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

GEORGE AUSTIN THOMAS, individually,
and on behalf of other members of the
general public similarly situated,

Plaintiff,

v.

REISS (RETAIL) LIMITED, a United
Kingdom corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 24STCV27146

Honorable Samantha Jessner
Department 7

CLASS ACTION

**DECLARATION OF MARIA
HALWADJIAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Complaint Filed:	October 16, 2024
FAC Filed:	September 4, 2025
Trial Date:	None Set

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DECLARATION OF MARIA HALWADJIAN

I, Maria Halwadjian, 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 George Austin Thomas (“Plaintiff”). 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.

EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC

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 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. 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. Lawyers *for* Justice, PC, sometimes in association with other law firms, has recovered millions of dollars on behalf of thousands in California.

3. Edwin Aiwarzian 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 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

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

15 4. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He
16 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
17 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
18 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
19 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
20 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
21 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
22 He was admitted to practice law in California in 2010. He is admitted to practice before all courts
23 of the State of California and all United States District Courts in the State of California. He has
24 worked on many wage-and-hour class action and representative action cases, taking the lead in
25 taking and defending depositions, arguing motions, and attending mediations. He has played an
26 integral role in preparing matters for class certification, including and not limited to, successful
27 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
28 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.

1 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
2 RG13680477). Under his supervision, dozens of class action or representative cases have resulted
3 in settlements that have been granted court approval. He has handled over one hundred and fifty
4 (150) mediations and worked on over two hundred and fifty (250) class action or representative
5 action cases which have resulted in settlement.

6 5. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a
7 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
8 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
9 Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010)
10 and in New York (since 2013) and is also admitted to practice in all U.S. District Courts in
11 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
12 Court. She has taken and defended dozens of depositions and successfully handled motion practice
13 in class action cases regarding discovery (including and not limited to, regarding class contact
14 information), class certification (both contested class certification and stipulated class
15 certification), arbitration agreements, coordination, intervention. She has successfully handled
16 briefing and oral argument on appeal and obtained notable decisions regarding Private Attorneys
17 General Act and employer efforts to compel arbitration of such claims, e.g., *Betancourt v.*
18 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal.,
19 May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175
20 (2019). She also has extensive experience with class actions, including and not limited to working
21 on cases to obtain class certification through contested motion practice and working on cases in
22 the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot
23 study, and trial preparation in conjunction with co-counsel in a case involving a certified class
24 consisting of approximately 2,600 individuals). She also has extensive experience with class
25 action and/or representative action settlements, and she has handled this process in over five
26 hundred (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision, Lawyers for
27 Justice, PC has handled the class certification and court approval process for hundreds of class
28 action and/or representative action matters that have successfully resolved. She is a member of

1 the California Employment Lawyers Association and, on several occasions, has been a speaker
2 regarding topics in wage and hour law at the organization’s continuing legal education events.

3 6. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor’s degree from
4 the University of California, Santa Barbara in 2019, and earned my Juris Doctor degree from the
5 Southwestern Law School in 2024. I was admitted to practice law in California in November of
6 2024. From approximately May 2022 to approximately August 2022, I served as a Judicial Extern
7 to the Honorable Andre Birotte Jr. at the United States District Court for the Central District of
8 California. I am admitted to practice before all courts of the State of California and all federal
9 district courts in the State of California. Since joining Lawyers *for* Justice, PC, I have worked on
10 wage and hour class action and PAGA representative matters. My work has included, *inter alia*,
11 researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and
12 finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation
13 and analysis, and making court appearances.

14 **EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND**
15 **REPRESENTATIVE ACTION CASES**

16 7. What follows are just a few examples of the type of results Lawyers *for* Justice, PC
17 (“LFJ”) has achieved on behalf of its clients:

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

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

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1 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class action against a national property management company involving
3 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court
4 granted final approval of the class action settlement. The Los Angeles County Superior Court
5 Case Number is BC430918.

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

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

16 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
17 wage-and-hour class and PAGA representative action against a national wholesale distributor of
18 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
19 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
20 representative action settlement. The Sacramento County Superior Court Case Number is 34-
21 2012-00136285.

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

27 h) LFJ, in association with co-counsel therein, represented the plaintiff in a
28 wage-and-hour class and PAGA representative action against a national retailer of household

1 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted
2 final approval of the class and PAGA representative action settlement. The San Francisco County
3 Superior Court Case Number is CGC-13-532344.

