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Attorneys for Plaintiff Keith Gilmore and the Class

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

KEITH GILMORE, and NOEL C.
PELLERIN, 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

Plaintiffs,

vs.

UNITED SITE SERVICES OF
CALIFORNIA, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 24CV009938

Honorable Lauri A. Damrell
Department 8B

CLASS ACTION

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

Date: August 21, 2026
Time: 9:00 a.m.
Department: 8B

Complaint Filed: May 20, 2024
FAC Filed: August 27, 2025
Trial Date: None Set

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 Plaintiff Keith Gilmore (“Plaintiff Gilmore”) and the Class in the above-captioned matter (“*Gilmore* Action”). 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 September 5, 2025, in Department 22 of the above-entitled Court, the Honorable Lauri. A. Damrell preliminarily approved the Class Action and PAGA Settlement Agreement (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiffs Keith Gilmore and Noel C. Pellerin (together, “Plaintiffs”) and Defendant United Site Services of California, Inc., (“Defendant,”) (collectively with Plaintiffs, the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiffs Keith Gilmore and Noel C. Pellerin as the representatives of the Class (“Class Representatives”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC and Bibiyan Law Group, PC as counsel for the Class (together, “Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement and Hearing Date for Final Court Approval (“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 Class Representative Service Payments (“Motion for Final Approval”), no Participating Class Member has objected to the Class Settlement, the contemplated request for Attorney’s Fees and Costs, Class Representative Service Payments, and Administration Costs, or the allocation for the PAGA Penalties.

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WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the matters since the inception of the *Gilmore* Action, which was commenced by Plaintiff Keith Gilmore on May 20, 2024. Lawyers *for* Justice, PC joined forces with Bibiyan Law Group, PC, who were pursuing the representative action entitled *Noel Christopher Pellerin v. United Site Services of California*, Case No. 24CV012760 filed on June 25, 2024 (the “*Pellerin* Action”).

6. Before initiating the *Gilmore* Action, 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 Gilmore and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative Private Attorneys General Act ("PAGA") claims and penalties, and wage-and-hour law and enforcement, Plaintiff Gilmore’s claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiff Gilmore 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 and/or non-exempt employees of Defendant within 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. Collectively, Class Counsel conducted significant formal and 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. Class Counsel propounded multiple sets of formal written discovery requests onto Defendant (specifically,

1 Form Interrogatories – General (Set One), Request for Admission (Set One), Request for Production of
2 Documents (Set One), and Special Interrogatories (Sets One and Two)) and noticed the deposition of
3 Defendant's Persons Most Knowledgeable designee. The volume of records and documents that
4 Class Counsel reviewed and analyzed included, and were not limited to: Plaintiffs' employment
5 records, a detailed sampling of Plaintiffs' and other Class Members' time data and pay records,
6 Defendant's Employee Handbook, internal memoranda, new hire orientation checklists, job
7 descriptions, company policy acknowledgements (including but not limited to Employee
8 Handbook Acknowledgment, Acknowledgment of Receipt of Policies, Acknowledgment of
9 Receipt of California Meal Period and Rest Break Policy, Employee Acknowledgment of Code
10 of Conduct, Final Pay Acknowledgment), forms (including but not limited to Employee Change
11 of Status, Mutual Dispute Resolution Agreement, Meal Period & Rest Break Premium
12 Authorization Form, Employee Meal Break Waiver Form, Day of Rest Confirmation Form,
13 Corrective Action Form), procedures (including but not limited to Meal Break Waiver
14 Agreements, Employee Warning Report, Training Report, and Employee Termination
15 Checklist), and policies (including but not limited to Meal and Rest Break Policy, Mutual
16 Dispute Resolution Agreement, and Mobile Time Policy), among other information and
17 documents. Class Counsel had the opportunity to interview and obtain information from
18 Plaintiffs and percipient witnesses, and reviewed and analyzed a volume of information, data,
19 and documents obtained from Plaintiffs, Defendant, and other sources. Class Counsel developed
20 liability, damages, violation, and penalties valuation models in the course of litigation and in
21 connection with the mediation and settlement negotiations, and met and conferred with
22 Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case
23 management, motion practice, formal and informal discovery, and the production of information,
24 documents, and data in the course of litigation and in connection with mediation and settlement
25 negotiations, and settlement. Other work performed by Class Counsel included, and was not
26 limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the
27 pleadings, motion-related papers, the mediation briefing and supporting materials, and settlement
28 documents; drafting and propounding multiple sets of formal written discovery requests on

