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*Attorneys for Plaintiffs and the Class*

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

CAMERON FLETCHER, individually,  
and on behalf of other members of the  
general public similarly situated;  
KATRINA  
WILSON, 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;

Plaintiffs,

vs.

TRIPLE B CORPORATION d/b/a  
CHARLIES PRODUCE, a Washington  
corporation; and DOES 1 through 100,

Defendants.

Case No.: 2:22-cv-3053-DMG-MAA

Honorable Dolly M. Gee  
Courtroom 8C

**CLASS ACTION**

**DECLARATION OF JOANNA  
GHOSH IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
CLASS COUNSEL AWARD,  
SERVICE AWARDS, AND  
ADMINISTRATIVE COSTS**

[Notice of Motion and Motion for  
Class Counsel Award, Service  
Awards, and Administrative Costs;  
Declaration of Class Representatives  
(Cameron Fletcher and Katrina  
Wilson); Declaration of Settlement  
Administrator (Gillian McCreedy);  
and [Proposed] Order Awarding  
Class Counsel Award, Service  
Awards and Administrative Costs  
filed concurrently herewith]

Date: December 6, 2024  
Time: 10:00 a.m.  
Courtroom: 8C

Complaint Filed: February 22, 2022  
FAC Filed: February 16, 2024  
Trial Date: None Set

**DECLARATION OF JOANNA GHOSH**

I, Joanna Ghosh, 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 Cameron Fletcher (“Plaintiff Fletcher”) and Katrina Wilson (“Plaintiff Wilson”) (together, “Plaintiffs”) and the Class. 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.

**PROCEDURAL HISTORY OF THE ACTION**

2. Defendant Triple B Corporation d/b/a Charlies Produce (“Defendant”) (collectively with Plaintiffs, the “Parties”) is a full-service produce company that focuses on sourcing fruits and vegetables from local growers and supplying produce to retail and foodservice customers. Plaintiff Fletcher was employed by Defendant as an hourly-paid, non-exempt employee from approximately March 2017 to approximately December 2019. Plaintiff Wilson was employed by Defendant as an hourly-paid, non-exempt employee in the State of California from approximately January 2021 to present.

3. On February 22, 2022, Plaintiff Fletcher filed the Class Action Complaint for Damages (“Original Complaint”), thereby commencing a putative class action in the Superior Court of California for the County of Los Angeles, Case No. 22STCV06634, against Defendant Triple B Corporation d/b/a Charlies Produce (“Defendant”) (collectively with Plaintiffs, the “Parties”) for violations of the California Labor Code and the California Business and Professions Code.

4. On May 5, 2022, Defendant removed the case to the United States District Court for the Central District of California (the “Court”), Case No. 2:22-cv-03053-DMG-MAA (the “Action”).

5. On May 12, 2022, Defendant filed its Answer to Plaintiff Fletcher’s Original Complaint (Docket No. 9).

1           6. On November 14, 2023, Plaintiff Wilson provided written notice to  
2 the Labor and Workforce Development Agency and Defendant, of Plaintiff  
3 Wilson's intent to seek civil penalties for alleged violations of the California Labor  
4 Code.

5           7. Plaintiffs' core allegations are that Defendant violated the California  
6 Labor Code and California Business and Professions Code by, *inter alia*, failing  
7 to properly pay all wages due (including minimum, regular, overtime, and  
8 reporting time wages), failing to provide compliant meal and rest periods or pay  
9 premiums in lieu thereof, failing to timely pay wages upon termination and  
10 associated waiting time penalties, failing to timely pay wages during employment,  
11 failing to provide accurate, itemized wage statements, failing to keep requisite  
12 payroll records, and failing to reimburse necessary business-related expenses.  
13 Plaintiff Wilson contends that Defendant's conduct constitutes unfair business  
14 practices and gives rise to penalties under Private Attorneys General Act of 2004,  
15 California Labor Code section 2698, *et seq.* ("PAGA"). Plaintiffs further allege  
16 that Defendant's failure to properly pay all compensation due, arises from, *inter*  
17 *alia*, Defendant's practices and policies which required Class Members to work  
18 before clocking in for their shifts and after clocking out of their shifts and due to  
19 alleged rounding practices and claimed improper regular rate calculations. As a  
20 result, Plaintiffs contends that they, Class Members, and Aggrieved Employees  
21 are entitled to, *inter alia*, unpaid wages, penalties (including and not limited to,  
22 penalties pursuant to PAGA), and attorneys' fees.

23           8. Defendant denies any liability of any kind associated with the claims  
24 and allegations, and further denies that Plaintiffs or the Class Members and  
25 Aggrieved Employees are entitled to any relief. Defendant also denies that this  
26 case is appropriate for class or representative treatment for any purpose other than  
27 the Settlement. Defendant maintains, among other things, that they have complied  
28 with federal and California laws in all respects.

1           9. The Parties engaged in extensive informal discovery through the  
2 exchange of information and documents to understand the nature of the allegations  
3 and the scope of potential liability.

4           10. The Parties began to discuss the possibility of mediation and  
5 Defendant provided Plaintiffs' counsel with pertinent data for the Class Members  
6 so that the Parties could fully-investigate the claims at issue and understand their  
7 strengths and weaknesses.

8           11. On May 11, 2023, the Parties attended a mediation with experienced  
9 mediator Mark S. Rudy, Esq. (the "Mediator"). After the mediation, the Parties  
10 reached a settlement, as provided in the Settlement Agreement and herein, to settle  
11 Plaintiffs' claims on a class-wide and representative basis.