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

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

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

20 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
21 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
22 involving allegations of misclassification of the “Department Manager” position. On August 12,
23 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class. On
24 August 6, 2019, the court granted final approval of the class action settlement. The Alameda
25 County Superior Court Case Number is RG13680477.

26 m) LFJ represented the plaintiff in a PAGA representative action against a real
27 estate and property management company, on behalf of non-exempt employees. On November 4,
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1 2016, the court granted approval of the PAGA representative action settlement. The Orange
2 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

3 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
4 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of non-
5 exempt employees. On November 18, 2016, the court granted final approval of the class and
6 PAGA representative action settlement. The San Francisco County Superior Court Case Number
7 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

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

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

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

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

1 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a lumber and hardware company on
3 behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class
4 and PAGA representative action settlement. The Orange County Superior Court Case Number is
5 30-2014-00747750-CU-OE-CXC.

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

11 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
12 representative action against a food company on behalf of non-exempt employees. On June 30,
13 2017, the court granted final approval of the class and PAGA representative action settlement. The
14 Sacramento County Superior Court Case Number is 34-2015-00175871.

15 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a chocolate company on behalf of non-exempt employees. On July
17 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
18 The Alameda County Superior Court Case Number is RG15764300.

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

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

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1 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
3 employees. On December 11, 2017, the court granted final approval of the class and PAGA
4 representative action settlement. The Los Angeles County Superior Court Case Number is
5 BC569646.

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

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

17 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
18 wage-and-hour class action against a container manufacturer, on behalf of non-exempt employees.
19 On October 15, 2018, the court granted the plaintiff's motion for class certification. On March 20,
20 2023, the court granted final approval of the class action settlement. The Tulare County Superior
21 Court Case Number is VCU264528.

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

27 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
28 PAGA representative action against a global provider of products and services to the energy

1 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court
2 granted approval of the PAGA representative action settlement. The Kern County Superior Court
3 Case Number is S-1500-CV-280215-SDC.

4 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a
5 wage-and-hour class action against a parking company on behalf of non-exempt employees. On
6 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a
7 class. On November 7, 2024, the court granted final approval of the class action settlement. The
8 Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial Council
9 Coordination Proceeding Number is 4886.

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

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

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

27 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
28 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed

1 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
2 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
3 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval
4 of the PAGA representative action settlement. The San Diego County Superior Court Case
5 Number is 37-2016-00005578-CU-OE-CTL.

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

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

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

25 mm) LFJ in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against manufacturer and supplier of power products and services on
27 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
28 for class certification and certified a class. On August 27, 2021, the court granted final approval

1 of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-
2 00025968-CU-OE-CTL.

3 nn) LFJ represented the plaintiff in a wage-and-hour class action against a
4 nutritional products manufacturer on behalf of non-exempt production line employees. On
5 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
6 certified a class. On January 16, 2024, the court granted final approval of the class and PAGA
7 representative action settlement. The Solano County Superior Court Case Number is FCS051001.

8 oo) LFJ represents the plaintiffs in a wage-and-hour class action against a
9 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the
10 restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July
11 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The
12 Los Angeles County Superior Court Case Number is BC707670.

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

17 **SUMMARY OF WORK PERFORMED AND SETTLEMENT TERMS**

18 8. Lawyers *for* Justice, PC has been actively engaged in this litigation from the
19 inception of the above-captioned action, which was commenced by Plaintiff on October 16, 2024.
20 Lawyers *for* Justice, PC has fully and actively participated in the litigation process throughout the
21 pendency of this case, and since joining forces with and associating the attorneys at JCL Law Firm,
22 APC and Zakay Law Group, APLC, we have worked closely with them to prosecute the action,
23 and our work with them has been a coordinated and combined effort. Together, Lawyers *for*
24 Justice, PC, JCL Law Firm, APC, and Zakay Law Group, APLC (together, "Class Counsel") have
25 worked cooperatively in a coordinated and combined effort to strategize and prosecute the action.

26 9. Before initiating the above-captioned action, Lawyers *for* Justice, PC conducted
27 extensive investigation and research into the facts and circumstances underlying the pertinent
28 factual and legal issues and applicable law. This required thorough discussions and interviews

1 between attorneys at our firm and Plaintiff, and research into the various legal issues involved in
2 the case, namely, the current state of the law as it applied to class certification, off-the-clock
3 theory, meal and rest periods, wage-and-hour enforcement, Plaintiff's claims and damages, and
4 potential defenses. After conducting initial investigation, our firm determined that Plaintiff's
5 claims were well-suited for class action treatment and representative adjudication owing to what
6 appeared to be a common course of conduct affecting a similarly situated group of current and
7 former non-exempt employees employed by Defendant Reiss (Retail) Limited ("Defendant") in
8 California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant
9 meal and rest periods, and unreimbursed business expenses.

