Arby Aiwazian (SBN 269827)
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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

GERALD HENDERSON, 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; VERONICA DUENAS, 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; GLORIA TORRES, individually, and on behalf of other members of the general public similarly situated,

Plaintiffs,

vs.

PHARMAVITE LLC, a California limited liability company; OTSUKA PHARMACEUTICAL CO., LTD., an unknown business entity; OTSUKA HOLDINGS CO., LTD., an unknown business entity; OTSUKA AMERICA, INC., a Delaware corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. 24STCV04979 (Lead Case)
Consolidated Case No. 25CHCV00609

CLASS ACTION

Honorable Elaine Lu
Department 9

DECLARATION OF RYAN SLINGER IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND SERVICE PAYMENTS

Date:	December 3, 2026
Time:	10:00 a.m.
Department:	9
Complaint Filed:	February 27, 2024
FAC Filed:	March 17, 2025
SAC Filed:	April 29, 2025
Trial Date:	None Set

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DECLARATION OF RYAN SLINGER

I, Ryan Slinger, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Veronica Duenas and Gloria Torres (together, "Plaintiffs") 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 June 18, 2026, in Department 9 of the above-entitled Court, the Honorable Elaine Lu preliminarily approved the First Amended Class Action and PAGA Settlement Agreement ("Settlement," "Agreement," or "Settlement Agreement,") entered into between Plaintiffs and Defendant Pharmavite LLC, ("Defendant,") (collectively with Plaintiffs, the "Parties") and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiffs Veronica Duenas and Gloria Torres as the representatives of the Class ("Class Representatives"). 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 Class Action Settlement ("Class Notice"), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Phoenix Settlement Administrators ("Phoenix") 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 Service Payments ("Motion for Final Approval"), no Participating Class Member has objected to the Class Settlement, the contemplated request for Attorneys' Fees and Costs, Service Payments, and Settlement Administration Costs, or the allocation for the PAGA Penalty 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 (the "Class Action") and the representative Private Attorneys General Act ("PAGA") action entitled *Gerald Henderson v. Pharmavite, Inc., et al* , Los Angeles County Superior Court, Case No. 24CHCV00609 (the "PAGA Action"), since they were filed on February 27, 2024. On July, 31, 2024, 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 Plaintiffs and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement, Plaintiffs' claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiffs 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 hourly-paid or non-exempt employees of Defendant in the State of California at any time during the Class Period, 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 a volume 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: Plaintiffs' employment records, Class Members' time and pay data, multiple iterations of

Defendant's Employee Handbook, internal memoranda, Defendant's operations and employment practices, forms, procedures, and policies, among other information and documents. Class Counsel had the opportunity to interview and obtain information from Plaintiffs, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiffs, Defendant, and other sources. Class Counsel developed liability, damages, violation, 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, informal discovery, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, 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 a volume of information, documents, and data obtained from Plaintiffs, Defendant, and other sources that provided a critical understanding of the nature of the work performed by the Class Members and Aggrieved 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 liability, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiations process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest periods, representative PAGA claims and penalties, wage-and-hour enforcement, arbitration agreements, regular rate, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

9. After conducting significant investigation of the facts and law during the prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in a mediation session conducted by Steven Rottman, Esq., a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations

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at arm's length in an adversarial position. In the course of the mediation and settlement negotiations, the Parties exchanged documents and data, and discussed various aspects of the cases, including and not limited to, the risks and delays of further litigation, the risks and expenses to the Parties of proceeding with class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, regular rates of pay, meal and rest periods (including *inter alia*, on premises breaks), expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and enforcement; Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication Defendant and its counsel felt strongly about Defendant's ability to avoid class certification prevail on the merits and, while Plaintiffs and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of $166,666.67, which is one-third (1/3) of the Gross Settlement Amount of $500,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs and Class Counsel, Plaintiffs have agreed to a contingency fee of at least one-third (1/3) of the recovery.

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11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to these cases. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving an Gross Settlement Amount of $500,000.00 (with a Net Settlement Amount of approximately at least $168,084.84 to be paid to Participating Class Members (with Individual Settlement Payments averaging approximately $407.97), payment of $25,000.00 to the Aggrieved Employees (with Individual PAGA Payment averaging approximately $33.97) and payment of $75,000.00 to the State of California)—support the percentage fee sought.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **303.40 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The work performed in this particular matter, the background of Lawyers *for* Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least $850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at

least $850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of $936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of $919.57 per hour; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp*. (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of $855.96 per hour.

