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Attorneys for Plaintiff Hadiza Jimada

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

OLIVIA PASS, and HADIZA JIMADA, as
individuals, and on behalf of all employees
similarly situated;

Plaintiffs,

vs.

DEL AMO HOSPITAL, INC., a California
Corporation; UHS OF DELAWARE, INC.,
a Delaware corporation; DEL AMO
BEHAVIORAL HEALTH SYSTEM, an
unknown business entity; DEL AMO
BEHAVIORAL HEALTH SYSTEM OF
CALIFORNIA, an unknown business entity
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 24STCV03085

[Assigned for all purposes to Hon. William E.
Weinberger, Dept. 37]

**DECLARATION OF DANIEL BASS IN
SUPPORT OF PLAINTIFFS' MOTION FOR
AN ORDER APPROVING SETTLEMENT
OF CLAIMS BROUGHT PURSUANT TO
THE PRIVATE ATTORNEYS GENERAL
ACT OF 2004**

Reservation ID: 476005153224
Date: May 26, 2026
Time: 8:30a.m.
Department: 37

Complaint Filed: February 5, 2024
FAC Filed: April 11, 2025
SAC Filed: February 11, 2026
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 Hadiza Jimada (“Plaintiff Jimada”) one of the named plaintiffs in the above-captioned case and the named plaintiff in the related action entitled *Hadiza Jimada v. UHS of Delaware, Inc. et al.*, Los Angeles Superior Court case number 24TRCV0128 (“*Jimada* Action”) (together with the above-captioned action, the “Actions”). 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 thereto.

LITIGATION AND REPRESENTATIVE AND CLASS ACTION EXPERIENCE

2. 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 Private Attorneys General Act (“PAGA”) representative actions. Lawyers *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. 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.

3. Edwin Aiwazian is the Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior

1 Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA
2 Extension Program. During the summer of 2000, he studied Legal Writing at Harvard
3 University. From approximately September 2002 to approximately December 2002, he served
4 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of
5 Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002,
6 he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of
7 Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice
8 law from the California State Bar. Since in or around October of 2008, through his work at
9 Lawyers for Justice, PC, he has almost exclusively focused on the prosecution of consumer and
10 employment class actions, involving wage-and-hour claims, race discrimination, unfair business
11 practices, or consumer fraud. While employed by Lawyers for Justice PC, he has argued over
12 one hundred (100) motions, taken or defended over one hundred fifty (150) depositions,
13 prepared dozens of expert witnesses for deposition or trial, and attended over one hundred
14 seventy-five (175) mediations. Together with other attorneys at the firm, and in many cases in
15 conjunction with co-counsel, he has successfully litigated cases involving the executive,
16 administrative, and other overtime exemptions to the State of California and federal overtime
17 compensation requirements. Under his supervision, Lawyers for Justice, PC has successfully
18 obtained class certification by contested motion practice in approximately sixteen (16) cases in
19 the last decade, and litigated over 1,000 class action or representative action cases.

20 4. Arby Aiwazian is a Member and Shareholder of Lawyers for Justice, PC. He
21 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
22 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
23 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to
24 the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate
25 District. From approximately August 2008 to approximately December 2008, he served as a
26 Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals
27 for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to
28 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 has worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

5. 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) and in New York (since 2013) and 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 argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration of PAGA 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.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

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

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

22 7. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Science
23 degree in Psychology from Missouri State University in 2009, and a Juris Doctor
24 degree from Washington University in St. Louis, School of Law in 2012, where I served as a
25 Senior Editor of the Law Review and as a member of the Note Selection Committee. I am
26 admitted to practice before all courts in the State of California, and all U.S. District Courts in
27 California. From 2014 through and including the present, my practice consisted almost
28 exclusively of complex wage and hour class action and PAGA action matters in California. I

1 have worked at several plaintiffs' side law firms, and started the employment practice at one of
2 them. I have taken and defended dozens of depositions and have successfully handled motion
3 practice in class action and PAGA cases regarding discovery (including and not limited to
4 motions regarding class contact information), class certification (both contested class
5 certification and stipulated class certification), dispositive motions, arbitration agreements,
6 coordination, and intervention. I have successfully handled a complex wage and hour class
7 action and PAGA case at every step prior to trial. I also successfully handled briefing on appeals,
8 including employer efforts to compel arbitration in *Jones v. UPS Supply Chain Solutions, Inc.*,
9 California Court of Appeals for the First District, Case No. A160726 (Cal. App. Jul 01, 2021)
10 (unpublished decision). Further, I have extensive experience with settlements of class actions
11 and PAGA actions and have handled and supervised this process in over fifty (50) cases.

