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Attorneys for Plaintiff

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

SHANE UNDERWOOD, individually, and
on behalf of other members of the general
public similarly situated;

Plaintiff,

vs.

VOLVO GROUP NORTH AMERICA, INC.,
a Delaware corporation; SABA HOLDING
COMPANY, LLC DBA VOLVO
CONSTRUCTION & EQUIPMENT
SERVICES, a Delaware limited liability
company; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: CVRI2401288 (Lead Case)
Consolidated Case No(s): CVRI2401287

Honorable Harold W. Hopp
Department 1

CLASS ACTION

**DECLARATION OF DANIEL BASS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND GENERAL
RELEASE FEE**

Date: September 11, 2026
Time: 8:30 a.m.
Department: 1

Complaint Filed: March 8, 2024
Trial Date: None Set

DECLARATION OF DANIEL BASS

I, Daniel Bass, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Shane Underwood (“Plaintiff”) and the Class in the above-captioned matters. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On April 28, 2026, in Department 1 of the above-entitled Court, the Honorable Harold W. Hopp preliminarily approved the Joint Stipulation of Class Action Settlement and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant SABA Holding Company, LLC dba Volvo Construction Equipment & Services, (“Defendant,”) (together with Plaintiff referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Shane Underwood 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 Notice of Proposed Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed ILYM Group, Inc. 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 Settlement, Attorneys’ Fees and Costs, and General Release Fee (“Motion for Final Approval”), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Attorneys’ Fees and Costs, General Release Fee, and Settlement Administration Costs, or the allocation for the PAGA Amount.

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WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers for Justice, PC have been actively performing work in the above captioned action entitled *Underwood v. Volvo Group North America, Inc. et al.*, Case No. CVRI2401288 (“Class Action”), which was filed on March 8, 2024, and the representative Private Attorneys General Act (“PAGA”) action entitled *Underwood v. Volvo Group North America, Inc. et al.*, Los Angeles County Superior Court, Case No. CVRI2401287 (“PAGA Action”), which was also filed on March 8, 2024, since prior to their commencement. On February 6, 2026, the Class Action and PAGA Action (together, the “Actions”) were consolidated and the Class Action was designated the lead action.

6. Before initiating the cases, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers for Justice, PC and Plaintiff and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative Private Attorneys General Act (“PAGA”) claims and penalties, and wage-and-hour law and enforcement, Plaintiff’s claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiff were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former non-exempt, hourly-paid employees who were employed by Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Class Counsel conducted significant informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and were preparing the cases for class certification and trial, prior to reaching the Settlement. The Parties exchanged thousands of pages of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. The volume of records and

documents that Class Counsel reviewed and analyzed included, and were not limited to: a sampling of Class Members' time and payroll data, Plaintiff's personnel records, Defendant's Handbook, payroll registers, company policy acknowledgements [including but not limited to Meal Period Waiver (Second Meal Period), Meal Period Waiver (6 or less hours in a workday), Equipment Dealers Agreement, Employee Handbook Confirmation of Receipt, Confirmation of Harassment Discrimination and Retaliation Prevention Policy, Acknowledgment of Meal and Rest Period Policy, Acknowledgment of Meal and Rest Period Policy and Timekeeping Policy, benefit program acknowledgments, union documents, Confidentiality, job descriptions, Defendant's operations and employment practice, policies, and procedures [including but not limited to Guidelines of Conduct Policy, Vehicle Use Policy Agreement, Punctuality and Attendance], among other information and documents. Class Counsel had the opportunity to interview Plaintiff and others to gather facts and to identify potential witnesses. Class Counsel developed liability, damages, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, motion practice, and production of information, documents, and data in the course of litigation and in connection with the mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; legal research; drafting, reviewing, and revising the pleadings, motion-related papers, mediation briefing and supporting materials, and settlement-related papers; and preparing for and attending court proceedings, settlement negotiations, and the mediation, among other tasks.

8. As outlined herein, the Parties have conducted significant investigation and informal discovery during the course of litigating this matter, mediation, and extensive settlement negotiations. Class Counsel analyzed thousands of pages of information, documents, and data obtained from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature of the work performed by the Class Members and PAGA Employees, as well as Defendant's organizational structure and their operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing

1 liability, damages, penalties, and other valuation issues in connection with all phases of the
2 litigation, and ultimately, in connection with the mediation and settlement negotiations process.
3 Class Counsel also performed significant research into the applicable law, which is evolving as it
4 relates to class certification, manageability, off-the-clock theory, meal and rest periods,
5 representative PAGA claims and penalties, wage-and-hour enforcement, regular rate, Plaintiff's
6 claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

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

1 would attend further litigation. These risks of further litigation include, and are not limited to, a
2 determination that the claims are unsuitable for class treatment and/or representative
3 adjudication, class de-certification after certification of a class, allowing a jury to decide the
4 claims asserted in this matter, and the real possibility of no monetary recovery after years of
5 litigation.