EXPERIENCE AND ADEQUACY OF

LAWYERS *for* JUSTICE, PC

14. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and PAGA representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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15. Edwin Aiwazian is the Chief Executive Officer of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000 class action or representative action cases.

16. Arby Aiwazian is a Senior Partner of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the

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Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative action cases have resulted in settlements that have been granted court approval. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

17. Joanna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010), in New York (since 2013), and in Washington (in 2026), 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, U.S. District Court for the Western District of Washington 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.,

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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.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby Aiwazian'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. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice before all courts of the State of California. I have worked on many wage-and-hour class action and PAGA representative cases, and my work on these cases has included preparing pleadings and motions, making court appearances, and drafting and finalizing settlement agreements.

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS *FOR* JUSTICE, PC

19. 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 $30,000.00. Lawyers *for* Justice, PC seeks reimbursement of **$26,748.49** 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 $3,251.51 will be

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part of the Net Settlement Amount, which will be distributed to the Participating Class Members in accordance with the Settlement.

SERVICE PAYMENTS TO PLAINTIFFS

20. In recognition of their efforts and work spearheading the prosecution of this matter and serving as Class Representatives, as well as their broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in section 5.1 of the Settlement Agreement), the Settlement provides for Service Payments, in the amount of up to $15,000.00 to each Plaintiff. Plaintiffs spent a substantial amount of time and effort discussing their employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiffs to receive $15,000.00 each as reasonable Service Payments for their broader waiver and release of claims and services performed in this matter, in addition to their individual settlement payments.

21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, the Class Members, Aggrieved Employees, and the State of California.

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

Executed this 16th day of October 2026, at Glendale, California.

Ryan Slinger

Ryan Slinger

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EXHIBIT 1

GERALD HENDERSON, ET AL. V. PHARMAVITE LLC, ET AL.
Los Angeles County Superior Court, Case No. 24STCV04979 ("Class Action")

GERALD HENDERSON V. PHARMAVITE LLC, ET AL.
Los Angeles County Superior Court, Case No. 24CHCV00609 ("PAGA Action")

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS *for* JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with former Plaintiff Gerald Henderson ("Former Plaintiff Henderson")	8.50
Meet, Communicate, and/or Review Communication with Plaintiff Gloria Torres ("Plaintiff Torres")	9.50
Meet, Communicate, and/or Review Communication with Plaintiff Veronica Duenas ("Plaintiff Duenas") (together with Plaintiff Torres, "Plaintiffs")	7.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	20.50
Pleadings and Court Filings	
Investigate the Merits of Former Plaintiff Henderson's Class Action Claims, Conduct Legal Research and Analysis Regarding Class Action Claims, and Draft, Review, and/or Revise Former Plaintiff Henderson's Class Action Complaint for Damages (filed on February 27, 2024) (Class Action)	7.50
Review Court's Notice of Case Assignment (filed on February 27, 2024) (Class Action)	0.20

Investigate the Merits of Former Plaintiff Henderson's Private Attorneys General Act ("PAGA") Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Former Plaintiff Henderson's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on February 27, 2024) (PAGA Action)	6.50
Review Court's Notice of Case Assignment Unlimited Civil Case (filed on February 27, 2024) (PAGA Action)	0.20
Review Court's Notice of Case Management Conference (filed on February 28, 2024) (PAGA Action)	0.10
Review Court's Minute Order Re: Newly Filed Class Action and Initial Status Conference Order (filed on March 6, 2024) (Class Action)	0.30
Review Defendant Pharmavite LLC's ("Defendant") and Former Defendants Otsuka Pharmaceutical Co., Ltd., Otsuka Holdings Co., Ltd., and Otsuka America, Inc.'s (collectively, "Former Defendants") Notice of Appearance (served on April 2, 2024) (Class Action)	0.40
Review Defendant and Former Defendants' Peremptory Challenge to Judicial Officer (filed on April 2, 2024) (Class Action)	0.40
Review Court's Minute Order Re: CCP 170.6 Peremptory Challenge (filed on April 5, 2024) (Class Action)	0.40
Review Defendant and Former Defendants' Notice of Order Re Peremptory Challenge (served on April 8, 2024) (Class Action)	0.20
Review and Analyze Defendant and Former Defendants' Answer to Former Plaintiff Henderson's Complaint, and Research Affirmative Defenses in Defendant and Former Defendants' Answer (served on April 24, 2024) (PAGA Action)	1.20
Draft, Review, and/or Revise Former Plaintiff Henderson's Notice of Posting Jury Fees (filed on June 13, 2024) (Class Action)	0.10
Meet and Confer with Defendant and Former Defendants' Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Statement (filed on June 14, 2024) (Class Action)	1.50

