
all others similarly situated;

Plaintiff,

vs.

BETHANY HOME SOCIETY OF SAN
JOAQUIN COUNTY, INC.; and DOES 1
through 20, inclusive,

Defendants.

BLANCA GALEAS, individually and on behalf
of other members of the general public similarly
situated;

Plaintiff,

vs.

BETHANY HOME SOCIETY OF SAN
JOAQUIN COUNTY, INC.; and DOES 1
through 20, inclusive,

Defendants.

Case No.: STK-CV-UOE-2020-0010956 (*Lead Case*)

[Consolidated with: Case No. STK-CV-UOE-2021-0010793]

Honorable Jayne C. Lee
Department 10C

CLASS ACTION

**DECLARATION OF SELENA
MATAVOSIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, CLASS COUNSEL
FEES PAYMENT, CLASS COUNSEL
LITIGATION EXPENSES PAYMENT,
AND CLASS REPRESENTATIVE
SERVICE PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action and PAGA
Settlement, Class Counsel Fees Payment,
Class Counsel Litigation Expenses Payment,
and Class Representative Service Payments;
Declaration of Class Counsel (Joseph M.
Szilagyi); Declarations of Class
Representatives (Blanca Galeas, Coryn Lewis,
and Tracy Hoge); Declaration of
Administrator (Lluvia Islas); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: July 31, 2025
Time: 9:00 a.m.
Department: 10C

**DECLARATION OF SELENA MATAVOSIAN IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL
OF CLASS ACTION AND PAGA SETTLEMENT, CLASS COUNSEL FEES PAYMENT, CLASS COUNSEL
LITIGATION EXPENSES PAYMENT, AND CLASS REPRESENTATIVE SERVICE PAYMENTS**

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<i>Hoge</i> Complaint Filed:	December 29, 2020
<i>Hoge</i> FAC Filed:	August 9, 2021
<i>Galeas</i> Complaint Filed:	November 19, 2021
<i>Hoge</i> SAC Filed:	October 16, 2024
Trial Date:	None Set

Samuel A. Wong (SBN 217104)
Kashif Haque (SBN 218672)
Jessica L. Campbell (SBN 280626)
Joseph M. Szilagyi (SBN 317450)
AEGIS LAW FIRM, PC
9811 Irvine Center Drive, Suite 100
Irvine, California 92618
Tel: (949) 379-6250 / Fax: (949) 379-6251

Attorneys for Plaintiff Tracy Hoge and the Class

DECLARATION OF SELENA MATAVOSIAN

I, Selena Matavosian, 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 Plaintiffs Blanca Galeas (“Plaintiff Galeas”) and Coryn Lewis (“Plaintiff Lewis”) and the Class in the above-captioned matters. 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 March 14, 2025, in Department 10C of the above-entitled Court, the Honorable Jayne C. Lee preliminarily approved the Class Action and PAGA Settlement Agreement and Amendment to Class Action and PAGA Settlement Agreement (together, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff Tracy Hoge (“Plaintiff Hoge”), Plaintiff Galeas, and Plaintiff Lewis (collectively, “Plaintiffs”), and Defendant Bethany Home Society of San Joaquin County, Inc. (“Defendant”) (collectively, the “Parties”). The Court also conditionally certified the Class for settlement purposes, and provisionally appointed Plaintiffs Tracy Hoge, Blanca Galeas, and Coryn Lewis (collectively, “Plaintiffs”) as the representatives of the Class (collectively, “Class Representatives”). The Court also provisionally appointed and designated Aegis Law Firm, PC and Lawyers *for* Justice, PC as counsel for the Class (together, “Class Counsel”).

3. The Court approved and ordered the mailing of the Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix” or “Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payments (“Motion for Final Approval”), no Participating Class Members have objected to the Class Settlement, the contemplated request for

Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, Class Representative Service Payments, and Administration Expenses Payment, or the allocation for the PAGA Penalties.

