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Attorneys for Plaintiff Ortega

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF IMPERIAL

JESUS RIOS and EMILIO CASTRO
ORTEGA individually on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiff,

v.

RMP SUPPLY TRIM, INC., a California
Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No: ECU003902

**DECLARATION OF HEATHER
DAVIS IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Date: September 15, 2026

Hearing Time: 8:30 a.m.

Department: 5

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1. I am an attorney duly admitted to the Bar of the State of California and all United States District Courts in the State of California. I am a Partner with Protection Law Group, LLP, counsel of record for Plaintiff Emilio Castro Ortega (“Plaintiff”). I have personal knowledge of the facts stated herein and if called as a witness I could and would competently testify thereto.

2. I am a duly licensed attorney and have been a member of the Colorado State Bar since 1998, the California State Bar since 2005, and the Arizona State Bar since 2007. I graduated from the University of Denver School of Law in 1998, and I am licensed to practice before all courts of the State of California and Colorado as well as the State of Arizona and District Courts throughout the country.

4. During my employment with Littler Mendelson, P.C., I continued my practice of employment law and was responsible for and defended dozens of complex class actions involving some of the largest representative and class actions brought under the California Labor Code, including meal and rest break violations, overtime, minimum wage claims, off-the-clock work, and other related wage claims. My practice included the management of dozens of class actions. My management of these cases included taking and defending hundreds of depositions and interviewing hundreds of putative class members as well as drafting extensive state, federal and appellate briefing on hundreds of wage and hour issues involving class actions.

5. During my employment at Littler Mendelson, I played a significant role in the class actions for which I was responsible. In particular, I was often in charge of leading the strategy of the cases and drafting all of the briefs. I received a wide-array of wage and hour class action experience performing the following types of tasks: drafting demurrers; motions to strike and/or dismiss; removing actions from state court to federal court; drafting and responding to

1 written discovery; drafting and opposing discovery related motions; arguing discovery related
2 motions; drafting motions to consolidate related matters; interviewing putative class members and
3 obtaining declarations in connection with class certification; drafting oppositions to motions for
4 class certification; drafting motions for decertification following class certification; conducting
5 exposure analyses to assess the strengths and weaknesses of asserted claims, the likelihood of
6 prevailing at class certification and potential damages resulting from such claims; drafting
7 mediation briefs; serving as the primary contact to in-house counsel; deposing plaintiff and
8 putative class members; deposing retained expert witnesses; and defending the depositions of
9 corporate witnesses. In short, I played an integral role in all aspects of litigation from the inception
10 of a matter through and beyond class certification.

11 6. Although not exhaustive, below is a representative list of several of the wage and
12 hour class actions that I performed substantial work on while I was an attorney with Littler
13 Mendelson, including, but not limited to: *Villacres v. ABM Industries, Inc.*, 189 Cal.App.4th 562
14 (2010); *Brizuela v. Copart, Inc.*, CIVRS11101592, (San Bernardino Superior Court class action
15 settlement); *Augustus v. ABM Industries, Inc.*, BC336416, 2 Cal. 5th 257 (2016); *Tagaki v. United*
16 *Airlines*, 2:11-CV9191 (Central District class action settlement); *Babasa v. Comerica, Inc.*, 3:11-
17 CV00595; *Leyva v. Medline Industries, Inc.* 5:11-cv-00164 (Central District); *Blue v. Coldwell*
18 *Banker Residential Brokerage Co.*, BC417335, (Los Angeles Superior Court, class action
19 settlement); and *Acosta v. Texwood Industries, Inc.*, 2:07-cv-03237-DDP-PLA (Central District
20 class action settlement).

21 7. During my practice in other jurisdictions and continuing today, I have been
22 primarily devoted to working in employment law and on complex class action and representative
23 litigation and multi-plaintiff work.

24 8. Protection Law Group, LLP is a law firm specifically devoted to the representation
25 of employees against employers in California involving claims relating to violations of the
26 California Labor Code, including claims for failure to pay all wages owed, failure to pay overtime
27 premiums, failure to any meal and rest premiums and failure to provide accurate wage records.
28 The practice of employment law is a very specific, narrow field which requires diligence in an

1 ever-evolving field of substantive and procedural law.