12                   **PRELIMINARY APPROVAL OF SETTLEMENT**

13           12. On November 17, 2023, Plaintiffs filed the Motion for Preliminary  
14 Approval of Class Action and PAGA Settlement ("Motion for Preliminary  
15 Approval") and supporting documents (Docket Nos. 26, 26-1, 26-2, 26-3, and 26-  
16 4). By way of this motion, Plaintiffs sought preliminary approval of the Settlement  
17 Agreement as well as leave to file an amended complaint in order to implement  
18 the Settlement.

19           13. On February 8, 2024, the Court issued an In Chambers-Order Re:  
20 Plaintiff's Motion for Preliminary Approval of Class Action and PAGA  
21 Settlement (Docket No. 29) ("February 8, 2024 Order"), requesting that the Parties  
22 provide additional information in support of the Motion for Preliminary Approval.

23           14. Pursuant to the instruction of the Court, the stipulation of the Parties,  
24 and the Court's order granting leave to file an amended complaint pursuant to the  
25 stipulation of the Parties, on February 16, 2024, Plaintiffs filed the First Amended  
26 Class Action Complaint for Damages and Enforcement Under the Private  
27 Attorneys General Act, Cal. Labor Code § 2698 Et Seq. (Docket No. 32). This  
28 amended complaint formally added Plaintiff Wilson as an additional named

1 plaintiff, added a cause of action under PAGA on behalf of Plaintiff Wilson, and  
2 fleshed out the allegations that were investigated, litigated, mediated and resolved  
3 to facilitate settlement of all claims.

4 15. On February 29, 2024, Plaintiffs filed Plaintiffs' Supplemental Brief  
5 in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and  
6 PAGA Settlement and supporting documentation (Docket Nos. 33, 33-1, and 33-  
7 2), thereby addressing the issues raised in the February 8, 2024 Order.

8 16. On March 15, 2024, the Parties attended a hearing regarding the  
9 Motion for Preliminary Approval ("March 15, 2024 Hearing"), wherein the Court  
10 raised additional issues with respect to the Motion for Preliminary Approval and  
11 ordered the Parties to provide the Court with a supplemental evidentiary filing by  
12 April 5, 2024 (Docket No. 35).

13 17. On March 29, 2024, pursuant to the Parties' stipulation, the Court  
14 entered an Order Re: Joint Stipulation to Continue Deadline to File Supplemental  
15 Evidence, thereby continuing the deadline for the Parties to file the supplemental  
16 evidentiary filing from April 5, 2024, to April 12, 2024 (Docket No. 37).

17 18. On April 12, 2024, Plaintiffs filed the Declaration of Joanna Ghosh in  
18 Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA  
19 Settlement and supporting documentation (Docket Nos. 38, 38-1, 38-2, and 38-3),  
20 thereby addressing the issues raised at the March 15, 2024 Hearing.

21 19. On July 5, 2024, the Court entered an Order, thereby setting the  
22 Motion for Preliminary Approval for hearing on July 26, 2024 at 10:00 a.m. in the  
23 above-captioned Court (Docket No. 39).

24 20. On July 26, 2024, the Parties attended a hearing regarding the Motion  
25 for Preliminary Approval at which the Court heard from the Parties, and the Court  
26 granted the motion. After the hearing, the Court entered an Order Granting  
27 Preliminary Approval of Class Action and PAGA Settlement ("Preliminary  
28 Approval Order") (Docket No. 41). By way of the Preliminary Approval Order,

the Court preliminarily approved the Class Action and PAGA Settlement Agreement (“Settlement Agreement,” “Settlement,” or “Agreement”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Cameron Fletcher and Katrina Wilson to represent the Class (“Class Representative(s)”). The Court preliminarily appointed and designated Edwin Aiwazian, Arby Aiwazian, Joanna Ghosh, and Selena Matavosian of Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class and Representative Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation, subject to the Court’s edits. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator for handling the notice and settlement administration process.

21. On July 26, 2024, the Parties received an email from the Court containing a redline version of the edits to the Class Notice which was referenced in the Preliminary Approval Order. On August 15, 2024, Plaintiffs filed the Declaration of Selena Matavosian Regarding Court-Approved Notice of Class and Representative Action, thereby informing the Court that the Parties incorporated the Court’s edits into the Class Notice and the Settlement Administrator formatted and prepared the Class Notice for mailing to the Class (Docket No. 42).

22. As of the date of filing the accompanying Motion for Class Counsel Award, Service Awards, and Administrative Costs (“Motion for Fees”), no Class Members have objected to the Class Settlement, the request for Class Counsel Award, Service Awards, or Administrative Costs, or the allocation for the penalties under the PAGA.

#### **WORK PERFORMED BY CLASS COUNSEL**

23. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned action since prior to its

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1 commencement in the Superior Court of California for the County of Los Angeles  
2 on February 22, 2022. This matter was removed by Defendant to the United States  
3 District Court for the Central District of California on May 5, 2022.

4 24. Before initiating the case, Lawyers *for* Justice, PC investigated and  
5 researched the facts and circumstances underlying the pertinent factual and legal  
6 issues and applicable law. This required thorough discussions and interviews  
7 between attorneys at Lawyers *for* Justice, PC and Plaintiff Cameron Fletcher, and  
8 research into the various legal issues involved in the case, namely, the current state  
9 of the law as it applied to class certification, off-the-clock theory, meal and rest  
10 periods, wage-and-hour law and enforcement, Plaintiff Cameron Fletcher's claims  
11 and allegations, and potential defenses. After conducting initial investigations,  
12 Lawyers *for* Justice, PC determined that the claims of Plaintiff Cameron Fletcher  
13 was well-suited for class-wide adjudication, owing to what appeared to be a  
14 common course of conduct affecting a similarly-situated group of current and  
15 former hourly-paid, non-exempt employees of Defendant within the State of  
16 California, who were not properly compensated for, *inter alia*, all hours worked,  
17 non-compliant meal and rest periods, and business expenses.

