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Attorneys for Plaintiff and the Class

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

LETICIA ACEVEDO, 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.

TURBONETICS HOLDINGS, INC., a
Delaware corporation; TURBONETICS,
INC., an unknown business entity; WABTEC
CORPORATION, an unknown business
entity; MOTIVEPOWER, INC., an unknown
business entity; NORDCO RAIL SERVICES,
LLC, an unknown business entity; NORDCO,
INC., an unknown business entity, RICON
CORP., an unknown business entity;
SHUTTLEWAGON, INC., an unknown
business entity; TRANSPORTATION
SYSTEMS SERVICES OPERATIONS INC.,
an unknown business entity; WABTEC
MANUFACTURING SOLUTION LLC, an
unknown business entity; WABTEC
RAILWAY ELECTRONICS, INC., an
unknown business entity; WABTEC US
RAIL, INC., an unknown business entity;
WESTINGHOUSE AIR BRAKE
TECHNOLOGIES CORPORATION, an
unknown business entity; XORAIL, INC., an
unknown business entity; WABTEC
TRANSPORTATION SYSTEMS, LLC, an
unknown business entity; and DOES 1
through 100, inclusive,

Case No. 2023CUOE008785

Honorable Charmaine H. Buehner
Department 44

CLASS ACTION

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

Date: February 25, 2026
Time: 1:30 p.m.
Department: 44

Complaint Filed: May 9, 2023
FAC Filed: August 26, 2023
Trial Date: None Set

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Defendants.

DECLARATION OF RYAN SLINGER

I, Ryan Slinger, 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 Leticia Acevedo (“Plaintiff”) and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On October 8, 2025, in Department 44 of the above-entitled Court, the Honorable Charmaine H. Buehner preliminarily approved the Class Action and PAGA Settlement Agreement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and of Defendants Turbonetics Holdings, Inc., MotivePower, Inc., Nordco Rail Services, LLC, Nordco, Inc., Ricon Corp., Shuttlewagon, Inc., Transportation Systems Services Operations Inc., Wabtec Manufacturing Solution LLC, Wabtec Railway Electronics, Inc., Wabtec US Rail, Inc., Westinghouse Air Brake Technologies Corporation, Xorail, Inc., Wabtec Transportation Systems, LLC, Turbonetics, Inc., and Wabtec Corporation (collectively, “Defendants”) (collectively with Plaintiff referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff as the representative of the Class (“Class Representative”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”).

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

4. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement, Attorneys’ Fees and Costs, and Enhancement Award (“Motion for Final Approval”), no Participating Class Member has objected to the Class Settlement, the

1 contemplated request for Attorneys' Fees and Costs, Enhancement Award, and Administration
2 Costs, or the allocation for penalties under the Private Attorneys General Act of 2004, California
3 Labor Code section 2698, et seq. ("PAGA").

4 **WORK PERFORMED BY CLASS COUNSEL**

5 5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work
6 in the above-captioned action (the "Action") since it was filed on May 9, 2023.

7 6. Before initiating the case, Lawyers *for* Justice, PC investigated and researched the
8 facts and circumstances underlying the pertinent factual and legal issues and applicable law. This
9 required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and
10 Plaintiff and research into the various legal issues involved in the case, namely, the current state
11 of the law as it applied to class certification, manageability, off-the-clock theory, meal and rest
12 periods, expense reimbursements, recordkeeping and wage statement requirements,
13 representative PAGA claims and penalties, and wage-and-hour law and enforcement, Plaintiff's
14 claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers
15 *for* Justice, PC determined that the claims of Plaintiff were well-suited for class-wide and
16 representative adjudication, owing to what appeared to be a common course of conduct affecting
17 a similarly situated group of individuals who were employed by Defendants as non-exempt
18 employees in the State of California, who were not properly compensated for, *inter alia*, all
19 hours worked, non-compliant meal and rest periods, and business expenses.