6 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks
7 attorneys' fees in the amount of \$495,250.00, which is thirty-five percent (35%) of the Total
8 Settlement Amount of \$1,415,000.00. Pursuant to the contingency-fee agreement entered into by
9 and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least
10 thirty-five percent (35%) of the recovery.

11 11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
12 took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to
13 the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
14 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
15 has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order
16 to devote their time and efforts to these cases. The nature of the work performed, skill exercised,
17 and the outcome in this matter which involves an outstanding monetary recovery involving a
18 Total Settlement Amount of \$1,415,000.00 (with a Net Settlement Amount of approximately at
19 least \$833,560.25 to be paid to Settlement Class Members (with gross Individual Settlement
20 Shares averaging approximately more than \$4,491.80), payment of \$13,750.00 to PAGA
21 Employees (with Individual PAGA Payment averaging approximately \$104.17) and payment of
22 \$41,250.00 to the State of California)—support the percentage fee sought and the application of
23 a lodestar multiplier.

24 12. While not necessarily required to be demonstrated because a percentage fee is
25 proper for this settlement, it should be noted that Class Counsel has incurred many hours of work
26 in connection with prosecuting this matter such that the award of attorneys' fees is also justified
27 under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **302.60**
28 **hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"**

1 is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services
2 provided by attorneys at Lawyers for Justice, PC and the time incurred by them in performing
3 those services. These hours include work done by several attorneys at Lawyers for Justice, PC.
4 Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had
5 litigation support personnel actively engaged in assisting with the prosecution of this matter.

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

23 EXPERIENCE AND ADEQUACY OF

24 LAWYERS for JUSTICE, PC

25 14. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the
26 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
27 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC
28 is the attorney of record in well over a dozen employment-related putative class actions in both

1 state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of
2 attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General
3 Act (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly
4 every aspect of California wage and hour law, including payment of overtime and minimum
5 wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of
6 wages, provision of compliant wage statements, reimbursement of business expenses, executive,
7 administrative, and other overtime exemptions to the State of California and federal overtime
8 compensation requirements, PAGA claims, and sister statutes under federal law. During a
9 relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered
10 millions of dollars on behalf of thousands of individuals in California.

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

1 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
2 has successfully litigated cases involving the executive, administrative, and other overtime
3 exemptions to the State of California and federal overtime compensation requirements. Under
4 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
5 contested motion practice in approximately sixteen (16) cases in the last decade, and litigated
6 over 1,000 class action or representative action cases.

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

26 17. Joanna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a
27 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
28 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from

Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District Courts in California, 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 Aiwarzian, and Arby Aiwarzian'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.

18. Brian J. St. John is a Member of Lawyers for Justice, PC. He received his Bachelor's degree from the University of California, San Diego in 2010 and earned his Juris Doctor degree from the University of California, Berkeley, School of Law in 2013. He was admitted to practice law in California in 2015. He is admitted to practice before all courts of the State of California and all federal district courts in the State of California. He has worked on

1 many wage and hour class action and PAGA representative matters, and his work has included
2 *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting,
3 negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice,
4 claims evaluation and analysis, and making court appearances. Prior to working at Lawyers *for*
5 Justice, PC, he spent several years working for a boutique employment and labor law firm
6 representing employers, and, in 2019 and 2020, he was employed as general counsel for a
7 DMHC licensed discount dental plan.

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

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LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS *FOR* JUSTICE, PC

20. 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 \$25,000.00. Lawyers *for* Justice, PC seeks reimbursement of **\$13,439.75** 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 \$11,560.25 will be part of the Net Settlement Amount, which will be distributed to the Settlement Class Members in accordance with the Settlement.

GENERAL RELEASE FEE TO PLAINTIFF

21. In recognition of his efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as his broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 36(c) of the Settlement Agreement), the Settlement provides for in the amount of up to \$10,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing his 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 him 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 General Release Fee for his broader waiver and release of claims and services performed in this matter, in addition to his individual settlement payment(s).

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LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

22. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, the Class, 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 19th day of August 2026, at Glendale, California.