Defendant and notices of depositions of Defendant's persons most knowledgeable designees; and preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

8. As outlined herein, the Parties have conducted significant investigation and formal 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, regular rate, meal and rest periods, representative PAGA claims and penalties, wage-and-hour enforcement, Plaintiffs' 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 Tagore Subramaniam Esq., 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 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, expense reimbursements, recordkeeping and wage statement requirements, representative PAGA claims and penalties, and wage-and-hour law and

enforcement; Plaintiffs' 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 \$487,500.00, which is one-third (1/3) of the Gross Settlement Amount of \$1,462,500.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least one-third (1/3) of the recovery.

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 have shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel have achieved in this matter; and (6) the other cases that Class Counsel have 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 a Gross Settlement Amount of \$1,462,500.00 (with a Net Settlement Amount of approximately at least \$760,500.00 to be paid to Participating Class Members (with gross

Individual Settlement Payments averaging approximately more than \$547.12), payment of \$37,500.00 to Aggrieved Employees (with Individual PAGA Payments averaging approximately \$31.86) and payment of \$112,500.00 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 have 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 **260.00 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 attorneys identified below have worked on this case, and they have performed their work in this matter exclusively on a contingency basis.

Attorneys	Titles	Bar Nos.	Years Admitted & Practicing in CA	Rate	Total Hours	Lodestar
Edwin Aiwazian	CEO	232943	21 years	\$1,495.00	29.70	\$44,401.50
Arby Aiwazian	Senior Partner	269827	15 years	\$1,295.00	37.10	\$48,044.50
Joanna Ghosh	Senior Partner	272479 (CA); 518149 (NY)	15 years	\$1,295.00	2.00	\$2,590.00
Elizabeth Parker-Fawley	Partner	301592	11 years	\$850.00	23.8	\$20,230.00
Brian J. St. John	Senior Attorney	304112	10 years	\$850.00	1.10	\$935.00
Aliza	Senior	311067	9 years	\$850.00	31.40	\$26,690.00

Grossman	Attorney					
Hagit Golzer	Senior Attorney	324276	7 years	\$850.00	13.10	\$11,135.00
Arman Marukyan	Senior Attorney	327150	6 years	\$850.00	0.90	\$765.00
Yasmin Hosseini	Senior Attorney	326399	6 years	\$850.00	1.40	\$1,190.00
Morgan Barney	Attorney	346855	3 years	\$725.00	50.20	\$36,395.00
Ryan Slinger	Attorney	351297	2 years	\$725.00	10.00	\$7,250.00
Harris Koepenick	Attorney	364423	0.6 years	\$575.00	16.90	\$9,717.50
Melissa A. LeBlanc-Mansell	Senior Attorney (formerly)	283080	14 years	\$850.00	6.70	\$5,695.00
Talar Derohannesian	Attorney (formerly)	311687	9 years	\$725.00	5.3	\$3,842.50
Gabriella Sole	Attorney (formerly)	346164	3 years	\$575.00	3.60	\$2,070.00
Kareen Shatikian	Attorney (formerly)	346554	3 years	\$575.00	7.80	\$4,485.00
Ani O. Menedjian	Attorney (formerly)	360616	1 years	\$575.00	19	\$10,925.00
Total:					260.00	\$236,361.00

14. Each of the attorneys identified above performed their work in this matter exclusively on a contingency basis. Plaintiffs have not been billed for, and have not paid for, any of the work performed in the instant action to date by attorneys at *Lawyers for Justice, PC* (i.e., Plaintiffs have not been billed for or paid the hourly rates of the various attorneys who performed work in the instant action). *Lawyers for Justice, PC* will receive compensation for the work performed by attorneys at the firm thus far, if attorneys' fees are awarded by the Court as a part of the Settlement.

15. The billing rates for each of the attorneys listed above, who worked on this matter, are reasonable, usual, and commensurate with the individual backgrounds, training, and experience of the attorneys, in litigating complex wage-and-hour actions, and in particular, employment class actions and representative actions. These rates are the reasonable and usual hourly rates for the referenced attorneys' services in wage and hour class action cases handled by *Lawyers for Justice, PC*, and are commensurate with rates charged in the community by other

1 plaintiffs-side and defense-side attorneys in this practice area. Lawyers *for* Justice, PC almost
2 exclusively handles the prosecution of plaintiffs' side cases. To the best of undersigned
3 counsel's knowledge, Lawyers *for* Justice, PC has not billed nor required any of its clients, who
4 are usually workers who do not have the financial means to pay a retainer or otherwise fund the
5 prosecution or litigation of their wage-and-hour cases against their current or former employers,
6 to pay the firm out of pocket for the legal work performed by attorneys at the firm (and thus, has
7 not billed any clients using any hourly rates).