10 10. Collectively, Class Counsel investigated the veracity, strength, and scope of the
11 claims, and worked on preparing the cases for class certification and trial, prior to reaching the
12 settlement. This matter involved extensive and ongoing investigations and research into legal and
13 factual issues, and formal and informal discovery. Class Counsel obtained information from
14 Plaintiff and percipient witnesses, reviewed and analyzed a volume of information, documents,
15 and data obtained from Plaintiff, Defendant, and other sources, researched applicable law, and
16 undertook analyses and calculations of the value of claims, damages, and penalties exposure.
17 Class Counsel also met and conferred with Defendant's counsel on numerous occasions, e.g., to
18 discuss issues relating to the pleadings, case management, formal and informal discovery,
19 production of information, documents, and data in the course of litigation, mediation, and
20 settlement negotiations, and the mediation and settlement negotiations. Other work that Class
21 Counsel has performed and/or will perform include, *inter alia*, case strategy and analysis; drafting,
22 reviewing, and revising the pleadings, motion-related papers, and settlement-related papers; case
23 management; claims assessment and evaluation; and preparing for and attending court proceedings
24 and the mediation and settlement negotiations.

25 11. As outlined herein, the parties have conducted significant investigations and
26 discovery during the course of litigating the case. Class Counsel analyzed a volume of information,
27 documents, and data obtained from Plaintiff, Defendant, and other sources. This information,
28 documents, and data provided a critical understanding of the nature of the work performed by class

1 members and aggrieved employees, as well as Defendant's operations and employment policies,
2 practices, and procedures, and were used in analyzing liability, damages, and penalties valuation
3 issues in connection with all phases of the litigation, and ultimately, in connection with the
4 mediation and settlement negotiation process. Accordingly, sufficient investigation and review of
5 information has taken place in order for the parties to be sufficiently informed of the nature and
6 extent of the claims, and to enable all parties to fully evaluate the settlement for its fairness,
7 adequacy, and reasonableness. Class Counsel analyzed class data and time and wage records to
8 determine violations rates and model potential recoveries for the Class, including, *inter alia*, for
9 unpaid minimum, regular, and overtime wages, failure to provide meal and rest breaks and
10 associated premiums, failure to timely pay wages during employment, failure to timely pay wage
11 upon termination and associated waiting time penalties, unreimbursed business expenses, and
12 other California Labor Code violations.

13 12. After conducting significant investigation of the facts and law during the prosecution
14 of the case, counsel for the parties engaged in mediation and extensive settlement negotiations to
15 try to resolve the case. These efforts included participating in mediation conducted by Christopher
16 E. Panetta, Esq., a well-regarded mediator who is experienced in mediating complex labor and
17 employment matters. During all settlement discussions, the parties conducted their negotiations at
18 arm's length in an adversarial position. In the course of mediation and settlement negotiations, the
19 parties discussed all aspects of the cases, including the risks and delays of further litigation
20 proceedings, class certification, and/or trial, the law relating to, *inter alia*, class certification,
21 manageability, off-the-clock theory, meal and rest periods, PAGA representative claims, and
22 wage-and-hour enforcement, as well as the evidence produced and analyzed, and the possibility
23 of appeals, among other things. Arriving at a settlement that was acceptable to the parties was not
24 easy. After conducting extensive investigations, formal and informal discovery, and continued
25 settlement negotiations, and with the aid of the mediator's evaluation, the parties ultimately agreed
26 to resolve the case given the legal issues relating to Plaintiff's principal claims, as well as the costs
27 and risks to both sides that would attend further litigation, and the real possibility of no recovery
28 after years of litigation.

1 13. If the Court approves the Settlement, Defendant will pay \$342,500.00 pursuant to
2 the Settlement (“Gross Settlement Amount”). The Net Settlement Amount will be calculated by
3 deducting the following amounts from the Gross Settlement Amount: (1) attorneys’ fees in the
4 amount of up to \$119,700.00 (which is up to thirty-five percent (35%) of the Gross Settlement
5 Amount) and reimbursement of litigation costs and expenses of up to \$30,000.00, to Class
6 Counsel; (2) service payment of up to \$10,000.00 to Plaintiff; (3) PAGA penalties of \$20,000.00,
7 of which sixty-five percent (65%), or \$13,000.00, will be paid to the Labor Workforce
8 Development Agency (“LWDA”), and thirty-five percent (35%), or \$7,000.00, will be distributed
9 to the Aggrieved Employees; and (4) administration expenses payment estimated not to exceed
10 \$6,225.00, to the Administrator.

