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12 Attorneys for Plaintiff ANTHONY WARD,
13 on behalf of himself and current and former aggrieved employees

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF ORANGE – CIVIL COMPLEX**

16 STATE OF CALIFORNIA ex rel. ANTHONY
17 WARD, as Private Attorney General

18 Plaintiff,

19 vs.

20 CAMDEN DEVELOPMENT, INC.; and DOES
21 1 to 100, inclusive,

22 Defendants.

CASE NO.: 30-2024-01445449-CU-OE-CXC

PAGA ACTION

HON. MELISSA R. MCCORMICK, Dept
CX105

**SUPPLEMENTAL DECLARATION OF
PAOLO POLICASTRO IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL
OF PRIVATE ATTORNEYS GENERAL
ACT SETTLEMENT**

*[Filed concurrently with the Supplemental
Declarations in Support of Plaintiff's Motion
for Approval of Private Attorneys General Act
Settlement; and the Revised [Proposed] Order]*

Hearing Information:

Date: April 2, 2026

Time: 02:00 p.m.

Dept.: CX105

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1 Revised Proposed Order is the Amendment No.1 to the Settlement Agreement, with the redline
2 copy of the revised PAGA Settlement Agreement attached as **Exhibit A** thereto, addressing the
3 following requested corrections:

- 4 a. The “Released Claims” provision in paragraph 1.23 of the Settlement Agreement has
5 been revised to remove the phrase “rights, demands, liabilities, and causes of action”
6 and replaced with “for civil penalties.” The first sentence of the same provision has
7 also been revised to remove all text after “California Industrial Welfare
8 Commission.” The second sentence in the same provision has been removed;
- 9 b. The “Release By Plaintiff, The State Of California, And The Aggrieved Employees”
10 provision in paragraph 5.1 of the Settlement Agreement has been revised to remove
11 all references to “The State of California.” This provision has also been revised to
12 remove the phrase “on behalf of himself.” Further, this provision has been revised to
13 reflect that the release of claims shall only be effective until Defendant has fully
14 funded the settlement;
- 15 c. The “Injunction From Pursuing Released Claims” provision in paragraph 5.2 of the
16 Settlement Agreement has been revised to remove the phrase “The State of
17 California.”;
- 18 d. The “Releasees” provision in paragraph 1.24 of the Settlement Agreement has been
19 revised to remove “related entities, and affiliates,” “trust managers,” “human
20 resources representatives,” and “agents, principals, heirs, representative, accountants,
21 auditors, consultants, insurers and reinsurers, and attorneys of the entities listed in
22 this paragraph.”;

23 6. Filed concurrently with this Declaration is a true and correct copy of the Declaration
24 of Michael Moore on Behalf of Phoenix Class Action Administration in Support of Preliminary
25 PAGA Approval (“Declaration of Michael Moore”), addressing the proposed settlement
26 administrator qualifications and experience, including evidence that Phoenix has procedures in
27 place to protect the security of the Class Data, errors and omissions insurance, as well as separate

1 data breach insurance policy. Attached as **Exhibit B** to the Declaration of Michael Moore is the true
2 and correct copy of Phoenix costs.

3 7. Section 4.4 of the Settlement (Settlement Administration Cost) Agreement provides
4 a buffer in case the Administrator incurs additional unexpected costs. The difference between
5 \$5,800, the cost allocated to the Settlement Administrator, and the actual cost of \$4,573.20
6 estimated by the Administrator (See **Exhibit B** to the Declaration of Michael Moore), will revert to
7 the PAGA Payment according to Section 4.4 of the Settlement Agreement.

8 8. As stated in the previously filed Motion for Private Attorneys General Act
9 Settlement Approval, Counsel for Plaintiff will likely have billables in this case exceeding
10 \$73,700.00, which greatly exceeds the amount the Parties originally requested and agreed to in the
11 Settlement Agreement (\$26,666.67, which is 33.33% of the gross settlement). Counsel for Plaintiff
12 has expended a great number of hours on this case, all on contingency with the additional risk of
13 potentially receiving nothing. Plaintiff's Counsel are only requesting a reasonable amount of fees
14 here, fees that have been agreed to by all parties involved. The previously stated contingency factor,
15 preclusion factor involved, and hours expended on this matter justify the very reasonable amount
16 requested here, and Counsel for Plaintiff argues that those should be considered unique
17 circumstances here. Counsel for Plaintiff will, however, respectfully defer to the judgment of the
18 Court on this issue, noting that they do not find these circumstances to be unique, and appreciate the
19 opportunity to have been heard on this issue.

20 9. Attached as **Exhibit "1"** to this Declaration is a true and correct copy of Plaintiff's
21 contemporaneous time records and billing statements documenting the work performed and time
22 spent for each task performed. The analysis revealed an increase in the number of hours compared
23 to the estimated number of hours included in the motion.

