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

AMANDA POWELL, 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.

BRIARPATCH COOPERATIVE OF  
NEVADA, INC., a California corporation;  
BRIARPATCH FOOD CO-OP, an unknown  
business entity; NEVADA COUNTY  
BRIARP, an unknown business entity; and  
DOES 1 through 100, inclusive,

Defendants.

Case No.: CU0001207

Honorable S. Robert Tice-Raskin  
Department 6

**CLASS ACTION**

**DECLARATION OF BRIAN J. ST. JOHN  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT,  
CLASS COUNSEL AWARD, AND CLASS  
REPRESENTATIVE ENHANCEMENT**

Date: December 19, 2025  
Time: 10:00 a.m.  
Department: 6

Complaint Filed: February 5, 2024  
Trial Date: None Set

**DECLARATION OF BRIAN J. ST. JOHN IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT, CLASS COUNSEL AWARD, AND  
CLASS REPRESENTATIVE ENHANCEMENT**

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**DECLARATION OF BRIAN J. ST. JOHN**

I, Brian J. St. John, 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 Amanda Powell (“Plaintiff”). The facts set forth in this declaration are within my personal knowledge, and, if called as a witness, I could and would competently testify as follows.

**PRELIMINARY APPROVAL OF SETTLEMENT**

2. On June 20, 2025, in Department 6 of the above-entitled court (“Court”), the Honorable S. Robert Tice-Raskin preliminarily approved the First Amended Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (referred to as “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendants Briarpatch Food Co-Op, Briarpatch Cooperative of Nevada County, Inc., and Nevada Conty BriarP (collectively, “Defendants”) (together, Plaintiff and Defendants are referred to as the “Parties”). The Court conditionally certified the Class for settlement purposes, preliminarily appointed Plaintiff to represent the Class (“Class Representative”), and preliminarily appointed and designated Lawyers *for* Justice, PC, Zakay Law Group, APLC, and JCL Law Firm, APC (collectively, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Apex Class Action, LLC (“Apex” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

**WORK PERFORMED BY CLASS COUNSEL**

3. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in this litigation of this matter from the inception of the above-captioned action, which was commenced by Plaintiff on February 5, 2024. Since joining forces with and associating Zakay Law Group, APLC, and JCL Law Firm, APC as co-counsel, we have worked closely with them to prosecute the matter, and our work with them has been a coordinated and combined effort. Ultimately,

1 Class Counsel's efforts and the efforts of Plaintiff have been successful in reaching the  
2 Settlement.

3 4. Before initiating the action, Lawyers *for* Justice, PC conducted extensive  
4 investigation and research into the facts and circumstances underlying the pertinent factual and  
5 legal issues and applicable law. This required thorough discussions and interviews between  
6 attorneys at Lawyers *for* Justice, PC and Plaintiff, and research into the various legal issues  
7 involved in the case, namely, the current state of the law as it applied to class certification, off-  
8 the-clock theory, meal and rest periods, Private Attorneys General Act ("PAGA") claims,  
9 manageability, wage-and-hour enforcement, Plaintiff's claims and allegations, and potential  
10 defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the  
11 claims of Plaintiff were well-suited for class action treatment and representative adjudication  
12 owing to what appeared to be a common course of conduct affecting a similarly situated group  
13 of current and former hourly-paid, non-exempt employees who worked for Defendants in the  
14 State of California, who were not properly compensated for, *inter alia*, all hours worked, non-  
15 compliant meal and rest periods, and business expenses.