12 **EXAMPLES OF RESULT IN REPRESENTATIVE AND CLASS ACTION CASES**

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

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

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

25 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against a national property management company involving
27 allegations of misclassification of the "Property Manager" position. On May 23, 2012, the court
28 granted final approval of the class action settlement. The Los Angeles County Superior Court

Case Number is BC430918.

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

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

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

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

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

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

7 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
8 wage-and-hour class and PAGA representative action against a national retailer of upscale
9 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
10 court granted final approval of the class and PAGA representative action settlement. The Los
11 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
12 Council Coordination Proceeding Number is 4794.

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

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

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

27 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of

1 non-exempt employees. On November 18, 2016, the court granted final approval of the class
2 and PAGA representative action settlement. The San Francisco County Superior Court Case
3 Number is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

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

8 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
9 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
10 the employer's motion to compel arbitration, which resulted in a published opinion by the
11 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
12 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
13 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
14 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
15 5046.

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

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

26 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a lumber and hardware company
28 on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the

1 class and PAGA representative action settlement. The Orange County Superior Court Case
2 Number is 30-2014-00747750-CU-OE-CXC.

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

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

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

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

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

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

1 BC569646.

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

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

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

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

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

27 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a
28 wage-and-hour class action against a parking company on behalf of non-exempt employees. On

September 3, 2019, the court granted the plaintiff's motion for class certification and certified a class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding Number is 4886.

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

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

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

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

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

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

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

20 mm) LFJ, in association with co-counsel therein, represented the plaintiffs in a
21 wage-and-hour class action against manufacturer and supplier of power products and services
22 on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
23 motion for class certification and certified a class. On August 27, 2021, the court granted final
24 approval of the class action settlement. The San Diego County Superior Court Case Number is
25 37-2015-00025968-CU-OE-CTL.

26 nn) LFJ represented the plaintiff in a wage-and-hour class action against a
27 nutritional products manufacturer on behalf of non-exempt production line employees. On
28 December 13, 2021, the court granted the plaintiff's motion for class certification in part and

certified a class. On January 16, 2024, the court granted final approval of the class and PAGA representative action settlement. The Solano County Superior Court Case Number is FCS051001.

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

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

**NOTICE TO THE CALIFORNIA LABOR AND WORKFORCE DEVELOPMENT
AGENCY AND THE EMPLOYERS**

9. Plaintiffs have satisfied the prerequisites under California Labor Code section 2699.3(a), including, and not limited to, providing the California Labor and Workforce Development Agency ("LWDA") and Defendant Del Amo Hospital, Inc. ("Defendant") with written notice of the specific provisions of the California Labor Code that are alleged to have been violated, including the facts and theories to support the alleged violations, by way of written correspondence on behalf of Plaintiff Olivia Pass ("Plaintiff Pass") that was dated February 5, 2024 ("Pass PAGA Notice") and written correspondence on behalf of Plaintiff Hadiza Jimada that was dated February 9, 2024 ("Jimada PAGA Notice") (together, the "PAGA Notices"). The Jimada PAGA Notice was sent by U.S. Certified Mail to Defendant and submitted to the LWDA by way of online submission on the LWDA's website. Aside from confirmation of receipt, the LWDA did not respond to the Jimada PAGA Notice.

THE LITIGATION AND WORK PERFORMED BY PAGA COUNSEL

10. Several attorneys and staff members at Lawyers for Justice, PC have been actively engaged in this litigation from the inception of the *Jimada* Action, which was commenced by

1 Plaintiff Jimada on April 15, 2024. Lawyers *for* Justice, PC has fully and actively participated
2 in the litigation process throughout the pendency of the matters, and since joining forces with
3 other plaintiff’s counsel, Tunyan Law, APC and The Sentinel Firm, APC, who represent
4 Plaintiff Pass in the above-caption action, we have worked cooperatively with them in a
5 coordinated and combined effort to strategize and prosecute the Actions. Lawyers *for* Justice,
6 Pc, Tunyan Law, APC and The Sentinel Firm, APC are referred to collectively as “PAGA
7 Counsel.”