20 7. Class Counsel conducted significant formal and informal discovery and
21 investigation into the facts of the case, to assess the veracity, strength, and scope of the claims,
22 and were preparing the case for class certification and trial, prior to reaching the Settlement. The
23 Parties exchanged a volume of information, documents, and data throughout the course of the
24 litigation and in connection with the mediation and settlement negotiations. Class Counsel served
25 multiple sets of formal written discovery requests onto Defendants Turbonetics Holdings, Inc.,
26 Turbonetics, Inc., and Wabtec Corporation (specifically, Form Interrogatories – General (Set
27 One), Requests for Production of Documents (Set One), and Special Interrogatories (Sets One
28 and Two)) and noticed the depositions of Defendants Turbonetics Holdings, Inc. and Wabtec

1 Corporation's Person Most Knowledgeable designees along with accompanying requests for
2 production of documents. The volume of records and documents that Class Counsel reviewed
3 and analyzed included, and were not limited to: Plaintiff's employment records, Plaintiff's and
4 other Class Members' time data and pay records, Defendants Employee Handbooks, internal
5 memoranda, new hire orientation checklists, job descriptions, company policy
6 acknowledgements (including but not limited to Employee Acknowledgment, Confirmation of
7 Receipt of Employee Handbook, and Final Paycheck Acknowledgment), forms (including but
8 not limited to Time Off Request Form and Leave of Absence Request Form), procedures
9 (including but not limited to Termination Checklist), and policies (including but not limited to
10 Agreement of Confidentiality, Confidential and Non-Disclosure Policy, and Sick Leave Policy),
11 among other information and documents. Class Counsel had the opportunity to interview and
12 obtain information from Plaintiff, and reviewed and analyzed a volume of information, data, and
13 documents obtained from Plaintiff, Defendants, and other sources. Class Counsel developed
14 liability, damages, violation, and penalties valuation models in the course of litigation and in
15 connection with the mediation and settlement negotiations, and met and conferred with
16 Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case
17 management, motion practice, discovery, and the production of information, documents, and data
18 in the course of litigation and in connection with mediation and settlement negotiations, and
19 settlement. Other work performed by Class Counsel included, and was not limited to, case
20 strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-
21 related papers, the mediation briefing and supporting materials, and settlement documents; and
22 preparing for and attending court proceedings, mediation, and settlement negotiations, among
23 other tasks.

24 8. As outlined herein, the Parties have conducted significant investigation and
25 formal and informal discovery during the course of litigating this matter, mediation, and
26 extensive settlement negotiations. Class Counsel analyzed a volume of information, documents,
27 and data obtained from Plaintiff, Defendants, and other sources that provided a critical
28 understanding of the nature of the work performed by the Class Members and Aggrieved

1 Employees, as well as Defendants' organizational structure and its operations and employment
2 policies, practices, and procedures. The information, documents, and data were used in analyzing
3 liability, damages, penalties, and other valuation issues in connection with all phases of the
4 litigation, and ultimately, in connection with the mediation and settlement negotiations process.
5 Class Counsel also performed significant research into the applicable law, which is evolving as it
6 relates to class certification, manageability, off-the-clock theory, meal and rest periods,
7 representative PAGA claims and penalties, wage-and-hour enforcement, arbitration agreements,
8 regular rate, Plaintiff's claims and allegations, and Defendants' defenses thereto, as well as facts
9 discovered.

10 9. After conducting significant investigation of the facts and law during the
11 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to
12 try to resolve the case. These efforts included participating in a mediation session conducted by
13 Monique Ngo-Bonnici, Esq., a well-regarded mediator experienced in handling complex labor
14 and employment matters. During all settlement discussions, the Parties conducted their
15 negotiations at arm's length in an adversarial position. In the course of the mediation and
16 settlement negotiations, the Parties exchanged documents and data, and discussed various
17 aspects of the case, including and not limited to, the risks and delays of further litigation, the
18 risks and expenses to the Parties of proceeding with class certification, manageability, off-the-
19 clock theory, regular rates of pay, meal and rest periods (including *inter alia*, on premises
20 breaks), expense reimbursements, recordkeeping and wage statement requirements,
21 representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiff's
22 claims and allegations, and Defendants' defenses thereto, as well as the evidence produced and
23 analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was
24 acceptable to the Parties was not easy. Defendants contended that individualized questions of
25 fact predominate over any common issues, and these issues would pose challenges to class
26 certification and representative adjudication. Defendants and their counsel felt strongly about
27 Defendants' ability to avoid class certification prevail on the merits and, while Plaintiff and
28 Class Counsel believed that they would be able to obtain class certification and prevail at trial.