2 9. Since opening my firm, I have served as lead counsel or co-class counsel in several
3 wage and hour class and/or representative actions seeking wages and penalties owed on behalf of
4 employees for which final approval of the settlement or class certification has been granted,
5 including, but not limited to the following:

- 6 • *Holzer v. Wedbush Securities, Inc.*, BC 550462 (Los Angeles Superior Court wage
7 and hour class action certifying class of independent contractors and appointing
8 Protection Law Group, LLP as class counsel);
- 9 • *Morera v. Continental Assets Mgmt.*, BC502003 (Los Angeles Superior Court wage
10 and hour class action appointing Protection Law Group, LLP as class counsel in
11 settlement);
- 12 • *Fong et al. v. Regis Corporation*, 3:13-cv-13-04497-VC (United States District Court,
13 Northern District of California, wage and hour class action settlement and
14 appointment Protection Law Group, LLP as class counsel in settlement);
- 15 • *Espinoza v. Financial Partners Credit Union*, BC502165 (Los Angeles Superior Court
16 wage and hour Class action appointing Protection Law Group, LLP as class counsel
17 in settlement);
- 18 • *Kesheshian, et al v. S. Cal. Logistics*, BC557981 (Los Angeles Superior Court wage
19 and hour class action appointing Protection Law Group, LLP as class counsel in
20 settlement);
- 21 • *Sampson v. 24 HR Homecare LLC*, BC586019 (Los Angeles County Superior Court
22 wage and hour class action);
- 23 • *Glenn v. Decron Properties Corp.*, BC578035 (Los Angeles Superior Court wage and
24 hour class action appointing Protection Law Group, LLP as class counsel in
25 settlement);
- 26 • *Torres v. Auto Rescue et al.*, RIC1509900 (Riverside County Superior Court wage and
27 hour class action appointing Protection Law Group, LLP as class counsel in
28 settlement);

- 1 • *Kashanian v. Plus Labs, Inc.*, 2016-1-CV-294231 (Santa Clara County Superior Court
2 wage and hour class action appointing Protection Law Group, LLP as class counsel in
3 settlement);
- 4 • *Cadena v. Tetra Property Management*, 257425 (Tulare County Superior Court wage
5 and hour class action appointing Protection Law Group, LLP as class counsel in
6 settlement);
- 7 • *Drayton v. Hollywood Park Casino*, BC593935 (Los Angeles Superior Court wage
8 and hour class action appointing Protection Law Group, LLP as class counsel in
9 settlement);
- 10 • *Khan v. FPI Management, Inc.*, JCCP4819 (Los Angeles Superior Court wage and
11 hour class action appointing Protection Law Group, LLP as class counsel in
12 settlement);
- 13 • *Byrd v. Masonite Corp.*, 5:16-cv-00035-JGBKK (United States District Court, Central
14 District of California appointing Protection Law Group, LLP as class counsel in
15 settlement);
- 16 • *Hadrick v. Woodmont Real Estate Serv., et al.*, CIV530405 (San Mateo County
17 Superior Court wage and hour class action appointing Protection Law Group, LLP as
18 class counsel in settlement);
- 19 • *Utterbach v. Daylight Transport, LLC et al.*, BC600994 (Los Angeles Superior Court
20 wage and hour class action appointing Protection Law Group, LLP as class counsel in
21 settlement);
- 22 • *Eiden v. Olive & June*, BC654685 (Los Angeles Superior Court wage and hour class
23 action appointing Protection Law Group, LLP as class counsel in settlement);
- 24 • *Lemus v. Slater Inc.*, CIVDS1703633 (San Bernardino Superior Court wage and hour
25 class action appointing Protection Law Group, LLP as class counsel in settlement);
- 26 • *Deluna v. Amerit Fleet Solutions et al.*, CIVDS1721564 (San Bernardino Superior
27 Court wage and hour class action appointing Protection Law Group, LLP as class
28 counsel in settlement);

