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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

DANIEL CISNEROS, 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.

HCI SYSTEMS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: CIVSB2408988

Honorable Stephanie Tañada
Department S33

**DECLARATION OF DANIEL BASS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LABOR CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND
COSTS, GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION
COSTS**

Hearing Date: April 9, 2026
Hearing Time: 8:30 a.m.
Department: S33

Complaint Filed: March 18, 2024
Trial Date: None Set

DECLARATION OF DANIEL BASS

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

LITIGATION AND REPRESENTATIVE AND CLASS ACTION EXPERIENCE

2. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. Lawyers *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

3. Edwin Aiwazian is the 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, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. 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 many 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.

4. 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, including and not limited to, those listed in paragraph 8 herein. He has handled over one hundred and fifty (150) mediations and has worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

5. Joanna Ghosh is a Senior Partner 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 also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration of PAGA claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby

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

6 6. Brian J. St. John is a member of Lawyers *for* Justice, PC. He received his
7 Bachelor's degree from the University of California, San Diego in 2010 and earned his Juris
8 Doctor degree from the University of California, Berkeley, School of Law in 2013. He was
9 admitted to practice law in California in 2015. He is admitted to practice before all courts of
10 the State of California and all federal district courts in the State of California. He has worked
11 on many wage and hour class action and PAGA representative matters, and his work has
12 included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion,
13 drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion
14 practice, claims evaluation and analysis, and making court appearances. Prior to working at
15 Lawyers *for* Justice, PC, he spent several years working for a boutique employment and labor
16 law firm representing employers, and, in 2019 and 2020, he was employed as general counsel
17 for a DMHC licensed discount dental plan.

18 7. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Science
19 degree in Psychology from Missouri State University in 2009, and a Juris Doctor
20 degree from Washington University in St. Louis, School of Law in 2012, where I served as a
21 Senior Editor of the Law Review and as a member of the Note Selection Committee. I am
22 admitted to practice before all courts in the State of California, and all U.S. District Courts in
23 California. From 2014 through and including the present, my practice consisted almost
24 exclusively of complex wage and hour class action and PAGA action matters in California. I
25 have worked at several plaintiffs' side law firms, and started the employment practice at one of
26 them. I have taken and defended dozens of depositions and have successfully handled motion
27 practice in class action and PAGA cases regarding discovery (including and not limited to
28 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 at every step prior to trial. I also successfully handled briefing on appeals, including employer efforts to compel arbitration in *Jones v. UPS Supply Chain Solutions, Inc.*, California Court of Appeals for the First District, Case No. A160726 (Cal. App. Jul 01, 2021) (unpublished decision). Further, I have extensive experience with settlements of class actions and PAGA actions and have handled and supervised this process in over fifty (50) cases

EXAMPLES OF RESULT IN REPRESENTATIVE AND CLASS ACTION CASES

8. What follows are just a few examples of the type of results Lawyers for Justice, PC (“LFJ”) has achieved on behalf of its clients:

a) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a major property management company involving allegations of misclassification of various “manager” positions. On September 20, 2010, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC400414.

b) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national retailer of household items involving allegations of misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC413498.

c) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national property management company involving allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC430918.

d) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national retailer involving allegations of misclassification of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class

1 certification. On August 26, 2013, the court granted final approval of the class action settlement.
2 The Los Angeles County Superior Court Case Number is BC424012.

3 e) LFJ, in association with co-counsel therein, represented the plaintiff in a
4 wage-and-hour class and PAGA representative action against a bank, involving allegations of
5 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
6 granted final approval of the class and PAGA representative action settlement. The Kern County
7 Superior Court Case Number is S-1500-CV-273194-LHB.

8 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
9 wage-and-hour class and PAGA representative action against a national wholesale distributor
10 of plumbing and builder supplies, involving allegations of misclassification of multiple salaried
11 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
12 representative action settlement. The Sacramento County Superior Court Case Number is 34-
13 2012-00136285.

14 g) LFJ, in association with co-counsel therein, represented the plaintiff in a
15 wage-and-hour class action against a multinational corporation that provides global workplace
16 solutions, involving allegations of misclassification of the “Operations Manager” position. On
17 September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles
18 County Superior Court Case Number is BC478769.

19 h) LFJ, in association with co-counsel therein, represented the plaintiff in a
20 wage-and-hour class and PAGA representative action against a national retailer of household
21 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted
22 final approval of the class and PAGA representative action settlement. The San Francisco
23 County Superior Court Case Number is CGC-13-532344.

24 i) LFJ, in association with co-counsel therein, represented the plaintiff in a
25 wage-and-hour class and PAGA representative action involving allegations of misclassification
26 of the salaried residential “Property Manager” position. On September 17, 2015, the court
27 granted plaintiff’s motion for class certification. On October 20, 2017, the court granted final
28 approval of the class and PAGA representative action settlement. The Los Angeles County

1 Superior Court Case Number is BC474784.

2 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
3 wage-and-hour class and PAGA representative action against a national retailer of upscale
4 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
5 court granted final approval of the class and PAGA representative action settlement. The Los
6 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
7 Council Coordination Proceeding Number is 4794.