1 With the aid of the mediator's evaluation, the Parties ultimately agreed that this matter was well-
2 suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as the
3 costs and risks to the Parties that would attend further litigation. These risks of further litigation
4 include, and are not limited to, a determination that the claims are unsuitable for class treatment
5 and/or representative adjudication, class de-certification after certification of a class, allowing a
6 jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery
7 after years of litigation.

8 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks
9 attorneys' fees in the amount of \$507,500.00, which is thirty-five percent (35%) of the Total
10 Settlement Amount of \$1,450,000.00. Pursuant to the contingency-fee agreement entered into by
11 and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least
12 thirty-five percent (35%) of the recovery.

13 11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
14 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
15 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
16 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
17 has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order
18 to devote their time and efforts to this case. The nature of the work performed, skill exercised,
19 and the outcome in this matter support the percentage fee sought and the application of a lodestar
20 multiplier.

21 12. This matter involves an outstanding monetary recovery involving a **Total**
22 **Settlement Amount of \$1,450,000.00** (with a Net Settlement Amount of approximately **at least**
23 **\$736,430.86 to be paid to Participating Class Members** (with gross Individual Settlement
24 **Payments averaging approximately more than \$3,081.30), payment of \$43,750.00 to**
25 **Aggrieved Employees** (with Individual PAGA Payments averaging approximately \$289.74) and
26 **payment of \$131,250.00 to the State of California**)—support the percentage fee sought and the
27 application of a lodestar multiplier.

28 13. While not necessarily required to be demonstrated because a percentage fee is

proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **287.40 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

14. The attorneys identified below have worked on this case, and they have performed their work in this matter exclusively on a contingency basis.

Attorneys	Law School	Titles	Bar Nos.	Years Admitted & Practicing in CA	Rate
Edwin Aiwazian	Pepperdine	Managing Attorney & Shareholder	232943	2004 (21 years)	\$1,495
Arby Aiwazian	Southwestern	Shareholder	269827	2010 (15 years)	\$1,295
Joanna Ghosh	Georgetown	Managing Attorney	272479 (CA); 518149 (NY)	2010 (CA); 2013 (NY) (15 years)	\$1,295
Elizabeth Parker-Fawley	UCLA	Senior Attorney	301592	2014 (11 years)	\$850
Yasmin Hosseini	Pepperdine	Senior Attorney	326399	2019 (6 years)	\$850
Brian J. St. John	UC Berkeley	Senior Attorney	304112	2015 (10 years)	\$850
Ryan Slinger	Loyola Law	Attorney	351297	2023 (2 years)	\$725
Melissa A. LeBlanc-Mansell	Tulane	Senior Attorney (formerly)	283080	2012 (13 years)	\$850
Charles T. Sweeny	USF	Attorney (formerly)	325167	2019 (6 years)	\$725
Gabriella C. Sole	USF	Attorney (formerly)	346164	2022 (3 years)	\$575
Eli J. Drummond	UCLA	Attorney (formerly)	348281	2023 (3 years)	\$575

Tatyana Akbarian	Loyola Law	Attorney (formerly)	354153	2024 (1 year)	\$575
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15. The work performed in this particular matter, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$850 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour.