16 5. Collectively, Class Counsel conducted significant litigation and formal and  
17 informal discovery and investigation into the facts of the action, to assess the veracity, strength,  
18 and scope of the claims, and were preparing the action for class certification and trial prior to  
19 reaching the Settlement. The Parties exchanged a large volume of information, documents, and  
20 data throughout the course of the litigation of the action and in connection with mediations and  
21 settlement negotiations. Class Counsel had the opportunity to interview and obtain information  
22 from Plaintiff and percipient witnesses, and reviewed and analyzed a volume of information,  
23 data, and documents obtained from Plaintiff, Defendants, and other sources. Class Counsel also  
24 developed liability, damages, violation, and penalties valuation models in the course of litigation  
25 and in connection with mediation and settlement negotiations, and met and conferred with  
26 Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings,  
27 case management, formal and informal discovery, production of information, documents, and  
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1 data in the course of litigation and in connection with mediations and settlement negotiations,  
2 and settlement. Other work that Class Counsel performed included, and was not limited to, case  
3 strategy and analysis; drafting, reviewing, and revising the pleadings and motion-related papers,  
4 and settlement-related papers; case management; claims assessment and evaluation; and  
5 preparing for and attending court proceedings and mediation and settlement negotiations.

6 6. As outlined herein, the parties have conducted significant investigations and  
7 formal and informal discovery during the course of litigating this matter. Class Counsel analyzed  
8 a large volume of information, documents, and data obtained from Plaintiff, Defendants, and  
9 other sources. This information, documents, and data provided a critical understanding of the  
10 nature of the work performed by class members and aggrieved employees, as well as  
11 Defendants' operations and employment policies, practices, and procedures, and were used in  
12 analyzing liability, damages, and penalties valuation issues in connection with all phases of the  
13 litigation, and ultimately, in connection with the mediation and settlement negotiation process.  
14 Accordingly, sufficient investigation and review of information has taken place in order for the  
15 parties to be sufficiently informed of the nature and extent of the claims, and to enable all parties  
16 to fully evaluate the settlement for its fairness, adequacy, and reasonableness.

17 7. After conducting significant investigation of the facts and law during the  
18 prosecution of the actions, counsel for the parties engaged in extensive settlement negotiations  
19 to try to resolve the action. These efforts included participating in two mediation sessions. The  
20 first mediation session was conducted on November 11, 2024, by Brandon McKelvey, Esq., a  
21 well-regarded mediator experienced in handling complex labor and employment matters. The  
22 first mediation was unsuccessful. On December 2, 2024, the Parties participated in a second  
23 mediation session also conducted by Brandon McKelvey, Esq, where the Parties were successful  
24 in reaching a resolution. During all settlement discussions, the Parties conducted their  
25 negotiations at arm's length in an adversarial position. In the course of mediations and settlement  
26 discussions, the parties exchanged information, documents, and data, and discussed various  
27 aspects of the action, including and not limited to, the risks and delays of further litigation, the  
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1 risks and expenses to the parties of proceeding with class certification and trial, the law relating  
2 to class certification, off-the-clock theory, meal and rest periods, regular rate, meal waivers,  
3 PAGA representative claims, wage-and-hour enforcement, as well as the evidence produced and  
4 analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was  
5 acceptable to the parties was not easy. Defendants contended that individualized questions of  
6 fact predominate over any common issues, and these issues would pose challenges to class  
7 certification. Defendants and its counsel felt strongly about Defendants' ability to avoid class  
8 certification and also prevail on the merits, while Plaintiff and Class Counsel believed that they  
9 would be able to obtain class certification and prevail at trial. After continued litigation and  
10 settlement discussions with the mediator, and with the aid of the mediator's evaluation, the  
11 Parties ultimately agreed that the action was well-suited for settlement. In reaching a settlement,  
12 the Parties took into consideration the legal issues relating to Plaintiff's principal claims, as well  
13 as the costs and risks to the Parties that would attend further litigation. These risks of further  
14 litigation include, and are not limited to, a determination that the claims are unsuitable for class  
15 treatment, class de-certification after certification of a class, allowing a jury to decide the claims  
16 asserted in the action, and the real possibility of no monetary recovery after years of litigation.

17 8. By way of the accompanying Motion for Final Approval, Class Counsel seeks  
18 attorneys' fees in the amount of \$327,500.00, which is one-third (1/3) of the Maximum  
19 Settlement Fund of \$982,500.00. Pursuant to the contingency fee agreements entered into by  
20 Plaintiff and Lawyers for Justice, PC, Plaintiff has agreed to a contingency fee of at least one-  
21 third (1/3) of the recovery.