24 10. Attached as **Exhibit "2"** hereto are the updated costs of Lavi & Ebrahimian, LLP
25 incurred in this matter, where the following revisions have been made:

26 a. The mailing costs have been removed;

- 1 b. After review, it appears that the January 16, 2024, entry for PAGA Complex
2 Filing Fee was incurred on January 16, 2025. Therefore, the reference to January
3 16, 2024, has been corrected to January 16, 2025;
- 4 c. The “Caseanywhere/Cloudbase System Access Fee” has been removed;
- 5 d. The additional costs incurred on August 26, 2025, re: Court Filing of the
6 Plaintiff’s Notice of Motion and Motion for Approval of Private Attorneys
7 General Act Settlement and related documents have been added.

8 **AS TO THE NOTICE LETTER:**

9 11. Attached as **Exhibit “3”** to the concurrently filed Revised Proposed Order is a true
10 and correct copy of the revised Notice of PAGA Settlement and Release (the “Notice Letter”), and
11 attached as **Exhibit A** hereto is a true and correct copy of the redline version of the Notice Letter
12 addressing the following requested corrections:

- 13 a. The last sentence of the first paragraph on page 1, which reads “Because this is a
14 settlement between the State of California and Defendant” has been removed;
- 15 b. The second sentence of the third paragraph on page 1, which reads ”Governor
16 Newsom signed PAGA reform legislation on July 1, 2024, that made some important
17 changes to PAGA, and which applied to this case” has been removed;
- 18 c. Everything after “wrongdoing” in the first sentence of the fourth paragraph on page 1
19 has been removed, and the fourth paragraph now reads only: “Although the Parties
20 have negotiated a settlement to resolve the Action, Defendant denies any liability or
21 wrongdoing. The settlement is not an admission of liability by Defendant.”;
- 22 d. The fifth paragraph on page 1 now includes the specific amounts for deductions from
23 the Gross Settlement Amount;
- 24 e. The first full paragraph on page 2 has been revised to remove the two references to
25 “the State of California” and the phrase "on behalf of himself”;
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- 1 f. The second and third paragraphs on page 2 have been revised consistently with the
2 revisions of Section 5.1 of the Settlement as described above. The last sentence of
3 the second paragraph on page 2 has been removed;
- 4 g. The first full sentence on page 2 now includes when the aggrieved employees'
5 release is effective in accordance with the edits to the Settlement stated above;
- 6 h. The fifth paragraph on page 2 now states that aggrieved employees may contact
7 Plaintiff's counsel with any questions about the case and the settlement, and also
8 includes Plaintiff's Counsel name(s) and contact information;
- 9 i. Attached as **Exhibit B** to the revised Notice Letter is a true and correct copy of the
10 Certified Spanish translation version of the Notice Letter.

11 **AS TO THE REVISED PROPOSED ORDER AND JUDGMENT:**

12 12. Filed concurrently with this Declaration is the Revised Proposed Order and
13 Judgment, where the following corrections have been made:

- 14 a. Counsel information has been removed from the caption page;
- 15 b. The first paragraph now states that attached to the Revised Proposed Order as
16 Exhibit "1" is the Amendment n.1 to the Settlement Agreement, attached thereto as
17 Exhibit "2" is the Settlement Agreement, and the revised Notice Letter is attached
18 thereto as Exhibit "3";
- 19 c. Paragraph 2 now states the Gross Settlement Amount of Eighty Thousand Dollars
20 and Zero Cents (\$80,000.00);
- 21 d. The Proposed Order and Judgment now provides on page 4 that "A copy of the
22 Notice of Entry of Judgment shall be posted on the settlement website hosted by the
23 Settlement Administrator, as indicated in the Notice to the Aggrieved Employees";
- 24 e. The Proposed Order and Judgment now provides on page 4 that "The Settlement
25 Administrator shall administer the settlement in accordance with the Settlement
26 Agreement";
- 27 f. Paragraph 16 now includes a reference to California Code of Civil Procedure §664.6;

1 g. The last paragraph of the Proposed Order now provides as follows: “A Final
2 Accounting Hearing shall be set for February 4, 2027 (or the next available date to
3 be selected by the Court). Plaintiff’s Counsel shall submit a final administrator’s
4 report at least nine court days before the hearing, addressing the status of the
5 settlement administration, including the actual amounts paid to the Aggrieved
6 Employees and the other amounts distributed under the Settlement Agreement,
7 including any uncashed checks”.

8 **EXHIBITS:**

9 13. Attached as **EXHIBIT 1** to this Declaration is a true and correct copy of Plaintiff’s
10 contemporaneous time records and billing statements.

11 14. Attached as **EXHIBIT 2** to this declaration is a true and correct copy of the updated
12 costs of Lavi & Ebrahimian, LLP, incurred during this matter.