Review Defendant and Former Defendants' Notice of Posting Jury Fees (served on June 18, 2024) (Class Action)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on June 21, 2024) (Class Action)	0.20
Review Defendant and Former Defendants' Notice of Related Case (filed on June 25, 2024) (Class Action & PAGA Action)	0.20
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing Notices of Related Case (filed on July 11, 2024) (Class Action)	0.20
Review Court's Order Re: Notice of Related Case; Notice of Complex Determination (filed on July 11, 2024) (PAGA Action)	0.20
Review Defendant and Former Defendants' Notice of Court's Orders Re Related Cases (served on July 18, 2024) (Class Action)	0.20
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing and Serving of Objection to Consolidation (filed on July 31, 2024) (Class Action & PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Order Re: Consolidation of Related Cases (filed on August 8, 2024) (Class Action)	0.20
Meet and Confer with Defendant and Former Defendants' Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Statement (filed on August 15, 2024) (Class Action)	1.10
Review Court's Tentative Case Management Order (issued on August 23, 2024) (Class Action)	0.30
Review Court's Case Management Order; Minute Order Re: Initial Status Conference; and Order Authorizing Electronic Filing and Service – Case Anywhere LLC (filed on August 23, 2024) (Class Action)	0.30
Draft, Review, and/or Revise Notice of Final Ruling and Order (filed on August 28, 2024) (Class Action)	0.20
Review and Analyze Defendant and Former Defendants' Answer to Former Plaintiff Henderson's Class Action Complaint, and Research Affirmative Defenses in Defendant and Former Defendants' Answer (served on September 23, 2024) (Class Action)	1.20

Meet and Confer with Defendant and Former Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Plaintiff's Deadline to File Motion for Class Certification; [Proposed] Order (submitted on November 5, 2024) (Class Action)	1.30
Review Court's Order to Continue Former Plaintiff Henderson's Deadline to File Motion for Class Certification (filed on November 8, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Former Plaintiff Henderson's Deadline to File Motion for Class Certification (filed on November 12, 2024) (Class Action)	0.10
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on December 20, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Notice Regarding December 20, 2024 Notice of Case Reassignment and Order for Plaintiff to Give Notice (Dates Remain) (filed on December 31, 2024) (Class Action)	0.20
Meet and Confer with Defendant and Former Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation Regarding Agreement to Mediate; [Proposed] Order Thereon (submitted on January 16, 2025) (Class Action)	1.10
Review Court's Order Regarding Agreement to Mediate (filed on January 17, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Joint Stipulation Regarding Agreement to Mediate (filed on March 5, 2025) (Class Action)	0.10
Draft, Review, and/or Revise Former Plaintiff Henderson and Plaintiffs' First Amended Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on March 17, 2025); Meet and Confer with Defendant and Former Defendants' Counsel, and Research, Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order Granting Former Plaintiff Henderson Leave to File [Proposed] First Amended Consolidated Class Action Complaint for Damages & Enforcement Under Private Attorneys General Act, California Labor Code § 2698, Et Seq. (submitted on March 6, 2025) (Class Action)	4.10
Review Court's Order Granting Former Plaintiff Henderson Leave to File First Amended Consolidated Class Action Complaint for Damages & Enforcement Under Private Attorneys General Act, California Labor Code § 2698, et seq. (filed on March 10, 2025) (Class Action)	0.20

Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Former Plaintiff Henderson Leave to File First Amended Consolidated Class Action Complaint for Damages & Enforcement Under Private Attorneys General Act, California Labor Code § 2698, et seq. (filed on March 12, 2025) (Class Action)	0.10
Draft, Review, and/or Revise Former Plaintiff Henderson and Plaintiffs' Second Amended Consolidated Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on April 29, 2025); Meet and Confer with Defendant and Former Defendants' Counsel, and Research, Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order Granting Plaintiffs Leave to File [Proposed] Second Amended Consolidated Class Action Complaint for Damages & Enforcement Under Private Attorneys General Act, California Labor Code § 2698, Et Seq. (submitted on April 17, 2025) (Class Action)	2.10
Review Court's Order Granting Plaintiffs Leave to File [Proposed] Second Amended Consolidated Class Action Complaint for Damages & Enforcement Under Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on April 23, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Leave to File Second Amended Consolidated Class Action Complaint (filed on April 28, 2025) (Class Action)	0.10
Meet and Confer with Defendant and Former Defendants' Counsel, and Draft, Review, and/or Revise Joint Status Report and Notice of Settlement (filed on May 14, 2025) (Class Action)	0.80
Meet and Confer with Defendant and Former Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Vacate Plaintiffs' Deadline to File a Motion for Class Certification and Non-Appearance Case Review Re: Filing and Serving of Motion for Class Certification; [Proposed] Order (submitted on May 14, 2025) (Class Action)	1.20
Review Court's Order to Vacate Plaintiffs' Deadline to File a Motion for Class Certification and Non-Appearance Case Review Re: Filing and Serving of Motion for Class Certification (filed on May 20, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Vacate Plaintiffs' Deadline to File a Motion for Class Certification and Non-Appearance Case Review Re: Filing and Serving of Motion for Class Certification (filed on May 22, 2025) (Class Action)	0.10

Review and Analyze Defendant and Former Defendants' Answer to Plaintiffs' Second Amended Complaint, and Research Affirmative Defenses in Defendant and Former Defendants' Answer (served on May 27, 2025) (Class Action)	1.10
Meet and Confer with Defendant and Former Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Plaintiffs' Deadline to File a Motion for Preliminary Approval of Class Action Settlement and Non-Appearance Case Review Re: Filing and Serving of Motion for Preliminary Approval; [Proposed] Order (submitted on July 29, 2025) (Class Action)	0.90
Review Court's Order to Continue Plaintiffs' Deadline to File a Motion for Preliminary Approval of Class Action Settlement and Non-Appearance Case Review Re: Filing and Serving of Motion for Preliminary Approval (filed on July 30, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Continue Plaintiffs' Deadline to File a Motion for Preliminary Approval of Class Action Settlement and Non-Appearance Case Review Re: Filing and Serving of Motion for Preliminary Approval (filed on August 1, 2025) (Class Action)	0.10
Review Court's [Tentative] Minute Order (issued on August 13, 2025) (Class Action)	0.30
Review Court's Minute Order Re: Order to Show Cause Re: Substitution of Counsel for Former Plaintiff Henderson (filed on August 13, 2025) (Class Action)	0.20
Meet and Confer with Defendant and Former Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Dismiss Defendants Otsuka Pharmaceutical Co., Ltd., Otsuka Holdings Co., Ltd., and Otsuka America, Inc. with Respect to the Claims of Plaintiffs; [Proposed] Order Thereon (submitted on October 27, 2025) (Class Action)	1.50
Review Court's Order to Dismiss Defendants Otsuka Pharmaceutical Co., Ltd., Otsuka Holdings Co., Ltd., and Otsuka America, Inc. with Respect to the Claims of Plaintiffs (filed on November 5, 2025) (Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation to Continue Plaintiffs' Deadline to File a Motion for Preliminary Approval of Class Action Settlement and Non-Appearance Case Review Regarding Filing and Serving of Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on November 12, 2025) (Class Action)	1.10