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers for Justice, PC have been actively performing work in the action entitled *Blanca Galeas v. Bethany Home Society of San Joaquin County, Inc.*, Superior Court of California for the County of San Joaquin, Case No. STK-CV-UOE-2021-0010793 (“*Galeas* Action”), which was filed on November 19, 2021, and the action entitled *Tracy Hoge, et al. v. Bethany Home Society of San Joaquin County, Inc.*, Superior Court of California for the County of San Joaquin, Case No. STK-CV-UOE-2020-0010956 (“*Hoge* Action”), since the *Galeas* Action and *Hoge* Action were consolidated. On May 20, 2022, the *Galeas* Action and the *Hoge* Action (together, the “Actions”) were consolidated and the *Hoge* Action was designated as the lead action. Lawyers for Justice, PC, counsel for Plaintiffs Galeas and Lewis, eventually joined forces with Aegis Law Firm, PC, counsel for Plaintiff Hoge, and since then have been working cooperatively and in a coordinated fashion to pursue this matter and reach an outstanding settlement recovery.

6. Before initiating the *Galeas* Action, 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 Galeas 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, manageability, off-the-clock theory, regular rate of pay, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, and wage-and-hour law and enforcement, Plaintiff Galeas’ claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiff Galeas were well-suited for class-wide adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of non-exempt employees currently or formerly employed by Defendant in California, who were not properly compensated for, *inter alia*,

1 all hours worked, non-compliant meal and rest periods, and business expenses.

2 7. Collectively, Class Counsel conducted significant formal and informal discovery
3 and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims,
4 and were preparing the cases for class certification and trial, prior to reaching the Settlement. The
5 Parties exchanged and analyzed a large volume of pages of information, documents, and data
6 obtained from Plaintiffs, Defendant, and other sources, throughout the course of the litigation and
7 in connection with the mediation and settlement negotiations. Lawyers *for* Justice, PC propounded
8 Form Interrogatories – General (Set One), Special Interrogatories (Sets One and Two), and
9 Requests for Production of Documents (Set One) onto Defendant, and served multiple notices of
10 deposition of Defendant’s Person Most Knowledgeable designees, along with accompanying
11 requests for production of documents. Lawyers *for* Justice, PC also reviewed and analyzed
12 Defendant’s responses and objections to written discovery requests and deposition notices, and
13 document produced by Defendant in discovery. The volume of records and documents that Class
14 Counsel reviewed and analyzed included, and were not limited to: a sampling of Class Members’
15 time and payroll records, Plaintiffs’ employment records, Defendant’s Team Member Handbook,
16 earning statements, company policy acknowledgements, job descriptions, new hire, orientation,
17 and/or termination checklists, application for employment, and Defendant’s other operations and
18 employment practice, policies, and procedures documents, among other information and
19 documents. Class Counsel had the opportunity to interview and obtain information from Plaintiffs
20 and percipient witnesses, and reviewed and analyzed a volume of information, data, and
21 documents obtained from Plaintiffs, Defendant, and other sources. Class Counsel developed
22 liability, damages, violation, and penalties valuation models in the course of litigation and in
23 connection with the mediation and settlement negotiations, and met and conferred with
24 Defendant’s counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case
25 management, motion practice, formal and informal discovery, the production of information,
26 documents, and data in the course of litigation and in connection with mediation and settlement
27 negotiations, and settlement. Other work performed by Class Counsel included, and was not
28 limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the

1 pleadings, motion-related papers, the mediation briefing and supporting materials, and settlement
2 documents; and preparing for and attending court proceedings, mediation, and settlement
3 negotiations, among other tasks.

4 8. As outlined herein, the Parties have conducted significant investigation and formal
5 and informal discovery during the course of litigating this matter, mediation, and extensive
6 settlement negotiations. Collectively, Class Counsel analyzed a large volume of pages of
7 information, documents, and data obtained from Plaintiffs, Defendant, and other sources that
8 provided a critical understanding of the nature of the work performed by the Class Members and
9 Aggrieved Employees, as well as Defendant's organizational structure and their operations and
10 employment policies, practices, and procedures. The information, documents, and data were used
11 in analyzing liability, damages, penalties, and other valuation issues in connection with all phases
12 of the litigation, and ultimately, in connection with the mediation and settlement negotiations
13 process. Class Counsel also performed significant research into the applicable law, which is
14 evolving as it relates to class certification, manageability, off-the-clock theory, rounding, regular
15 rate of pay, meal and rest periods, representative PAGA claims and penalties, wage-and-hour
16 enforcement, Plaintiffs' claims and allegations, and Defendant's defenses thereto, as well as facts
17 discovered.