- 1 • *Stone v. Universal Protection Services*, AAA Case No. 01-15-0002-7497 (American
2 Arbitration Association wage and hour class action appointing Protection Law Group,
3 LLP as class counsel in settlement on behalf of class of 75,000+ putative class
4 members)
- 5 • *Commick v. Prometheus Real Estate Group*, CIV531264 (San Mateo Superior Court
6 wage and hour class action appointing Protection Law Group, LLP as class counsel in
7 settlement);
- 8 • *Martinez v. AMRO Fabricating Corp.*, BC681938 (Los Angeles Superior Court wage
9 and hour class action appointing Protection Law Group, LLP as class counsel in
10 settlement);
- 11 • *Ramirez v. Western National Properties*, BC639319 (Los Angeles Superior Court
12 wage and hour class action appointing Protection Law Group, LLP as class counsel in
13 settlement);
- 14 • *Hernandez v. Access Dental Plan et. al*, 34-2017-00220944 (Sacramento Superior
15 Court wage and hour class action appointing Protection Law Group, LLP as class
16 counsel in settlement);
- 17 • *Fernandez v. Sumitomo Rubber North America, Inc.*, CIVDS1803211 (San
18 Bernardino Superior Court wage and hour class action appointing Protection Law
19 Group, LLP as class counsel in settlement);
- 20 • *Gomez v. Fairway Staffing Services, Inc.*, BC689771 (Los Angeles Superior Court
21 wage and hour class action appointing Protection Law Group, LLP as class counsel in
22 settlement);
- 23 • *Fuentes v. Communications Test Design, Inc.*, CIVDS1802427 (San Bernardino
24 Superior Court wage and hour class action appointing Protection Law Group, LLP as
25 class counsel in settlement);
- 26 • *Hartline v. Senior Operations, LLC*, BC697665 (Los Angeles Superior Court wage
27 and hour class action appointing Protection Law Group, LLP as class counsel in
28 settlement);

- 1 • *Carrozzella v. Basalite Concrete Products, LLC*, 34-2014-00220214 (Sacramento
2 Superior Court wage and hour class action appointing Protection Law Group, LLP as
3 class counsel in settlement);
- 4 • *Howey v. Battery Systems, Inc.*, 2026114 (Stanislaus Superior Court wage and hour
5 class action appointing Protection Law Group, LLP as class counsel in settlement);
- 6 • *Correa v. Cashbak, LLC*, BC723845 (Los Angeles Superior Court wage and hour class
7 action appointing Protection Law Group, LLP as class counsel in settlement);
- 8 • *Lemus v. Cass Construction*, 37-2017-00028180 (San Diego Superior Court wage and
9 hour class action appointing Protection Law Group, LLP as class counsel in
10 settlement);
- 11 • *Sales v. J.S. International Shipping Corp.*, 18CIV05048 (San Mateo Superior Court
12 wage and hour class action appointing Protection Law Group, LLP as class counsel in
13 settlement);
- 14 • *Aparicio v. Advantage Painting*, CIVDS2013809 (San Bernardino County Superior
15 Court approving PAGA Settlement);
- 16 • *Rodriguez v. TheRealReal, Inc.*, CGC-19-574661 (San Francisco County Superior
17 Court approving PAGA Settlement);
- 18 • *Parm v. Think Together*, CIVDS1823659 (San Bernardino County Superior Court
19 approving PAGA Settlement);
- 20 • *Casey-Neith v. Pacific Union Financial*, 30-2018-01014980 (Orange County Superior
21 Court approving PAGA Settlement);
- 22 • *Wallace v. Alvarado Restaurant Group, LLC*, 20STCV26260 (Los Angeles County
23 Superior Court approving PAGA Settlement);
- 24 • *Adams v. West Marine Products, Inc.*, 19CIV00436 (San Mateo Superior Court wage
25 and hour class action appointing Protection Law Group, LLP as class counsel in
26 settlement); and
- 27 • *Coronel, et al. v. CMH Manufacturing, Inc., et al.*, RIC2003070 (Riverside County
28 Superior Court approving PAGA Settlement).

1 10. I am fully familiar with the legal and factual issues in the Action and have specific
2 experience litigating complex wage and hour actions as class actions, including employment cases
3 as set forth above.

4 11. The Settlement presented here only resulted after having engaged in extensive
5 informal discovery and investigation and is the product of hard-fought litigation and extensive
6 arms' length negotiations. In my opinion as an experienced class counsel, the Settlement is fair,
7 reasonable, adequate, and in the best interests of the Class, Aggrieved Employees, and State of
8 California

9 12. My office originally filed this matter on behalf of Plaintiff Ortega with the Los
10 Angeles Superior Court. On January 31, 2025, Plaintiff Ortega submitted a PAGA notice to the
11 LWDA and on February 3, 2025, Plaintiff Ortega filed a putative wage and hour class action with
12 the Los Angeles Superior Court, Case No. 25STCV02983 (the "Ortega Action").