8 11. Before initiating the *Jimada* Action, Lawyers *for* Justice, PC conducted extensive
9 investigation and research into the facts and circumstances underlying the pertinent factual and
10 legal issues and applicable law. This required thorough discussions and interviews between
11 attorneys at Lawyers *for* Justice, PC, and Plaintiff Jimada, and research into the various legal
12 issues involved in the actions, namely, the current state of the law as it applied to off-the-clock
13 theory, meal breaks, rest periods, PAGA claims, manageability, wage-and-hour enforcement,
14 Plaintiff Jimada’s allegations, and potential defenses.

15 12. Collectively, PAGA Counsel investigated the veracity, strength, and scope of the
16 claim and allegations, engaged in litigation and proceedings regarding the pleadings and
17 discovery, and worked on preparing the case for trial, prior to reaching the Settlement. This
18 matter involved extensive and ongoing investigations and research into legal and factual issues.
19 PAGA Counsel obtained information, documents, and data in the course of litigation and in
20 connection with mediation and settlement negotiations. PAGA Counsel reviewed and analyzed
21 a volume of information, documents, and data obtained from Plaintiffs, Defendant, and other
22 sources, researched applicable law, and undertook analyses and calculations of the value of
23 claims, and penalties exposure. Counsel for the parties undertook significant investigation and
24 evaluation of the PAGA claim and related allegations, including, and not limited to, calculating
25 the potential monetary recovery under PAGA. PAGA Counsel also met and conferred with
26 Defendant’s counsel on numerous occasions, e.g., to discuss issues relating to the pleadings,
27 case management, informal discovery, production of information, documents, and data in the
28 course of litigation, arbitration, mediation, and settlement negotiations. Other work that PAGA

Counsel has performed and/or will perform include, *inter alia*, case strategy and analysis; drafting, reviewing, and revising the pleadings, motion-related papers, and settlement-related papers; case management; claims assessment and evaluation; and preparing for and attending court proceedings and the mediation and settlement negotiations.

13. As outlined herein, the parties have conducted significant investigations, litigation, and discovery in this matter. The volume of information, documents, and data obtained from Plaintiffs, Defendants, and other sources provided a critical understanding of the nature of the work performed by aggrieved employees, as well as Defendants' operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing liability and penalties valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediations and settlement negotiation process. Accordingly, sufficient investigation and review of information has taken place in order for the parties to be adequately informed of the nature and extent of the PAGA claim and allegations upon which it is based, and to enable all parties to fully evaluate the Settlement for its fairness, adequacy, and reasonableness.

14. After engaging in extensive investigations, informal discovery, and exchange of information, data, and documents, the parties participated in extensive settlement discussions and negotiations to try to resolve the above-captioned lawsuit and related *Jimada* Action. These efforts included participating in a formal full-day mediation on September 30, 2025, conducted by Deborah Saxe, Esq., a well-respected mediator experienced in mediating complex labor and employment matters. With the aid of the mediator and significant negotiations facilitated thereafter the Parties reached the Settlement described herein. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and settlement discussions, the parties discussed all aspects of the case, including the risks and delays of further litigation, potential arbitration of claims, and proceeding with trial, as well as the law relating to representative PAGA actions, off-the-clock theory, meal and rest periods, meal waivers, regular rate of pay calculations, Industrial Welfare Commission Wage Orders, arbitration agreements, wage-and-hour enforcement, the evidence produced and

1 analyzed, and the possibility of bifurcation of discovery and/or trial and appeals, among other
2 things. Arriving at a settlement that was acceptable was not easy. After conducting extensive
3 investigations, formal and informal discovery, and settlement negotiations, and with the aid of
4 the mediators evaluation, the parties ultimately agreed to resolve the case given the ;egal issues
5 relating to Plaintiffs' principal claims, as well as the costs and risks to both sides that would
6 attend further litigations, and the real possibility of no recovery after years of litigation.