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

16. 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 PAGA representative actions. The firm has successfully litigated cases involving nearly every aspect of California

1 wage and hour law, including payment of overtime and minimum wages, provision of meal and
2 rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant
3 wage statements, reimbursement of business expenses, executive, administrative, and other
4 overtime exemptions to the State of California and federal overtime compensation requirements,
5 PAGA claims, and sister statutes under federal law. During a relatively short time, in association
6 with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of
7 thousands of individuals in California.

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

1 supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested
2 motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000
3 class action or representative action cases.

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

23 19. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
24 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
25 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
26 Georgetown University Law Center in 2010. She is admitted to practice in California (since
27 2010) and in New York (since 2013) and she is also admitted to practice in all U.S. District
28 Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the

U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

20. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice before all courts of the State of California. I have worked on many wage-and-hour class action and PAGA representative cases, and my work on these cases has included preparing pleadings and motions, making court appearances, and drafting and finalizing settlement agreements.

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

21. 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. The Settlement provides for reimbursement of litigation costs and expenses of up to \$50,000.00. Lawyers *for* Justice, PC seeks reimbursement of **\$14,119.14** in litigation costs and expenses incurred in the matter, as reflected in “**EXHIBIT 2**” attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. The cost savings of \$35,880.86 will be part of the Net Settlement Amount, which will be distributed to the Participating Class Members in accordance with the Settlement.

ENHANCEMENT AWARD TO PLAINTIFF

22. In recognition of her efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as her broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 5.1 of the Settlement Agreement), the Settlement provides for an Enhancement Award, in the amount of up to \$10,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing her employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive \$10,000.00 as a reasonable Enhancement Award for her broader waiver and release of claims and services performed in this matter, in addition to her individual settlement payments.

23. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, the Class, 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.

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Executed this 28th day of January 2026, at Glendale, California.



Ryan Slinger

EXHIBIT 1

LETICIA ACEVEDO V. TURBONETICS HOLDINGS, INC. ET AL.
Ventura County Superior Court Case No. 2023CUOE008785

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 Leticia Acevedo (“Plaintiff”)	9.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	7.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Action Claims, Conduct Legal Research and Analysis Regarding the Claims, and Draft, Review, and/or Revise Plaintiff’s Class Action Complaint for Damages (filed on May 9, 2023)	7.50
Review Court’s Notice of Case Assignment and Mandatory Appearance (filed on May 12, 2023)	0.10
Review Court’s Minute Order Re: Complex/Class Action Case Designation (filed on May 16, 2023)	0.10
Review and Analyze Defendants Turbonetics Holdings, Inc., Turbonetics, Inc., and Wabtec Corporation (collectively, “Defendants”) Answer to Plaintiff’s Class Action Complaint (served on July 10, 2023), and Research Affirmative Defenses in Defendants’ Answer	3.50
Draft, Review, and/or Revise Plaintiff’s Notice of Posting Jury Fees (filed on September 7, 2023)	0.20
Meet and Confer with Defendants’ Counsel, and Draft, Review, and/or Revise Joint Complex Status Report (filed on September 13, 2023)	1.60
Review Court’s Minute Order Re: Case Management Conference Complex Track (filed on September 18, 2023)	0.10

Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Complex Status Report (filed on November 13, 2023)	1.60
Review Court's Minute Order Re: Case Management Conference Complex Track (filed on November 17, 2023)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Complex Status Report (filed on December 4, 2023)	0.80
Review Court's Notice of Continuance (filed on December 7, 2023)	0.10
Review Defendants' Substitution of Attorney—Civil (served on January 5, 2024)	0.20
Review Court's Notice of Continuance (filed on January 11, 2024)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on May 24, 2024)	1.50
Review Court's Order to Continue Case Management Conference (filed on June 3, 2024)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement and Notice of Settlement (filed on June 18, 2024)	1.20
Review Court's Minute Order Re: Court Order (filed on July 29, 2024)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Deadline to File Plaintiff's Motion for Preliminary Approval of Settlement, Joint Case Management Conference, and Order to Show Cause Regarding Representation of Settlement; [Proposed] Order Thereon (submitted on October 24, 2024)	1.30
Review Court's Order Granting Parties' Joint Stipulation to Continue Deadline to File Plaintiff's Motion for Preliminary Approval of Settlement, Joint Case Management Conference, and Order to Show Cause Regarding Representation of Settlement (filed on October 28, 2024)	0.10
Review Court's Minute Order Re: Case Management Conference Complex Track & Order to Show Cause Re: Representation of Settlement (filed on February 4, 2025)	0.10
Review Court's Notice of Rescheduled Hearing (filed on June 5, 2025)	0.10
Research, Draft, Review, and/or Revise First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq., (filed on	5.10