13 13. On April 10, 2025, after more than 65 days had passed without a response from
14 the LWDA Plaintiff Ortega filed a First Amended Complaint in the Ortega Action adding a cause
15 of action under the Private Attorneys General Act.

16 14. My office mediated this matter alongside Counsel for Plaintiff Rios and the Parties
17 reached a global settlement agreement. As part of the settlement the Parties agreed to permit the
18 filing of a First Amended Complaint ("FAC") in the *Rios* Action in order to add the claims from
19 the *Ortega* Action and Plaintiff Ortega to the *Rios* and consolidate these matters for the purposes
20 of settlement.

21 15. On or about March 5, 2026, the Parties submitted a stipulation granting Plaintiff
22 Rios leave to file a FAC, and add Plaintiff Ortega as a proposed Class Representative.

23 16. On or about March 12, 2026, Plaintiff Rios and Ortega filed the operative FAC in
24 this matter.

25 17. On or about May 20, 2026, the Court granted the motion for preliminary approval
26 of the settlement. Now, following Notice of the Settlement to the Class, Plaintiffs move for final
27 approval of the settlement.

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1 **REASONABLENESS OF THE TERMS OF THE SETTLEMENT**

2 18. The preliminarily approved settlement is the result of intense and hotly contested
3 litigation between the parties and reaching an agreement in this matter was not easy. Settlement
4 was reached in this matter only after extensive informal discovery, including review and analysis
5 time and payroll data. Defendant also provided key data points including the number of putative
6 class members and the number of current versus former employees; the number of employees and
7 pay periods within a year of the filing of the complaint, the total workweeks worked by the Class
8 during the class period, the pay periods worked by the PAGA Members during the PAGA Period
9 and other relevant areas of investigation.

10 19. Following extensive review of this information, the Parties briefed the strengths
11 and weaknesses of Plaintiffs' claims and Defendant's defenses and provided their analyses to the
12 mediator for his consideration. The Parties attended mediation with the Hon. Brian Walsh (Ret.),
13 a highly-respected mediator, during which the Parties engaged in extensive settlement
14 negotiations. The negotiations were at arm's length and, although conducted in a professional
15 manner, were adversarial.

16 20. Based on my experience, and as discussed extensively in Plaintiffs' motion for
17 preliminary approval, I believe this settlement represents a fair and reasonable compromise of the
18 class's claims against Defendant. Defendant strongly contested its liability and raised defenses
19 regarding whether these claims were appropriate for class certification and the merits of the
20 individual claims. This included arguments regarding the potential for individualized issues with
21 respect to Plaintiffs' meal period claims, rest period claims, and claims regarding off-the-clock
22 work. Defendant at all times maintained that it had complied with California wage and hour laws.
23 Similarly, Plaintiffs were prepared to vigorously litigate the disputes including through class
24 certification and trial in the event a settlement could not be reached. The proposed Settlement was
25 reached at the end of a process that was neither fraudulent nor collusive. To the contrary, counsel
26 for the Parties advanced their respective positions throughout the mediation process and, with the
27 help of the mediator, the Parties were eventually able to reach an agreement to resolve these
28 claims.

21. Based on my experience litigating similar and complex matters and the history of this litigation, I would reasonably expect a vigorous and lengthy defense to both class certification and merits absent a settlement with substantial risk that Class Members could be forced to wait years and incur additional costs for the same or possibly worse result.

CLASS COUNSEL FEES

22. Class Counsel are seeking attorneys' fees in the amount of \$166,666.66.00, which is 1/3 of the Gross Settlement Amount. The percentage award of the attorneys' fees is commensurate with: (1) the economic risk Class Counsel took in commencing the Action on a contingency basis, knowing that there would likely be a long battle with a premier defense firm; (2) the time, effort and expense dedicated to the Action; (3) the skill and determination the Action has required; (4) the results achieved throughout the litigation; and (5) the value of the settlement achieved for Class Members, PAGA Members, and State of California.

23. Protection Law Group is a small law firm specifically devoted to the representation of employees against employers in California involving claims relating to violations of the California Labor Code, including claims for failure to pay all wages owed, failure to pay overtime premiums, failure to pay meal and rest premiums and failure to provide accurate wage records. The practice of employment law is a very specific, narrow field which requires diligence in an ever-evolving field of substantive and procedural law. Class Counsel have devoted significant time and attention to this matter on a contingent basis. The significant time and attention spent on this matter was time we could not spend on other cases or clients.