18 25. Class Counsel conducted significant investigation and informal  
19 discovery into the facts of the case, to assess the veracity, strength, and scope of  
20 the claims, and was preparing the matter for class certification and trial prior to  
21 reaching the Settlement. Class Counsel reviewed and analyzed a large volume of  
22 information, data, and documents obtained from Plaintiffs, Defendant, and other  
23 sources, in the course of litigation and in connection with mediation and settlement  
24 negotiations. The Parties agreed to engage in, and did engage in, extensive  
25 informal discovery through the exchange of information and documents. The  
26 information, documents, and data reviewed and analyzed by Class Counsel  
27 included, and were not limited to, approximately 97% of Class Members' time and  
28 pay data. Class Counsel developed liability, damages, and penalties valuation

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1 models in the course of litigation and in connection with mediation and settlement  
2 negotiations, and met and conferred with Defendant's counsel on numerous  
3 occasions, e.g., to discuss issues relating to the pleadings, case management,  
4 discovery, jurisdiction, and production of information, documents, and data in the  
5 course of litigation and in connection with the mediation and settlement  
6 negotiations, and mediation and settlement. Other work performed by Class  
7 Counsel included, and was not limited to, case strategy and analysis; drafting,  
8 reviewing, and revising the pleadings, motion-related papers, the mediation brief,  
9 and settlement documents; and preparing for and attending court proceedings and  
10 mediation and settlement negotiations, among other tasks.

11 26. As outlined herein, the Parties have conducted significant  
12 investigation and informal discovery during the course of litigating the case,  
13 mediation, and extensive settlement negotiations. Class Counsel analyzed a large  
14 amount of information, data, and documents obtained from Plaintiffs, Defendant,  
15 and other sources, that provided a critical understanding of the nature of the work  
16 performed by the Class Members, as well as Defendant's operations and  
17 employment policies, practices, and procedures. The information, documents, and  
18 data were used in analyzing liability, damages, penalties, and valuation issues in  
19 connection with all phases of the litigation, and ultimately in connection with the  
20 mediation and settlement negotiation process. Class Counsel also performed  
21 research regarding applicable law, which is evolving as it relates to class  
22 certification, manageability, off-the-clock theory, rounding, regular rate of pay,  
23 meal and rest periods, representative PAGA claims and penalties, wage-and-hour  
24 law and enforcement, Plaintiffs' claims and allegations, and Defendant's defenses  
25 thereto, as well as facts discovered.

26 27. After conducting significant investigation into the facts and law during  
27 the prosecution of the case, counsel for the Parties engaged in extensive settlement  
28 negotiations to try to resolve the case. These efforts included participating in a

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1 formal, full-day mediation conducted by Mark S. Rudy, Esq., a well-regarded  
2 mediator experienced in mediating complex labor and employment matters.  
3 During all settlement discussions, the Parties conducted their negotiations at arm's  
4 length in an adversarial position. In the course of mediation and settlement  
5 negotiations, the Parties exchanged information, documents, and data, and  
6 discussed all aspects of the case, including and not limited to, the risks and delays  
7 of further litigation, the risks to the Parties of proceeding with class certification  
8 and/or representative adjudication, the law relating to class certification,  
9 manageability, off-the-clock theory, rounding, regular rate of pay, meal and rest  
10 periods, representative PAGA claims, wage-and-hour law and enforcement, as  
11 well as the evidence produced and analyzed, and the possibility of appeals, among  
12 other things. Arriving at a settlement that was acceptable to the Parties was not  
13 easy. Defendant contended that individualized questions of fact predominate over  
14 any common issues, and these issues would pose challenges to class certification  
15 and representative adjudication. Defendant and its counsel felt strongly about  
16 Defendant's ability to avoid class certification and representative adjudication and  
17 prevail on the merits. Plaintiffs and Class Counsel believe that they would be able  
18 to obtain class certification and prevail at trial. With the aid of the mediator's  
19 evaluation, the Parties ultimately agreed that the case was well-suited for  
20 settlement given the legal issues relating to principal claims in the case, as well as  
21 the costs and risks to the Parties that would attend further litigation. These risks  
22 of further litigation include, and are not limited to, a determination that the claims  
23 are unsuitable for class treatment and/or representative adjudication, class de-  
24 certification after certification of a class, allowing a jury to decide the claims  
25 asserted in the case, and the real possibility of no monetary recovery after years of  
26 litigation.

27 ///

28 ///

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28. As set forth more fully in the accompanying Motion for Fees, Class Counsel seeks attorneys' fees in the amount of \$563,500.00 which is thirty-five percent (35%) of the Gross Settlement Amount of \$1,610,000.00, as provided in the Settlement Agreement. Pursuant to the contingency-fee agreements entered into by and between Plaintiffs and Class Counsel, Plaintiffs have agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

29. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to devote Class Counsel's time and efforts to the case. The nature of the work performed, skill exercised, and the outcome in this matter support the percentage fee sought and the application of a lodestar multiplier. An outstanding monetary recovery has been obtained in this matter, involving a ***Gross Settlement Amount of \$1,610,000.00*** (with a Net Settlement Amount of ***approximately \$920,665.35 to be paid to Settlement Class Members*** with an average payment of at least approximately \$1,088.80 per Settlement Class Member, a ***payment of \$18,750.00 to Aggrieved Employees*** with an average payment of \$102.46 per Aggrieved Employee, and ***payment of \$56,250.00 to the State of California***).

30. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel have incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a lodestar analysis with a multiplier of 1.87. Attorneys at Lawyers for Justice, PC have spent a total of **355.40 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT A"** is an Attorney Task and Time Chart that sets forth in detail the

1 nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and  
2 the time incurred in performing those services. The hours include work done by  
3 several attorneys. Also, separate from the hours referenced herein and in the chart,  
4 Lawyers *for* Justice, PC had litigation support personnel actively engaged in  
5 assisting with the prosecution of this matter.

6 31. The work performed in this particular matter, the background of  
7 Lawyers *for* Justice, PC, as well as the individual backgrounds, training, and  
8 experience of the attorneys who worked on this matter, in litigating complex wage-  
9 and-hour cases, and in particular, employment class actions and representative  
10 actions, support a reasonable blended hourly rate of compensation at the rate of at  
11 least \$850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for*  
12 Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of  
13 at least \$850 per hour for legal services performed, by courts granting approval of  
14 settlements in other wage-and-hour class action and/or representative action cases:  
15 final approval of the class and representative action settlement in *David Dugan v.*  
16 *TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No.  
17 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees  
18 involved compensation at the rate of \$936.47 per hour; final approval of the class  
19 and representative action settlement in *Larry Greenwood, et al. v. Scan Health*  
20 *Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20,  
21 2021, and the award of attorneys' fees involved compensation at the rate of  
22 \$919.57 per hour; and final approval of the class and representative action  
23 settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court  
24 Case No. SCV258764) was granted on February 6, 2019, and the award of  
25 attorneys' fees involved compensation at the rate of \$855.96 per hour.

26 **EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC**

27 32. For over a decade, Lawyers *for* Justice, PC has almost exclusively  
28 focused on the prosecution of consumer and employment class actions, involving

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1 wage-and-hour claims, race discrimination, unfair business practices, or consumer  
2 fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a  
3 dozen employment-related putative class actions in both state and federal courts  
4 in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who  
5 focus on litigating complex wage-and-hour class and PAGA representative  
6 actions. Lawyers *for* Justice, PC has successfully litigated cases involving the  
7 executive, administrative, and other overtime exemptions to the State of California  
8 and federal overtime compensation requirements. During a relatively short time,  
9 in association with other law firms, Lawyers *for* Justice, PC has recovered millions  
10 of dollars on behalf of thousands of individuals in California.

11 33. Edwin Aiwarzian is the Managing Member and Shareholder of  
12 Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine  
13 University in April of 1999 and earned a Juris Doctor degree from Pepperdine  
14 University School of Law in May of 2004. He has extensive formal training in  
15 dispute resolution and negotiation from the Straus Institute for Dispute Resolution  
16 as part of its Masters in Dispute Resolution degree program. In addition, he has  
17 previously served as a pro bono mediator for the Los Angeles County Superior  
18 Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the  
19 UCLA Extension Program. During the summer of 2000, he studied Legal Writing  
20 at Harvard University. From approximately September 2002 to approximately  
21 December 2002, he served as a Judicial Extern to the Honorable Kim McLane  
22 Wardlaw of the United States Court of Appeals for the Ninth Circuit. From  
23 approximately June 2002 to approximately August 2002, he served as a Judicial  
24 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the  
25 Second Appellate District. In December of 2004, he obtained a license to practice  
26 law from the California State Bar. Since in or around October of 2008, through  
27 his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the  
28 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.

34. Arby Aiwarzian 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.

1 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court  
2 Case No. RG13680477). Under his supervision, dozens of class action or  
3 representative action cases have resulted in settlements that have been granted  
4 court approval, including and not limited to, those listed in paragraph 37 herein.  
5 He has handled over one hundred and fifty (150) mediations and has worked on  
6 over two hundred and fifty (250) class action or representative action cases which  
7 have resulted in settlement.

8 35. I am a Managing Member of Lawyers *for* Justice, PC. I received a  
9 Bachelor of Arts degree from California State University, Los Angeles in 2006, a  
10 Master of Science degree from the London School of Economics in 2007, and a  
11 Juris Doctor degree from Georgetown University Law Center in 2010. I am  
12 admitted to practice in California (since 2010) and in New York (since 2013) and  
13 I am also admitted to practice in all U.S. District Courts in California, the U.S.  
14 Bankruptcy Court for the Central District of California, and the U.S. Supreme  
15 Court. I have taken and defended dozens of depositions and successfully handled  
16 motion practice in class action cases regarding discovery (including and not  
17 limited to, regarding class contact information), class certification (both contested  
18 class certification and stipulated class certification), arbitration agreements,  
19 coordination, and intervention. I have successfully handled briefing and oral  
20 argument on appeal and obtained notable decisions regarding the Private  
21 Attorneys General Act and employer efforts to compel arbitration of PAGA  
22 claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar.  
23 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S.,  
24 Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. I have  
25 significant experience with class actions, including and not limited to working on  
26 cases to obtain class certification through contested motion practice and working  
27 on cases in the post-certification stage (e.g., post-certification discovery, appeal,  
28 statistical sampling and pilot study, and trial preparation in conjunction with co-

1 counsel in a case involving a certified class consisting of approximately 2,600  
2 individuals). I have extensive experience with class action and/or representative  
3 action settlements, and have handled this process in over five hundred (500) cases.  
4 Under my, Edwin Aiwazian, and Arby Aiwazian's supervision, Lawyers *for*  
5 Justice, PC has handled the class certification and court approval process for  
6 hundreds of class action and/or representative action matters that have successfully  
7 resolved. I am a member of the California Employment Lawyers Association and,  
8 on several occasions, have been a speaker regarding topics in wage and hour law  
9 at the organization's continuing legal education events.