7 15. As set forth more fully in the accompanying Motion and Declaration of Lilit
8 Tunyan, PAGA Counsel seeks attorneys' fees in the amount of \$183,750.00, which represents
9 approximately thirty-five percent (35%) of the Gross Settlement Amount. Pursuant to the
10 contingency-fee agreements entered into by and between Plaintiff Jimada and Lawyers *for*
11 Justice, PC, Plaintiff Jimada has agreed to contingency-fees of at least thirty-five percent (35%)
12 of the recovery.

13 16. The attorneys' fees sought are commensurate with: (1) the risk that PAGA
14 Counsel took in commencing the case; (2) the time, effort, and expense that PAGA Counsel
15 dedicated to their respective cases; (3) the skill and determination that PAGA Counsel have
16 shown; (4) the results that PAGA Counsel have achieved throughout the litigation; (5) value of
17 the settlement that PAGA Counsel have achieved in the cases; and (6) the other cases that PAGA
18 Counsel have turned down in order to devote their time and efforts to the Actions. Additionally,
19 Lawyers *for* Justice, PC; Tunyan Law, APC; and The Sentinel Firm, APC have a written
20 agreement, approved by their respective clients, to split the attorneys' fees awarded.

21 17. While not necessarily required to be demonstrated because a percentage fee is
22 proper for this settlement, it should be noted that PAGA Counsel has performed many hours of
23 work in connection with prosecuting the Actions such that the requested attorneys' fees award
24 is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a
25 total of **146.50 hours** performing tasks to obtain a recovery on behalf of Plaintiffs, the State of
26 California, and the Aggrieved Employees.

27 18. Attached hereto as "**EXHIBIT 1**" is an Attorney Task and Time Chart that sets
28 forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC

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

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

21 20. Applying the blended rate of \$850 per hour to 146.50 hours worked by Lawyers
22 *for Justice*, PC would place a base lodestar value of \$124,525.00 on the services provided by
23 Lawyers *for Justice*, PC.

24 LITIGATION COSTS INCURRED BY PAGA COUNSEL

25 21. To date, PAGA Counsel have borne all of the risks and costs of litigation and will
26 not receive any compensation until a recovery is obtained in this matter. Lawyers *for Justice*,
27 PC has incurred **\$16,050.68** in litigation costs and expenses in this case, as reflected in
28 "EXHIBIT 2" attached hereto. These costs and expenses were reasonable and necessary in the

1 prosecution of this matter and to obtain the Settlement.

2 22. PAGA Counsel submits that the Settlement is fair, reasonable, and adequate, and
3 is in the best interest of Plaintiffs, Aggrieved Employees, and the State of California. PAGA
4 Counsel further submits that the Settlement is within an acceptable range of recovery for this
5 type of litigation given the strengths and weaknesses of the case, the inherent costs and risks of
6 further litigation, and the costs and risks associated with representative adjudication, trial, and/or
7 appeals.

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

10 Executed this 6th day of March 2026, at Glendale, California.

11 

12 _____
Daniel Bass

EXHIBIT 1

HADIZA JIMADA V. UHS DELAWARE, INC.
Los Angeles County Superior Court Case No. 24TRCV01282 (“Jimada 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 Hadiza Jimada (“Plaintiff Jimada”)	10.50
Investigate, Communicate with, and/or Interview Aggrieved Employees and/or Percipient Witnesses	4.50
Review and Analyze Court Filings in <i>Olivia Pass v. Del Amo Hospital, Inc.</i> , Los Angeles County Superior Court, Case No. 24STCV03085 (“Pass Action”)	1.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Jimada’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding PAGA Claim, and `Draft, Review, and/or Revise Plaintiff Jimada’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on April 15, 2024) (Jimada Action)	7.50
Review Court’s Notice of Case Assignment (filed on April 15, 2024)	0.10
Review Court’s Notice of Case Management Conference and Order to Show Cause Hearing (filed on April 18, 2024) (Jimada Action)	0.10
Review and Analyze Defendants UHS of Delaware, Inc. and Del Amo Hospital, Inc.’s (together, “Defendants”) Answer to Plaintiff Jimada’s Complaint, and Research Affirmative Defenses in Defendants’ Answer (served on May 21, 2024) (Jimada Action)	1.20
Review Notice of Related Case (May 21, 2024) (Jimada Action)	0.20