18 9. After conducting significant investigation of the facts and law during the
19 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to
20 try to resolve the cases. These efforts included participating in a mediation session conducted by
21 Hon. Lisa Cole (Ret.), a well-regarded mediator experienced in handling complex labor and
22 employment matters. During all settlement discussions, the Parties conducted their negotiations at
23 arm's length in an adversarial position. In the course of the mediation and settlement negotiations,
24 the Parties exchanged information, documents, and data, and discussed various aspects of the
25 cases, including and not limited to, the risks and delays of further litigation, the risks and expenses
26 to the Parties of proceeding with class certification, representative adjudication, and trial; the law
27 relating to class certification, manageability, off-the-clock theory, rounding, regular rates of pay,
28 meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements,

representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiffs' claims and allegations, and Defendant's defenses thereto, as well as the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class certification prevail on the merits and, while Plaintiffs and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the cases, and the real possibility of no monetary recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$666,666.66, which is one-third (1/3) of the Gross Settlement Amount of \$2,000,000.00. Pursuant to the contingency-fee agreements entered into by Plaintiff Galeas and Plaintiff Lewis, with their counsel, Plaintiff Galeas and Plaintiff Lewis have each agreed to a contingency fee of at least one-third (1/3) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (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 these cases. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Gross Settlement Amount of \$2,000,000.00—with a Net Settlement Amount of approximately at least \$1,163,226.96 to be paid to Participating Class Members (with gross Individual Class Payments

1 averaging approximately more than \$1,355.44), payment of \$15,000.00 to Aggrieved Employees
2 (with Individual PAGA Payments averaging approximately \$26.22), and payment of \$45,000.00
3 to the State of California—support the percentage fee sought.

4 12. While not necessarily required to be demonstrated because a percentage fee is
5 proper for this settlement, it should be noted that Class Counsel has incurred many hours of work
6 in connection with prosecuting this matter such that the award of attorneys' fees is also justified
7 under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **359.40 hours**
8 performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** is an
9 Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by
10 attorneys at Lawyers for Justice, PC and the time incurred by them in performing those services.
11 These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate
12 from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support
13 personnel actively engaged in assisting with the prosecution of this matter.

14 13. The work performed in this particular matter, the background of Lawyers for
15 Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who
16 worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment
17 class action and representative action cases, support a reasonable blended hourly rate of
18 compensation of at least \$850 per hour for work performed by Lawyers for Justice, PC. Lawyers
19 for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850
20 per hour for legal services performed, by courts granting approval of settlements in other wage-
21 and-hour class action and representative action cases: final approval of the class and representative
22 action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case
23 No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved
24 compensation at the rate of \$936.47 per hour; final approval of the class and representative action
25 settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No.
26 BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved
27 compensation at the rate of \$919.57 per hour; final approval of the class and representative action
28 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 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.

15. Edwin Aiwazian 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

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

16. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He 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, U.S. Ninth Circuit Court of Appeals, 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 regarding, Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.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 has handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action

1 matters that have successfully resolved. Joanna Ghosh is a member of the California Employment
2 Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and
3 hour law at the organization's continuing legal education events.

4 18. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Science
5 degree from California State University, Northridge in 2019, and was the recipient of the Wildman
6 Schumacher Scholarship. I earned a Juris Doctor degree from Southwestern Law School in 2022,
7 and I was the recipient of the Witkin Award for Academic Excellence. I was admitted to practice
8 law in California in 2022. I am admitted to practice before all courts of the State of California and
9 all U.S. Federal District Courts in the State of California. I have worked on many wage-and-hour
10 class action and PAGA representative cases, and my work on these cases has included, *inter alia*,
11 researching and drafting pleadings and motion-related papers, administrative notice exhaustion,
12 drafting, negotiating, and finalizing stipulations and settlement agreements, performing claims
13 evaluation and analysis, and making court appearances.