10 36. Selena Matavosian is a Member of Lawyers *for* Justice, PC. She  
11 received a Bachelor of Science degree from California State University,  
12 Northridge in 2019 and earned a Juris Doctor degree from Southwestern Law  
13 School in 2022. She was admitted to practice law in California in 2022. She is  
14 admitted to practice before all courts of the State of California and all federal  
15 district courts in the State of California. She has worked on many wage-and-hour  
16 class action and PAGA representative cases, and her work on these cases has  
17 included researching and drafting pleadings and motions, administrative notice  
18 exhaustion, drafting, negotiating, and finalizing stipulations and settlement  
19 agreements, claims evaluation and analysis, and making court appearances.

20 ***EXAMPLES OF RESULTS IN WAGE AND HOUR CLASS ACTION AND***  
21 ***REPRESENTATIVE ACTION CASES***

22 37. What follows are just a few examples of the type of results Lawyers  
23 *for* Justice, PC ("LFJ") has achieved on behalf of its clients:

24 a. LFJ, in association with co-counsel therein, represented the  
25 plaintiffs in a wage-and-hour class action against a major property management  
26 company involving allegations of misclassification of various "manager"  
27 positions. On September 20, 2010, the court granted final approval of the class  
28

1 action settlement. The Los Angeles County Superior Court Case Number is  
2 BC400414.

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

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

13 d. LFJ, in association with co-counsel therein, represented the  
14 plaintiffs in a wage-and-hour class action against a national retailer involving  
15 allegations of misclassification of the “Store Manager” position. On June 10,  
16 2011, the court granted plaintiffs’ motion for class certification. On August 26,  
17 2013, the court granted final approval of the class action settlement. The Los  
18 Angeles County Superior Court Case Number is BC424012.

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

25 f. LFJ, in association with co-counsel therein, represented the  
26 plaintiff in a wage-and-hour class and PAGA representative action against a  
27 national wholesale distributor of plumbing and builder supplies, involving  
28 allegations of misclassification of multiple salaried “manager” positions. On May

22, 2014, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2012-00136285.

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

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

i. LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action involving allegations of misclassification of the salaried residential “Property Manager” position. On September 17, 2015, the court granted plaintiff’s motion for class certification. On October 20, 2017, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC474784.

j. 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 upscale hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County

1 Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial  
2 Council Coordination Proceeding Number is 4794.

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

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

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

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

26 o. LFJ represented the plaintiffs in a wage-and-hour class and  
27 PAGA representative action against a foodservice distributor, on behalf of non-  
28 exempt employees. On January 26, 2017, the court granted final approval of the

1 class and PAGA representative action settlement. The San Bernardino County  
2 Superior Court Case Number is CIVDS1507260.

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

12 q. LFJ, in association with co-counsel therein, represented the  
13 plaintiffs in a wage-and-hour class and PAGA representative action against a  
14 consumer packaging company, on behalf of non-exempt employees. On March 10,  
15 2017, the court granted final approval of the class and PAGA representative action  
16 settlement. The Los Angeles County Superior Court Case Number is BC590429.

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

23 s. LFJ, in association with co-counsel therein, represented the  
24 plaintiffs in a wage-and-hour class and PAGA representative action against a  
25 lumber and hardware company on behalf of non-exempt employees. On April 26,  
26 2017, the court granted final approval of the class and PAGA representative action  
27 settlement. The Orange County Superior Court Case Number is 30-2014-  
28 00747750-CU-OE-CXC.

1 t. LFJ represented the plaintiff in a wage-and-hour class and  
2 PAGA representative action against a property management company, on behalf  
3 of non-exempt employees. On June 14, 2017, the court granted final approval of  
4 the class and PAGA representative action settlement. The Los Angeles County  
5 Superior Court Case Number is BC586234.

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

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

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

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

26 y. LFJ, in association with co-counsel therein, represented the  
27 plaintiffs in a wage-and-hour class and PAGA representative action against a bank  
28 on behalf of non-exempt employees. On December 11, 2017, the court granted

1 final approval of the class and PAGA representative action settlement. The Los  
2 Angeles County Superior Court Case Number is BC569646.

3 z. LFJ, in association with co-counsel therein, represented the  
4 plaintiffs in a wage-and-hour class and PAGA representative action against a  
5 property management company on behalf of hourly-paid and non-exempt  
6 employees. On January 4, 2018, the court granted final approval of the class and  
7 PAGA representative action settlement. The Los Angeles County Superior Court  
8 Case Number is JCCP4819 and the Judicial Council Coordination Proceeding  
9 Number is 4819.

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

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

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

25 dd. LFJ, in association with co-counsel therein, represented the  
26 plaintiff in a PAGA representative action against a global provider of products and  
27 services to the energy industry, on behalf of hourly-paid and non-exempt  
28 employees. On November 19, 2018, the court granted approval of the PAGA

1 representative action settlement. The Kern County Superior Court Case Number  
2 is S-1500-CV-280215-SDC.

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

9 ff. LFJ, in association with co-counsel therein, represents the  
10 plaintiffs in a wage-and-hour class and PAGA representative action against a bank  
11 on behalf of non-exempt employees. On September 27, 2019, the court granted  
12 the plaintiffs' motion for class certification in part and certified a class. The  
13 Alameda County Superior Court Case Number is RG15757606 and the Judicial  
14 Council Coordination Proceeding Number is 4921.