Review Court's Minute Order Re: Court Order/Notice of Related Case (filed on June 14, 2024) (Jimada Action)	0.30
Review Defendants' Notice of Entry of Minute Order on Notice of Related Case (served on June 26, 2024) (Jimada Action)	0.10
Draft, Review, and/or Revise Plaintiff Jimada's Case Management Statement (filed on July 10, 2024) (Jimada Action)	0.80
Review Defendants' Case Management Statement (served on July 17, 2024) (Jimada Action)	0.20
Review Court's Minute Order Re: Status Conference (filed on July 26, 2024) (Jimada Action)	0.20
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 31, 2025) (Jimada Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Order to Show Cause Re: Status of Arbitration and All Related Deadlines; [Proposed] Order (submitted on August 22, 2025) (Jimada Action)	1.10
Review Court's Order Re Order to Show Cause Re: Status of Arbitration and All Related Deadlines and Minute Order Re: Court Order/Joint Stipulation (August 26, 2025) (Jimada Action)	0.10
Draft, Review, and/or Revise Notice of Settlement of Entire Case (filed on October 16, 2025) (Jimada Action)	0.30
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Response to Order to Show Cause Re: Status of Arbitration (filed on November 7, 2025) (Jimada Action)	0.90
Review Court's Minute Order Re: Order to Show Cause Re: Status of Arbitration (filed on November 21, 2025) (Jimada Action)	0.10
Notice of Case Reassignment and Order for Plaintiff to Give Notice (January 15, 2026) (Jimada Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Case Reassignment and Order for Plaintiff to Give Notice (Dates Remain) (filed on January 10, 2026)	0.30

Research, Draft, Review, and/or Revise Plaintiff Olivia Pass and Plaintiff Jimada's (together, "Plaintiffs") Second Amended Complaint (filed on February 11, 2026) (Pass Action)	0.40
Appearances	
Prepare for and Remotely Attend Status Conference (July 26, 2024) (Jimada Action)	1.90
Prepare for and Remotely Attend Hearing on Plaintiff Jimada's Motion to Compel Arbitration (August 21, 2024) (Jimada Action)	2.10
Prepare for, Travel to/from, and Attend Hearing on Plaintiff Jimada's Motion to Compel Arbitration (September 25, 2024) (Jimada Action)	2.50
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 Jimada (served on January 25, 2024)	3.80
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Jimada under the Private Attorneys General Act (served on February 9, 2024)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with Defendants' Counsel	13.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with Other Plaintiff's Counsel	6.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources Prior to Mediation	24.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting, Reviewing, and/or Revising the Mediation Brief and Compiling the Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Penalties Analyses and Calculations (submitted on September 23, 2025)	10.50

Attend Mediation Session (September 30, 2025; via Zoom Video Conference)	15.20
Review and Analyze Mediator's Proposal (issued October 3, 2025)	1.50
Draft, Review, Revise, and/or Analyze Term Sheet (fully executed on October 10, 2025)	1.20
Draft, Review, Revise, Negotiate, and Finalize Private Attorneys General Act Settlement Agreement (executed on January 22, 2026), and Draft, Review, and/or Revise Cover Letter	3.50
Law and Motion	
Review and Analyze Defendants' Notice of Motion and Motion to Compel Arbitration of Individual PAGA Claim and Stay Representative Action; Memorandum of Points and Authorities in Support Thereof, Compendium of Declarations and Exhibits in Support Thereof, Request for Judicial Notice, and [Proposed] Order Thereon (served on July 15, 2024) (Jimada Action)	1.80
Draft, Review, and/or Revise Plaintiff Jimada's Opposition to Defendants' Motion to Compel Arbitration of Individual PAGA Claim and Stay Representative Action, Declaration of Plaintiff Jimada in Support Thereof, and Objections to Defendants' Purported Evidence (filed on August 7, 2024) (Jimada Action)	15.80
Review and Analyze Defendants' Reply to Plaintiff Jimada's Opposition to Defendants' Motion to Compel Arbitration of Individual PAGA Claim and Stay Representative Action and Responses to Objections of Plaintiff to Evidence (served on August 14, 2024) (Jimada Action)	1.40
Review Court's Minute Order Re: Hearing on Motion to Compel Arbitration (filed on August 21, 2024) (Jimada Action)	0.10
Review Court's Tentative Ruling Re: Motion to Compel Arbitration (issued on September 24, 2024) (Jimada Action)	0.60
Review Court's Minute Order Re: Hearing on Motion to Compel Arbitration (filed on September 25, 2024) (Jimada Action)	0.20
Review Defendants' Notice of Ruling on Defendants' Motion to Compel Arbitration of Individual PAGA Claim and Stay (served on September 26, 2024) (Jimada Action)	0.20
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for an Order Approving Settlement of Claims Brought Pursuant to the Private Attorneys General Act of 2004; Memorandum of	4.50

