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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

ANNIE ALBRITTON, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

ALLIED PROFESSIONAL NURSING
CARE, INC., a California corporation; and
DOES 1 through 100, inclusive;

Defendants.

Case No.: CIVSB2124648

Honorable Christian Towns
Department S26

CLASS ACTION

**DECLARATION OF HELENE MAYER
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES, LITIGATION
COSTS, AND ENHANCEMENT
PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action and PAGA
Settlement, Attorneys' Fees, Litigation
Costs, and Enhancement Payment;
Declaration of Class Representative (Annie
Albritton); Declaration of Settlement
Administrator (Simpluris, Inc.); and
[Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: January 6, 2025
Time: 8:30 a.m.
Department: S26

Complaint Filed: August 26, 2021
FAC Filed: May 29, 2024
Trial Date: None Set

DECLARATION OF HELENE MAYER

I, Helene Mayer, hereby declare as follows:

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

PRELIMINARY APPROVAL OF SETTLEMENT

2. On July 30, 2024, in Department S26 of the above-entitled Court, the Honorable Jessica Morgan preliminarily approved the Joint Stipulation for Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Allied Professional Nursing Care, Inc. (“Defendant”) (together with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Annie Albritton as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees, Litigation Costs, and Enhancement Payment (“Motion for Final Approval”), no Settlement Class Members have objected to the Class Settlement, the contemplated requests for Attorneys’ Fees, Litigation Costs, Enhancement Payment, and Administration Costs, or the PAGA Penalties.

WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the matters since prior to its commencement on August 26, 2021.

5. Before initiating the case, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers for Justice, PC and Plaintiff and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, representative PAGA claims, off-the-clock theory, meal and rest periods, wage-and-hour law and enforcement, Plaintiff's claims and damages, and Defendant's potential defenses. After conducting an initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiff were well-suited for class-wide 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 who worked for any of the Defendants within the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel conducted significant litigation and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and was preparing the case for class certification and trial prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff and other Class Members, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. The volume of data and documents that Class Counsel reviewed and analyzed included and was not limited to: Plaintiff's employment records, a detailed sampling of Plaintiff's and other Class Members' time data and pay records, job descriptions, new hire checklists, Defendant's Employee Handbooks, daily activity records, internal memorandum, company policy acknowledgements (including but not limited to, Alternate Workweek Schedule Acknowledgments), forms (including but not limited to On the Job Paid Meal Agreement), procedures, and policies (Safety Policies, Ethics at Allied Professional Nursing, Staffing Cancellation, Nursing Notes/Timesheet Submission Policy, Cell Phone/Laptop Computers/Smoking/Timecard Policy, Transportation, Patient Abandonment, and Behavior

Policy, Attendance Policy, Afterhours/Overtime Policy, and Policy and Procedure for Standards of Care and Practice), among other information and documents. Class Counsel also developed damages/valuation calculations in the course of litigation and in connection with mediation and settlement negotiations and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, informal discovery, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to drafting the Plaintiff's pleadings and mediation brief; preparing for and attending court proceedings; preparing for and engaging in mediation and settlement negotiations; and other tasks.

7. As outlined herein, the Parties have conducted significant investigation and informal discovery during the course of litigating the case, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature of the work performed by the Class Members and PAGA Members, as well as Defendant's operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing violations, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to certification, representative PAGA claims, off-the-clock theory, meal and rest periods, wage-and-hour law and enforcement, Plaintiff's claims and damages, and Defendant's defenses thereto, as well as facts discovered.

8. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the case. These efforts included participating in a formal, full-day mediation conducted by Brian C. Sinclair, a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and settlement

1 discussions, the Parties exchanged information, documents, and data, and discussed various
2 aspects of the case, including and not limited to, the risks and delays of further litigation; the risks
3 to the Parties of proceeding with class certification and/or representative adjudication; the law
4 relating to off-the-clock theory, meal and rest periods, PAGA representative claims, and wage-
5 and-hour law and enforcement; the evidence produced and analyzed; and the possibility of
6 appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not
7 easy. Defendant contended that individualized questions of fact predominate over any common
8 issues, and these issues would pose challenges to class certification and representative
9 adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class
10 certification and prevail on the merits, while Plaintiff and Class Counsel believed that they would
11 be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation,
12 the Parties ultimately agreed that the case was well-suited for settlement given the legal issues
13 relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that would
14 attend further litigation. These risks of further litigation include, and are not limited to, a
15 determination that the claims are unsuitable for class treatment and/or representative adjudication,
16 class de-certification after certification of a class, allowing a jury to decide the claims asserted in
17 the case, and the real possibility of no monetary recovery after years of litigation.