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

22 hh. LFJ, in association with co-counsel therein, represented the  
23 plaintiff in a wage-and-hour class and PAGA representative action against a  
24 medical equipment supplier on behalf of non-exempt employees. On February 13,  
25 2020, the court granted the plaintiff's motion for class certification and certified a  
26 class. On November 2, 2023, the court granted final approval of the class and  
27 PAGA representative action settlement. The San Bernardino County Superior  
28 Court Case Number is CIVDS1505744.

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

9 jj. LFJ, in association with co-counsel therein, represented the  
10 plaintiff in a wage-and-hour class and PAGA representative action against a large  
11 national drug testing laboratory on behalf of non-exempt employees. On February  
12 21, 2020, the court granted the plaintiff's motion for class certification and  
13 certified a class. On October 28, 2022, the court granted final approval of the class  
14 and PAGA representative action settlement. The San Diego County Superior  
15 Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

23 ll. LFJ, in association with co-counsel therein, represented the  
24 plaintiffs in a wage-and-hour class and PAGA representative action against a  
25 plastic packaging company on behalf of non-exempt employees. On June 8, 2020,  
26 the court granted in part the plaintiffs' motion for class certification and certified  
27 a class. On November 8, 2021, the court granted approval of the partial settlement  
28 of the action. On April 22, 2024, the court granted approval of the PAGA

1 settlement and entered an order dismissing the action. The San Bernardino County  
2 Superior Court Case Number is CIVDS1507361.

3 mm. LFJ, in association with co-counsel therein, represented the  
4 plaintiffs in a wage-and-hour class action against manufacturer and supplier of  
5 power products and services on behalf of non-exempt employees. On July 31,  
6 2020, the court granted in part the plaintiffs' motion for class certification and  
7 certified a class. On August 27, 2021, the court granted final approval of the class  
8 action settlement. The San Diego County Superior Court Case Number is 37-  
9 2015-00025968-CU-OE-CTL.

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

16 oo. LFJ represents the plaintiffs in a wage-and-hour class action  
17 against a manufacturer and distributor of commercial dish and glass cleaning  
18 machines and supplies for the restaurant and hospitality industries, on behalf of  
19 hourly-paid or non-exempt employees. On July 13, 2023, the court granted the  
20 plaintiffs' motion for class certification and certified a class. The Los Angeles  
21 County Superior Court Case Number is BC707670.

22 pp. LFJ represents the plaintiffs in a wage-and-hour class action  
23 against a chain of restaurants on behalf of non-exempt employees. On July 22,  
24 2024, the court granted in part the plaintiffs' motion for class certification and  
25 certified a class. The San Francisco Superior Court Cast Number is CGC-20-  
26 582809.

27 ///

28 ///

**LITIGATION COSTS AND EXPENSES INCURRED BY CLASS  
COUNSEL**

38. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Class Counsel seeks reimbursement of **\$17,834.65** in litigation costs and expenses incurred in the case, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of the case and to obtain the Settlement.

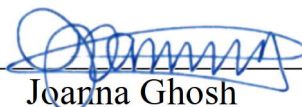
**SERVICE AWARDS TO PLAINTIFFS**

39. In recognition of their efforts and work serving as the Class Representatives, as well as their broader individual release and waiver of claims, the Settlement provides for Service Awards in the amount of \$10,000.00 each to Plaintiffs Cameron Fletcher and Katrina Wilson (for a total of \$20,000.00). The requested Service Awards are fair and appropriate. Plaintiffs spent a substantial amount of time and effort to produce relevant documents and information, and provided facts and evidence to support the prosecution of the claims. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would facilitate the pursuit of the case. Accordingly, it is appropriate for Plaintiffs to receive \$10,000.00 each as a reasonable Service Award, in addition to their individual settlement payment(s).

40. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiffs, Class Members, Aggrieved Employees, and the State of California.

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

Executed this 30th day of September 2024, at Glendale, California.

  
Joanna Ghosh

# EXHIBIT A

***CAMERON FLETCHER V. TRIPLE B CORPORATION D/B/A CHARLIES PRODUCTIONS***  
**Los Angeles County Superior Court, Case No. 22STCV06634 (“State Action”);**  
**United States District Court, Central District of California, Case No. 2:22-cv-03053-DMG-MAA (“Federal Action”)**

**ATTORNEY TASK AND TIME CHART**

| TASK                                                                                                                                                                          | LAWYER |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                             |        |
| Meet and Communicate with Plaintiff Cameron Fletcher (“Plaintiff Fletcher”) During the Case                                                                                   |        |
| Meet and Communicate with Plaintiff Katrina Wilson (“Plaintiff Fletcher”) (together with Plaintiff Fletcher, “Plaintiffs”) During the Case                                    |        |
| Investigate, Communicate with, and/or Interview Class Members, Aggrieved Employees, and/or Percipient Witnesses                                                               |        |
| <b>Pleadings and Court Filings</b>                                                                                                                                            |        |
| Research and Draft Plaintiff Fletcher’s Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 22, 2022) (State Action) |        |
| Review Court’s Notice of Case Assignment – Unlimited Civil Case (filed on February 22, 2022) (State Action)                                                                   |        |
| Review Court’s Initial Status Conference Order and Minute Order Re: Court Order Regarding Newly Filed Class Action (filed on March 11, 2022) (State Action)                   |        |
| Review Defendant’s Notice to State Court and Adverse Parties of Removal to Federal Court (filed on May 5, 2022) (State Action)                                                |        |
| Review Defendant’s Notice of Interested Parties and Corporate Disclosure (filed on May 5, 2022) (Federal Action)                                                              |        |