11 14. The Parties have agreed to retain Apex Class Action LLC (“Apex”) to handle
12 administration of the Settlement, and the Parties respectfully request that this Court appoint Apex
13 to serve as the Administrator. The administration expenses payment are estimated not to exceed
14 \$6,225.00 and will be paid from the Gross Settlement Amount, subject to Court approval.

15 15. The Settlement provides for a Class Representative Service Award in an amount of
16 up to \$10,000.00 to Plaintiff, to be paid out of the Gross Settlement Amount. Prior to the final
17 approval hearing, Plaintiff will file a motion for final approval and, at that time, also move this
18 Court to award the Class Representative Service Award to Plaintiff. The contemplated Class
19 Representative Service Award is fair and reasonable, in light of Plaintiff’s broader general release
20 of claims and California Civil Code section 1542 waiver, as well as his time and effort expended
21 to pursue the case. By initiating and pursuing the action, Plaintiff undertook the responsibilities of
22 serving in a representative capacity for the Class. Plaintiff was available whenever Class Counsel
23 needed him, actively tried to obtain and provide information, and spent a substantial amount of
24 time and effort providing the facts and evidence necessary to facilitate the prosecution of the case.
25 Accordingly, it is appropriate and just for Plaintiff to receive a reasonable service award, in
26 addition to his individual settlement payment under the Settlement.

27 16. The Settlement provides for attorneys’ fees up to \$119,700.00. Prior to the final
28 approval hearing, Plaintiff will move this Court for an award of attorneys’ fees, and show why

1 awarding the full amount of attorneys' fees is fair and reasonable. The attorneys' fees
2 contemplated under the settlement are fair and reasonable considering (1) the risk Class Counsel
3 took in commencing the case; (2) the time, effort, and expense Class Counsel dedicated to the
4 case; (3) the skill and determination Class Counsel have shown; (4) the results Class Counsel have
5 achieved throughout the litigation; (5) the value of the settlement that Class Counsel have achieved
6 for Plaintiff and the Class; and (6) the other cases Class Counsel have turned down in order to
7 devote their time and efforts to this matter.

8 17. The Settlement also provides for reimbursement of litigation costs and expenses in
9 an amount up to \$30,000.00. Prior to the final approval hearing, Plaintiff will move this Court for
10 an award of reimbursement of Class Counsel's litigation costs and expenses in the precise amount
11 that will be demonstrated in the motion, but not to exceed \$30,000.00.

12 18. On August 12, 2024, Lawyers for Justice, PC provided written notice by online
13 submission to the Labor and Workforce Development Agency and by certified mail to Defendant,
14 on behalf of Plaintiff, of Plaintiff's intent to pursue civil penalties under the Private Attorneys
15 General Act ("PAGA") against Defendant for alleged violations of the California Labor Code and
16 Industrial Welfare Commission Wage Orders, a true and correct copy of which is attached hereto
17 as "EXHIBIT A." The LWDA did not respond to the notice letter that was sent on behalf of
18 Plaintiff.

19 19. Class Counsel and Plaintiff have entered into a written fee split agreement by which
20 Lawyers for Justice, PC will receive forty percent (40%) of any attorneys' fees awarded by the
21 Court, JCL Law Firm will receive thirty percent (30%) of any attorneys' fees awarded by the
22 Court, and Zakay Law Group, APLC will receive thirty percent (30%) of any attorneys' fees
23 awarded by the Court.

24 20. Class Counsel submits that the Settlement is fair, reasonable, and adequate, and is
25 in the best interest of Plaintiff, the Class, Aggrieved Employees, and the State of California. Class
26 Counsel further submit that the Settlement is within an acceptable range of recovery for this type
27 of litigation given the strengths and weaknesses of the cases, the inherent costs and risks of further
28

1 litigation, and the costs and risks associated with class certification, representative adjudication,
2 trial, and/or appeals.