13 15. On March 20, 2026, a copy of the Revised Settlement was submitted via online
14 submission to the LWDA. A true and correct copy of the LWDA’s email confirmation of the upload
15 of the Settlement is hereto attached as **EXHIBIT 3.**

16 16. Plaintiff’s Counsel endeavored to file this on or before the Court’s deadline of March
17 19, 2026, and apologizes for the delay and any inconvenience caused by the delay.

18 17. Plaintiff’s Counsel’s offices experienced an electrical blackout on March 19, 2026.
19 The blackout delayed counsel’s filing of this declaration and related supporting documentation.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing is
21 true and correct. Executed this on the 19th day of March, at Beverly Hills, California.

22
23 /s/Paolo PolICASTRO

24 Paolo PolICASTRO

EXHIBIT 1

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLE SUMMARY**

Attorney Name	Sum of HOURS	Sum of Billed	
Alex Aroeste	9.5	\$	6,412.50
Joseph Lavi	21.6	\$	21,600.00
Malcolm Clayton	9.4	\$	6,345.00
Paolo PolICASTRO	31.5	\$	21,262.50
Vincent Granberry	10.1	\$	7,575.00
(blank)		\$	-
Jincy Varughese	46.4	\$	31,320.00
Jordan Bello	1	\$	750.00
Grand Total	129.5	\$	95,265.00

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
8/13/2024	Jincy Varughese	Correspondence. Personnel File Request (10 pgs.) [Class]	0.4	\$ 675.00	\$ 270.00
9/24/2024	Jincy Varughese	Client's Intake and Additional Documents (36 pgs.) [Class]	1.8	\$ 675.00	\$ 1,215.00
9/24/2024	Jincy Varughese	Client's Personnel File (60 pgs.) [Class]	2.5	\$ 675.00	\$ 1,687.50
9/30/2024	Alex Aroeste	Summons (1 pgs.) [Class]	0.3	\$ 675.00	\$ 202.50
9/30/2024	Alex Aroeste	Civil Case Cover Sheet (2 pgs.) [Class]	0.3	\$ 675.00	\$ 202.50
9/30/2024	Jincy Varughese	Draft. Class Complaint (50 pgs.) [Class]	5.5	\$ 675.00	\$ 3,712.50
10/1/2024	Jincy Varughese	Second Draft. Class Complaint (23 pgs.) [Class]	3.5	\$ 675.00	\$ 2,362.50
10/2/2024	Alex Aroeste	Final. Civil Case Cover Sheet (2 pgs.) [Class]	0.2	\$ 675.00	\$ 135.00
10/2/2024	Alex Aroeste	Filed. Civil Case Cover Sheet Sheet (2 pgs.) [Class]	0.1	\$ 675.00	\$ 67.50
10/2/2024	Alex Aroeste	Filed. Summons (1 pgs.) [Class]	0.1	\$ 675.00	\$ 67.50
10/2/2024	Alex Aroeste	Filed. Class Complaint (33 pgs.) [Class]	0.2	\$ 675.00	\$ 135.00
10/2/2024	Jincy Varughese	Final. Class Complaint (33 pgs.) [Class]	2.5	\$ 675.00	\$ 1,687.50
10/8/2024	Joseph Lavi	Orange County Alternative Dispute Resolution (5 pgs.) [Class]	0.6	\$ 1,000.00	\$ 600.00
10/16/2024	Joseph Lavi	External Communication: Discussing regarding Arbitration Agreement	1.2	\$ 1,000.00	\$ 1,200.00
10/16/2024	Joseph Lavi	Arbitration Agreement (4 pgs.) [Class]	1	\$ 1,000.00	\$ 1,000.00
10/17/2024	Alex Aroeste	Proof of Service of Summons and Complaint (2 pgs.) [Class]	0.3	\$ 675.00	\$ 202.50
10/17/2024	Alex Aroeste	Filed. Proof of Service of Summons and Complaint (2 pgs.) [Class]	0.2	\$ 675.00	\$ 135.00
10/18/2024	Alex Aroeste	Draft. Proposed Belaire West Notice (3 pgs.) [Class]	0.9	\$ 675.00	\$ 607.50