22 9. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel  
23 took in commencing the action; (2) the time, effort, and expense that Class Counsel dedicated  
24 to the action; (3) the skill and determination that Class Counsel has shown; (4) the results that  
25 Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class  
26 Counsel has achieved in the action; and (6) the other cases that Class Counsel has turned down  
27 in order to devote their time and efforts to this matter.

10. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has performed many hours of work in connection with prosecuting this action such that the requested attorneys' fees award is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **113.70 hours** performing tasks to obtain a recovery on behalf of Plaintiff, Class Members, PAGA Covered Employees, and the State of California. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred in performing those services. These hours include work done by several attorneys at the firm. Also, separate from the hours references herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of the case.

11. 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 cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate of at least \$800 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 \$800 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and/or representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior 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.

12. Using a blended hourly rate of \$800 per hour, Lawyers *for* Justice, PC's base lodestar to date is approximately \$90,960.00.

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

13. 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 attorney of record in dozens of employment-related putative class actions and/or representative actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. Lawyers *for* Justice has successfully litigated cases involving executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Lawyers *for* Justice, PC, sometimes in association with other law firms, has recovered millions of dollars on behalf of thousands of individuals in California.

14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth

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

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

16. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.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 also has extensive experience with class action and/or representative action settlements, and has handled this process in over 500 cases. Under Edwin Aiwazian, Arby Aiwazian, and her supervision, Lawyers for Justice, PC has handled the class certification and court approval process for

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

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

17 **EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND**  
18 **REPRESENTATIVE ACTION CASES**

19 18. What follows are a few examples of the type of results Lawyers for Justice, PC  
20 ("LFJ") has achieved on behalf of its clients:

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

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

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

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

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

19 f) LFJ, in association with co-counsel therein, represented the plaintiff in a  
20 wage-and-hour class and PAGA representative action against a national wholesale distributor  
21 of plumbing and builder supplies, involving allegations of misclassification of multiple salaried  
22 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA  
23 representative action settlement. The Sacramento County Superior Court Case Number is 34-  
24 2012-00136285.

25 g) LFJ, in association with co-counsel therein, represented the plaintiff in a  
26 wage-and-hour class action against a multinational corporation that provides global workplace  
27 solutions, involving allegations of misclassification of the “Operations Manager” position. On  
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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 Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial Council Coordination Proceeding Number is 4794.

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

l) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national retailer of apparel, accessories, and home products, involving allegations of misclassification of the "Department Manager" position. On August 12, 2016, the court granted the plaintiffs' motion for class certification in part and

1 certified a class. On August 6, 2019, the court granted final approval of the class action  
2 settlement. The Alameda County Superior Court Case Number is RG13680477.

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

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

12 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
13 representative action against a foodservice distributor, on behalf of non-exempt employees. On  
14 January 26, 2017, the court granted final approval of the class and PAGA representative action  
15 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

16 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative  
17 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to  
18 the employer's motion to compel arbitration, which resulted in a published opinion by the  
19 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*  
20 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.  
21 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are  
22 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is  
23 5046.

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

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

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

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

18 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA  
19 representative action against a food company on behalf of non-exempt employees. On June 30,  
20 2017, the court granted final approval of the class and PAGA representative action settlement.  
21 The Sacramento County Superior Court Case Number is 34-2015-00175871.

22 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
23 representative action against a chocolate company on behalf of non-exempt employees. On July  
24 19, 2017, the court granted final approval of the class and PAGA representative action  
25 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

bb) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class action against a container manufacturer, on behalf of non-exempt employees. On October 15, 2018, the court granted the plaintiff's motion for class certification. On March 20, 2023, the court granted final approval of the class action settlement. The Tulare

County Superior Court Case Number is VCU264528.