8 k) LFJ, in association with co-counsel therein, represented the plaintiffs in a
9 wage-and-hour class action against a national retailer of apparel and fashion accessories, on
10 behalf of non-exempt employees. On August 5, 2016, the court granted final approval of the
11 class action settlement. The Los Angeles County Superior Court Case Number is BC488069.

12 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
13 wage-and-hour class action against a national retailer of apparel, accessories, and home
14 products, involving allegations of misclassification of the "Department Manager" position. On
15 August 12, 2016, the court granted the plaintiffs' motion for class certification in part and
16 certified a class. On August 6, 2019, the court granted final approval of the class action
17 settlement. The Alameda County Superior Court Case Number is RG13680477.

18 m) LFJ represented the plaintiff in a PAGA representative action against a
19 real estate and property management company, on behalf of non-exempt employees. On
20 November 4, 2016, the court granted approval of the PAGA representative action settlement.
21 The Orange County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

22 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
23 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of
24 non-exempt employees. On November 18, 2016, the court granted final approval of the class
25 and PAGA representative action settlement. The San Francisco County Superior Court Case
26 Number is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

27 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
28 representative action against a foodservice distributor, on behalf of non-exempt employees. On

January 26, 2017, the court granted final approval of the class and PAGA representative action settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer's motion to compel arbitration, which resulted in a published opinion by the California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S. Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is 5046.

q) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a consumer packaging company, on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC590429.

r) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a manufacturer of food service industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final approval of the class and PAGA representative action settlement. The Orange County Superior Court Case Number is 30-2015-00810013-CU-OE-CXC.

s) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a lumber and hardware company on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class and PAGA representative action settlement. The Orange County Superior Court Case Number is 30-2014-00747750-CU-OE-CXC.

t) LFJ represented the plaintiff in a wage-and-hour class and PAGA representative action against a property management company, on behalf of non-exempt employees. On June 14, 2017, the court granted final approval of the class and PAGA

1 representative action settlement. The Los Angeles County Superior Court Case Number is
2 BC586234.

3 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
4 representative action against a food company on behalf of non-exempt employees. On June 30,
5 2017, the court granted final approval of the class and PAGA representative action settlement.
6 The Sacramento County Superior Court Case Number is 34-2015-00175871.

7 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
8 representative action against a chocolate company on behalf of non-exempt employees. On July
9 19, 2017, the court granted final approval of the class and PAGA representative action
10 settlement. The Alameda County Superior Court Case Number is RG15764300.

11 w) LFJ firm represented the plaintiff in a PAGA representative action, against
12 the parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On
13 October 18, 2017, the court granted approval of the PAGA representative action settlement. The
14 Los Angeles County Superior Court Case Number is BC569664.

15 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a manufacturer of plastic containers on behalf of non-exempt
17 employees. On October 31, 2017, the court granted final approval of the class and PAGA
18 representative action settlement. The Los Angeles County Superior Court Case Number is
19 BC577233.

20 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
21 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
22 employees. On December 11, 2017, the court granted final approval of the class and PAGA
23 representative action settlement. The Los Angeles County Superior Court Case Number is
24 BC569646.

25 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a property management company
27 on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
28 approval of the class and PAGA representative action settlement. The Los Angeles County

1 Superior Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding
2 Number is 4819.

3 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
4 wage-and-hour class and PAGA representative action against a global provider of flexible office
5 space solutions. On February 15, 2018, the court granted final approval of the class and PAGA
6 representative action settlement. The Los Angeles County Superior Court Case Number is
7 BC498401.

8 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
9 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
10 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.
11 The Tulare County Superior Court Case Number is VCU264528.

12 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
13 representative action against a behavioral health service provider on behalf of non-exempt
14 employees. On November 13, 2018, the court granted final approval of the class and PAGA
15 representative action settlement. The Alameda County Superior Court Case Number is
16 RG16811450.

17 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
18 PAGA representative action against a global provider of products and services to the energy
19 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the
20 court granted approval of the PAGA representative action settlement. The Kern County
21 Superior Court Case Number is S-1500-CV-280215-SDC.

22 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a
23 wage-and-hour class action against a parking company on behalf of non-exempt employees. On
24 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a
25 class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial
26 Council Coordination Proceeding Number is 4886.

27 ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a
28 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt

employees. On September 27, 2019, the court granted the plaintiffs' motion for class certification in part and certified a class. The Alameda County Superior Court Case Number is RG15757606 and the Judicial Council Coordination Proceeding Number is 4921.

gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a national retailer of apparel and fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

hh) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a medical equipment supplier on behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion for class certification and certified a class. On November 2, 2023, the court granted final approval of the class and PAGA representative action settlement. The San Bernardino County Superior Court Case Number is CIVDS1505744.

ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a notable decision from the California Supreme Court clarifying the law regarding PAGA claims, *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval of the PAGA representative action settlement. The San Diego County Superior Court Case Number is 37-2016-00005578-CU-OE-CTL.

jj) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a large national drug testing laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the plaintiff's motion for class certification and certified a class. On October 28, 2022, the court granted final approval of the class and PAGA representative action settlement. The San Diego County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

1 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
3 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020,
4 the court granted in part the plaintiff's motion for class certification and certified a class. The
5 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
6 Judicial Council Coordination Proceeding Number is 4930.