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

10 16. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
11 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
12 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC
13 is the attorney of record in well over a dozen employment-related putative class actions in both
14 state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of
15 attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General
16 Act ("PAGA") representative actions. Lawyers *for* Justice, PC has successfully litigated cases
17 involving the executive, administrative, and other overtime exemptions to the State of California
18 and federal overtime compensation requirements. During a relatively short time, in association
19 with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of
20 thousands of individuals in California.

21 17. Edwin Aiwarzian is the Chief Executive Officer of Lawyers *for* Justice, PC. He
22 received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a
23 Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
24 extensive formal training in dispute resolution and negotiation from the Straus Institute for
25 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
26 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
27 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
28 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From

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

18 18. Arby Aiwazian is a Senior Partner of Lawyers *for* Justice, PC. He received his
19 Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum
20 laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From
21 approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
22 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
23 From approximately August 2008 to approximately December 2008, he served as a Judicial
24 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the
25 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
26 before all courts of the State of California and all United States District Courts in the State of
27 California. He has worked on many wage-and-hour class action and representative action cases,
28 taking the lead in taking and defending depositions, arguing motions, and attending mediations.

1 He has played an integral role in preparing matters for class certification, including and not
2 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
3 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
4 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
5 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
6 representative action cases have resulted in settlements that have been granted court approval.
7 He has handled over one hundred and fifty (150) mediations and has worked on over two
8 hundred and fifty (250) class action or representative action cases which have resulted in
9 settlement.

10 19. Joanna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a
11 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
12 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
13 Georgetown University Law Center in 2010. She is admitted to practice in California (since
14 2010), in New York (since 2013), and in Washington (since 2026), and she is admitted to
15 practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central
16 District of California, U.S. District Court for the Western District of Washington, and the U.S.
17 Supreme Court. She has taken and defended dozens of depositions and successfully handled
18 motion practice in class action cases regarding discovery (including and not limited to, regarding
19 class contact information), class certification (both contested class certification and stipulated
20 class certification), arbitration agreements, coordination, and intervention. She has successfully
21 handled briefing and oral argument on appeal and obtained notable decisions regarding the
22 Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v.*
23 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal.,
24 May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175
25 (2019). She has significant experience with class actions, including and not limited to working
26 on cases to obtain class certification through contested motion practice and working on cases in
27 the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and
28 pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified

1 class consisting of approximately 2,600 individuals). She also has extensive experience with
2 class action and/or representative action settlements, and she has handled this process in over
3 three hundred (300) cases. Under her, Edwin Aiwasian and Arby Aiwasian, Lawyers *for* Justice,
4 PC has handled the class certification and court approval process for hundreds of class action
5 and/or representative action matters that have successfully resolved. She is a member of the
6 California Employment Lawyers Association and, on several occasions, she has been a speaker
7 regarding topics in wage and hour law at the organization's continuing legal education events.

8 20. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree
9 from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law
10 School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice
11 before all courts of the State of California. I have worked on many wage-and-hour class action
12 and PAGA representative cases, and my work on these cases has included preparing pleadings
13 and motions, making court appearances, and drafting and finalizing settlement agreements.

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

16 21. To date, Class Counsel have borne all of the risks and costs of litigation and will
17 not receive any compensation until recovery is obtained in this matter. The Settlement provides
18 for reimbursement of litigation costs and expenses of up to \$30,000.00. Lawyers *for* Justice, PC
19 seeks reimbursement of \$15,374.73 in litigation costs and expenses incurred in the matter, as
20 reflected in "EXHIBIT 2" attached hereto. These expenses were reasonable and necessary in
21 the prosecution of the matter and to obtain the Settlement.