August 26, 2025); Meet and Confer with Counsel for Defendants and Defendants MotivePower, Inc., Nordco Rail Services, LLC, Nordco, Inc., Ricon Corp., Shuttlewagon, Inc., Transportation Systems Services Operations Inc., Wabtec Manufacturing Solution LLC, Wabtec Railway Electronics, Inc., Wabtec US Rail, Inc., Westinghouse Air Brake Technologies Corporation, Xorail, Inc., and Wabtec Transportation Systems, LLC (collectively, “All Defendants”), and Draft, Review, and/or Revise Joint Stipulation Permitting Plaintiff to File a First Amended Complaint; [Proposed] Order Thereon (submitted on August 4, 2025)	
Meet and Confer with All Defendants’ Counsel, and Draft, Review, and/or Revise Joint Case Management and Order to Show Cause Re: Representation of Settlement Statement (filed on August 12, 2025)	0.90
Review Court’s Minute Order Re: Case Management Conference Complex Track & Order to Show Cause Re: Representation of Settlement (filed on August 18, 2025)	0.10
Review Court’s Order Permitting Plaintiff to File a First Amended Complaint (filed on August 20, 2025)	0.10
Appearances	
Prepare for and Remotely Attend Initial Case Management Conference (September 18, 2023)	0.70
Prepare for and Remotely Attend Case Management Conference (November 17, 2023)	0.90
Prepare for and Remotely Attend Case Management Conference and Order to Show Cause Re: Representation of Settlement (February 4, 2025)	0.50
Prepare for and Remotely Attend Case Management Conference and Order to Show Cause Re: Representation of Settlement (August 18, 2025)	1.50
Prepare for and Remotely Attend Hearing on Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement (September 2, 2025)	1.20
Prepare for and Remotely Attend Hearing on Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement (October 8, 2025)	1.00
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 Leticia Acevedo	7.20

Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Wabtec Corporation (served on August 25, 2023)	3.30
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Turbonetics Holdings, Inc., (served on August 25, 2023)	3.10
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Turbonetics, Inc. (served on August 25, 2023)	3.10
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Wabtec Corporation and Requests for Production of Documents (Organizational Structure; noticed for October 12, 2023) (served on August 31, 2023)	1.40
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Wabtec Corporation and Requests for Production of Documents (Wage and Hour Practices; October 13, 2023) (served on August 31, 2023)	1.60
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Turbonetics Holdings, Inc., and Requests for Production of Documents (Organizational Structure; noticed for October 16, 2023) (served on August 31, 2023)	1.30
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Turbonetics Holdings, Inc., and Requests for Production of Documents (Wage and Hour Practices; October 18, 2023) (served on August 31, 2023)	1.50
Letters and Correspondence	
Research, 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 December 11, 2023)	4.50
Research, Draft, Review, and/or Revise Amended Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff under the Private Attorneys General Act (served on February 26, 2025)	2.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, All Defendants' Counsel	18.50