24. Additionally, because this case was litigated on a contingent basis had Class Counsel not been successful the time devoted to this matter would have been for naught and Class Counsel would not have received any fee or any reimbursement for any of the expenses incurred on behalf of the Class. Class Counsel has borne all the risks and costs of litigation and will not receive any compensation until recovery is obtained in the Action. This risk is a relevant factor when considering the reasonableness of Class Counsel's requested fee.

25. The Settlement provides for a requested fee of approximately 1/3 of the Gross Settlement Amount and this amount has not been objected to by any member of the Class. I am

1 aware that the common and acceptable rate for representation in wage-and-hour class action
2 litigation is normally twenty-five (25) to thirty-five (35) percent. A fee of approximately 1/3 of
3 the Gross Settlement Amount is appropriate here because of the excellent result achieved for the
4 Class, the Aggrieved Employees, and State of California despite the substantial risks involved in
5 the case including the risk that the Class Members, the PAGA Members, and State of California
6 could recover nothing at all.

7 26. While the requested fee is a proper and commonly requested percentage of the
8 common fund, the fee request is also justified under a simple lodestar analysis.

9 27. Protection Law Group actively and continuously represents plaintiffs in
10 employment class actions and representative actions, in Superior Courts throughout the State of
11 California. Because of the unique history and nature of our practice, all of the attorneys at
12 Protection Law Group have a high level of knowledge and experience in labor and employment
13 law. Besides myself the following attorneys at Protection Law Group spent significant time
14 working on this matter:

15 a. D. Luke Clapp – Senior Associate at Protection Law Group, LLP. Mr. Clapp received
16 his Bachelor of Arts degree from Macalester College, and a Juris Doctor degree from
17 Indiana University Maurer School of Law. He was admitted to practice law in
18 California in December of 2015, and has also been admitted to the Central District of
19 California. Since being admitted to California State Bar, Mr. Clapp's practice has
20 focused on the representation of employee plaintiffs in complex wage and hour class
21 and representative actions. Mr. Clapp has extensive experience in briefing and arguing
22 motions, managing written discovery, preparing for class certification, and drafting
23 mediation briefs and complex wage and hour settlements.

24 b. Carlos Jimenez—(Former) Partner at Protection Law Group, LLP. Mr. Jimenez
25 received his Bachelor of Arts degree from University of California, Los Angeles in
26 1999, and a Juris Doctor degree from Loyola Law School in 2003. He was admitted to
27 practice law in California in November of 2003, and has been admitted to practice in
28 all federal district courts in the State of California. Prior working at Protection Law

1 Group, LLP, Mr. Jimenez worked at Littler Mendelson, P.C. (“Littler”), the largest
2 labor and employment law firm in the United States, from May 30, 2007, until October
3 8, 2021. During his time at Littler, Mr. Jimenez specialized in defending Class and
4 PAGA actions, and was the Co-Chair of Littler’s National Class Action Practice Group.
5 While employed at Protection of Law Group, LLP, Mr. Jimenez focused his practice
6 on the representation of employees against employers in California.

7 c. Brendan Burton—(Former) Senior Associate with Protection Law Group, LLP. Mr.
8 Burton received his Bachelor of Arts degree from the University of San Diego and a
9 Juris Doctor degree from California Western School of Law. Mr. Burton was admitted
10 to practice in California in December 2018. While employed at Protection Law Group,
11 LLP, Mr. Burton’s practice focused solely on the representation of employee plaintiffs
12 in complex wage and hour class and representative actions. Mr. Burton has extensive
13 experience briefing and arguing motions, and managing written discovery.

14 d. Stephanie Papayanis – (Former) Associate Attorney at Protection Law Group, LLP.
15 Ms. Papayanis received her Bachelor of Science degree in 2016 from San Diego State
16 University and her Juris Doctor degree from California Western School of Law in 2021.
17 Ms. Papayanis was admitted to the State Bar of California in June 2021. While
18 employed at Protection Law Group Ms. Papayanis practice focused solely on the
19 representation of employees in class and representative actions.