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

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

ee) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class action against a parking company on behalf of non-exempt employees. On September 3, 2019, the court granted the plaintiff's motion for class certification and certified a class. On November 7, 2024, the court granted final approval of the class action settlement. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding Number is 4886.

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

gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a national retailer of apparel and fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the

1 court granted final approval of the class and PAGA representative action settlement. The  
2 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

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

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

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

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

8                    mm) LFJ in association with co-counsel therein, represented the plaintiffs in a  
9 wage-and-hour class action against manufacturer and supplier of power products and services  
10 on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'  
11 motion for class certification and certified a class. On August 27, 2021, the court granted final  
12 approval of the class action settlement. The San Diego County Superior Court Case Number is  
13 37-2015-00025968-CU-OE-CTL.

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

20                    oo) LFJ represents the plaintiffs in a wage-and-hour class action against a  
21 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for  
22 the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On  
23 July 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class.  
24 On June 2, 2025, the court granted final approval of the class action settlement and entered an  
25 order dismissing the action. The Los Angeles County Superior Court Case Number is  
26 BC707670.

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

**LITIGATION COSTS AND EXPENSES INCURRED BY**

**LAWYERS *for* JUSTICE, PC**

19. To date, Lawyers *for* Justice, PC has borne the risks and costs of litigation of the action and will not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks reimbursement of **\$2,685.08** in litigation costs and expenses incurred in this matter, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement.

**CLASS REPRESENTATIVE ENHANCEMENT TO PLAINTIFF**

20. The Settlement provides for an enhancement payment in an amount of up to \$10,000.00 to Plaintiff for her efforts in the case that led to the significant settlement recovery, as well as the execution of an individual settlement agreement which provides for the payment to Plaintiff of \$10,000 for her general release of claims and California Civil Code section 1542 waiver. The contemplated enhancement payment is fair and appropriate in light of the time and effort he expended to pursue the case. Plaintiff spent considerable time and effort to produce relevant documents and past employment records and to provide the facts and evidence necessary to attempt to prove the allegations. Plaintiff was available whenever Class Counsel needed her, and actively tried to obtain information that would facilitate the pursuit of the class and PAGA claims. Accordingly, it is appropriate and just for Plaintiff to receive a reasonable enhancement payment, in addition to her general release payment and individual settlement payments as a member of the Class.

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21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, Class Members, PAGA Covered 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 20<sup>th</sup> day of November 2025, at Glendale, California.



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Brian J. St. John

# **EXHIBIT A**

**AMANDA POWELL V. BRIARPATCH COOPERATIVE OF NEVADA, INC., ET AL.**  
**Nevada County Superior Court Case No. CU0001207**

**ATTORNEY TASK AND TIME CHART**

| <b>TASK</b>                                                                                                                                                                                                                                                                                                                                                                                                   | <b>LAWYERS <i>for</i> JUSTICE, PC</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                                                                                                                                                                                                                                             |                                       |
| Meet and Communicate with Plaintiff Amanda Powell (“Plaintiff”) during the Case                                                                                                                                                                                                                                                                                                                               | 14.50                                 |
| Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses                                                                                                                                                                                                                                                                                      | 10.50                                 |
| <b>Pleadings and Court Filings</b>                                                                                                                                                                                                                                                                                                                                                                            |                                       |
| Investigate the Merits of Plaintiff’s Claims, Conduct Legal Research and Analysis Regarding All Claims Involved, and Draft Plaintiff’s Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on February 5, 2024)                                                                                                          | 7.50                                  |
| Review Court’s Notice of Case Management Conference (filed on February 14, 2024)                                                                                                                                                                                                                                                                                                                              | 0.10                                  |
| Draft Plaintiff’s Notice of Posting Complex Fees (filed on February 21, 2024)                                                                                                                                                                                                                                                                                                                                 | 0.10                                  |
| Review and Analyze Defendants Briarpatch Cooperative of Nevada, Inc. (“Defendant Briarpatch Cooperative of Nevada, Inc.”), Briarpatch Food Co-Op (“Defendant Briarpatch Food Co-Op”), and Nevada County BriarP (“Defendant Nevada County BriarP”) (collectively, “Defendants”) Answer to Plaintiff’s Unverified Complaint (served on March 25, 2024), and Research Affirmative Defenses in Defendants’ Answer | 1.50                                  |
| Draft Plaintiff’s Notice of Association of Counsel (filed on April 10, 2024)                                                                                                                                                                                                                                                                                                                                  | 0.20                                  |
| Meet and Confer with Defendants’ Counsel and Co-Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on May 3, 2024)                                                                                                                                                                                                                                                   | 0.20                                  |