Paul

Daniel Bass

EXHIBIT 1

SHANE UNDERWOOD V. VOLVO GROUP NORTH AMERICA, INC., ET AL.
Riverside County Superior Court Case No. CVRI2401288 (“Class Action”)
Riverside County Superior Court Case No. CVRI2401287 (“PAGA Action”)

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 Shane Underwood (“Plaintiff”)	17.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	19.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Class Action Claims, Conduct Legal Research and Analysis Regarding the Class Claims, and Draft, Review, and/or Revise Plaintiff’s Class Action Complaint for Damages (filed on March 8, 2024) (Class Action)	7.50
Investigate the Merits of Plaintiff’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on March 8, 2024) (PAGA Action)	6.50
Review Court’s Notice of Case Management Conference and Notice of Department Assignment (filed on March 11, 2024) (Class Action)	0.30
Review Court’s Notice of Case Management Conference and Notice of Department Assignment (filed on March 11, 2024) (PAGA Action)	0.30
Review Court’s Class Action Case Management Order #1 (filed on March 14, 2024) (Class Action)	0.80

Review Court's Minute Order Re: Court Ruling Re: Class Action Case Management Order #1 (filed on March 14, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Related Case (filed on April 23, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Related Case (filed on April 23, 2024) (PAGA Action)	0.20
Meet and Confer with Defendant Saba Holding Company, LLC dba Volvo Construction Equipment & Services' ("Defendant Saba") Counsel and Defendant Volvo Group North America, Inc.'s ("Defendant Volvo") Counsel, and Draft, Review, and/or Revise Joint Initial Case Management Conference Statement (filed on May 3, 2024) (Class Action)	1.60
Draft, Review, and/or Revise Plaintiff's Notice of Posting Jury Fees (filed on May 3, 2024) (Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on May 6, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Ruling (filed on May 9, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Amended Notice of Ruling (filed on May 9, 2024) (Class Action)	0.10
Review and Analyze Defendant Saba's Answer to Class Action Complaint, and Research Affirmative Defenses in Defendant Saba's Answer (served on May 10, 2024) (Class Action)	1.20
Review and Analyze Defendant Volvo's Answer to Plaintiff's Complaint, and Research Affirmative Defenses in Defendant Volvo's Answer (served on May 13, 2024) (PAGA Action)	1.10
Draft, Review, and/or Revise Amendment to Complaint (filed on May 16, 2024) (PAGA Action)	0.20
Meet and Confer with Defendant Saba's Counsel and Defendant Volvo's Counsel, and Draft, Review, and/or Revise Joint Status Report (filed on June 18, 2024) (Class Action)	1.50
Review Court's Minute Order Re: Case Management Conference (filed on June 26, 2024) (Class Action)	0.20
Review and Analyze Defendant Saba's Answer to Amendment to Complaint, and Research Affirmative Defenses in Defendant Saba's Answer to Amendment to Complaint (served on July 1, 2024) (PAGA Action)	1.10

Review and Analyze Defendant Volvo's Answer to Class Action Complaint, and Research Affirmative Defenses in Defendant Volvo's Answer (served on August 21, 2024) (Class Action)	1.30
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on August 21, 2024) (PAGA Action)	0.80
Review Defendant Saba's Case Management Statement (served on August 22, 2024) (PAGA Action)	0.30
Meet and Confer with Defendant Saba's Counsel and Defendant Volvo's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on September 3, 2024) (Class Action)	1.30
Review Court's Order to Continue Case Management Conference (filed on September 6, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order to Continue Case Management Conference (filed on September 6, 2024) (Class Action)	0.20
Review Court's Notice of Case Management Conference (filed on September 6, 2024) (Class Action)	0.20
Review Court's Minute Order Re: Case Reassignment (filed on September 6, 2024) (PAGA Action)	0.30
Review Declaration of Kelley Baker in Support of Stipulation Regarding Dismissal of Non-Employment Entity (served on October 9, 2024) (Class Action)	0.50
Meet and Confer with Defendant Saba's Counsel and Defendant Volvo's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on October 23, 2024) (PAGA Action)	0.90
Review Court's Order to Continue Case Management Conference and Notice of Case Management Conference (filed on October 25, 2024) (PAGA Action)	0.30
Draft, Review, and/or Revise Notice of Entry of Judgment or Order to Continue Case Management Conference (filed on October 25, 2024) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 15, 2025) (Class Action)	0.20

Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 15, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Request for Dismissal, Declaration of Arman Marukyan in Support Thereof, and [Proposed] Order Thereon (submitted on January 15, 2025) (Class Action)	1.10
Draft, Review, and/or Revise Request for Dismissal, Declaration of Arman Marukyan in Support Thereof, and [Proposed] Order Thereon (submitted on January 15, 2025) (PAGA Action)	0.60
Review Court's Minute Order and Order Re: Dismissal (filed on January 22, 2025) (Class Action)	0.20
Review Court's Minute Order and Order Re: Dismissal (filed on January 22, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Dismissal (filed on January 23, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Dismissal (filed on January 23, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Settlement of Entire Case (filed on March 21, 2025) (Class Action)	0.50
Draft, Review, and/or Revise Notice of Settlement of Entire Case (filed on March 21, 2025) (PAGA Action)	0.50
Review Court's Notice of Hearing and Order to Show Cause Re: Dismissal After Conditional Settlement (filed on April 1, 2025) (Class Action)	0.40
Review Court's Notice of Hearing and Order to Show Cause Re: Dismissal After Conditional Settlement (filed on April 1, 2025) (PAGA Action)	0.40
Review Court's Minute Order Re: Hearing on Order to Show Cause Re: Dismissal After Conditional Settlement Pursuant to CRC 3.1385(c) (filed on May 5, 2025) (Class Action)	0.20
Review Court's Minute Order Re: Hearing on Order to Show Cause Re: Dismissal After Conditional Settlement Pursuant to CRC 3.1385(c) (filed on May 5, 2025) (PAGA Action)	0.20
Review Court's Minute Order Re: Hearing on Order to Show Cause Re: Dismissal After Conditional Settlement Pursuant to CRC 3.1385(c) (May 16, 2025) (PAGA Action)	0.20

Review Court's Amended Minute Order Re: Hearing on Order to Show Cause Re: Dismissal After Conditional Settlement Pursuant to CRC 3.1385(c) (filed on May 16, 2025) (PAGA Action)	0.20
Meet and Confer with Defendant Saba's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Consolidate Cases; [Proposed] Order (submitted on January 6, 2026) (Class Action)	1.10
Review Court's Order to Consolidate Cases (filed on February 6, 2026) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Consolidating Cases (filed on February 10, 2026) (Class Action and PAGA Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Re: Dismissal After Conditional Settlement Pursuant to CRC 3.1385(C) (filed on April 28, 2026) (Class Action and PAGA Action)	0.90
Review Court's Minute Order Re: Hearing on Order to Show Cause Re: Dismissal After Conditional Settlement Pursuant to CRC 3.1385(c) (filed on May 4, 2026) (Class Action)	0.20
Review Court's Minute Order Re: Hearing on Order to Show Cause Re: Dismissal After Conditional Settlement Pursuant to CRC 3.1385(c) (filed on May 5, 2026) (PAGA Action)	0.20
Appearances	
Prepare for and Remotely Attend Case Management Conference (June 26, 2024) (Class Action)	0.60
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (April 16, 2026) (Class Action)	2.20
Discovery and Deposition	
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Shane Underwood (served on October 30, 2023)	1.10
Draft, Review, and/or Revise Plaintiff's Special Interrogatories (Set One) to Defendant Volvo Group North America, Inc. (served on July 12, 2024) (Class Action)	0.60
Draft, Review, and/or Revise Contemplated <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (July 9, 2024)	1.20

Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Shane Underwood under the Private Attorneys General Act (served on December 22, 2023)	4.50
Research, Draft, Review, and/or Revise Additional Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Shane Underwood under the Private Attorneys General Act (served on February 13, 2024)	3.20
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendant's Counsel	19.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant Saba (approximately 12,000 pages), and Other Sources Prior to Mediation	68.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations (submitted on February 27, 2025)	32.50
Attend Mediation Session (March 6, 2025; via Zoom Video Conference)	13.50
Review and/or Analyze Mediator's Proposal (Term Sheet) (issued March 6, 2025; accepted March 13, 2025)	3.50
Draft, Review, Revise, and/or Analyze Memorandum of Understanding – Class Action and PAGA Settlement (executed on April 29, 2025)	6.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on September 29, 2025), and Draft, Review, and/or Revise Notice of Proposed Class Action Settlement	18.50
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	6.50