|                                                                                                                                                                                                                                                                    |  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Review Court's Notice of Assignment to United States Judges, Notice to Counsel Re Consent to Proceed Before a United States Magistrate Judge, Initial Standing Order, and Notice to Parties of Court-Directed ADR Program, (filed on May 6, 2022) (Federal Action) |  |
| Review Defendant's Notice of Minute Order and Court's May 9, 2022 Minute Order Re: Court Order: Notice of Removal to Federal Court (filed on May 11, 2022) (State Action)                                                                                          |  |
| Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (filed on May 12, 2022) (Federal Action)                                                                                       |  |
| Review Court's Order Re: Scheduling Meeting of Counsel and Scheduling Conference (filed on May 13, 2022) (Federal Action)                                                                                                                                          |  |
| Meet and Confer with Defendant's Counsel, and Draft Joint Rule 26 Scheduling Report (filed on June 10, 2022) (Federal Action)                                                                                                                                      |  |
| Draft Plaintiff Fletcher's Notices of Appearance or Withdrawal of Counsel (filed on June 13, 2022) (Federal Action)                                                                                                                                                |  |
| Review Court's (In Chambers) Order (filed on June 21, 2022) (Federal Action)                                                                                                                                                                                       |  |
| Review Court's Scheduling and Case Management Order Re: Jury Trial and Order/Referral to ADR (filed on July 6, 2022) (Federal Action)                                                                                                                              |  |
| Meet and Confer with Defendant's Counsel, and Draft Stipulation to Modify Schedule of Pretrial and Trial Dates to Extend Mediation Completion Date, and [Proposed] Order Thereon (filed on July 27, 2022) (Federal Action)                                         |  |
| Review Court's Order Approving Stipulation to Extend Mediation Completion Date (filed on August 1, 2022) (Federal Action)                                                                                                                                          |  |
| Review Defendant's Notice of Status of Removed Case (filed on August 25, 2022) (State Action)                                                                                                                                                                      |  |
| Review Court's Minute Order Re: Non-Appearance Case Review Re: Status of Removal to Federal Court (filed on September 1, 2022) (State Action)                                                                                                                      |  |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Meet and Confer with Defendant's Counsel, and Draft Stipulation to Modify Schedule of Pretrial and Trial Dates to Extend Mediation Completion Date, and [Proposed] Order Thereon (filed on April 6, 2023) (Federal Action)                                                                                                                                                                                                                     |  |
| Review Court's Order Approving Stipulation to Extend Mediation Completion Date (filed on April 10, 2023) (Federal Action)                                                                                                                                                                                                                                                                                                                      |  |
| Meet and Confer with Defendant's Counsel, and Draft Joint Report Regarding the Results of Early Mediation and Joint Notice of Settlement and Stipulation to Vacate Dates, and [Proposed] Order Granting Thereon (filed on May 30, 2023) (Federal Action)                                                                                                                                                                                       |  |
| Review Court's Order Re: Joint Stipulation to Vacate Dates (filed on June 1, 2023) (Federal Action)                                                                                                                                                                                                                                                                                                                                            |  |
| Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Deadline to File Motion for Preliminary Approval of Class Action Settlement, and [Proposed] Order Thereon (filed on September 29, 2023) (Federal Action)                                                                                                                                                                                                     |  |
| Review Court's Order Approving Joint Stipulation to Continue Deadline to File Motion for Preliminary Approval of Class Action Settlement (filed on October 4, 2023) (Federal Action)                                                                                                                                                                                                                                                           |  |
| Draft Plaintiff Fletcher's Notice of Appearance or Withdrawal of Counsel (filed on November 22, 2023) (Federal Action)                                                                                                                                                                                                                                                                                                                         |  |
| Draft Plaintiff Fletcher's Notice of Appearance or Withdrawal of Counsel (filed on November 22, 2023) (Federal Action)                                                                                                                                                                                                                                                                                                                         |  |
| Research and Draft Plaintiffs' First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, Cal. Labor Code §2698, Et Seq. and Legal Research and Analysis of All Claims Involved; and Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint, and [Proposed] Order Thereon (filed on February 15, 2024) (Federal Action) |  |
| Review Court's Order Granting Leave to File First Amended Complaint (filed on February 16, 2024) (Federal Action)                                                                                                                                                                                                                                                                                                                              |  |

| <b>Appearances</b>                                                                                                                                                                                                                                                               |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Prepare for, Travel to/from, and Attend Hearing on Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement (March 15, 2024) (Federal Action)                                                                                                                      |  |
| Prepare for, Travel to/from, and Attend Hearing on Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement (July 26, 2024) (Federal/Current Action)                                                                                                               |  |
| <b>Discovery and Deposition</b>                                                                                                                                                                                                                                                  |  |
| Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Fletcher (served on September 7, 2021)                                                                                                                                       |  |
| Draft Additional Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Fletcher (served on November 10, 2021)                                                                                                                            |  |
| Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Fletcher (served December 15, 2021)                                                                                                  |  |
| Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Wilson (served October 25, 2023)                                                                                                     |  |
| <b>Letters and Correspondence</b>                                                                                                                                                                                                                                                |  |
| Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Katrina Wilson for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (“PAGA”) (served on November 14, 2023)                        |  |
| Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant’s Counsel                                                                                                                                                                                      |  |
| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                      |  |
| Review and Analyze Information, Data, and Documents Obtained from Defendant (in excess of 12,400 pages), and Other Sources Prior to Mediation                                                                                                                                    |  |
| Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis/Calculations (submitted on May 4, 2023) |  |