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources Prior to Mediation	54.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing Damages and Penalties Analyses and Calculations (submitted on May 22, 2024)	33.50
Attend Mediation Session (March 29, 2024; via Zoom Video Conference)	14.50
Review and Analyze Mediator's Proposal (issued May 29, 2024)	1.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action and PAGA Settlement (fully executed on September 26, 2024)	4.70
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on July 31, 2025), and Draft, Review, and/or Revise Court Approved Notice of Class Action Settlement	23.50
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration and Review Weekly Reports, and Respond to Class and/or Other Inquiries	6.50
Law and Motion	
Review Declaration of Settlement Administrator Lisa Mullins, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Ryan Slinger in Support Thereof, Declaration of Plaintiff Leticia Acevedo in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on August 8, 2025)	20.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval (issued September 2, 2025)	0.40
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on September 2, 2025)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Entry of Judgment or Order Re: Minute Order on Motion for Preliminary Approval (filed on September 3, 2025)	0.20
Draft, Review, and/or Revise Supplemental Declaration of Ryan Slinger in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, Supplemental Declaration of Leticia	6.50

Acevedo in Support Thereof, and [Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 1, 2025)	
Review Court's Tentative Ruling Re: Motion for Preliminary Approval (issued on October 7, 2025)	0.60
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval (filed on October 8, 2025)	0.10
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on October 14, 2025)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 17, 2025)	0.20
Review Declaration of Settlement Administrator Garvin Brown, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Award; Memorandum of Points and Authorities in Support Thereof, Declaration of Ryan Slinger in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed January 28, 2026)	22.50
Total Hours:	287.40

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Acevedo vs. Turbonetics Holdings, Inc., et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/2/2022	U.S. Postmaster	Postage	\$7.85
12/12/2022	U.S. Postmaster	Postage	\$24.27
5/9/2023	Legal Document Server, Inc.	Attorney Service	\$269.73
5/9/2023	Ventura Superior Court	Complex Filing Fee	\$1,000.00
5/9/2023	Ventura Superior Court	Complaint Filing Fee	\$435.00
5/19/2023	ProLegal	Attorney Service	\$634.50
6/6/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
9/7/2023	Legal Document Server, Inc.	Attorney Service	\$160.43
9/7/2023	Ventura Superior Court	Jury Fee	\$150.00
9/13/2023	CourtCall, LLC	Attorney Service	\$72.00
9/13/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
11/10/2023	CourtCall, LLC	Attorney Service	\$72.00
12/11/2023	U.S. Postmaster	Postage	\$35.08
12/11/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
5/1/2024	Signature Resolution LLC	Mediation Fee	\$7,950.00
5/28/2024	Legal Document Server, Inc.	Attorney Service	\$156.39
5/28/2024	Ventura Superior Court	Stipulation & Order Fee	\$20.00
5/29/2024	CourtCall, LLC	Attorney Service	\$72.00
5/29/2024	Tatyana Akbarian	Travel Reimbursement	\$39.23
5/30/2024	CourtCall, LLC	Attorney Service	\$72.00
5/31/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
6/18/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
9/16/2024	General Logistics Systems US, Inc.	Courier Service	\$25.90
10/24/2024	Legal Document Server, Inc.	Attorney Service	\$311.39
10/24/2024	Ventura Superior Court	Stipulation & Order Fee	\$20.00
1/30/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
1/31/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
2/4/2025	Legal Document Server, Inc.	Attorney Service	\$202.78
2/4/2025	Ventura Superior Court	Stipulation & Order Fee	\$40.00
2/5/2025	CourtCall, LLC	Attorney Service	\$72.00
3/12/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
3/13/2025	CPAnalytics	Data Analysis of Sampling of Time Records	\$892.50
7/18/2025	General Logistics Systems US, Inc.	Courier Service	\$99.08
8/5/2025	Legal Document Server, Inc.	Attorney Service	\$194.59
8/11/2025	Legal Document Server, Inc.	Attorney Service	\$22.37
8/11/2025	Ventura Superior Court	Motion Fee	\$60.00
8/13/2025	Legal Document Server, Inc.	Attorney Service	\$18.20

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Acevedo vs. Turbonetics Holdings, Inc., et al.

8/25/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
8/27/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
9/5/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
10/1/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
10/2/2025	Legal Document Server, Inc.	Attorney Service	\$175.00
10/21/2025	Legal Document Server, Inc.	Attorney Service	\$18.20
Total:			<u>\$14,119.14</u>