Review Court's Order to Continue Plaintiffs' Deadline to File a Motion for Preliminary Approval of Class Action Settlement and Non-Appearance Case Review Regarding Filing and Serving of Motion for Preliminary Approval (filed on November 14, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Dismiss Defendants Otsuka Pharmaceutical Co., Ltd., Otsuka Holdings Co., Ltd., and Otsuka America, Inc. (filed on November 14, 2025) (Class Action)	0.10
Review Court's Minute Order Re: Setting Status Conference Regarding Gerald Henderson's Individual Claims (filed on June 22, 2026) (Class Action)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Final Ruling and June 18, 2026 Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on July 1, 2026) (Class Action)	0.10
Appearances	
Prepare for and Remotely Attend Initial Status Conference (August 23, 2024) (Class Action)	1.60
Prepare for and Remotely Attend Hearing on Motion to be Relieved as Counsel (June 24, 2025) (Class Action)	1.40
Prepare for and Remotely Attend Order to Show Cause Re: Substitution of Counsel (August 13, 2025) (Class Action)	1.10
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (March 19, 2026) (Class Action)	0.50
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant and Former Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Former Plaintiff Henderson (served on November 27, 2023)	2.20
Review and Analyze Documents Produced by Defendant and Former Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Torres (served on February 7, 2024)	1.90

Review and Analyze Documents Produced by Defendant and Former Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Duenas (served on January 23, 2025)	1.80
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Former Plaintiff Henderson under the Private Attorneys General Act (served on December 20, 2023)	4.50
Research, Draft, Review, and/or Revise Additional Notice to California Labor and Workforce Development Agency Re: Claim of Former Plaintiff Henderson and Plaintiff Duenas under the Private Attorneys General Act (served on February 10, 2025)	3.10
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendant's Counsel	20.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Former Plaintiff Henderson, Defendant, Former Defendants, and Other Sources Prior to Mediation	44.50
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 April 17, 2025)	36.50
Attend Mediation Session (April 24, 2025; Zoom Video Conference)	16.50
Review and/or Analyze Mediator's Proposal (issued on April 24, 2025; accepted on April 29, 2025)	1.10
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding Re: Class Action and PAGA Settlement (executed on August 28, 2025)	5.50
Draft, Review, Revise, Negotiate, and/or Finalize Class Action and PAGA Settlement Agreement (executed on February 13, 2026) and Draft, Review, and/or Revise Notice of Class Action Settlement	16.50

Draft, Review, Revise, Negotiate, and/or Finalize First Amended Class Action and PAGA Settlement Agreement (executed on April 30, 2026)	1.10
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	6.50
Law and Motion	
Draft, Review, and/or Revise Notice of Motion and Motion to be Relieved as Counsel, Declaration in Support of Attorney's Motion to be Relieved as Counsel – Civil, and [Proposed] Order Granting Attorney's Motion to be Relieved as Counsel – Civil (filed on May 16, 2025) (Class Action)	1.30
Review Court's Tentative Ruling Re: Motion to be Relieved as Counsel (issued on June 18, 2025) (Class Action)	0.30
Draft, Review, and/or Revise Order Granting Attorney's Motion to be Relieved as Counsel – Civil (submitted on June 20, 2025) (Class Action)	0.10
Review Court's Minute Order Re: Hearing on Motion to be Relieved as Counsel and Order Granting Attorney's Motion to Be Relieved as Counsel – Civil (filed on June 24, 2025) (Class Action)	0.20
Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on January 14, 2026) (Class Action)	17.50
Draft, Review, and/or Revise Notice of *Errata* and Correction to Declaration of Yasmin Hosseini in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (submitted on February 20, 2026) (Class Action)	1.80
Review Court's Tentative Ruling Re: Motion for Preliminary Approval (issued on March 11, 2026) (Class Action)	0.40
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement and Checklist for Preliminary Approval of Class Action Settlement (filed on March 19, 2026) (Class Action)	0.40

Review Declaration of Settlement Administrator, and Draft, Review, and/or Revise Supplemental Declaration of Yasmin Hosseini in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, Declaration of Plaintiff Torres in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, and Declaration of Plaintiff Duenas in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on April 30, 2026) (Class Action)	4.50
Draft, Review, and/or Revise [Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (submitted on May 1, 2026) (Class Action)	0.60
Review Court's Tentative Ruling Re: Motion for Preliminary Approval and Case Anywhere Message Re: Tentative Ruling (issued on June 16, 2026) (Class Action)	0.50
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement and Final Ruling Re: Preliminary Approval of Class Action Settlement (filed on June 18, 2026) (Class Action)	0.20
Review Declaration of the Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Service Payments; Memorandum of Points and Authorities in Support Thereof, Declaration of Ryan Slinger in Support Thereof, and [Proposed] Final Approval Order and Judgment (Class Action)	20.50
Total Hours:	303.40

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Henderson, et al. vs. Pharmavite, LLC, et al.