18 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
19 attorneys' fees ("Attorneys' Fees") in the amount of \$472,500.00, which is 35% of the Maximum
20 Settlement Amount of \$1,350,000.00. Pursuant to the contingency-fee agreement entered into by
21 and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least 35%
22 of the recovery.

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

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case 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 **320.30 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred 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.

12. 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 \$800 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$800 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour.

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

13. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is attorney of record in dozens of employment-related putative class actions 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. 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. Lawyers *for* Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth 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 100 motions, taken or defended over 150 depositions, prepared dozens of expert witnesses for deposition or trial, and attended over 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 15 cases in the last decade and litigated over 1,000 class action or representative action cases.

15. Arby Aiwarzian is a Member and Shareholder 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 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 cases have resulted in settlements that have been granted court approval. He has

1 handled over 150 mediations and worked on over 250 class action or representative action cases
2 which have resulted in settlement.

3 16. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
4 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
5 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
6 Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010)
7 and in New York (since 2013) and is also admitted to practice in all U.S. District Courts in
8 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
9 Court. She has taken and defended dozens of depositions and successfully handled motion
10 practice in class action cases regarding discovery (including and not limited to, regarding class
11 contact information), class certification (both contested class certification and stipulated class
12 certification), arbitration agreements, coordination, and intervention. She has successfully
13 handled briefing and oral argument on appeal and obtained notable decisions regarding Private
14 Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g.,
15 *Betancourt v. Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert.
16 denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*,
17 8 Cal.5th175 (2019). She has significant experience with class actions, including and not limited
18 to working on cases to obtain class certification through contested motion practice and working
19 on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical
20 sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving
21 a certified class consisting of approximately 2,600 individuals). She also has extensive experience
22 with class action and/or representative action settlements, and has handled this process in over
23 300 cases. Under her, Edwin Aiwazian, Arby Aiwazian's supervision, Lawyers *for* Justice, PC
24 has handled the class certification and court approval process for hundreds of class action and/or
25 representative action matters that have successfully resolved. She is a member of the California
26 Employment Lawyers Association and, on several occasions, has been a speaker regarding topics
27 in wage and hour law at the organization's continuing legal education events.

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17. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree from University of San Diego in 2017, and I earned my Juris Doctor degree from University of San Diego School of Law in 2020. I was admitted to practice law in California in 2021. I am admitted to practice before all courts of the State of California and all U.S. Federal District Courts in the State of California. I have worked on wage-and-hour class action and PAGA representative cases, and my work has included, *inter alia*, researching and drafting pleadings; administrative notice exhaustion; drafting, negotiating, and finalizing stipulations and settlement agreements; and making court appearances. Prior to working at Lawyers *for* Justice, PC, I worked at law firms focused primarily on family law matters, including, *inter alia*, representing clients in divorce, parentage, child custody, and domestic violence restraining order proceedings; researching and drafting pleadings; negotiating and finalizing marital settlement agreements; engaging in motion practice; and making court appearances.

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

18. 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. Lawyers *for* Justice, PC seeks reimbursement of **\$10,604.52** in litigation costs and expenses incurred in the case, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

19. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Payment in the amount of \$10,000.00 to Plaintiff Annie Albritton. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort to produce relevant documents and information and provided facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would facilitate the pursuit of the case. Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing her work experiences with Defendant, and gathering and

1 reviewing documents. Accordingly, it is appropriate for Plaintiff to receive \$10,000.00 as a
2 reasonable Enhancement Payment for her services in the case, in addition to her individual
3 settlement payments.

4 20. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
5 interests of Plaintiff, Class Members, PAGA Members, and the State of California.