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
10/18/2024	Jincy Varughese	External Communication: E-mail from Client regarding Arbitration	0.5	\$ 675.00	\$ 337.50
10/18/2024	Jincy Varughese	Draft. Stipulated Protective Order (15 pgs.) [Class]	1.2	\$ 675.00	\$ 810.00
10/18/2024	Jincy Varughese	Draft. Plaintiff's Special Interrogatories to Defendant, Set One (23 pgs.)	1.8	\$ 675.00	\$ 1,215.00
10/18/2024	Jincy Varughese	Draft. Plaintiff's Request for Production of Documents to Defendant, Set	1.8	\$ 675.00	\$ 1,215.00
10/24/2024	Jincy Varughese	Minute Order Dated 10/24/2024 (3 pgs.) [Class]	0.1	\$ 675.00	\$ 67.50
10/27/2024	Jincy Varughese	Client's Personnel File. Second Version. (16 pgs.) [Class]	0.8	\$ 675.00	\$ 540.00
10/28/2024	Jincy Varughese	Review. Client's Personnel File (Pgs. 76) [PAGA]	1.8	\$ 675.00	\$ 1,215.00
10/28/2024	Vincent Granberry	Review. Arbitration Agreement Evaluation (Pgs. 1) [PAGA]	1.2	\$ 750.00	\$ 900.00
10/28/2024	Jordan Bello	Review. Arbitration Agreement Evaluation Notes	1	\$ 750.00	\$ 750.00
10/30/2024	Jincy Varughese	Draft. Proposed Order Regarding Dismissal of Plaintiff's Class Action	1.5	\$ 675.00	\$ 1,012.50
10/30/2024	Jincy Varughese	Draft. Joint Stipulation to Dismiss Class Action Complaint (4 pgs.) [Class]	1.5	\$ 675.00	\$ 1,012.50
10/30/2024	Jincy Varughese	Second Draft. Proposed Order Regarding Dismissal of Plaintiff's Class	0.6	\$ 675.00	\$ 405.00
10/30/2024	Jincy Varughese	Second Draft. Joint Stipulation to Dismiss Class Action Complaint (4 pgs.)	0.5	\$ 675.00	\$ 337.50
10/31/2024	Jincy Varughese	Third Draft. Proposed Order Regarding Dismissal of Plaintiff's Class	0.3	\$ 675.00	\$ 202.50

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
10/31/2024	Jincy Varughese	Third Draft. Joint Stipulation to Dismiss Class Action Complaint (4 pgs.)	0.3	\$ 675.00	\$ 202.50
11/1/2024	Jincy Varughese	Fourth Draft. Proposed Order Regarding Dismissal of Plaintiff's Class	0.4	\$ 675.00	\$ 270.00
11/1/2024	Jincy Varughese	Fourth Draft. Joint Stipulation to Dismiss Class Action Complaint (4 pgs.)	0.4	\$ 675.00	\$ 270.00
11/4/2024	Jincy Varughese	Fifth Draft. Proposed Order Regarding Dismissal of Plaintiff's Class	0.4	\$ 675.00	\$ 270.00
11/4/2024	Jincy Varughese	Fifth Draft. Joint Stipulation to Dismiss Class Action Complaint (4 pgs.)	0.2	\$ 675.00	\$ 135.00
11/4/2024	Vincent Granberry	Draft. Proposed Order Granting Dismissal of Plaintiff's Class	1.2	\$ 750.00	\$ 900.00
11/5/2024	Jincy Varughese	Sixth Draft. Joint Stipulation to Dismiss Class Action Complaint (4 pgs.)	0.2	\$ 675.00	\$ 135.00
11/5/2024	Jincy Varughese	Sixth Draft. Proposed Order Regarding Dismissal of Plaintiff's Class	0.3	\$ 675.00	\$ 202.50
11/5/2024	Jincy Varughese	Seventh Draft. Proposed Order Regarding Dismissal of Plaintiff's Class	0.1	\$ 675.00	\$ 67.50
11/5/2024	Jincy Varughese	Eighth Draft. Joint Stipulation to Dismiss Class Action Complaint (4 pgs.)	0.1	\$ 675.00	\$ 67.50
11/5/2024	Jincy Varughese	Ninth Draft. Joint Stipulation to Dismiss Class Action Complaint (4 pgs.)	0.3	\$ 675.00	\$ 202.50
11/5/2024	Jincy Varughese	Tenth Draft. Joint Stipulation to Dismiss Class Action Complaint (4 pgs.)	0.2	\$ 675.00	\$ 135.00