Points and Authorities, Declaration of Daniel Bass in Support Thereof, Declaration of Plaintiff Jimada in Support Thereof, and [Proposed] Order and Judgment (Pass Action)	
Total Hours:	146.50

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Jimada vs. UHS of Delaware Inc., et al. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/27/2023	U.S. Postmaster	Postage	\$17.12
1/25/2024	U.S. Postmaster	Postage	\$17.94
2/9/2024	U.S. Postmaster	Postage	\$26.79
4/17/2024	Legal Document Server, Inc.	Attorney Service	\$46.38
4/17/2024	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
5/1/2024	Elite Litigation Support	Attorney Service	\$520.50
5/24/2024	Los Angeles Superior Court	Document Download Fee	\$50.80
5/28/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
7/11/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
8/7/2024	Legal Document Server, Inc.	Attorney Service	\$166.15
8/21/2024	Coalition Court Reporters	Court Reporter	\$764.80
9/4/2024	Los Angeles Superior Court	Document Download Fee	\$14.00
9/13/2024	Coalition Court Reporters	Court Reporter	\$675.00
9/25/2024	Coalition Court Reporters	Court Reporter	\$808.40
9/25/2024	Jacquelyn Silva	Travel Reimbursement	\$33.00
1/31/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
4/23/2025	Los Angeles Superior Court	Document Download Fee	\$2.00
8/7/2025	Jams, Inc.	Mediation Fee	\$8,833.34
8/20/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
8/22/2025	Los Angeles Superior Court	Document Download Fee	\$48.80
8/26/2025	Legal Document Server, Inc.	Attorney Service	\$20.09
8/26/2025	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
9/30/2025	Aliza Grossman	Travel Reimbursement	\$29.22
10/16/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
10/20/2025	Berger Consulting Group, LLC	Data Analysis of Sampling of Time Records	\$3,420.00
11/13/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
Total:			<u>\$16,050.68</u>

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of 18
6 and not a party to the within action; my business address is 355 S. Grand Ave., Suite 1450
7 Los Angeles, CA 90071.

8 On the date indicated below, I served the document described as: **DECLARATION OF**
9 **DANIEL BASS IN SUPPORT OF PLAINTIFFS' MOTION FOR AN ORDER**
10 **APPROVING SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO THE PRIVATE**
11 **ATTORNEYS GENERAL ACT OF 2004** on the interested parties in this action by sending a
12 true copy thereof to interested parties as follows and as stated on the attached service list:

13 Summer Young-Agriesti
14 syoung@kbylaw.com

15 Ana Thomas

16 athomas@kbylaw.com

17 Melissa Brandman

18 mbrandman@kbylaw.com

19 Andrew Cristea

20 acristea@yatlaw.com

21 Michelle Perciavalle

22 mperciavalle@kbylaw.com

23 **Young-Agriesti & Thomas, LLP**

24 7755 Center Avenue, Suite 1100

25 Huntington Beach, California 92647

26 Telephone: 949-221-8700

27 Facsimile: 949-222-1044

28 ***Attorneys for Defendant DEL AMO HOSPITAL, INC.***

[✓] **BY E-MAIL:** I hereby certify that this document was served from Glendale, California,
by e-mail delivery on the parties listed herein at their most recent known e-mail address or
e-mail of record in this action.

[✓] **BY ELECTRONIC SERVICE:** Based on an agreement of the parties to accept electronic
service, I caused the documents to be sent to the persons at the electronic service addresses
listed above via electronic mail. I did not receive an error message.

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

Executed on March 8, 2026, at Los Angeles, California.

Ivette Hernandez

Name

Signature

PROOF OF SERVICE