7 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
8 wage-and-hour class and PAGA representative action against a plastic packaging company on
9 behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs'
10 motion for class certification and certified a class. On November 8, 2021, the court granted
11 approval of the partial settlement of the action. On April 22, 2024, the court granted approval
12 of the PAGA settlement and entered an order dismissing the action. The San Bernardino County
13 Superior Court Case Number is CIVDS1507361.

14 mm) LFJ, in association with co-counsel therein, represented the plaintiffs in a
15 wage-and-hour class action against manufacturer and supplier of power products and services
16 on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
17 motion for class certification and certified a class. On August 27, 2021, the court granted final
18 approval of the class action settlement. The San Diego County Superior Court Case Number is
19 37-2015-00025968-CU-OE-CTL.

20 nn) LFJ represented the plaintiff in a wage-and-hour class action against a
21 nutritional products manufacturer on behalf of non-exempt production line employees. On
22 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
23 certified a class. On January 16, 2024, the court granted final approval of the class and PAGA
24 representative action settlement. The Solano County Superior Court Case Number is
25 FCS051001.

26 oo) LFJ represents the plaintiffs in a wage-and-hour class action against a
27 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for
28 the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On

July 13, 2023, the court granted the plaintiffs’ motion for class certification and certified a class. The Los Angeles County Superior Court Case Number is BC707670.

pp) LFJ represents the plaintiffs in a wage-and-hour class action against a chain of restaurants on behalf of non-exempt employees. On July 22, 2024, the court granted in part the plaintiffs’ motion for class certification and certified a class. The San Francisco Superior Court Case Number is CGC-20-582809.

THE LAWSUIT

9. Defendant is located in Ontario, California and provides fire safety and alarm systems for businesses throughout California. Defendant is a licensed systems integration contractor offering a full spectrum of services, including sales, engineering, installation, service, and maintenance. During the relevant time period, Defendant provided services in several of the major city areas in California, including San Diego, Los Angeles, Sacramento, as well as Fresno, Irvine, Ontario, and Pleasanton. Plaintiff Daniel Cisneros is a former employee of Defendant.

10. Plaintiff has satisfied the prerequisites under California Labor Code section 2699.3(a), including, and not limited to, providing the California Labor and Workforce Development Agency (“LWDA”) and the employer with written notice of the specific provisions of the California Labor Code that are alleged to have been violated, including the facts and theories to support the alleged violations, by way of written correspondence on behalf of Plaintiff that was dated November 15, 2023 (“PAGA Notice”). The PAGA Notice was sent by U.S. Certified Mail to the employers and submitted to the LWDA by way of online submission on the LWDA’s website. Aside from confirmation of receipt of the PAGA Notice, the LWDA did not respond to the PAGA Notice. A true and correct copy of the PAGA Notice is attached hereto as “**EXHIBIT 1.**”

11. March 18, 2024, Plaintiff filed a Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, *Et Seq.* (“Operative Complaint”) against Defendant in the San Bernardino County Superior Court (“Court”), Case No. CIVSB2408988 (the “Action”). The Operative Complaint asserted ten causes of action on behalf of Plaintiff and on behalf of a putative class of Defendant’s non-

1 exempt or hourly paid employees for damages, restitution, and penalties, flowing from the
2 California Labor Code, California Business & Professions Code, as well as applicable Industrial
3 Commission Wage Orders (the “Stand-Alone Claims”). The Operative Complaint also asserted,
4 as to the eleventh cause of action, a single cause of action for civil penalties under PAGA, for
5 violations of multiple provisions of the California Labor Code (the “PAGA Claim”). Plaintiff’s
6 core allegation is that Defendant has violated the California Labor Code by engaging in a
7 uniform practice and procedure, with respect to Plaintiff and other Aggrieved Employees, of,
8 *inter alia*, failing to pay overtime and minimum wages, failing to provide compliant meal and
9 rest periods and associated premiums, failing to pay timely wages during employment and upon
10 termination of employment, failing to provide complete and accurate itemized wage statements,
11 failing to keep complete and accurate payroll records, and failing to reimburse necessary
12 business-related expenses and costs.

13 12. On May 22, 2024, Defendant filed a Motion to Compel Arbitration (the “MTCA”),
14 asking the Court to compel all of Plaintiff’s claims to arbitration on an individual basis and stay
15 the case pending the outcome of the individual arbitration.

16 13. After being served with Defendant’s MTCA, but before the motion was heard,
17 Plaintiff propounded multiple sets of written discovery requests on June 3, 2024, including
18 Requests for Production of Documents, (Set One); Special Interrogatories (Sets One), Form
19 Interrogatories—General (Set One), and Requests for Admission (Set One), all of which sought
20 information relevant to numerous defenses to arbitration.

21 14. Plaintiff filed extensive opposition papers to the MTCA, consisting of two
22 separate declarations and a series of objections to Defendant’s purported evidence. In his
23 opposition, filed on June 25, 2024, Plaintiff explained that upon receiving Plaintiff’s arbitration-
24 related discovery requests, Defendant took the position that the mere filing of its MTCA
25 automatically stayed the action and that no discovery responses were therefore required under
26 California Code of Civil Procedure § 1281.4.

27 15. Plaintiff also argued *inter alia*, that arbitration-related discovery should first be
28 completed for numerous reasons and that the discovery responses were not due until after the

1 opposition deadline, that Defendant had not met its evidentiary contract formation burden, that
2 the alleged agreement was unconscionable, that PAGA claims were excluded from the scope of
3 the agreement, and that a stay should not be imposed.