20 28. My current billing rate and the actual rate charged clients is \$900 per hour. D. Luke
21 Clapp, a Senior Associate with the firm who worked on the matter bills at a rate of \$750 per hour.
22 While employed with Protection Law Group, Carlos Jimenez, a former Partner with the firm, last
23 utilized a billing rate of \$825 per hour. Brendan Burton, a former associate with the firm, last
24 utilized a billing rate of \$500 per hour and Stephanie Papayanis, another former associate, last
25 utilized a billing rate of \$400 per hour while employed at Protection Law Group. While the
26 overwhelming majority of my firm’s practice is contingency-based, this is the actual rate we charge
27 billing clients if retained on an hourly basis to handle employment-law related issues.

28 29. Based on my familiarity with prevailing market rates for work of similar

1 complexity in California, including my extensive involvement in fee application work on my own
2 behalf and on behalf of others, I can attest that these hourly rates are within the prevailing market
3 rate for work of similar complexity performed by attorneys of similar skill and experience. I have
4 extensive knowledge of the prevailing hourly rates in the community for work of similar nature
5 and complexity to the work in this case. My experience and knowledge in this regard comes from
6 a variety of sources, including: (a) reviewing dozens of fee applications in other matters; (b) my
7 familiarity with fee application orders in other cases; and (c) my independent research and
8 knowledge of the prevailing market rates based on fee requests of other counsel and my
9 familiarity with rates charged in other law firms; and (d) my independent reading and research
10 regarding law firm billing rates.

11 30. As such, it is my opinion that our requested hourly rates of \$900 for myself, \$825
12 for Mr. Jimenez, \$750 for Mr. Clapp, \$500 for Mr. Burton, \$400 for Ms. Papayanis, and the use
13 of a blended rate of at least \$650 for Protection Law Group based on the work performed in this
14 matter is well within the range of a reasonable rates for attorneys of our skill, knowledge,
15 experience, and ability.

16 31. Since beginning work on this matter, Protection Law Group has spent
17 approximately 141.60 hours litigating these matters including litigation in the separately filed
18 *Ortega* Action, Los Angeles Superior Court Case No. 25STCV02983. To date, applying a
19 blended rate of \$650.00 for the work performed by Protection Law Group results in an estimated
20 lodestar value of \$92,040.00. Attached hereto as **Exhibit 1** is a time and task sheet detailing the
21 estimated hours spent on the different tasks associated with the Action.

22 CLASS COUNSELS' COSTS

23 32. To date, Class Counsel have borne all risks and costs of litigation and will
24 not receive any compensation until recovery is obtained by Plaintiffs and the participating
25 members of the Settlement Class. To date, Protection Law Group has incurred \$10,878.09 in
26 costs and litigation expenses associated with this litigation including filings in both this action
27 and the *Ortega* Action, Los Angeles Superior Court Case No. 25STCV02983, mediation fees,
28 and expert costs. These costs were necessary for the resolution of the Action, and I would request

1 that the Court award Protection Law Group \$10,878.09 to cover the costs and expenses associated
2 with this litigation. Attached hereto as **Exhibit 2** is a costs sheet detailing the various costs
3 incurred by Protection Law Group.

4 **PLAINTIFFS' ENHANCEMENT AWARDS**

5 33. Here, the requested Class Representative Enhancement Payments of \$10,000.00
6 each to Plaintiffs Rios and Ortega are justified. It is very reasonable in my experience for Class
7 and PAGA Representatives to recover up to \$10,000.00 as a service payment/enhancement award.
8 Here, this amount is justified because of the extensive time Plaintiffs have spent and the assistance
9 they have provided to Class Counsel. Plaintiffs have taken actions throughout the litigation to
10 protect the interests of those they now represent and provided valuable information regarding the
11 allegations in the case. Plaintiffs Rios and Ortega were instrumental in establishing the wage and
12 hour violations alleged in the Action, and the recovery provided for in the Settlement Agreement
13 would have been impossible to obtain without their participation.

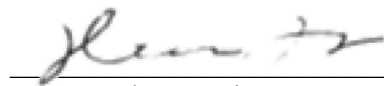
14 34. Additionally, Plaintiffs face actual risks with regard to their future employment by
15 putting themselves on public record in an employment lawsuit. As this Court is aware, prospective
16 employers conduct searches on job applicants. One type of search is to learn about an applicant's
17 litigation history. These searches are easy to run on the internet and relatively inexpensive.

18 35. As a result of Plaintiffs' actions, other employees have the opportunity to
19 participate in a settlement, reimbursing them for wage violations they may have never known
20 about or been willing to pursue on their own.