Date	Payee	Expense Description	Amount
11/6/2023	U.S. Postmaster	Postage	$17.12
1/17/2024	U.S. Postmaster	Postage	$17.12
2/28/2024	Legal Document Server, Inc.	Attorney Service	$115.88
2/28/2024	Los Angeles Superior Court	Complex Filing Fee	$1,000.00
2/28/2024	Los Angeles Superior Court	Complaint Filing Fee	$435.00
4/2/2024	Legal Document Server, Inc.	Attorney Service	$28.10
4/3/2024	Legal Document Server, Inc.	Attorney Service	$16.15
6/13/2024	Legal Document Server, Inc.	Attorney Service	$26.58
6/13/2024	Los Angeles Superior Court	Jury Fee	$150.00
6/14/2024	Legal Document Server, Inc.	Attorney Service	$16.15
6/21/2024	Diane Le	Travel Reimbursement	$16.11
6/21/2024	Jacquelyn Silva	Travel Reimbursement	$21.78
7/19/2024	Steven J. Rottman, LLC	Mediation Fee	$15,000.00
8/1/2024	Case Anywhere LLC	Attorney Service	$110.49
8/8/2024	Legal Document Server, Inc.	Attorney Service	$16.15
8/15/2024	Legal Document Server, Inc.	Attorney Service	$16.15
8/27/2024	General Logistics Systems US, Inc.	Courier Service	$23.94
8/28/2024	Legal Document Server, Inc.	Attorney Service	$16.15
11/1/2024	General Logistics Systems US, Inc.	Courier Service	$31.23
11/5/2024	Case Anywhere LLC	Attorney Service	$165.00
11/5/2024	General Logistics Systems US, Inc.	Courier Service	$21.91
11/6/2024	Legal Document Server, Inc.	Attorney Service	$19.09
11/6/2024	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
11/13/2024	Legal Document Server, Inc.	Attorney Service	$17.70
1/2/2025	Legal Document Server, Inc.	Attorney Service	$18.70
1/2/2025	U.S. Postmaster	Postage	$20.00
1/17/2025	Legal Document Server, Inc.	Attorney Service	$20.09
1/17/2025	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
1/23/2025	General Logistics Systems US, Inc.	Courier Service	$44.51
2/3/2025	Case Anywhere LLC	Attorney Service	$183.00
2/28/2025	General Logistics Systems US, Inc.	Courier Service	$53.53
3/5/2025	Legal Document Server, Inc.	Attorney Service	$18.70
3/5/2025	Case Anywhere LLC	Attorney Service	$49.00
3/6/2025	Legal Document Server, Inc.	Attorney Service	$20.09
3/6/2025	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
3/12/2025	Legal Document Server, Inc.	Attorney Service	$18.70
3/17/2025	Legal Document Server, Inc.	Attorney Service	$18.70

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Henderson, et al. vs. Pharmavite, LLC, et al.