4 16. The MTCA was heard on July 30, 2024, and, following the hearing, the Court
5 issued an order granting the MTCA as to the first ten causes of action (i.e., the Stand-Alone
6 Claims for labor code violations brought individually and on behalf of the putative class) and
7 denying the MTCA in its entirety as to the eleventh cause of action under PAGA (the
8 “Arbitration Order”). The Court also stayed the Action in its entirety, including both the
9 individual and non-individual components of the PAGA Claim, pending the outcome of the
10 arbitration of Plaintiff’s individual, Stand-Alone Claims. Thus, as a result of the Arbitration
11 Order, the class action components of the Stand-Alone Claims in the Operative Complaint are
12 no longer pending.

13 17. Sweeny Law, PC associated into this case shortly after the Arbitration Order was
14 issued and the Parties agreed to pursue mediation to resolve all claims still pending, i.e., both
15 all PAGA Claims as well as the *individual* components of Plaintiff’s Stand-Alone Claims.

16 18. On April 30, 2025, the Parties participated in a full-day mediation conducted by
17 the Honorable Patrick J. Walsh (Ret.), a former Chief United States Magistrate Judge and a
18 highly regarded mediator with extensive experience mediating complex labor and employment
19 matters. The matter did not settle at mediation, however, the Parties continued to engage in
20 extensive post-mediation settlement discussion and, with the further assistance of the mediator,
21 the Parties tentatively agreed to the core terms of the settlement via a mediator’s proposal.

22 **THE LITIGATION AND WORK PERFORMED BY PLAINTIFF’S COUNSEL**

23 19. The effectiveness of Plaintiff’s Counsel, Lawyers for Justice, PC in prosecuting
24 this case has translated into tangible monetary benefits for Plaintiff, Aggrieved Employees, and
25 the State of California in the following respects: (1) their recoveries over a reasonably short
26 period of time as opposed to waiting additional years for the same, or possibly, a worse, result;
27 (2) a guaranteed result that compares favorably with other similar representative action
28 settlements; and (3) significant savings in fees and costs which would have only increased

1 significantly had the case progressed through trial and/or appeals.

2 20. After engaging in extensive investigations, formal and informal discovery, and
3 exchange of information, data, and documents, the parties participated in extensive settlement
4 discussions and negotiations to try to resolve the above-captioned lawsuit. These efforts
5 included participating in a formal full-day mediation on April 30, 2025, conducted by Hon.
6 Patrick J. Walsh (Ret.), a well-respected mediator experienced in mediating complex labor and
7 employment matters. The matter did not settle at mediation, but with the aid of the mediator's
8 continued evaluation and through his proposal, the Parties ultimately reached a settlement to
9 resolve the remaining claims in the Action in their entirety. In the course of mediation and
10 settlement discussions, the parties discussed all aspects of the case, including the risks and
11 delays of further litigation and proceeding with trial, as well as the law relating to representative
12 PAGA actions, various off-the-clock theories, rounding of time and meal periods, meal and rest
13 periods, on-premises rest periods, on-call issues, regular rate of pay, arbitration
14 agreements/clauses, business expenses reimbursement, wage statement noncompliance, and
15 wage-and-hour enforcement, the evidence produced and analyzed, and the possibility of
16 bifurcation of discovery and/or trial and appeals, among other things, Plaintiff's claims, and
17 Defendant's defenses, as well as facts discovered. During all settlement discussions, the parties
18 conducted their negotiations at arm's length in an adversarial position.

19 21. Prior to reaching the Settlement, the parties investigated the veracity, strength, and
20 scope of the PAGA claim and allegations, and were preparing for trial. Plaintiff conducted
21 significant investigation and formal and informal discovery and exchange of information,
22 documents, and data regarding the facts of the case, including and not limited to, the review,
23 consideration, and analysis of substantial pages of information, documents, and data obtained
24 from Plaintiff, Defendant, and other sources. Plaintiff's Counsel propounded formal written
25 discovery requests onto Defendant (specifically, Requests for Production of Documents (Set
26 One), Special Interrogatories (Set One), Requests for Admissions (Set One) and Form
27 Interrogatories – General (Set One)). The information, documents, and data that were reviewed
28 and analyzed by Plaintiff's Counsel included, and were not limited to, Plaintiff's employment

records; a representative sampling of Aggrieved Employees' time and pay data; job descriptions; various forms, agreements, and acknowledgments (such as, Defendant's Acknowledgement of Receipt of Employee Handbook and Acknowledgment and Agreement to Arbitration of Disputes); and Defendant's operations and employment practices, policies, and procedures (such as, Prevailing Wage Projects Wage Calculation and On-Call Policy), among other documents. Counsel for the parties undertook significant investigation and evaluation of the PAGA claim and related allegations, including, and not limited to, calculating the potential monetary recovery under PAGA. Other work performed by Plaintiff's Counsel included, but was not limited to: meeting and conferring with Defendant's counsel regarding the pleadings, case management, discovery, arbitration, mediation, and settlement negotiations, among other issues; case strategy and analysis; researching, drafting, reviewing, and revising pleadings, court filings, motion-related papers (e.g., with respect to arbitration and settlement approval motion papers), briefs for settlement negotiations and mediation, and the Settlement Agreement; preparing written discovery requests; claims evaluation and analysis; preparing for and participating in settlement negotiations and the mediation; and appearing for court proceedings. Counsel for the parties have further invested time to research the applicable law, which is evolving as it relates to representative PAGA actions, various off-the-clock theories, meal and rest periods, rounding of time and meal periods, meal and rest periods, on-premises rest periods, on-call issues, regular rate of pay, arbitration agreements/clauses, business expenses reimbursement, wage statement noncompliance, Industrial Welfare Commission Wage Orders, Plaintiff's claims, and Defendant's defenses, as well as facts discovered.