14 **LITIGATION COSTS AND EXPENSES INCURRED BY**
15 **LAWYERS *FOR* JUSTICE, PC**

16 19. To date, Class Counsel have borne all of the risks and costs of litigation and will
17 not receive any compensation until recovery is obtained in this matter. The Settlement provides
18 for reimbursement of Class Counsel's litigation costs and expenses in the amount of up to
19 \$60,000.00. Lawyers *for* Justice, PC seeks reimbursement of **\$9,220.67** in litigation costs and
20 expenses incurred in the matter, as reflected in "**EXHIBIT 2**" attached hereto. These expenses
21 were reasonable and necessary in the prosecution of the matter and to obtain the Settlement.

22 **CLASS REPRESENTATIVE SERVICE PAYMENTS TO PLAINTIFFS**

23 20. In recognition of their efforts and work spearheading the prosecution of the cases
24 and serving as the Class Representatives, as well as their broader individual waiver and release of
25 claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 5.1.1 of the
26 Settlement Agreement), the Settlement provides for Class Representative Service Payments, in the
27 amount of up to \$15,000.00 each to Plaintiffs (for a combined total of \$45,000.00). Plaintiffs spent
28 a substantial amount of time and effort discussing their employment with Class Counsel, gathering

1 and providing relevant documents and information, and providing facts and evidence to support
2 the prosecution of the claims. Plaintiffs were available whenever Class Counsel needed them and
3 actively tried to obtain and provide information that would help obtain a recovery in this matter.
4 Accordingly, it is appropriate for Plaintiffs to each receive \$15,000.00 as a reasonable Class
5 Representative Service Payment for their broader waiver and release of claims and services
6 performed in this matter, in addition to their Individual Class Payment(s) and Individual PAGA
7 Payment(s) (if applicable).

8 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
9 interests of Plaintiffs, Class Members, Aggrieved Employees, and the State of California.

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

12 Executed this 9th day of July 2025, at Glendale, California.

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16 Selena Matavosian
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EXHIBIT 1

TRACY HOGE, ET AL. V. BETHANY HOME SOCIETY OF SAN JOAQUIN COUNTY, INC.
San Joaquin County Superior Court Case No. STK-CV-UOE-2020-0010956 (“Hoge Action”)

BLANCA GALEAS V. BETHANY HOME SOCIETY OF SAN JOAQUIN COUNTY, INC.
San Joaquin County Superior Court Case No. STK-CV-UOE-2021-0010793 (“Galeas Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Blanca Galeas (“Plaintiff Galeas”) During the Case	23.50
Meet and Communicate with Plaintiff Coryn Lewis (“Plaintiff Lewis”) During the Case	17.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	9.50
Review and Analyze Court Filings in <i>Tracy Hoge, et al. v. Bethany Home Society of San Joaquin County, Inc.</i> , San Joaquin County Superior Court, Case No STK-CV-UOE-2020-0010956 (i.e., Hoge Action)	2.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Galeas’ Claims, Conduct Legal Research and Analysis of All Claims, and Draft Plaintiff Galeas’ Class Action Complaint for Damages (filed on November 19, 2021) (Galeas Action)	8.50
Review Court’s Notice of Case Assignment and Notice of Hearing (filed on November 19, 2021) (Galeas Action)	0.10
Review and Analyze Defendant Bethany Home Society of San Joaquin County, Inc.’s (“Defendant”) Answer to Plaintiff Galeas’ Class Action Complaint (filed on April 4, 2022), and Research Affirmative Defenses in Defendant’s Answer (Galeas Action)	1.50