3/19/2025	Legal Document Server, Inc.	Attorney Service	$18.70
4/4/2025	Case Anywhere LLC	Attorney Service	$73.00
4/17/2025	Legal Document Server, Inc.	Attorney Service	$18.70
4/18/2025	Legal Document Server, Inc.	Attorney Service	$20.09
4/18/2025	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
4/24/2025	Andrea Cadaing	Travel Reimbursement	$43.30
4/24/2025	Aliza Grossman	Travel Reimbursement	$54.68
4/29/2025	Legal Document Server, Inc.	Attorney Service	$31.65
4/30/2025	Legal Document Server, Inc.	Attorney Service	$18.70
5/1/2025	Legal Document Server, Inc.	Attorney Service	$18.70
5/2/2025	Case Anywhere LLC	Attorney Service	$61.00
5/8/2025	General Logistics Systems US, Inc.	Courier Service	$25.99
5/14/2025	Legal Document Server, Inc.	Attorney Service	$20.09
5/14/2025	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
5/16/2025	Legal Document Server, Inc.	Attorney Service	$54.52
5/16/2025	Los Angeles Superior Court	Motion Fee	$60.00
5/22/2025	Legal Document Server, Inc.	Attorney Service	$18.70
6/2/2025	Case Anywhere LLC	Attorney Service	$115.00
6/20/2025	Legal Document Server, Inc.	Attorney Service	$18.70
6/24/2025	Los Angeles Superior Court	Document Download Fee	$3.00
6/25/2025	Legal Document Server, Inc.	Attorney Service	$18.70
7/1/2025	Case Anywhere LLC	Attorney Service	$67.00
7/8/2025	CPAnalytics	Data Analysis	$5,305.00
7/29/2025	Los Angeles Superior Court	Document Download Fee	$2.00
7/30/2025	Legal Document Server, Inc.	Attorney Service	$20.09
7/30/2025	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
7/31/2025	Legal Document Server, Inc.	Attorney Service	$37.40
8/4/2025	Legal Document Server, Inc.	Attorney Service	$18.70
8/4/2025	Case Anywhere LLC	Attorney Service	$67.00
8/13/2025	Los Angeles Superior Court	Document Download Fee	$2.00
8/14/2025	Legal Document Server, Inc.	Attorney Service	$18.70
9/2/2025	Case Anywhere LLC	Attorney Service	$55.00
10/1/2025	Case Anywhere LLC	Attorney Service	$49.00
10/28/2025	Legal Document Server, Inc.	Attorney Service	$155.09
10/28/2025	General Logistics Systems US, Inc.	Courier Service	$70.15
10/28/2025	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
10/29/2025	Legal Document Server, Inc.	Attorney Service	$18.70
11/3/2025	Case Anywhere LLC	Attorney Service	$67.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Henderson, et al. vs. Pharmavite, LLC, et al.

11/13/2025	Legal Document Server, Inc.	Attorney Service	$147.95
11/14/2025	Legal Document Server, Inc.	Attorney Service	$20.09
11/14/2025	Los Angeles Superior Court	Stipulation & Order Fee	$20.00
11/18/2025	Legal Document Server, Inc.	Attorney Service	$18.70
12/1/2025	Case Anywhere LLC	Attorney Service	$67.00
1/2/2026	Case Anywhere LLC	Attorney Service	$49.00
1/15/2026	Legal Document Server, Inc.	Attorney Service	$240.07
1/15/2026	Los Angeles Superior Court	Motion Fee	$60.00
1/16/2026	Legal Document Server, Inc.	Attorney Service	$164.50
1/20/2026	Legal Document Server, Inc.	Attorney Service	$19.70
2/2/2026	Case Anywhere LLC	Attorney Service	$91.00
2/24/2026	Legal Document Server, Inc.	Attorney Service	$19.70
3/2/2026	Case Anywhere LLC	Attorney Service	$55.00
3/3/2026	Legal Document Server, Inc.	Attorney Service	$19.70
4/1/2026	Case Anywhere LLC	Attorney Service	$55.00
5/1/2026	Case Anywhere LLC	Attorney Service	$79.00
5/1/2026	Legal Document Server, Inc.	Attorney Service	$213.80
5/4/2026	Legal Document Server, Inc.	Attorney Service	$19.70
6/1/2026	Case Anywhere LLC	Attorney Service	$61.00
6/29/2026	Los Angeles Superior Court	Document Download Fee	$7.80
7/1/2026	Case Anywhere LLC	Attorney Service	$49.00
7/2/2026	Legal Document Server, Inc.	Attorney Service	$19.70
8/1/2026	Case Anywhere LLC	Attorney Service	$55.00
9/1/2026	Case Anywhere LLC	Attorney Service	$49.00
		Total:	**26,150.28**

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Henderson vs. Pharmavite, LLC, et al. (PAGA)

Date	Payee	Expense Description	Amount
12/20/2023	U.S. Postmaster	Postage	$25.68
12/20/2023	Labor & Workforce Development Agency	PAGA Filing Fee	$75.00
2/28/2024	Legal Document Server, Inc.	Attorney Service	$46.38
2/28/2024	Los Angeles Superior Court	Complaint Filing Fee	$435.00
4/2/2024	Legal Document Server, Inc.	Attorney Service	$16.15
		Total:	**$598.21**