22. Based on investigation and information discovered, Plaintiff's Counsel believes that there is sufficient evidence to support the allegations that Defendant violated the California Labor Code. While Plaintiff's Counsel believes that the PAGA claim has merit and that Plaintiff will ultimately succeed in this litigation and prevail at trial, Plaintiff and Plaintiff's Counsel also recognize Defendant's defenses, the costs of further litigation, and multiple risks to recovery. For example, although wage-and-hour actions are amenable to resolution as to a group of employees, some courts have also found that, for various reasons, the issues raised by Plaintiff,

1 including, and not limited to, the issues of non-compliant meal periods, non-compliant rest
2 periods, and unreimbursed business expenses, raise individualized issues and/or are not suitable
3 for adjudication as to a group of employees.

4 23. Plaintiff and his counsel have also considered the uncertainty and risk of the
5 outcome of further litigation, including the difficulties and delays inherent in such litigation. In
6 order to prevail on the PAGA claim, Plaintiff would have to prove that Defendant engaged in
7 the alleged California Labor Code violations and demonstrate that Defendant's conduct warrants
8 the imposition of penalties.

9 **ATTORNEYS' FEES REQUESTED BY PLAINTIFF'S COUNSEL**

10 24. As set forth more fully in the accompanying Declaration of Charles Sweeney,
11 Plaintiff's Counsel seeks attorneys' fees in the amount of \$453,250.00, which represents
12 approximately thirty-five percent (35%) of the Gross Settlement Amount. Pursuant to the
13 contingency-fee agreement entered into by and between Plaintiff and Plaintiff's Counsel,
14 Plaintiff has agreed to contingency-fees of at least thirty-five percent (35%) of the recovery.
15 The attorneys' fees sought are commensurate with: (1) the risk that Plaintiff's Counsel took in
16 commencing the case; (2) the time, effort, and expense that Plaintiff's Counsel dedicated to the
17 case; (3) the skill and determination that Plaintiff's Counsel has shown; (4) the results that
18 Plaintiff's Counsel has achieved throughout the litigation; (5) value of the settlement that
19 Plaintiff's Counsel has achieved in the case; and (6) the other cases that Plaintiff's Counsel has
20 turned down in order to devote its time and efforts to this case.

21 25. While not necessarily required to be demonstrated because a percentage fee is
22 proper for this settlement, it should be noted that Plaintiff's Counsel has performed many hours
23 of work in connection with prosecuting this matter such that the requested attorneys' fees award
24 is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a
25 total of **105.60 hours** performing tasks to obtain a recovery on behalf of Plaintiff, the State of
26 California, and Aggrieved Employees. Attached hereto as "**EXHIBIT 2**" is an Attorney Task
27 and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at
28 Lawyers *for* Justice, PC and the time incurred in performing those services. These hours include

work done by several attorneys at the firm. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of the case.

26. The work performed in this particular case, the background of Lawyers for Justice PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour class and PAGA representative actions, support a reasonable blended hourly rate of compensation of at least \$850 for work performed by Plaintiff's Counsel. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting approval of wage and hour class action and/or representative action settlements in other cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57; and final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an hourly rate of \$855.96.

LITIGATION COSTS AND EXPENSES INCURRED BY PLAINTIFF'S COUNSEL

27. The Settlement provides for reimbursement of all actual, reasonable out-of-pocket litigation costs and expenses. Plaintiff's Counsel seek total reimbursement of \$12,652.15 for litigation costs and expenses incurred in this case, of which Lawyers for Justice, PC incurred \$12,556.04, as reflected in the Case Cost Detail attached hereto as "EXHIBIT 3" and of which Sweeny Law, PC incurred \$96.11, as reflected in the Case Cost Detail that is attached to the concurrently filed declaration of Charles T. Sweeny. It should be noted that Plaintiff's Counsel has borne all of the risks and costs of litigation to date and will not receive any compensation until a recovery is obtained in this matter. These costs and expenses were reasonable and

necessary in the prosecution of this matter and to obtain the Settlement.

GENERAL RELEASE FEE TO PLAINTIFF

28. For bringing this action as a representative of the State of California and for a broader release individually, the Settlement provides General Release Fee to Plaintiff in the total amount of \$5,000.00 to be paid out of the Gross Settlement Amount, subject to approval by the Court. Plaintiff has also entered into a separate agreement to release his non-PAGA claims (i.e., the Stand-Alone Claims that were compelled to arbitration on an individual basis by the Arbitration Order) for \$5,000.00.