Law and Motion	
Review Declaration of Settlement Administrator and Declaration of Proposed <i>Cy Pres</i> Recipient, 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 Daniel Bass in Support Thereof, Declaration of Plaintiff Shane Underwood in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on January 16, 2026) (Class Action)	20.50
Review Declaration of Michelle Schwanhauser in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement and Declaration of Tiffany Brosnan in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement (served on February 26, 2026) (Class Action)	0.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on April 15, 2026) (Class Action)	0.30
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on April 16, 2026) (Class Action)	0.20
Draft, Review, and/or Revise [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (submitted on April 17, 2026) (Class Action)	0.40
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on May 1, 2026) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on May 5, 2026) (Class Action)	0.20
Review Declaration of Settlement Administrator, and Research, Draft, Review and/or Revise Plaintiff's Notice of Motion and Motion for Final Approval of Class Action Settlement and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Daniel Bass in Support Thereof, Declaration of Plaintiff Shane Underwood in Support Thereof, and [Proposed] Judgment and Order Granting Final Approval of Class Action and PAGA Settlement	22.50
Total Hours:	302.60

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Underwood vs. Volvo Group North America, Inc., et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/6/2023	U.S. Postmaster	Postage	\$17.12
3/11/2024	Legal Document Server, Inc.	Attorney Service	\$116.53
3/11/2024	Riverside Superior Court	Complex Filing Fee	\$1,000.00
3/11/2024	Riverside Superior Court	Complaint Filing Fee	\$450.00
3/26/2024	Elite Litigation Support	Attorney Service	\$278.75
4/1/2024	Riverside Superior Court	Document Download Fee	\$1.00
5/1/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
5/3/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
5/7/2024	Legal Document Server, Inc.	Attorney Service	\$26.18
5/7/2024	Riverside Superior Court	Jury Fee	\$150.00
5/8/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
5/10/2024	Legal Document Server, Inc.	Attorney Service	\$31.50
6/21/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
6/26/2024	Riverside Superior Court	Document Download Fee	\$1.00
7/12/2024	General Logistics Systems US, Inc.	Courier Service	\$20.65
7/30/2024	Jams, Inc.	Mediation Fee	\$8,000.00
8/21/2024	Riverside Superior Court	Document Download Fee	\$1.00
9/4/2024	Legal Document Server, Inc.	Attorney Service	\$17.14
9/4/2024	Riverside Superior Court	Stipulation & Order Fee	\$20.00
9/9/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
9/23/2024	Legal Document Server, Inc.	Attorney Service	\$13.80
1/13/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
1/22/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
1/23/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
3/6/2025	Liza Goldenberg	Travel Reimbursement	\$36.33
4/1/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
5/1/2025	CPAnalytics	Data Analysis	\$1,650.00
1/27/2026	Legal Document Server, Inc.	Attorney Service	\$23.47
1/27/2026	Riverside Superior Court	Motion Fee	\$60.00
2/6/2026	Legal Document Server, Inc.	Attorney Service	\$20.69
2/6/2026	Riverside Superior Court	Stipulation & Order Fee	\$20.00
3/16/2026	Legal Document Server, Inc.	Attorney Service	\$13.95
3/17/2026	Legal Document Server, Inc.	Attorney Service	\$5.35
3/18/2026	Riverside Superior Court	Document Download Fee	\$1.00
3/25/2026	Riverside Superior Court	Document Download Fee	\$1.00
4/17/2026	Legal Document Server, Inc.	Attorney Service	\$155.00
4/28/2026	Legal Document Server, Inc.	Attorney Service	\$38.60

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Underwood vs. Volvo Group North America, Inc., et al.

5/5/2026	Legal Document Server, Inc.	Attorney Service	\$33.25
5/8/2026	Riverside Superior Court	Document Download Fee	\$2.00
5/11/2026	Legal Document Server, Inc.	Attorney Service	\$19.30
Total:			<u>\$12,367.41</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Underwood vs. Volvo Group North America, Inc., et al. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/22/2023	U.S. Postmaster	Postage	\$18.02
12/22/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
3/11/2024	Legal Document Server, Inc.	Attorney Service	\$47.03
3/11/2024	Riverside Superior Court	Complaint Filing Fee	\$450.00
3/26/2024	Elite Litigation Support	Attorney Service	\$251.00
4/29/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
4/30/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
5/20/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
7/1/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
7/16/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
7/17/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
8/23/2024	Legal Document Server, Inc.	Attorney Service	\$15.75
9/6/2024	Riverside Superior Court	Document Download Fee	\$1.00
10/24/2024	Legal Document Server, Inc.	Attorney Service	\$18.69
10/24/2024	Riverside Superior Court	Stipulation & Order Fee	\$20.00
10/30/2024	Legal Document Server, Inc.	Attorney Service	\$17.30
1/13/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
1/22/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
1/23/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
4/1/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
Total:			<u>\$1,072.34</u>