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

8 Executed this 11th day of December 2024, at Mooresville, North Carolina.

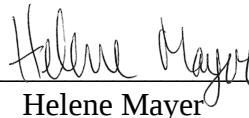
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EXHIBIT A

ALBRITTON V. ALLIED PROFESSIONAL NURSING CARE, INC., ET AL.
San Bernardino Superior Court Case No. CIVSB2124648

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Annie Albritton (“Plaintiff Albritton”) during the Case	24.00
Investigate, Communicate with, and/or Interview Class Members, Aggrieved Employees, and/or Percipient Witnesses	8.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff Albritton’s Class Action Complaint for Damages and (filed on August 26, 2021)	7.50
Review Court’s Initial Case Management Conference Order (filed on September 28, 2021)	0.40
Review Court’s Guidelines for the Complex Litigation Program (filed on September 29, 2021)	0.20
Review Defendant’s Notice of General Appearance by Defendant Allied Professional Nursing Care, Inc. (served on November 12, 2021)	0.10
Meet and Confer with Defendant’s Counsel, and Draft Initial Status Conference Joint Report (filed on December 3, 2021)	1.40
Review and Analyze Answer of Defendant Allied Professional Nursing Care, Inc. to Plaintiff’s Class Action Complaint, and Affirmative Defenses Alleged Therein (served on January 13, 2022)	1.50

Draft Plaintiff's Notice of Posting Jury Fees (filed on May 11, 2022)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on June 13, 2022)	1.20
Draft Plaintiff's Notice of Continuance (filed on December 12, 2022)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on January 3, 2023)	1.00
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Motion for Class Certification Filing Deadline; Draft Proposed Order Thereon (filed on May 12, 2023)	1.20
Review Court's Order Granting Joint Stipulation to Continue Motion for Class Certification Filing Deadline Leave to File First Amended Complaint (filed on April 29, 2024)	0.10
Draft Plaintiff's Notice of Entry of Judgement or Order re: Order to Continue Motion for Class Certification Filing Deadline (filed on May 17, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Further Case Management Conference; Draft Proposed Order Thereon (filed on June 22, 2023)	1.20
Draft Plaintiff's Notice of Entry of Judgement or Order re: Order to Continue Further Case Management Conference (filed on July 11, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Stipulation to Vacate Plaintiff's Deadline to File Her Motion for Class Certification (filed on August 14, 2023)	1.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on January 12, 2024)	1.10
Review Court's Minute Order Re: Further Case Management Conference (filed on January 22, 2024)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement; Draft Proposed Order Thereon (filed on April 29, 2024)	1.20
Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed on April 29, 2024)	0.20
Draft Plaintiff's Notice of Entry of Judgement or Order re: Order Granting Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed May 2, 2024)	0.10
Research and Draft Plaintiff's First Amended Complaint (filed on May 29, 2024)	4.50
Appearances	
Prepare for and Telephonically Attend Hearing Re: Initial Case Management Conference (December 15, 2021)	1.40
Prepare for and Telephonically Attend Hearing Re: Case Management Conference (June 22, 2022)	1.40
Prepare for and Telephonically Attend Hearing Re: Case Management Conference (January 10, 2023)	1.70
Prepare for and Remotely Attend Hearing Held Via Court Call (January 22, 2024)	1.50
Prepare for and Remotely Attend Hearing Re: Plaintiff's Motion for Preliminary Approval of Class Action Settlement (July 30, 2024)	1.20
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Annie Albritton (served on March 26, 2021)	1.90
Draft Follow Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Annie Albritton (served on June 23, 2021)	1.50

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Annie Albritton (sent on June 28, 2021)	5.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Allied Professional Nursing Care, Inc., and Requests for Production of Documents (filed on March 16, 2022)	1.50
Draft Plaintiff's Form Interrogatories – General (Set One), Requests for Production of Documents (Set One) and Special Interrogatories (Sets One and Two) to Defendant Allied Professional Nursing Care, Inc. (sent on March 16, 2022)	4.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Pay Stubs (sent on May 27, 2022)	0.20
Review and Analyze Thousands of Pages of Documents Produced by Defendant in Response to the Request for Payroll Records and Data (sent on September 30, 2022)	42.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Workweek Schedule (sent on November 17, 2022)	0.70
Review and Analyze Documents Produced by Defendant in Response to the Request for Unique Employee ID Numbers (sent on May 10, 2023)	0.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Employee Handbooks and Policies and Procedures (sent on June 16, 2023)	6.00
Review and Analyze Documents Produced by Defendant in Response to the Request for Wage Statement Exemplars (sent June 29, 2023)	2.00