29. The requested General Release Fee is fair and appropriate. It is also worth noting that Plaintiff has undertaken significant efforts and work to spearhead the pursuit of this matter. By initiating and pursuing this matter, Plaintiff stepped into the shoes of the State of California and undertook the responsibilities of serving in a representative capacity. Plaintiff has spent a substantial amount of time and effort discussing his employment with his counsel, gathering and producing relevant documents and information, and providing the facts and evidence necessary to attempt to prove the allegations. Plaintiff was available whenever his counsel needed him and actively tried to obtain and provide information that would facilitate the pursuit of the PAGA claim. Accordingly, it is appropriate and just for Plaintiff to receive General Release Fee, in addition any individual penalties payment he will receive as an aggrieved employee and as a separate fee outside of his separate individual settlement agreement.

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

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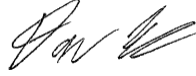
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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed this 17th day of March 2026, at Glendale, California.

4 

5 _____
Daniel Bass

EXHIBIT 1



November 15, 2023

BY ONLINE SUBMISSION

California Labor & Workforce Development Agency
PAGAFilings@dir.ca.gov

Re: HCI SYSTEMS, INC.

Dear Representative:

We have been retained to represent Daniel Cisneros against HCI Systems, Inc. (including any and all affiliates, subsidiaries, parents, directors, officers, agents, and executive employees) (collectively referred to as "HCI") for violations of California wage-and-hour laws. Mr. Cisneros seeks penalties for violations of the California Labor Code, which are recoverable under California Labor Code section 2698, et seq., the Labor Code Private Attorneys General Act of 2004 ("PAGA") and all other remedies available under PAGA.

Mr. Cisneros seeks these remedies on behalf of the State of California and "aggrieved employees," as defined herein. This letter is sent in compliance with the reporting requirements of California Labor Code section 2699.3.

HCI employed Mr. Cisneros as an hourly-paid, non-exempt employee from approximately October 2022 to approximately March 2023, in the State of California.

The "aggrieved employees" that Mr. Cisneros may seek penalties on behalf of are all current and former hourly-paid or non-exempt employees who worked for any of the above-referenced entities within the State of California.

Based on the following facts and theories, HCI has violated and/or continues to violate, among other provisions of the California Labor Code and applicable wage law, California Labor Code sections 201, 202, 203, 204, 226(a), 226.7, 510, 512(a), 551, 552, 558, 1174(d), 1194, 1197, 1197.1, 1198, 2800 and 2802, and IWC Wage Orders including *inter alia*, Wage Orders 4-2001, and 16-2001.

HCI required aggrieved employees to perform work before their scheduled shifts, after their scheduled shifts, during off-the-clock meal breaks, and/or during rest breaks and failed to compensate aggrieved employees for this time. Such work included, but was not limited to, responding to work-related inquiries.

California Labor Code sections 510 and 1198 require employers to pay time-and-a-half or double time overtime wages, and make it unlawful to work employees for hours longer than eight hours in one day and/or over forty hours in one week without paying the premium overtime rates at one-

and-one-half times or double the regular rate of pay, including additional remuneration. During the relevant time period, Mr. Cisneros and other aggrieved employees worked in excess of 8 hours in a day and 40 hours in a week. Therefore, Mr. Cisneros and other aggrieved employees were entitled to receive certain wages for overtime compensation, but they were not paid for all overtime hours worked.

California Labor Code sections 226.7 and 512 require employers to pay an employee one additional hour of pay at the employee's regular rate for each meal or rest period that is not provided. During the relevant time period, HCI required Mr. Cisneros and other aggrieved employees to work during meal and rest periods and failed to compensate them properly for non-compliant meal and rest periods including, *inter alia*, short, late, interrupted, and missed meal and rest periods.

California Labor Code sections 201 and 202 provide that if an employer discharges an employee, the wages earned and unpaid at the time of discharge are due and payable immediately, and if an employee quits his or her employment, his or her wages shall become due and payable not later than seventy-two (72) hours thereafter, unless the employee has given seventy-two (72) hours' notice of his or her intention to quit, in which case the employee is entitled to his or her wages at the time of quitting. During the relevant time period, HCI failed to pay Mr. Cisneros and other aggrieved employees all wages due to them within any time period specified by California Labor Code sections 201 and 202, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code section 204 requires that all wages earned by any person in any employment between the 1st and the 15th days, inclusive, of any calendar month, other than those wages due upon termination of an employee, are due and payable between the 16th and the 26th day of the month during which the labor was performed, and that all wages earned by any person in any employment between the 16th and the last day, inclusive, of any calendar month, other than those wages due upon termination of an employee, are due and payable between the 1st and the 10th day of the following month. California Labor Code section 204 also requires that all wages earned for labor in excess of the normal work period shall be paid no later than the payday for the next regular payroll period. During the relevant time period, HCI failed to pay Mr. Cisneros and other aggrieved employees all wages due to them within any time period specified by California Labor Code section 204, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code section 226 requires employers to make, keep and provide complete and accurate itemized wage statements to their employees. During the relevant time period, HCI did not provide Mr. Cisneros and other aggrieved employees with complete and accurate itemized wage statements. The wage statements they received from HCI were in violation of California Labor Code section 226(a). The violations include, but are not limited to, the failure to include the total hours worked by Mr. Cisneros and other aggrieved employees, including time spent working off-the-clock and during meal and rest periods as discussed above.