Review Defendant's Case Management Statement (filed on May 2, 2022) (Galeas Action)	0.20
Draft, Review, and/or Revise Plaintiff Galeas' Case Management Statement (filed on May 3, 2022) (Galeas Action)	0.80
Draft, Review, and/or Revise Plaintiff Galeas' Notice of Posting Jury Fees (served on May 12, 2022) (Galeas Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on May 18, 2022) (Galeas Action)	0.10
Draft, Review, and/or Revise Plaintiff Galeas' Case Management Statement (filed on August 30, 2022) (Galeas Action)	0.60
Review Defendant's Case Management Statement (filed on September 2, 2022) (Galeas Action)	0.20
Review Court's Minute Order Re: Further Case Management Conference (filed on September 14, 2022) (Galeas Action)	0.10
Review Defendant's Notice of Change of Handling Attorney (filed on October 4, 2022) (Hoge Action)	0.10
Review Defendant's Notice of Association of Counsel (filed on November 3, 2022) (Galeas Action)	0.10
Review Defendant's Substitution of Attorney – Civil (Without Court Order) (filed on November 8, 2022) (Galeas Action)	0.10
Review Defendant's Case Management Statement (filed on December 20, 2022) (Hoge Action)	0.10
Draft, Review, and/or Revise Plaintiff Galeas' Case Management Statement (filed on December 23, 2022) (Galeas Action)	0.50
Review Defendant's Notice of Remote Appearance (filed on January 6, 2023) (Hoge Action)	0.10
Review Defendant's Notice of Change of Handling Attorney (filed on February 14, 2023) (Galeas Action)	0.10
Review Defendant's Substitution of Attorney (filed on June 30, 2023) (Galeas Action)	0.10
Review Court's Minute Order Re: Request for Dismissal (filed on January 29, 2024) (Galeas Action)	0.10
Review Court's Notice of Court's OSC Re: Dismissal (filed on February 2, 2024) (Galeas Action)	0.10

Draft, Review, and/or Revise Plaintiff Galeas' Declaration of Samantha J. Costa in Response to Order to Show Cause Hearing for Failure to Prosecute (filed on April 16, 2024) (Galeas Action)	1.50
Review Court's Minute Order Re: OSC Re: Dismissal (filed on May 1, 2024) (Galeas Action)	0.10
Draft, Review, and/or Review Plaintiff Galeas' Notice Regarding May 1, 2024 Order to Show Cause Re: Dismissal (filed on May 7, 2024)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Plaintiff Tracy Hoge's ("Plaintiff Hoge") and Plaintiff Galeas' Notice of Settlement and Joint Stipulation to Vacate Deadlines for Class Certification and [Proposed] Order Thereon (filed on July 9, 2024) (Hoge Action)	1.20
Review Court's Order Granting Joint Stipulation to Vacate Deadlines for Class Certification (filed on July 10, 2024) (Hoge Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on July 19, 2024) (Galeas Action)	0.80
Review Court's Minute Order Re: Status Hearing (filed on August 2, 2024) (Galeas Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Plaintiff Hoge's and Plaintiff Galeas' Notice of Settlement and Joint Stipulation to Vacate Deadlines for Class Certification and Granting Plaintiffs Leave to File Second Amended Complaint; [Proposed] Order Thereon (filed on October 9, 2024) (Hoge Action)	1.20
Investigate the Merits of Plaintiff Lewis' Claims, Conduct Legal Research and Analysis of All Claims, and Draft, Review, and/or Revise Plaintiff Hoge's, Plaintiff Galeas', and Plaintiff Lewis' (collectively, "Plaintiffs") Second Amended Consolidated Complaint (filed on October 16, 2024) (Hoge Action)	4.50
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on October 18, 2024) (Galeas Action)	1.10
Review Court's Minute Order Re: Status Conference (filed on October 31, 2024) (Galeas Action)	0.10
Review Court's Notice of Status Conference (filed on October 31, 2024) (Galeas Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on November 19, 2024) (Galeas Action)	1.10
Draft, Review, and/or Revise Plaintiff Galeas' Notice of Entry of Judgment or Order (filed on April 16, 2025) (Hoge Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation Regarding Mailing a Corrective Postcard to the Class; [Proposed] Order Thereon (filed on June 27, 2025) (Hoge Action)	1.50
Review Court's Order Granting Stipulation Regarding Mailing a Corrective Postcard to the Class (filed on June 30, 2025) (Hoge Action)	0.20
Appearances	
Prepare for and Remotely Attend Case Management Conference Hearing (May 18, 2022) (Galeas Action)	0.80
Prepare for and Remotely Attend Further Case Management Conference Hearing (September 14, 2022) (Galeas Action)	0.80
Prepare for and Remotely Attend Further Case Management Conference Hearing (January 10, 2023) (Galeas Action)	2.30
Prepare for and Remotely Attend Order to Show Cause Re: Dismissal Hearing (May 1, 2024) (Galeas Action)	0.60
Prepare for and Remotely Attend Status Hearing (August 2, 2024) (Galeas Action)	0.70
Prepare for and Remotely Attend Status Conference Hearing (November 27, 2024) (Galeas Action)	0.80
Prepare for and Remotely Attend Status Conference (February 5, 2025) (Hoge Action)	0.40
Prepare for and Remotely Attend Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (March 14, 2025) (Hoge Action)	1.60