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
11/7/2024	Alex Aroeste	External Communication: Clerk Advising about Joint Stipulation [Class]	0.6	\$ 675.00	\$ 405.00
11/13/2024	Alex Aroeste	Filed. Order Granting Dismissal of Plaintiff's Class Action Complaint	0.2	\$ 675.00	\$ 135.00
11/19/2024	Jincy Varughese	Eighth Draft. Proposed Order Regarding Dismissal of Plaintiff's Class	0.6	\$ 675.00	\$ 405.00
11/25/2024	Alex Aroeste	Request for Dismissal Form (2 pgs.) [Class]	0.6	\$ 675.00	\$ 405.00
12/3/2024	Alex Aroeste	Request for Dismissal Form (2 pgs.) [Class]	0.1	\$ 675.00	\$ 67.50
12/3/2024	Alex Aroeste	Filed. Order Granting Dismissal of Plaintiff's Class Action Complaint	0.2	\$ 675.00	\$ 135.00
12/3/2024	Alex Aroeste	Signed. Request for Dismissal Form (2 pgs.) [Class]	0.2	\$ 675.00	\$ 135.00
12/3/2024	Alex Aroeste	Filed. Request for Dismissal Form (3 pgs.) [Class]	0.2	\$ 675.00	\$ 135.00
12/4/2024	Alex Aroeste	Draft. Summons. (Pgs. 1) [PAGA]	0.3	\$ 675.00	\$ 202.50
12/4/2024	Alex Aroeste	Draft. Civil Case Cover Sheet (Pgs.2) [PAGA]	0.3	\$ 675.00	\$ 202.50
12/4/2024	Jincy Varughese	Draft. PAGA Complaint (Pgs.7) [PAGA]	4.5	\$ 675.00	\$ 3,037.50
12/10/2024	Alex Aroeste	Second Draft. Civil Case Cover Sheet (Pgs.2) [PAGA]	0.2	\$ 675.00	\$ 135.00
12/10/2024	Alex Aroeste	Second Draft. Summons (Pgs. 1) [PAGA]	0.2	\$ 675.00	\$ 135.00
12/17/2024	Alex Aroeste	Filed. Summons (Pgs.1) [PAGA]	0.1	\$ 675.00	\$ 67.50
12/17/2024	Alex Aroeste	Filed. Civil Case Cover Sheet (Pgs.2) [PAGA]	0.1	\$ 675.00	\$ 67.50
12/17/2024	Alex Aroeste	Filed. PAGA Complaint (Pgs.18) [PAGA]	0.3	\$ 675.00	\$ 202.50
12/17/2024	Alex Aroeste	First Draft. Notice and Acknowledgment of Receipt- Civil for Defendant Camden Development (Pgs.1) [PAGA]	0.3	\$ 675.00	\$ 202.50

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
12/17/2024	Alex Aroeste	Final Draft. Notice and Acknowledgment of Receipt- Civil for Defendant Camden Development (Pgs.1) [PAGA]	0.3	\$ 675.00	\$ 202.50
12/17/2024	Jincy Varughese	Draft. Plaintiff's Peremptory Challenge to Judge Pursuant to Code of Civil Procedure § 170.6; Declaration of Jincy Varughese (Pgs. 3) [PAGA]	0.8	\$ 675.00	\$ 540.00
12/17/2024	Jincy Varughese	Fully Executed. Plaintiff's Peremptory Challenge to Judge Pursuant to Code of Civil Procedure § 170.6; Declaration of Jincy Varughese (Pgs. 3) [PAGA]	0.5	\$ 675.00	\$ 337.50
1/6/2025	Alex Aroeste	Fully Executed. Notice and Acknowledgment of Receipt- Civil for Defendant Camden Development (Pgs.21) [PAGA]	0.3	\$ 675.00	\$ 202.50
1/6/2025	Alex Aroeste	Correspondence. Notice and Acknowledgment of Receipt- Civil for Defendant Camden Development (Pgs.3) [PAGA]	0.2	\$ 675.00	\$ 135.00
1/6/2025	Vincent Granberry	Review. First Amended Class Action	1.5	\$ 750.00	\$ 1,125.00
1/9/2025	Alex Aroeste	Filed. Notice and Acknowledgment of Receipt- Civil for Defendant	0.2	\$ 675.00	\$ 135.00
1/16/2025	Alex Aroeste	Filed. Request for Dismissal (3 pgs.) [Class]	0.2	\$ 675.00	\$ 135.00
1/16/2025	Alex Aroeste	First Draft. Plaintiff's Notice of Minute Order (Pgs. 3) [PAGA]	0.8	\$ 675.00	\$ 540.00

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
1/16/2025	Jincy Varughese	Second Draft. Plaintiff's Notice of Minute Order (Pgs. 3) [PAGA]	0.5	\$ 675.00	\$ 337.50
1/16/2025	Jincy Varughese	Fully Executed. Plaintiff's Notice of Minute Order (Pgs. 7) [PAGA]	0.5	\$ 675.00	\$ 337.50
1/20/2025	Alex Aroeste	Filed. Plaintiff's Notice of Minute Order (Pgs. 7) [PAGA]	0.2	\$ 675.00	\$ 135.00
2/4/2025	Jincy Varughese	Draft. Joint Prosecution Agreement (5 pgs.) [Class]	1.2	\$ 675.00	\$ 810.00
2/5/2025	Jincy Varughese	First Draft. Joint Prosecution and Fee-Sharing Agreement (Pgs. 5) [PAGA]	0.8	\$ 675.00	\$ 540.00
2/10/2025	Jincy Varughese	Second Draft. Joint Prosecution and Fee-Sharing Agreement (Pgs. 5) [PAGA]	0.6	\$ 675.00	\$ 405.00
2/11/2025	Vincent Granberry	Third Draft. Joint Prosecution and Fee-Sharing Agreement (Pgs. 5) [PAGA]	0.4	\$ 750.00	\$ 300.00
2/11/2025	Vincent Granberry	Review. Mediation Disclosures (Pgs. 4) [PAGA]	1	\$ 750.00	\$ 750.00
2/12/2025	Jincy Varughese	Final Draft. Joint Prosecution and Fee-Sharing Agreement (Pgs. 5) [PAGA]	0.5	\$ 675.00	\$ 337.50
2/12/2025	Jincy Varughese	Fully Executed. Joint Prosecution and Fee-Sharing Agreement (Pgs. 5) [PAGA]	0.6	\$ 675.00	\$ 405.00
2/18/2025	Jincy Varughese	Review. Defendant Camden Development, Inc.'s Answer to Plaintiff's Complaint for Civil Penalties Pursuant to The Private Attorneys General Act Of 2004 ("PAGA") (Pgs. 18) [PAGA]	1.2	\$ 675.00	\$ 810.00