California Labor Code sections 551 and 552 require that every person employed in any occupation of labor is entitled to one day's rest in a seven-day workweek, that no employer of labor shall cause his employees to work more than six days in a workweek, and that an employer shall pay a civil

penalty in the amounts of fifty dollars (\$50) for each aggrieved employee per pay period for the initial violation and one hundred dollars (\$100) for each aggrieved employee per pay period for each subsequent violation. During the relevant time period, Mr. Cisneros and the aggrieved employees were required to regularly and/or consistently work in excess of six (6) days in a workweek. During the relevant time period, Mr. Cisneros and the aggrieved employees were required to work in excess of thirty (30) hours in a week and/or six (6) hours in any one (1) day thereof, during workweeks in which they were required to work in excess of six (6) days. During the relevant time period, Mr. Cisneros and the aggrieved employees were required to work in excess of six (6) days in a workweek without accumulating or being provided the opportunity to take at least one (1) day of rest, and when Mr. Cisneros and the aggrieved employees accumulated days of rest, they were not actually provided the opportunity to take the equivalent of one (1) day's rest in seven (7) during each calendar month.

California Labor Code sections 1174(d) requires an employer to keep, at a central location in the state or at the plants or establishments at which employees are employed, payroll records showing the hours worked daily by and the wages paid to, and the number of piece-rate units earned by and any applicable piece rate paid to, employees employed at the respective plants or establishments. These records shall be kept with rules established for this purpose by the commission, but in any case shall be kept on file for not less than two years. During the relevant time period, HCI failed to keep accurate and complete payroll records showing the actual hours worked daily and the wages earned by Mr. Cisneros and other aggrieved employees, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code sections 1194, 1197, and 1197.1 provide the minimum wage to be paid to employees, and the payment of a lesser wage than the minimum so fixed is unlawful. During the relevant time period, HCI did not provide Mr. Cisneros and other aggrieved employees with the minimum wages to which they were entitled for work performed "off-the-clock."

California Labor Code section 1198 provides that "The employment of any employee ... under conditions of labor prohibited by the [Industrial Wage Orders] is unlawful." The applicable Industrial Wage Orders, including *inter alia*, Wage Orders 4-2001, and 16-2001, require that for each workday an employee is required to report for work and does report, but is not put to work or is furnished less than half said employee's usual or scheduled day's work, the employee shall be paid for half the usual or scheduled day's work, but in no event for less than two (2) hours nor more than four (4) hours, at the employee's regular rate of pay. Further, if an employee is required to report for work a second time in any one workday and is furnished less than two (2) hours of work on the second reporting, said employee shall be paid for two (2) hours at the employee's regular rate of pay. During the relevant time period, HCI failed to pay Mr. Cisneros and other aggrieved employees half the usual or scheduled day's work in an amount no less than two (2) hours nor more than four (4) hours at the employee's regular rate of pay for workdays in which Mr. Cisneros and the other aggrieved employees reported to work and were furnished less than half the usual or scheduled day's work. During the relevant time period, HCI failed to pay Mr. Cisneros and other aggrieved employees for two (2) hours at the employee's regular rate of pay on days in which Mr. Cisneros and the other aggrieved employees were required to report for work a second time in one workday and were furnished less than two (2) hours of work upon the second reporting.

California Labor Code sections 2800 and 2802 require an employer to reimburse its employee for all necessary expenditures incurred by the employee in direct consequence of the discharge of his or her job duties or in direct consequence of his or her obedience to the directions of the employer. During the relevant time period, Mr. Cisneros and other aggrieved employees incurred necessary business-related expenses and costs that were not fully reimbursed by HCI.

Therefore, on behalf of all aggrieved employees, Mr. Cisneros seeks all applicable penalties arising out of the above-referenced wage, hour, and payroll practices, or which could be assessed and collected by the Labor and Workforce Development Agency, for violation of the California Labor Code pursuant to PAGA, including civil penalties pursuant to Labor Code section 558.

If you have any questions or require additional information, please do not hesitate to contact us. Thank you for your attention to this matter and the noble cause you advance each and every day.

With kind regards,



Gabriella Sole, Esq.

Cc: (By U.S. Certified Mail / Return Receipt Requested)

HCI Systems, Inc.
c/o Hany Dimitry
Agent for Service of Process
1354 S. Parkside Place
Ontario, CA 91761

LAWYERS FOR JUSTICE

410 ARDEN AVE, SUITE 203 / GLENDALE, CA 91203

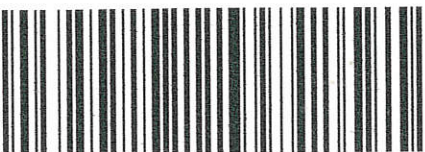
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PAGA Notice

Daniel Cisneros v. HCI Systems, Inc

PS Form 3800, April 2015 PSN 7530-02-000-9047

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c/o Hany Dimity
Agent for Service of Process
1354 S. Parkside Place
Ontario, CA 91761



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c/o Hany Dimitry

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PAGA Notice

Daniel Cisneros v. HCI Systems, Inc

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Ontario, CA 91761

9590 9402 8362 3156 4297 71

2. Article Number (Transfer from service label)

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PS Form 3811, July 2020 PSN 7530-02-000-9053