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

5 Executed on this 29th day of October 2025 at Glendale, California.

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7 Maria Halwadjian
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EXHIBIT A



August 12, 2024

BY ONLINE SUBMISSION

California Labor & Workforce Development Agency
PAGAFilings@dir.ca.gov

Re: REISS (RETAIL) LIMITED

Dear Representative:

We have been retained to represent Mr. George Austin Thomas against Reiss (Retail) Limited (including any and all affiliates, subsidiaries, parents, directors, officers, agents, and executive employees) (collectively referred to as “Reiss”) for violations of California wage-and-hour laws. Mr. Thomas seeks penalties for violations of the California Labor Code, which are recoverable under California Labor Code section 2698, et seq., the Labor Code Private Attorneys General Act of 2004 (“PAGA”) and all other remedies available under PAGA.

Mr. Thomas seeks these remedies on behalf of the State of California and “aggrieved employees,” as defined herein. This letter is sent in compliance with the reporting requirements of California Labor Code section 2699.3.

Reiss employed Mr. Thomas as an hourly-paid, non-exempt employee from approximately November 2023 to approximately April 2024, in the State of California.

The “aggrieved employees” that Mr. Thomas may seek penalties on behalf of are all current and former hourly-paid or non-exempt employees who worked for any of the above-referenced entities within the State of California.

Based on the following facts and theories, Reiss has violated and/or continues to violate, among other provisions of the California Labor Code and applicable wage law, California Labor Code sections 201, 202, 203, 204, 226(a), 226.7, 510, 512(a), 551, 552, 558, 1174(d), 1194, 1197, 1197.1, 1198, 2800 and 2802, and IWC Wage Orders including *inter alia*, Wage Orders 4-2001, and 7-2001.

Reiss required aggrieved employees to perform work before their scheduled shifts, after their scheduled shifts, during off-the-clock meal breaks, and/or during rest breaks and failed to compensate aggrieved employees for this time. Such work included, but was not limited to, responding to work-related inquiries.

California Labor Code sections 510 and 1198 require employers to pay time-and-a-half or double time overtime wages, and make it unlawful to work employees for hours longer than eight hours in one day and/or over forty hours in one week without paying the premium overtime rates at one-

and-one-half times or double the regular rate of pay, including additional remuneration. During the relevant time period, Mr. Thomas and other aggrieved employees worked in excess of 8 hours in a day and 40 hours in a week. Therefore, Mr. Thomas and other aggrieved employees were entitled to receive certain wages for overtime compensation, but they were not paid for all overtime hours worked.

California Labor Code sections 226.7 and 512 require employers to pay an employee one additional hour of pay at the employee's regular rate for each meal or rest period that is not provided. During the relevant time period, Reiss required Mr. Thomas and other aggrieved employees to work during meal and rest periods and failed to compensate them properly for non-compliant meal and rest periods including, *inter alia*, short, late, interrupted, and missed meal and rest periods.

California Labor Code sections 201 and 202 provide that if an employer discharges an employee, the wages earned and unpaid at the time of discharge are due and payable immediately, and if an employee quits his or her employment, his or her wages shall become due and payable not later than seventy-two (72) hours thereafter, unless the employee has given seventy-two (72) hours' notice of his or her intention to quit, in which case the employee is entitled to his or her wages at the time of quitting. During the relevant time period, Reiss failed to pay Mr. Thomas and other aggrieved employees all wages due to them within any time period specified by California Labor Code sections 201 and 202, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code section 204 requires that all wages earned by any person in any employment between the 1st and the 15th days, inclusive, of any calendar month, other than those wages due upon termination of an employee, are due and payable between the 16th and the 26th day of the month during which the labor was performed, and that all wages earned by any person in any employment between the 16th and the last day, inclusive, of any calendar month, other than those wages due upon termination of an employee, are due and payable between the 1st and the 10th day of the following month. California Labor Code section 204 also requires that all wages earned for labor in excess of the normal work period shall be paid no later than the payday for the next regular payroll period. During the relevant time period, Reiss failed to pay Mr. Thomas and other aggrieved employees all wages due to them within any time period specified by California Labor Code section 204, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code section 226 requires employers to make, keep and provide complete and accurate itemized wage statements to their employees. During the relevant time period, Reiss did not provide Mr. Thomas and other aggrieved employees with complete and accurate itemized wage statements. The wage statements they received from Reiss were in violation of California Labor Code section 226(a). The violations include, but are not limited to, the failure to include the total hours worked by Mr. Thomas and other aggrieved employees, including time spent working off-the-clock and during meal and rest periods as discussed above.