Letters and Correspondence	
Draft Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff Annie Albritton under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (served on March 22, 2024)	4.50
Draft Correspondence to, and Respond to Correspondence from, Defense Counsel	17.00
Review Letter from Defendant Re: Payroll Records, Time Records, Meal Period Waivers, and Alternative Workweek Documents (served September 20, 2022)	0.10
Draft Letter to Defendant Re: Request to Contact Lawyers <i>for</i> Justice, PC (sent June 14, 2023)	0.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (approximately 3,145 pages), and Other Sources Prior to Mediation	46.50
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages Analysis and Calculations (submitted on July 12, 2023)	36.00
Attend Mediation Session (July 19, 2023; via Video Conference)	8.50
Review, Analyze, and Respond to Mediator's Proposal (executed on July 19, 2023)	3.00
Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action/PAGA Settlement (executed on August 29, 2023)	4.50
Review, Revise, Negotiate, and Finalize Stipulation of Class Action Settlement (executed on July 8, 2024), and Draft Notice of Class Action Settlement	17.00

Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Review Calculations, Documents, and Weekly Reports	7.50
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Helene Mayer in Support Thereof, Declaration of Plaintiff Annie Albritton in Support Thereof, and [Proposed] Order and Judgment (filed on July 8, 2024)	17.50
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed July 30, 2024)	0.20
Draft Plaintiff's Notice of Entry of Judgement or Order re: Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed August 2, 2024)	0.10
Review and Analyze Settlement Administrator's Declaration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees, Litigation Costs, and Enhancement Payment, Declaration of Helene Mayer in Support Thereof, Declaration of Settlement Administrator, and [Proposed] Final Approval Order and Judgment (filed on December 11, 2024)	26.50
Total Hours:	320.30

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Albritton vs. Allied Professional Nursing Care, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/26/2021	Legal Document Server, Inc.	Attorney Service	\$200.23
8/26/2021	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
8/26/2021	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
12/3/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
12/3/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
12/3/2021	General Logistics Systems US, Inc.	Courier Service	\$16.44
12/15/2021	CourtCall, LLC	Attorney Service	\$94.00
5/12/2022	Legal Document Server, Inc.	Attorney Service	\$145.00
5/12/2022	Legal Document Server, Inc.	Attorney Service	\$155.13
5/12/2022	San Bernardino Superior Court	Jury Fee	\$150.00
6/13/2022	General Logistics Systems US, Inc.	Courier Service	\$25.39
6/14/2022	Legal Document Server, Inc.	Attorney Service	\$145.00
6/22/2022	CourtCall, LLC	Attorney Service	\$94.00
6/22/2022	CourtCall, LLC	Attorney Service	\$94.00
7/29/2022	Legal Document Server, Inc.	Attorney Service	\$130.00
12/12/2022	Legal Document Server, Inc.	Attorney Service	\$150.00
12/13/2022	General Logistics Systems US, Inc.	Courier Service	\$24.16
1/3/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
1/3/2023	Legal Document Server, Inc.	Attorney Service	\$45.00
1/12/2023	CourtCall, LLC	Attorney Service	\$72.00
3/8/2023	RUTAN & TUCKER, LLP	Mediation Fee	\$5,000.00
5/9/2023	Legal Document Server, Inc.	Attorney Service	\$151.39
5/9/2023	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
5/17/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
6/14/2023	General Logistics Systems US, Inc.	Courier Service	\$52.33
6/23/2023	Legal Document Server, Inc.	Attorney Service	\$152.00
6/23/2023	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
7/11/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
8/15/2023	Legal Document Server, Inc.	Attorney Service	\$151.39
8/15/2023	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
1/12/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
1/23/2024	CourtCall, LLC	Attorney Service	\$72.00
3/22/2024	U.S. Postmaster	Postage	\$10.88
3/22/2024	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
3/25/2024	Legal Document Server, Inc.	Attorney Service	\$150.00
4/24/2024	Legal Document Server, Inc.	Attorney Service	\$19.03
4/24/2024	Legal Document Server, Inc.	Attorney Service	\$45.00
4/24/2024	Legal Document Server, Inc.	Attorney Service	\$116.39

LAWYERS for JUSTICE PC CASE COST DETAIL
Albritton vs. Allied Professional Nursing Care, Inc.

4/24/2024	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
4/24/2024	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
5/6/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
5/29/2024	Legal Document Server, Inc.	Attorney Service	\$45.00
5/29/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
5/29/2024	San Bernardino Superior Court	Document Download Fee	\$2.00
7/9/2024	Legal Document Server, Inc.	Attorney Service	\$222.50
7/12/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
7/15/2024	Legal Document Server, Inc.	Attorney Service	\$21.37
7/15/2024	Legal Document Server, Inc.	Attorney Service	\$242.50
7/15/2024	San Bernardino Superior Court	Motion Fee	\$60.00
8/2/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
8/2/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
Total:			<u>\$10,604.52</u>