|                                                                                                                                                                                                                                                                 |      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Meet and Confer with Defendants' Counsel and Co-Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on August 1, 2024)                                                                                                  | 0.20 |
| Meet and Confer with Defendants' Counsel and Co-Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on November 12, 2024)                                                                                                          | 0.20 |
| Meet and Confer with Defendants' Counsel and Co-Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on December 17, 2024)                                                                                                          | 0.20 |
| Review Court's Tentative Ruling Re: Case Management Conference (issued on January 10, 2025)                                                                                                                                                                     | 0.10 |
| Meet and Confer with Defendants' Counsel and Co-Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on March 3, 2025)                                                                                                              | 0.20 |
| Review Court's Tentative Ruling Re: Case Management Conference (issued on March 21, 2025)                                                                                                                                                                       | 0.10 |
| Meet and Confer with Defendants' Counsel and Co-Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on April 14, 2025)                                                                                                             | 0.20 |
| Review Court's Tentative Ruling Re: Case Management Conference (issued on May 2, 2025)                                                                                                                                                                          | 0.10 |
| <b>Appearances</b>                                                                                                                                                                                                                                              |      |
| Prepare for and Remotely Attend Case Management Conference (May 5, 2025)                                                                                                                                                                                        | 0.90 |
| <b>Discovery and Deposition</b>                                                                                                                                                                                                                                 |      |
| Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Amanda Powell (served September 19, 2023)                                                                          | 3.50 |
| Draft 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 BriarPatch Cooperative Nevada, Inc. (served on April 3, 2024) | 4.50 |
| Draft 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 Nevada County BriarP (served on April 3, 2024)                | 3.50 |

|                                                                                                                                                                                                                                                    |      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Draft 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 BriarPatch Food Co-Op. (served on April 3, 2024) | 2.50 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BriarPatch Cooperative Nevada, Inc. and Requests for Production of Documents (Organizational Structure; noticed for May 7, 2024) (served on April 3, 2024)        | 1.30 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BriarPatch Cooperative Nevada, Inc. and Requests for Production of Documents (Wage and Hour Practices; noticed for May 8, 2024) (served on April 3, 2024)         | 1.60 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BriarPatch Food Co-Op. and Requests for Production of Documents (Organizational Structure; noticed for May 9, 2024) (served on April 3, 2024)                     | 1.10 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant BriarPatch Food Co-Op. and Requests for Production of Documents (Wage and Hour Practices; noticed for May 10, 2024) (served on April 3, 2024)                     | 1.40 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Nevada County BriarP and Requests for Production of Documents (Organizational Structure; noticed for May 14, 2024) (served on April 3, 2024)                      | 1.30 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Nevada County BriarP and Requests for Production of Documents (Wage and Hour Practices; noticed for May 15, 2024) (served on April 3, 2024)                       | 1.60 |
| <b>Letters and Correspondence</b>                                                                                                                                                                                                                  |      |
| Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff under the Private Attorneys General Act ("PAGA") (served on December 1, 2023)                                                                             | 4.50 |
| Meet with, Draft Correspondence to, and/or Respond to Correspondence from, Defendants' Counsel                                                                                                                                                     | 9.50 |
| Meet with, Draft Correspondence to, and/or Respond to Correspondence from, Co-Counsel                                                                                                                                                              | 8.50 |

| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources Prior to Mediation, Research Settlement-Related and Merits-Related Issues, Perform Claim Evaluation and Analysis, and Draft, Review, and/or Revise Plaintiff's Mediation Brief (submitted on November 9, 2024)                                                                                                                                                                                                                                                                       | 13.50 |
| Review and Analyze Mediator's Proposal (issued on December 2, 2024; accepted on December 3, 2024)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 0.50  |
| Draft, Review, Revise, Negotiate, and Finalize Stipulation of Class Action Settlement and PAGA Settlement and Release of the Claims (executed on February 21, 2025), and Draft, Review, and/or Revise Notice of Class Action Settlement                                                                                                                                                                                                                                                                                                                                                         | 1.10  |
| Draft, Review, Revise, Negotiate, and Finalize Addendum to Stipulation of Class Action and PAGA Settlement and Release of Claims (executed on March 26, 2025)                                                                                                                                                                                                                                                                                                                                                                                                                                   | 0.90  |
| Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries                                                                                                                                                                                                                                                                                                                                                                                                                                          | 3.50  |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |       |
| Review Declaration of Settlement Administrator, Declaration of Jean-Claude Lapuyade, Declaration of Jennifer M. Gerstenzang, Declaration of Shani O. Zakay, Declaration of Plaintiff Amanda Powell, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion for Preliminary Approval of Class Action and PAGA Settlement, Memorandum of Points and Authorities in Support Thereof, Declaration of Brian J. St. John in Support Thereof, and [Proposed] Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on April 28, 2025) | 4.50  |
| Review and Analyze Defendants' Non-Opposition to Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on June 6, 2025)                                                                                                                                                                                                                                                                                                                                                                                                                                        | 0.10  |
| Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on June 18, 2025)                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 0.20  |
| Draft, Review, and/or Revise [Proposed] Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on June 20, 2025)                                                                                                                                                                                                                                                                                                                                                                                                                                 | 0.10  |
| Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on June 20, 2025)                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 0.20  |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Review Declaration of Settlement Administrator, Declaration of Jean-Claude Lapuyade, Declaration of Shani O. Zakay, and Declaration of Plaintiff Amanda Powell, and Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion for Final Approval of Class Action and PAGA Settlement, Memorandum of Points and Authorities in Support Thereof, Declaration of Brian J St. John in Support Thereof, [Proposed] Order Granting Final Approval, and [Proposed] Judgment | 7.50          |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>113.70</b> |

# **EXHIBIT B**

LAWYERS *for* JUSTICE, PC CASE COST DETAIL  
Powell vs. BriarPatch Cooperative of Nevada, Inc., et al.

| <u>Date</u> | <u>Payee</u>                         | <u>Expense Description</u> | <u>Amount</u>            |
|-------------|--------------------------------------|----------------------------|--------------------------|
| 8/28/2023   | U.S. Postmaster                      | Postage                    | \$17.12                  |
| 12/1/2023   | U.S. Postmaster                      | Postage                    | \$26.31                  |
| 12/1/2023   | Labor & Workforce Development Agency | PAGA Filing Fee            | \$75.00                  |
| 2/14/2024   | Legal Document Server, Inc.          | Attorney Service           | \$44.13                  |
| 2/14/2024   | Nevada County Superior Court         | Complaint Filing Fee       | \$435.00                 |
| 2/19/2024   | ProLegal                             | Attorney Service           | \$777.40                 |
| 2/21/2024   | Legal Document Server, Inc.          | Attorney Service           | \$244.50                 |
| 2/21/2024   | Nevada County Superior Court         | Complex Filing Fee         | \$1,000.00               |
| 3/29/2024   | Legal Document Server, Inc.          | Attorney Service           | \$13.90                  |
| 4/4/2024    | General Logistics Systems US, Inc.   | Courier Service            | \$23.92                  |
| 4/10/2024   | Legal Document Server, Inc.          | Attorney Service           | \$13.90                  |
| 4/22/2024   | Legal Document Server, Inc.          | Attorney Service           | \$13.90                  |
| Total:      |                                      |                            | <u><u>\$2,685.08</u></u> |