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
2/28/2025	Jincy Varughese	Review. Defendant's Notice of Related Case (Pgs. 4) [PAGA]	0.8	\$ 675.00	\$ 540.00
3/26/2025	Jincy Varughese	Draft. Joint Initial Case Management Conference Statement (Pgs. 8) [PAGA]	1.2	\$ 675.00	\$ 810.00
4/7/2025	Joseph Lavi	Review. Client's Arbitration Agreement (Pgs. 4) [PAGA]	2	\$ 1,000.00	\$ 2,000.00
4/7/2025	Joseph Lavi	Review. Damages Analysis. (Pgs.3) [PAGA]	1.8	\$ 1,000.00	\$ 1,800.00
4/7/2025	Joseph Lavi	Review. Mediation Analysis (Pgs.1) [PAGA]	1.2	\$ 1,000.00	\$ 1,200.00
4/16/2025	Vincent Granberry	Review. Defendant's Mediation Brief (Pgs. 49) [PAGA]	1.5	\$ 750.00	\$ 1,125.00
4/16/2025	Vincent Granberry	Review. Defendant's Mediation Brief (Pgs. 49) [Class]	1.5	\$ 750.00	\$ 1,125.00
4/22/2025	Joseph Lavi	Mediation Preparation	4	\$ 1,000.00	\$ 4,000.00
4/23/2025	Joseph Lavi	Full day Mediation	8	\$ 1,000.00	\$ 8,000.00
4/23/2025	Paolo Policastro	First Draft. Memorandum of Understanding (Pgs. 5) [Class]	1.5	\$ 675.00	\$ 1,012.50
4/24/2025	Malcolm Clayton	Fourth Draft. Memorandum of Understanding (Pgs. 5) [Class]	0.8	\$ 675.00	\$ 540.00
4/24/2025	Paolo Policastro	Second Draft. Memorandum of Understanding (Pgs. 5) [Class]	1	\$ 675.00	\$ 675.00
4/24/2025	Paolo Policastro	Third Draft. Memorandum of Understanding (Pgs. 5) [Class]	0.6	\$ 675.00	\$ 405.00
4/25/2025	Paolo Policastro	First Draft. Memorandum of Understanding (Pgs. 6) [PAGA]	1.2	\$ 675.00	\$ 810.00
5/2/2025	Malcolm Clayton	Third Draft. Memorandum of Understanding (Pgs. 6) [PAGA]	0.8	\$ 675.00	\$ 540.00

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
5/2/2025	Paolo Policastro	Second Draft. Memorandum of Understanding (Pgs. 6) [PAGA]	0.8	\$ 675.00	\$ 540.00
5/9/2025	Malcolm Clayton	Final Draft. Memorandum of Understanding (Pgs. 6) [PAGA]	0.8	\$ 675.00	\$ 540.00
5/23/2025	Malcolm Clayton	Review. ILYM Settlement Administrators Summary Fees and Expenses (Pgs. 3) [PAGA]	1	\$ 675.00	\$ 675.00
5/23/2025	Paolo Policastro	Fully Executed. Memorandum of Understanding (Pgs. 6) [PAGA]	1	\$ 675.00	\$ 675.00
5/23/2025	Paolo Policastro	Review. Simpluris Settlement Administrators Estimate Cost (Pgs. 5) [PAGA]	0.6	\$ 675.00	\$ 405.00
6/2/2025	Paolo Policastro	Review. CPT Settlement Administrators Project Assumptions and Administrative Cost (Pgs. 5) [PAGA]	0.4	\$ 675.00	\$ 270.00
6/5/2025	Paolo Policastro	Internal Communication: Attorney communication with Assistant regarding Mediation Disclosures [Class]	0.6	\$ 675.00	\$ 405.00
6/13/2025	Malcolm Clayton	Review. Phoenix Settlement Administrators Case Assumptions and Estimate Cost (Pgs. 4) [PAGA]	0.8	\$ 675.00	\$ 540.00
6/19/2025	Joseph Lavi	Review. Penalties Under the New PAGA (Pgs. 3) [PAGA]	1.8	\$ 1,000.00	\$ 1,800.00
6/26/2025	Paolo Policastro	First Draft. Client's Individual Settlement Agreement (Pgs. 6) [PAGA]	2	\$ 675.00	\$ 1,350.00