|                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Attend Mediation Session (May 11, 2023; Zoom Video Conference)                                                                                                                                                                                                                                                                                                                                                                               |  |
| Review Confidential Mediator’s Proposal (Issued May 12, 2023; Accepted May 17, 2023)                                                                                                                                                                                                                                                                                                                                                         |  |
| Draft, Review, Revise, Negotiate, and/or Finalize Class Action and PAGA Settlement Agreement (executed on November 17, 2023) and Notice of Class and Representative Action Settlement                                                                                                                                                                                                                                                        |  |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                                                                                                                        |  |
| Review Defendant’s Notice of Removal and Exhibits, Declaration of Tiffanie De La Riva in Support Thereof, and Declaration of Sue Quirk in Support Thereof (served on May 5, 2022) (Federal Action)                                                                                                                                                                                                                                           |  |
| Research and Draft Plaintiffs’ Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Selena Matavosian in Support Thereof, Declaration of Cameron Fletcher in Support Thereof, Declaration of Katrina Wilson in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on November 17, 2023) (Federal Action) |  |
| Review Court’s (In Chambers) Order Re: Plaintiff’s Motion for Preliminary Approval of Class Action Settlement and PAGA Settlement (filed on February 8, 2024) (Federal Action)                                                                                                                                                                                                                                                               |  |
| Review Declaration of Brandy Jesse; and Research and Draft Plaintiffs’ Supplemental Brief in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action and PAGA Settlement, and Supplemental Declaration of Selena Matavosian in Support Thereof (filed on February 29, 2024) (Federal Action)                                                                                                                                  |  |
| Review Court’s (In Chambers) Order (filed on March 5, 2024) (Federal Action)                                                                                                                                                                                                                                                                                                                                                                 |  |
| Review Court’s Civil Minutes—General Re: Plaintiffs’ Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on March 15, 2024) (Federal Action)                                                                                                                                                                                                                                                                          |  |
| Meet and Confer with Defendant’s Counsel, and Draft Joint Stipulation to Continue Deadline to File Supplemental Evidentiary Filing, and [Proposed] Order (filed on March 29, 2024) (Federal Action)                                                                                                                                                                                                                                          |  |
| Review Court’s Order Re Joint Stipulation to Continue Deadline to File Supplemental Evidence (filed on March 29, 2024) (Federal Action)                                                                                                                                                                                                                                                                                                      |  |

|                                                                                                                                                                                                                                                                                                                                                                     |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Review Declaration of Jennifer Arballo; and Draft Declaration of Joanna Ghosh in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, Supplemental Declaration of Cameron Fletcher, and Supplemental Declaration of Katrina Wilson in Support Thereof (filed on April 12, 2024) (Federal Action)                             |  |
| Review Court's (In Chambers) Order (filed on July 5, 2024) (Federal Action)                                                                                                                                                                                                                                                                                         |  |
| Review Court's Minutes of Plaintiffs' Motion for Settlement Approval of Class and PAGA Settlement and Order Granting Preliminary Approval of Class Action Settlement (filed on July 26, 2024) (Federal Action)                                                                                                                                                      |  |
| Meet and Confer with Defendant's Counsel and Draft Revised Notice of Class and Representative Action Settlement; and Draft Declaration of Selena Matavosian Regarding Court-Approved Notice of Class and Representative Action Settlement (filed on August 15, 2024) (Federal Action)                                                                               |  |
| Review and Analyze Declaration of Settlement Administrator; and Research and Draft Plaintiffs' Motion for Class Counsel Award, Service Awards, and Administrative Costs, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Order Awarding Class Counsel Award, Service Awards, and Administrative Costs (filed on September 30, 2024) (Federal Action) |  |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                                                 |  |

# EXHIBIT B

**LAWYERS *for* JUSTICE PC CASE COST DETAIL**  
**Fletcher, et al. vs. Triple B Corporation**

| <u>Date</u>   | <u>Payee</u>                         | <u>Expense Description</u>           | <u>Amount</u>             |
|---------------|--------------------------------------|--------------------------------------|---------------------------|
| 9/7/2021      | U.S. Postmaster                      | Postage                              | \$7.38                    |
| 11/10/2021    | U.S. Postmaster                      | Postage                              | \$7.38                    |
| 2/23/2022     | Legal Document Server, Inc.          | Attorney Service                     | \$83.36                   |
| 2/23/2022     | Los Angeles Superior Court           | Complex Filing Fee                   | \$1,000.00                |
| 2/23/2022     | Los Angeles Superior Court           | Complaint Filing Fee                 | \$435.00                  |
| 4/6/2022      | Legal Document Server, Inc.          | Attorney Service                     | \$11.00                   |
| 4/6/2022      | Legal Document Server, Inc.          | Attorney Service                     | \$115.00                  |
| 4/18/2022     | Legal Document Server, Inc.          | Attorney Service                     | \$15.20                   |
| 4/18/2022     | Legal Document Server, Inc.          | Attorney Service                     | \$15.20                   |
| 8/30/2022     | Mark S. Rudy                         | Mediation Fee                        | \$12,500.00               |
| 5/19/2023     | Desmond, Marcello & Amster LLC       | Analysis of Sampling of Time Records | \$3,548.75                |
| 11/14/2023    | U.S. Postmaster                      | Postage                              | \$21.38                   |
| 11/14/2023    | Labor & Workforce Development Agency | PAGA Filing Fee                      | \$75.00                   |
| <b>Total:</b> |                                      |                                      | <b><u>\$17,834.65</u></b> |