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Galeas (served on September 23, 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 Galeas (served on October 13, 2021)	5.90
Draft Plaintiff Galeas' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on March 7, 2023)	5.40
Draft Plaintiff Galeas' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; Noticed for April 4, 2023) (served on March 7, 2023)	1.90
Draft Plaintiff Galeas' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; Noticed for April 5, 2023) (served on March 7, 2023)	2.10
Review and Analyze Defendant's Objections to Plaintiff Galeas' Notice of Deposition of Defendant's Person Most Knowledgeable and Requests for Production of Documents (served on March 22, 2023)	1.10
Review and Analyze Defendant's Objections to Plaintiff Galeas' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (served on March 29, 2023)	1.10
Review and Analyze Defendant's Objections to Plaintiff Galeas' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (served on March 29, 2023)	1.50
Review and Analyze Defendant's Responses to Plaintiff Galeas' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on April 17, 2023)	4.50
Review and Analyze Documents Produced by Defendant (served on April 17, 2023)	3.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Lewis (served on October 23, 2023)	4.80

Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Lewis for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (“PAGA”) (served on November 27, 2023)	4.50
Draft Correspondence to, and Respond to Correspondence from, Defendant’s Counsel	20.50
Draft Correspondence to, and Respond to Correspondence from, Plaintiff Hoge’s Counsel	12.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to Mediation	48.50
Prepare for Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting, Reviewing, and/or Revising the Mediation Brief, Compiling the Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on February 19, 2024)	18.50
Attend Mediation Session (February 23, 2024; via Zoom Video Conference)	8.50
Review and Analyze Mediator’s Proposal (issued on February 23, 2024)	1.80
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding Re: Class Action and PAGA Settlement (fully executed on May 14, 2024)	2.50
Draft, Review, Revise, Negotiate, and/or Finalize Class Action and PAGA Settlement Agreement (fully executed on October 29, 2024), and Draft, Review, and/or Revise Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	10.50
Draft, Review, Revise, Negotiate, and/or Finalize Amendment to Class Action and PAGA Settlement Agreement (fully executed on December 27, 2024)	1.50
Communicate with Settlement Administrator, Monitor Notice Administration Process, and Review Weekly Reports	7.50

Law and Motion	
Review and Analyze Plaintiff Hoge's Notice of Motion for Appointment of Aegis Law Firm, PC as Lead Counsel, Memorandum of Points and Authorities in Support Thereof, Declaration of Joseph M. Szilagyi in Support Thereof, and [Proposed] Order Thereon (filed on June 21, 2023) (Hoge Action)	1.50
Review Plaintiff Hoge's Amended Notice of Motion for Appointment of Aegis Law Firm, PC as Lead Counsel, and Notice of Errata Re: Plaintiff Tracy Hoge's Motion for Appointment of Aegis Law Firm, PC as Lead Counsel (filed on June 21, 2023) (Hoge Action)	0.50
Draft, Review, and/or Revise Plaintiff Galeas' Opposition to Plaintiff Tracy Hoge's Motion for Appointment of Aegis Law Firm, PC as Lead Counsel, Declaration of Edwin Aiwazian in Support Thereof, Declaration of Christina Galajan in Support Thereof, and Declaration of Arman Marukyan in Support Thereof (filed on July 7, 2023) (Hoge Action)	19.60
Review and Analyze Plaintiff Hoge's Reply in Support of Motion for Appointment of Aegis Law Firm, PC as Lead Counsel and Declaration of Joseph M. Szilagyi in Support Thereof (filed on July 12, 2023) (Hoge Action)	1.50
Review and Analyze Plaintiff Hoge's Supplement to Plaintiff Hoge's Reply in Support of Motion for Appointment of Aegis Law Firm, PC as Lead Counsel and Request for Judicial Notice in Support Thereof (filed on July 13, 2023) (Hoge Action)	8.50
Review Court's Tentative Ruling Re: Motion to Appoint Lead Counsel (published on July 19, 2023) (Hoge Action)	0.20
Review Court's Minute Order Re: Motion to Appoint Lead Counsel (filed on July 20, 2023) (Hoge Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Plaintiffs' Joint Stipulation to Continue Plaintiffs' Deadline to File Motion for Class Certification and [Proposed] Order Re: Joint Stipulation to Continue Deadline to File Motion for Class Certification (filed on October 26, 2023) (Hoge Action)	1.20
Review Court's Order Regarding Joint Stipulation to Continue Deadline to File Motion for Class Certification (filed on October 30, 2023) (Hoge Action)	0.20