EXHIBIT 2

DANIEL CISNEROS V. HCI SYSTEMS, INC.
San Bernardino County Superior Court Case No. CIVSB2408988

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Daniel Cisneros (“Plaintiff”)	8.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	5.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Action and Private Attorneys General Act (“PAGA”) Claims, Conduct Legal Research and Analysis Regarding Class and PAGA Claims, and Draft, Review, and/or Revise Plaintiff’s Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, et seq. (filed on March 18, 2024)	7.50
Review Court’s Notice of Case Assignment for All Purposes and Notice of Case Management Conference (filed on April 15, 2024)	0.20
Review Defendant’s Conference Statement Re: Meet and Confer on Motion to Compel Arbitration and Stay Litigation (served on July 3, 2024)	0.40
Review Court’s Minute Order Re: Other Predisposition Hearing (filed on October 8, 2024)	0.20
Draft, Review and/or Revise Plaintiff’s Notice of Association of Counsel (filed on October 23, 2024)	0.20
Draft, Review, and/or Revise Plaintiff’s Notice of Change of Address or Other Contact Information (filed on February 5, 2025)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Re: Status of Arbitration Hearings and Notice of Settlement (filed on July 25, 2025)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Statement Re: Non-Appearence Case Review Re: Status of PAGA Settlement Approval Motion (filed on September 23, 2025)	0.20
Review Court's Minute Order Re: Non-Appearence Case Review Re: Status of PAGA Settlement Approval Motion (filed on September 29, 2025)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Statement Re: Order to Show Cause Re: Status of PAGA Settlement Approval Motion (filed on December 31, 2025)	0.30
Review Court's Minute Order Re: Order to Show Cause – Predisposition (filed on January 7, 2026)	0.20
Appearances	
Prepare for and Remotely Attend Hearing on Defendant's Motion to Compel Arbitration (July 30, 2024)	2.40
Prepare for and Remotely Attend Order to Show Cause Re: Status of Settlement Approval (January 7, 2025)	1.10
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 Daniel Cisneros (served on September 21, 2023)	2.20
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Defendant (served on June 3, 2024)	4.50
Letters and Correspondence	
Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff under the Private Attorneys General Act (served on November 15, 2023)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with Defendant's Counsel	10.50

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation, and Draft, Review, and/or Revise Mediation Brief, Supporting Materials, and Penalties Analyses and Calculations for Mediation	18.50
Review and/or Analyze Mediator's Proposal (issued May 19, 2025)	1.20
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding Re: PAGA Representative Action Settlement (executed on August 4, 2025)	0.70
Review, Revise, Negotiate, and Finalize Private Attorneys General Act Settlement Agreement and Release and Cover Letter (executed on January 5, 2026)	1.20
Law and Motion	
Review and Analyze Defendant's Notice of Motion and Motion to Compel Arbitration and Stay Litigation; Declaration in Support (served on May 24, 2024)	2.20
Draft, Review, and/or Revise Plaintiff's Opposition to Defendant's Motion to Compel Arbitration and Stay Litigation, Plaintiff's Objections to Defendant's Evidence, Declaration of Desiree Ruiz Alfaro in Support Thereof, and Declaration of Plaintiff Daniel Cisneros in Support Thereof (filed on June 25, 2024)	18.50
Review and Analyze Defendant's Reply Memorandum in Support of Its Motion to Compel Arbitration and Stay Litigation; Declaration of Charles G. Smith in Support Thereof (served on July 1, 2024)	2.40
Review Court's Minute Order Re: Motion to Compel Arbitration (filed on July 3, 2024)	0.50
Draft, Review, and/or Revise Plaintiff's Supplemental Brief in Further Opposition to Defendant's Motion to Compel Arbitration and Stay Litigation (filed on July 25, 2024)	6.50
Review Court's Minute Order Re: Motion to Compel Arbitration (filed on July 30, 2024)	0.60
Research, Draft, Review, and/or Revise Declaration of Daniel Bass in Support of Plaintiff's Motion for Approval of Private Attorneys General Act Settlement Agreement	4.50
Total Hours:	105.60

EXHIBIT 3

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Cisneros vs. HCI Systems, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/17/2023	U.S. Postmaster	Postage	\$8.56
8/18/2023	U.S. Postmaster	Postage	\$17.60
9/14/2023	U.S. Postmaster	Postage	\$18.80
11/15/2023	U.S. Postmaster	Postage	\$8.56
11/15/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
3/16/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
4/15/2024	Legal Document Server, Inc.	Attorney Service	\$156.28
4/15/2024	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
4/15/2024	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
4/16/2024	Elite Litigation Support	Attorney Service	\$187.00
6/3/2024	General Logistics Systems US, Inc.	Courier Service	\$16.67
6/10/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
6/25/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
7/19/2024	CourtCall, LLC	Attorney Service	\$72.00
7/25/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
7/25/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
11/7/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
3/8/2025	Legal Document Server, Inc.	Attorney Service	\$18.15
4/2/2025	Signature Resolution LLC	Mediation Fee	\$10,250.00
7/25/2025	Legal Document Server, Inc.	Attorney Service	\$18.89
9/23/2025	Legal Document Server, Inc.	Attorney Service	\$18.89
12/31/2025	Legal Document Server, Inc.	Attorney Service	\$18.89
Total:			<u>\$12,556.04</u>