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
6/30/2025	Paolo Policastro	Second Draft. Client's Individual Settlement Agreement (Pgs. 6) [PAGA]	1	\$ 675.00	\$ 675.00
7/1/2025	Malcolm Clayton	Third Draft. Client's Individual Settlement Agreement (Pgs. 6) [PAGA]	1	\$ 675.00	\$ 675.00
7/7/2025	Paolo Policastro	First Draft. Joint Case Management Statement (Pgs. 4) [PAGA]	0.6	\$ 675.00	\$ 405.00
7/8/2025	Paolo Policastro	Second Draft. Joint Case Management Statement (Pgs. 4) [PAGA]	0.4	\$ 675.00	\$ 270.00
7/8/2025	Paolo Policastro	Fully Executed. Joint Case Management Statement (Pgs. 5) [PAGA]	0.2	\$ 675.00	\$ 135.00
7/11/2025	Paolo Policastro	Fourth Draft. Client's Individual Settlement Agreement (Pgs. 6) [PAGA]	1	\$ 675.00	\$ 675.00
7/11/2025	Paolo Policastro	Final Draft. Client's Individual Settlement Agreement (Pgs. 6) [PAGA]	0.8	\$ 675.00	\$ 540.00
7/11/2025	Paolo Policastro	Fully Executed. Client's Individual Settlement Agreement (Pgs. 6) [PAGA]	0.5	\$ 675.00	\$ 337.50
7/14/2025	Jincy Varughese	Review. Court Minute Order (Pgs. 2) [PAGA]	0.6	\$ 675.00	\$ 405.00
7/29/2025	Alex Aroeste	Review. Lavi & Ebrahimson, LLP W- 9 tax form (Pgs.1) [PAGA]	0.2	\$ 675.00	\$ 135.00
7/29/2025	Alex Aroeste	Review. Client's W-4 & W-9 tax form (Pgs. 2) [PAGA]	0.2	\$ 675.00	\$ 135.00
8/5/2025	Paolo Policastro	Draft. Plaintiff's Notice of Motion and Motion for Approval of Private Attorneys General Act Settlement (Pgs. 31) [PAGA]	5	\$ 675.00	\$ 3,375.00

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
8/26/2025	Malcolm Clayton	Final Draft. Plaintiff's Notice of Motion and Motion for Approval of Private Attorneys General Act Settlement (Pgs. 29) [PAGA]	1	\$ 675.00	\$ 675.00
8/26/2025	Paolo Policastro	Fully Executed. [Proposed] Order Granting Plaintiff's Motion for Approval of Private Attorneys General Act Settlement and Judgment Thereon (Pgs. 5) [PAGA]	1.5	\$ 675.00	\$ 1,012.50
8/26/2025	Paolo Policastro	Fully Executed. Plaintiff's Notice of Motion and Motion for Approval of Private Attorneys General Act Settlement (Pgs. 29) [PAGA]	0.5	\$ 675.00	\$ 337.50
8/26/2025	Paolo Policastro	Draft. Declaration Of Paolo Policastro in Support of Plaintiff's Motion for Approval of Private Attorneys General Act Settlement (Pgs. 31) [PAGA]	2.5	\$ 675.00	\$ 1,687.50
8/26/2025	Paolo Policastro	Fully Executed. Declaration Of Paolo Policastro in Support of Plaintiff's Motion for Approval of Private Attorneys General Act Settlement (Pgs. 139) [PAGA]	0.5	\$ 675.00	\$ 337.50
8/26/2025	Paolo Policastro	Fully Executed. Declaration Of Anthony Ward in Support of Approval of Private Attorneys General Act Settlement (Pgs.4) [PAGA]	2	\$ 675.00	\$ 1,350.00