California Labor Code sections 551 and 552 require that every person employed in any occupation of labor is entitled to one day's rest in a seven-day workweek, that no employer of labor shall cause his employees to work more than six days in a workweek, and that an employer shall pay a civil

penalty in the amounts of fifty dollars (\$50) for each aggrieved employee per pay period for the initial violation and one hundred dollars (\$100) for each aggrieved employee per pay period for each subsequent violation. During the relevant time period, Mr. Thomas and the aggrieved employees were required to regularly and/or consistently work in excess of six (6) days in a workweek. During the relevant time period, Mr. Thomas and the aggrieved employees were required to work in excess of thirty (30) hours in a week and/or six (6) hours in any one (1) day thereof, during workweeks in which they were required to work in excess of six (6) days. During the relevant time period, Mr. Thomas and the aggrieved employees were required to work in excess of six (6) days in a workweek without accumulating or being provided the opportunity to take at least one (1) day of rest, and when Mr. Thomas and the aggrieved employees accumulated days of rest, they were not actually provided the opportunity to take the equivalent of one (1) day's rest in seven (7) during each calendar month.

California Labor Code sections 1174(d) requires an employer to keep, at a central location in the state or at the plants or establishments at which employees are employed, payroll records showing the hours worked daily by and the wages paid to, and the number of piece-rate units earned by and any applicable piece rate paid to, employees employed at the respective plants or establishments. These records shall be kept with rules established for this purpose by the commission, but in any case shall be kept on file for not less than two years. During the relevant time period, Reiss failed to keep accurate and complete payroll records showing the actual hours worked daily and the wages earned by Mr. Thomas and other aggrieved employees, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code sections 1194, 1197, and 1197.1 provide the minimum wage to be paid to employees, and the payment of a lesser wage than the minimum so fixed is unlawful. During the relevant time period, Reiss did not provide Mr. Thomas and other aggrieved employees with the minimum wages to which they were entitled for work performed "off-the-clock."

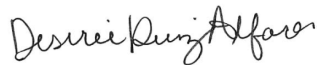
California Labor Code section 1198 provides that "The employment of any employee ... under conditions of labor prohibited by the [Industrial Wage Orders] is unlawful." The applicable Industrial Wage Orders, including *inter alia*, Wage Orders 4-2001 and 7-2001, require that for each workday an employee is required to report for work and does report, but is not put to work or is furnished less than half said employee's usual or scheduled day's work, the employee shall be paid for half the usual or scheduled day's work, but in no event for less than two (2) hours nor more than four (4) hours, at the employee's regular rate of pay. Further, if an employee is required to report for work a second time in any one workday and is furnished less than two (2) hours of work on the second reporting, said employee shall be paid for two (2) hours at the employee's regular rate of pay. During the relevant time period, Reiss failed to pay Mr. Thomas and other aggrieved employees half the usual or scheduled day's work in an amount no less than two (2) hours nor more than four (4) hours at the employee's regular rate of pay for workdays in which Mr. Thomas and the other aggrieved employees reported to work and were furnished less than half the usual or scheduled day's work. During the relevant time period, Reiss failed to pay Mr. Thomas and other aggrieved employees for two (2) hours at the employee's regular rate of pay on days in which Mr. Thomas and the other aggrieved employees were required to report for work a second time in one workday and were furnished less than two (2) hours of work upon the second reporting.

California Labor Code sections 2800 and 2802 require an employer to reimburse its employee for all necessary expenditures incurred by the employee in direct consequence of the discharge of his or her job duties or in direct consequence of his or her obedience to the directions of the employer. During the relevant time period, Mr. Thomas and other aggrieved employees incurred necessary business-related expenses and costs that were not fully reimbursed by Reiss. These costs include, but are not limited to, the use of personal phones for work-related tasks, the use of mileage on personal vehicles for work-related tasks, and the purchasing and maintenance of clothing and footwear in compliance with the dress code.

Therefore, on behalf of all aggrieved employees, Mr. Thomas seeks all applicable penalties arising out of the above-referenced wage, hour, and payroll practices, or which could be assessed and collected by the Labor and Workforce Development Agency, for violation of the California Labor Code pursuant to PAGA, including civil penalties pursuant to Labor Code section 558.

If you have any questions or require additional information, please do not hesitate to contact us. Thank you for your attention to this matter and the noble cause you advance each and every day.

With kind regards,



Desiree Ruiz Alfaro, Esq.

Cc: (By U.S. Certified Mail / Return Receipt Requested)

Reiss (Retail) Limited
c/o National Registered Agents, Inc.
Agent for Service of Process
330 N. Brand Blvd. Suite 700
Glendale, California 91203