21 36. As such, Plaintiffs did more than simply lend their name for the lawsuit, and I
22 believe they deserve the requested Enhancement Awards.

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

25 Executed on August 13, 2026

26 

27 Heather Davis
28

Exhibit 1

Rios v. RMP Supply Trim, Inc.
IMPERIAL COUNTY SUPERIOR CASE NO. ECU0039002

Ortega v. RMP Supply Trim, Inc.
LOS ANGELES COUNTY SUPERIOR COURT CASE NO. 25STCV02983

ATTORNEY TASK AND TIME CHART

TASK	PROTECTION LAW GROUP LLP
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements including Adequacy, Typicality, Superiority, and Commonality	5.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Emilio Castro Ortega (“Plaintiff”) Claims and the Merits of the Claims of other Putative Class Members,	4.00
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant RMP Supply Trim (“Defendant”) with Respect to Plaintiff, Putative Class Members, and Aggrieved Employees	3.00
Investigation of Defendant, Defendant's Business Relationships, and the Industry in which Defendant Operates	2.50
Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members	1.00
Research and Investigation Re: Defendant's Policies, Practices, and Procedures Relating to Reporting Time, Timekeeping, Meal/Rest Breaks, Overtime Compensation, and Reimbursement of Business-Related Expense	2.50

Research and Investigation of Related Matter <i>Rios v. RMP Supply Trim</i> , Imperial County Case No. ECU0039002 comparison regarding allegations in PAGA Notice and Complaint, scope of class.	2.00
Prepare a Discovery Strategy Plan of Action, Including Topics of Inquiry Important to Class Certification, Manageability, Liability, and Damages/Civil Penalties	3.50
Meet and Communicate with Plaintiff Emilio Castro Ortega Throughout the Pendency of the Case	9.00
Pleadings and Court Filings	
Research and Draft Plaintiff Ortega's Class Action Complaint with the Los Angeles County Superior Court (filed on February 3, 2025)(<i>Ortega v. RMP Supply Trim</i> , LASC Case No. 25STCV02983 hereinafter " <i>Ortega Action</i> .")	6.00
Review Initial Status Conference Order (filed February 25, 2025) (<i>Ortega Action</i>)	0.10
Draft Notice of Initial Status Conference (filed March 6, 2025) (<i>Ortega Action</i>)	0.20
Review Notice of Appearance for RMP Supply Trim (filed March 12, 2025) (<i>Ortega Action</i>)	0.10
Review Notice of Related Case (filed March 13, 2025) (<i>Ortega Action</i>)	0.20
Draft, Review, and Revise Joint Status Conference Statement (filed April 9, 2025) (<i>Ortega Action</i>)	0.50
Draft, Review, and Revise First Amended Class Action and PAGA Complaint (filed April 10, 2025) (<i>Ortega Action</i>)	2.00
Review Defendant's Answer to Plaintiff's First Amended Complaint and Research Affirmative Defenses (filed May 7, 2025) (<i>Ortega Action</i>)	1.00

Draft, Review, and Revise, Joint Stipulation Regarding Mediation and Discovery (filed September 23, 2025) (<i>Ortega</i> Action)	1.20
Draft, Review, and Revise Stipulation and Protective Order Confidential Designation Only (filed December 1, 2025) (<i>Ortega</i> Action)	0.40
Draft, Review, and Revise Joint Post Mediation Status Conference Statement (filed February 13, 2026) (<i>Ortega</i> Action)	0.20
Draft, Review, and Revise Joint Stipulation Granting Plaintiff Leave to File a First Amended Complaint (filed March 6, 2026)(<i>Rios</i> Action)	0.50
Draft Request for Dismissal without Prejudice, Declaration of D. Luke Clapp in Support of Request for Dismissal (filed March 25, 2026) (<i>Ortega</i> Action)	0.40
Draft Review, and Revise First Amended Class Action Complaint (filed March 12, 2026)(<i>Rios</i> Action)	2.20
Appearances	
Prepare for and Attend Initial Status Conference (April 17, 2025) (<i>Ortega</i> Action)	1.00
Prepare for and Attend Post Mediation Status Conference (February 23, 2026) (<i>Ortega</i> Action)	0.80
Prepare for and Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (May 20, 2026)(<i>Rios</i> Action)	0.80
Discovery and Deposition	
Draft, Review, Revise Plaintiff's Demand for Initial Disclosures, Special Interrogatories, Form Interrogatories, Requests for Production of Documents, Notice of Deposition of Defendant's Person Most Qualified, and proposed Belaire West Notice (served April 23, 2025) (<i>Ortega</i> Action)	6.00