Review and Analyze Declaration of Joseph M. Szilagyi, and Research and Draft, Review, and/or Revise Plaintiffs' Notice of Plaintiffs' Motion for Preliminary Approval of Class and PAGA Action Settlement, Memorandum of Points and Authorities in Support Thereof, Declaration of Selena Matavosian in Support Thereof, and [Proposed] Order Thereon (filed on January 22, 2025) (Hoge Action)	12.50
Review Plaintiffs' Amended Notice of Plaintiffs' Motion for Preliminary Approval of Class and PAGA Action Settlement (filed on February 5, 2025) (Hoge Action)	0.20
Review Court's Order Granting Preliminary Approval of Class Action Settlement and Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on March 14, 2025) (Hoge Action)	0.20
Review and Analyze Declarations of Administrator, Joseph M. Szilagyi, and Plaintiff Tracy Hoge, and Research and Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payments; Memorandum of Points and Authorities, Declaration of Selena Matavosian in Support Thereof, Declaration of Plaintiff Blanca Galeas, Declaration of Coryn Lewis, and [Proposed] Final Approval Order and Judgment (filed on July 9, 2025) (Hoge Action)	21.50
Total Hours:	359.40

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Galeas v. Bethany Home Society of San Joaquin County, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/23/2021	U.S. Postmaster	Postage	\$7.38
11/19/2021	Legal Document Server, Inc.	Attorney Service	\$230.99
11/19/2021	San Joaquin Superior Court	Complex Filing Fee	\$1,000.00
11/19/2021	San Joaquin Superior Court	Complaint Filing Fee	\$435.00
12/2/2021	ProLegal	Attorney Service	\$267.25
1/19/2022	Legal Document Server, Inc.	Attorney Service	\$150.00
3/15/2022	Legal Document Server, Inc.	Attorney Service	\$170.00
5/3/2022	Legal Document Server, Inc.	Attorney Service	\$170.00
5/12/2022	Legal Document Server, Inc.	Attorney Service	\$180.13
5/12/2022	San Joaquin Superior Court	Jury Fee	\$150.00
8/30/2022	Legal Document Server, Inc.	Attorney Service	\$175.00
12/23/2022	Legal Document Server, Inc.	Attorney Service	\$175.00
3/8/2023	General Logistics Systems US, Inc.	Courier Service	\$35.51
7/11/2023	Legal Document Server, Inc.	Attorney Service	\$251.75
11/27/2023	U.S. Postmaster	Postage	\$17.06
11/28/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
1/23/2024	Signature Resolution LLC	Mediation Fee	\$4,650.00
2/23/2024	Samantha Costa	Travel Reimbursement	\$40.60
4/16/2024	Legal Document Server, Inc.	Attorney Service	\$180.00
5/7/2024	Legal Document Server, Inc.	Attorney Service	\$180.00
7/19/2024	Legal Document Server, Inc.	Attorney Service	\$160.00
10/18/2024	Legal Document Server, Inc.	Attorney Service	\$180.00
11/19/2024	Legal Document Server, Inc.	Attorney Service	\$180.00
4/17/2025	Legal Document Server, Inc.	Attorney Service	\$160.00
Total:			<u>\$9,220.67</u>