22 **CLASS REPRESENTATIVE SERVICE PAYMENTS TO PLAINTIFFS**

23 22. In recognition of their efforts and work spearheading the prosecution of this
24 matter and serving as the Class Representatives, as well as their broader individual waiver and
25 release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 5.1.1
26 of the Settlement Agreement), the Settlement provides for Class Representative Service
27 Payments, in the amount of up to \$10,000.00 to each of the Plaintiffs (for a combined total of
28 \$20,000.00). Plaintiff Gilmore spent a substantial amount of time and effort discussing his

1 employment with Class Counsel, gathering and providing relevant documents and information,
2 and providing facts and evidence to support the prosecution of the claims. Plaintiff Gilmore was
3 available whenever Class Counsel needed him and actively tried to obtain and provide
4 information that would help obtain a recovery in this matter. Accordingly, it is appropriate for
5 Plaintiff Gilmore to receive \$10,000 as a reasonable Class Representative Service Payment for
6 his broader waiver and release of claims and services performed in this matter, in addition to his
7 individual settlement payments.

8 23. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
9 interests of Plaintiffs, the Class, Aggrieved Employees, and the State of California.

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

12 Executed this 30th day of July 2026, at Glendale, California.

13 */s/ Ryan Slinger*

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15 Ryan Slinger
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EXHIBIT 1

KEITH GILMORE V. UNITED SITE SERVICES OF CALIFORNIA, INC
Sacramento County Superior Court Case No. 24CV009938

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate with, and/or Review Communication with Plaintiff Keith Gilmore (“Plaintiff Gilmore”)	11.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	15.50
Review and Analyze Court Filings in <i>Noel C. Pellerin vs. United Site Services</i> , Superior Court of California, County of Sacramento, Case No. 24CV012760	1.50
Review and Analyze Court Filings in <i>Noel C. Pellerin vs. United Site Services</i> , Superior Court of California, County of Los Angeles, Case No. 24STCV21871	1.10
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Gilmore’s Class Action and Private Attorneys General Act (“PAGA”) Claims, Conduct Legal Research and Analysis Regarding Class Action and PAGA Claims, and Draft, Review, and/or Revise Plaintiff Gilmore’s Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on May 20, 2024)	7.50
Review Court’s Notice of Case Assignment and Case Management Conference (filed on May 21, 2024)	0.30
Review Court’s Minute Order Re: Complex Determination and Notice of Case Reassignment (filed on May 28, 2024)	0.30
Review Court’s Notice of Case Management Conference and Orders Re: Complex Case Management Procedures (filed on June 10, 2024)	0.40

Review and Analyze Defendant United Site Services of California, Inc.'s ("Defendant") Answer to Plaintiff Gilmore's Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq., and Research Affirmative Defenses in Defendant's Answer (served on July 12, 2024)	1.60
Meet and Confer with Defendant's Counsel, and Draft, Review, and Revise Joint Stipulation to Toll Five Year Deadline Under Code of Civil Procedure Section 583.310 Pending Mediation; [Proposed] Order Thereon (submitted on August 14, 2024)	1.50
Review Court's Order to Toll Five Year Deadline Under Code of Civil Procedure Section 583.310 Pending Mediation (filed on August 16, 2024)	0.20
Review Notice of Related Case (served on October 2, 2024)	0.30
Draft, Review, and/or Revise Notice of Change of Address or Other Contact Information (filed on January 24, 2025)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on February 13, 2025)	0.70
Review Court's Minute Order Re: Continuance of Case Management Conference Scheduled for March 08, 2025 (filed on February 24, 2025)	0.20
Review Defendant's Amended Notice of Related Case (served on March 14, 2025)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on May 30, 2025)	1.20
Review Court's Order to Continue Case Management Conference (filed on June 10, 2025)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on June 12, 2025)	0.20
Review Court's Minute Order Re: Case Management Conference on 08/01/2025 Rescheduled to 08/22/2025 at 9:00 a.m. for Court Efficiency (filed on June 12, 2025)	0.20
Research, Draft, Review, and/or Revise First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code 2698, Et Seq. (filed on August 27, 2025); Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint	2.50

Stipulation and [Proposed] Order Granting Plaintiff Leave to File [Proposed] Amended Class Action Complaint for Damages Enforcement Under the Private Attorneys General Act, California Labor Code 2698, Et Seq. (submitted on July 30, 2025)	
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement – Continuance Requested (filed on August 7, 2025)	0.90
Review Court's Order Granting Plaintiff Gilmore Leave to File [Proposed] Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code 2698, et seq. (filed on August 13, 2025)	0.20
Review Court's Tentative Ruling Re: Case Management Order (published on August 21, 2025)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on August 22, 2025)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on August 26, 2025)	0.20
Review Court's Tentative Ruling Re: Status Conference (Compliance Hearing) (published on September 3, 2025)	0.20
Review Court's Minute Order Re: Status Conference (Compliance Hearing) (filed on September 5, 2025)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgement or Order (filed on September 9, 2025)	0.20
Review and Analyze Defendant's Answer to Plaintiffs' First Amended Class Action Complaint for Damages and Enforcement Under Private Attorneys General Act (served on September 10, 2025)	0.80
Review and Analyze Defendant's Suggestion of Bankruptcy (served on January 5, 2026)	1.60
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on February 19, 2026)	1.20
Review Court's Minute Order Re: Further Case Management Conference (filed on March 6, 2026)	0.20
Review Court's Notice of Department Relocation (filed on April 6, 2026)	0.20

Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Keith Gilmore (served on February 21, 2024)	3.90
Draft, Review, and/or Revise Plaintiff's First Notice of Deposition of Defendant's Person Most Knowledgeable and Requests for Production of Documents (Organizational Structure and Wage and Hour Practices; noticed for August 28, 2024) (served on July 16, 2024)	1.40
Draft, Review, and/or Revise Plaintiff Gilmore's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Request for Admissions (Set One), and Request for Production of Documents (Set One) to Defendant (served on July 16, 2024)	4.50
Letters and Correspondence	
Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Keith Gilmore Under the Private Attorneys General Act (served on March 15, 2024)	4.50
Meet With, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with Defendant's Counsel	9.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff Gilmore, Defendant and Other Sources Prior to Mediation	78.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Exhibits in Support of the Mediation Brief, and Performing Damages and Penalties Analyses and Calculations (submitted on January 30, 2025)	32.50
Attend Mediation Session (February 6, 2025; Zoom Video Conference)	12.50
Review and Analyze Mediator's Proposal (issued February 6, 2025; executed on February 10, 2025)	1.70
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (fully executed on June 17, 2025) and Draft, Review, and/or Revise Notice of Class Action Settlement and Hearing Date for Final Court Approval	12.50

Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, and Respond to Inquiries	6.50
Law and Motion	
Review Declaration of David D. Bibiyan and Research, Draft, Review, and/or Revise Plaintiffs Keith Gilmore and Noel C. Pellerin's (together, "Plaintiffs") Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Elizabeth Parker-Fawley in Support Thereof, Declaration of Keith Gilmore in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on July 31, 2025)	16.50
Review Court's Tentative Ruling Re: Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement (published on August 21, 2025)	0.60
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on August 22, 2025)	0.20
Review Declaration of Noel Pellerin and Draft, Review, and/or Revise Declaration of Ani Menedjian in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, Declaration of Keith Gilmore in Support Thereof, and [Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (submitted on August 29, 2025)	2.40
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on September 5, 2025)	0.20
Review Declaration of Settlement Administrator and Declaration David D. Bibiyan, and Research, Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payments, Declaration of Ryan Slinger in Support Thereof, and [Proposed] Final Approval Order and Judgment; and Review Declaration of Settlement Administrator in Support Thereof (filed on February 10, 2026)	18.50
Total Hours:	260.00

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Gilmore vs. United Site Services of California, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/18/2024	U.S. Postmaster	Postage	\$17.12
3/15/2024	U.S. Postmaster	Postage	\$17.86
3/15/2024	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
5/21/2024	Legal Document Server, Inc.	Attorney Service	\$114.63
5/21/2024	Sacramento Superior Court	Complex Filing Fee	\$1,000.00
5/21/2024	Sacramento Superior Court	Complaint Filing Fee	\$435.00
6/13/2024	Legal Document Server, Inc.	Attorney Service	\$29.80
8/15/2024	Momentum ADR	Mediation Fee	\$8,500.00
11/20/2024	Los Angeles Superior Court	Document Download Fee	\$70.60
1/27/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
2/13/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
3/6/2025	CPAnalytics	Data Analysis	\$4,535.00
6/2/2025	Legal Document Server, Inc.	Attorney Service	\$17.84
6/2/2025	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
6/16/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
7/31/2025	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
8/1/2025	Legal Document Server, Inc.	Attorney Service	\$265.46
8/1/2025	Sacramento Superior Court	Motion Fee	\$60.00
8/7/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
8/26/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
8/29/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
9/2/2025	Legal Document Server, Inc.	Attorney Service	\$32.90
9/10/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
1/27/2026	General Logistics Systems US, Inc.	Courier Service	\$30.92
2/20/2026	Legal Document Server, Inc.	Attorney Service	\$17.45
Total:			<u>\$15,374.73</u>