Draft, Review, and Revise Plaintiff's Responses to Initial Disclosures and Prepare Plaintiff's Document Production (served June 23, 2025) (<i>Ortega</i> Action)	1.50
Letters and Correspondence	
Research and Draft, Review, and Revise, PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Ortega for Penalties Under California Labor Code section 2698, et seq. (served on January 31, 2025) (<i>Ortega</i> Action)	2.50
Draft Correspondence to and Upload Correspondence with California Labor and Workforce Development Agency Re: Plaintiff's Claims for Penalties Under California Labor Code section 2698; Payment of Filing Fees; Proposed Settlement; and Additional Communications	0.70
Preparation for and Discussions with Defendant's Counsel, Draft Correspondence to Defendant's Counsel, and Review and Respond to Correspondence from Defendant's Counsel	16.50
Draft Correspondence to and Review and Respond to Correspondence from Third Party Settlement Administrators Regarding Settlement Administration Quotes, Individual Settlement Payment Calculations, and Settlement Administration. Review Weekly Reports Regarding Settlement Administration. Correspondence with Settlement Administrator regarding Opt-Outs, Objection, Retailed Notices, Declarations.	2.20
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Produced by Defendant in advance of December 10, 2025, Mediation with Hon. Brian Walsh (Ret.) including amongst other relevant documents, employee handbooks, wage statements and corresponding time and payroll records	10.00
Research Settlement-Related Issues and Merits of Claims, Draft, Review, and Revise Mediation Brief and Damages Analysis.	4.50
Prepare for and Attend Pre-Mediation Conference with Mediator the Hon. Brian Walsh (Ret.) (December 8, 2025)	0.80

Prepare for and Attend Mediation via Zoom with Hon Brian Walsh Ret. and Additional Post-Mediation Communications (August 27, 2025)	9.50
Draft, Review, and Revise Memorandum of Understanding (fully executed on December 12, 2025)	2.00
Draft, Review, Negotiate, and Revise Joint Stipulation of Class Action and PAGA Settlement and Proposed Class Notice (fully executed February 24, 2026)	7.00
Law and Motion	
Draft, Review and Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval; Declaration of Heather Davis in Support of Motion for Preliminary Approval; Declaration of Plaintiff Ortega in Support of Motion for Preliminary Approval, Proposed Order Granting Motion for Preliminary Approval; Review Declaration of Ken Seligson in Support of Motion for Preliminary Approval, Declaration of Jean-Claude Lapuyade in Support of Motion for Preliminary Approval. Declaration of Shani O Zakay in Support of Motion for Preliminary Approval; Declaration of Plaintiff Rios in Support of Motion for Preliminary Approval (filed April 24, 2026)(<i>Rios</i> Action)	22.00
Review Court's Signed Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed May 20, 2026))(<i>Rios</i> Action)	0.10
Draft Notice of Entry of Order Granting Motion for Preliminary Approval (filed May 26, 2026) (<i>Rios</i> Action)	0.20
Review and Revise Motion for Final Approval of Class Action and PAGA Settlement, [Proposed] Final Approval Order and [Proposed] Judgment; Draft Declaration of Heather Davis in Support of Motion for Final Approval and Exhibits in Support Thereof (filed August 18, 2026) (Anticipated)(<i>Rios</i> Action)	5.50
Total Hours:	141.60

Exhibit 2

***Ortega v. RMP Supply Trim, Inc.*--- Los Angeles County Superior Court Case No. 25STCV02983**

PROTECTION LAW GROUP LLP - EXPENSE REPORT

Date	Memo	Debit
January 2025-June 2026	PAGA Filings, Court Filings, Attorney Service Fees, and Remote Appearance Fees	\$ 2,240.34
May 2025-August 2026	Case Anywhere (LASC Complex Designated Electronic Service Provider)	\$ 1,072.87
March 2025	Case Name Search with Los Angeles Superior Court	\$ 1.00
June 2025	Mediation Fees and Expenses	\$ 4,550.00
December 2025	Expert Fees - Berger Consulting Group, LLP	\$ 3,013.88
TOTAL COSTS		\$ 10,878.09