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
8/26/2025	Paolo Policastro	Email. LWDA Submission of the Proposed Settlement Agreement (Pgs. 1) [PAGA]	0.6	\$ 675.00	\$ 405.00
9/5/2025	Vincent Granberry	Review. Court's Minute Order (Pgs. 1) [PAGA]	1	\$ 750.00	\$ 750.00
11/10/2025	Vincent Granberry	Review. Defendant's Statement of Non-Opposition to Plaintiff's Motion for Approval of Private Attorneys General Act Settlement (Pgs. 3) [PAGA]	0.6	\$ 750.00	\$ 450.00
11/10/2025	Vincent Granberry	Review. Defendant's Notice of Remote Appearance (Pgs. 4) [PAGA]	0.2	\$ 750.00	\$ 150.00
11/11/2025	Alex Aroeste	Fully Executed. Notice of Remote Appearance (Pgs. 4) [PAGA]	0.2	\$ 675.00	\$ 135.00
11/12/2025	Alex Aroeste	Filed. Notice of Remote Appearance (Pgs. 4) [PAGA]	0.2	\$ 675.00	\$ 135.00
11/13/2025	Malcolm Clayton	Review. Honorable Melissa R. McCormick's Tentative Ruling (Pgs. 30) [PAGA]	3	\$ 675.00	\$ 2,025.00
3/2/2026	Paolo Policastro	Draft. Revised PAGA Settlement Agreement (Pgs. 20) [PAGA]	1	\$ 675.00	\$ 675.00
3/3/2026	Paolo Policastro	Draft. Declaration Of Michael Moore of Behalf of Phoenix Class Action Settlement Administration in Support of Preliminary PAGA Approval (Pgs. 5) [PAGA]	0.4	\$ 675.00	\$ 270.00
3/4/2026	Malcolm Clayton	Final Draft. Amendment No. 1 To Representative Action Settlement Agreement and Release (Pgs. 4) [PAGA]	0.2	\$ 675.00	\$ 135.00

LAVI & EBRAHIMIAN, LLP**WARD v. CAMDEN****BILLABLES**

DATE	Name	DESCRIPTION	HOURS	Rate	Billed
3/4/2026	Paolo Policastro	First Draft. Revised [Proposed] Order Granting Plaintiff's Motion for Approval of Private Attorneys General Act Settlement and Judgment Thereon (Pgs. 5) [PAGA]	1	\$ 675.00	\$ 675.00
3/4/2026	Paolo Policastro	Second Draft. Revised [Proposed] Order Granting Plaintiff's Motion for Approval of Private Attorneys General Act Settlement and Judgment Thereon (Pgs. 5) [PAGA]	0.6	\$ 675.00	\$ 405.00
3/4/2026	Paolo Policastro	Review. Amendment No. 1 To Representative Action Settlement Agreement and Release (Pgs. 23) [PAGA]	0.8	\$ 675.00	\$ 540.00
3/4/2026	Paolo Policastro	Second Draft. Amendment No. 1 To Representative Action Settlement Agreement and Release (Pgs. 4) [PAGA]	0.4	\$ 675.00	\$ 270.00
3/9/2026	Paolo Policastro	Fully Executed. Amendment No. 1 To Representative Action Settlement Agreement and Release (Pgs. 4) [PAGA]	0.5	\$ 675.00	\$ 337.50

EXHIBIT 2

LAW OFFICES OF
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March 19, 2026

COSTS AND FEES ADVANCED BY LAVI & EBRAHIMIAN, LLP

DATE	ITEM	COST
	SETTLEMENT AMOUNT	\$
	ORANGE COUNTY SUPERIOR COURT	
10/02/2024	Class Action Summons and Complaint Filing Fee; Complex Fees	\$1,435.00
12/10/2024	PAGA Action Summons and Complaint Filing Fee	\$435.00
01/16/2025	PAGA Action Complex Filing Fee	\$1,000.00
08/26/2025	Court Filing of the Motion Filing Fee	\$60.00
	DEPARTMENT OF INDUSTRIAL RELATIONS	
10/02/2024	Private Attorney General Act Fee- Initial PAGA Notice	\$75.00
	DDS LEGAL SERVICES	
10/02/2024	Court Filing of the Class Summons and Complaint	\$75.25
10/08/2024	Process Service of the Class Summons and Complaint on Defendant Camden Development, Inc.	\$124.90
10/17/2024	Filing of the Proof of Service of Summons and Complaint for Defendant Camden Development, Inc.	\$32.20
12/03/2024	Filing of the Request for Dismissal for Class Action	\$32.20
12/10/2024	Filing of the PAGA Complaint and Summons	\$45.25
12/17/2024	Filing of the Plaintiff's Peremptory Challenge	\$32.20
12/18/2024	Resubmission of the Peremptory Challenge	\$32.20
01/07/2025	Filing of the Notice of Acknowledgement of Receipt- Civil	\$32.20
01/10/2025	Filing of the Plaintiff's Notice of Minute Order	\$64.40
01/16/2025	Filing of the Notice of Minute Order of Initial Case Management Conference and Filing of the Complex fees	\$62.20
07/08/2025	Court Filing of the Joint Case Management Statement	\$32.20
08/26/2025	Court Filing of the Plaintiff's Notice of Motion and Motion for Approval of Private Attorneys General Act Settlement with Courtesy Copies	\$113.95
	ONE LEGAL	
11/11/2025	Court Filing of the Notice of Appearance	\$19.82

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	Total Costs, fees and expenses	\$3,703.97

“EXHIBIT 3”