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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA**

MARK DUTILLIEUL, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

v.

METHODOLOGY, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendant.

Case No.: C22-00759

CLASS AND PAGA ACTION

*Assigned for All Purposes to the Honorable
Charles s. Treat, Department 12*

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Date: November 14, 2024
Time: 9:00 a.m.

DECLARATION OF VARTAN MADOYAN

I, Vartan Madoyan, 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 Mark Dutilleul (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On July 24, 2024 in Department 12 of the above-entitled Court, the Honorable Charles S. Treat preliminarily approved the Stipulation of Settlement of Class Action and PAGA Claims and Release of Claims (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and defendant Methodology, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff as the representative of the Class (“Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC, JCL Law Firm, APC, and Zakay Law Group, APLC as counsel for the Class (together, “Class Counsel”). The Court approved and ordered the mailing of the Court Approved Notice of Class Action Settlement (“Class Notice”), and adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Apex Class Action LLC (“Apex” or “Settlement Administrator”) to serve as Settlement Administrator for handling the notice and settlement administration process.

WORK PERFORMED BY CLASS COUNSEL

3. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating this matter since the inception of the above-captioned action (the “Action”), which was filed on April 19, 2022.

4. Lawyers *for* Justice, PC joined forces with JCL Law Firm, APC and Zakay Law Group, APLC, who were associated in as co-counsel in the Action in June 2022. Lawyers *for* Justice, PC fully and actively participated in the litigation of the Action, including and not

1 limited to, preparing the pleadings, case strategy, undertaking investigation, performing legal
2 research, engaging in formal and informal discovery, and conducting claims evaluation and
3 analysis. Class Counsel have worked cooperatively to strategize and prosecute the Action.
4 Ultimately, Class Counsel's efforts and Plaintiff's efforts have been successful in reaching the
5 Settlement.

6 5. Before initiating the Action, Lawyers *for* Justice, PC investigated and researched
7 the facts and circumstances underlying the pertinent factual and legal issues and applicable law.
8 This required thorough discussions and interviews between attorneys at our firm and Plaintiff,
9 and research into the various legal issues involved in the case, namely, the current state of the
10 law as it applied to certification, off-the-clock theory, meal and rest periods, reimbursement of
11 business-related expenses, wage-and-hour enforcement, Plaintiff's claims and allegations, and
12 potential defenses. After conducting initial investigation, Lawyers *for* Justice, PC determined
13 that the claims of Plaintiff were well-suited for class-wide adjudication owing to what appeared
14 to be a common course of conduct affecting a similarly situated group of current and former non-
15 exempt employees of Defendant in California, who were not properly compensated for, *inter*
16 *alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business
17 expenses.

18 6. Collectively, Class Counsel investigated the veracity, strength, and scope of the
19 claims and were preparing the Action for class certification and trial prior to reaching the
20 Settlement. Class Counsel conducted significant formal and informal discovery and
21 investigation into the facts of the case, exchanging a volume of information, documents, and data
22 in the course of litigation and mediation and settlement negotiations. Class Counsel reviewed
23 and analyzed a volume of information, documents, and data obtained from Plaintiff, Defendant,
24 and other sources. Class Counsel researched applicable law, developed liability and damages
25 valuation models in connection with mediation and settlement negotiations, and met and
26 conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the
27 pleadings, case management, formal and informal discovery, and production of various
28 information, documents, and data in the course of litigation and in connection with the mediation

1 and settlement negotiations. Class Counsel also met and conferred extensively with Defendant
2 regarding Defendant's financial condition and related documents. Other work performed by
3 Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing,
4 and revising pleadings, law and motion practice, and the mediation brief; preparing and
5 appearing for court proceedings; and preparing for and attending mediation and engaging in
6 extensive settlement negotiations, among other tasks.

7 7. As outlined herein, the parties have conducted significant formal and informal
8 discovery and investigation in the Action. Class Counsel analyzed a volume of information,
9 documents, and data obtained from Plaintiff, Defendant, or other sources. The information,
10 documents, and data provided a critical understanding of the nature of the work performed by the
11 Class Members and Aggrieved Employees, as well as Defendant's operations and employment
12 policies, practices, and procedures, and Defendant's financial condition and ability to pay a
13 settlement and/or judgment, and such documents information were used in analyzing liability,
14 damages, and valuation issues in connection with all phases of litigation, and ultimately with the
15 mediation and settlement negotiation process. Class Counsel also performed significant research
16 into the applicable law, which is evolving as it relates class certification, off-the-clock theory,
17 meal and rest periods, reimbursement of business-related expenses, representative PAGA claims,
18 wage-and-hour enforcement, Plaintiff's claims and allegations, and Defendant's defenses thereto,
19 as well as facts discovered. Accordingly, sufficient investigation and review of information have
20 taken place in order for the parties to be adequately informed of the nature and extent of the
21 claims, and to enable all parties to fully evaluate the Settlement for its fairness, adequacy, and
22 reasonableness.

23 8. After conducting significant investigation of the facts and law during the
24 prosecution of the case, the Parties engaged in extensive settlement negotiations to try to resolve
25 the Action. These efforts included participating in a formal, full-day private mediations
26 conducted by Judge Mitchel R. Goldberg (Ret.). During all settlement discussions, the parties
27 conducted their negotiations at arm's length in an adversarial position. Mediation was not
28 successful, but following further informal discovery, negotiations, and meet and confer

discussions regarding Defendant's financial condition, and with the continued assistance of the mediator, the parties ultimately agreed to a settlement that is now memorialized in the Parties' Settlement Agreement.

9. Plaintiff moves for an award of attorneys' fees to Class Counsel in the amount of \$66,666.66 which is one-third (1/3rd) of the Gross Settlement Amount of \$200,000. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least one-third (1/3rd) of the recovery.

10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing and/or pursuing the Action; (2) the time, effort, and expense that Class Counsel dedicated to the Action; (3) the skill and determination that Class Counsel have shown; (4) the substantial results that Class Counsel have achieved throughout the litigation of the Action; (5) the value of the settlement that Class Counsel have achieved; and (6) the other cases that Class Counsel have turned down in order to devote their time and efforts to the Action.

11. While not necessarily required to be demonstrated because the percentage fee from the common fund is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the Action such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **42.00 hours** performing tasks and obtaining recovery in the Action. Attached hereto as **"EXHIBIT A"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by Lawyers for Justice, PC, and the time incurred in performing those services. The hours attributable to Lawyers for Justice, PC include work done by several other attorneys at the firm and myself. Additionally, separate from the hours of work referenced herein and in the attached chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this Action, in litigating complex wage-and-hour cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate

of at least \$800 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys’ fees, compensating the firm at the rate of at least \$800 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and/or representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys’ fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys’ fees involved compensation at the rate of \$919.57 per hour; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys’ fees involved compensation at the rate of \$855.96 per hour; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys’ fees involved compensation at the rate of \$831.38 per hour; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys’ fees involved compensation at the rate of \$845.64 per hour.

EXPERIENCE AND ADEQUACY OF

LAWYERS *for* JUSTICE, PC

13. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is attorney of record in dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly every aspect of

1 California wage and hour law, including payment of overtime and minimum wages, provision of
2 meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of
3 compliant wage statements, reimbursement of business expenses, executive, administrative, and
4 other overtime exemptions to the State of California and federal overtime compensation
5 requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has
6 recovered (sometimes in association with other law firms) millions of dollars on behalf of
7 thousands of individuals in California.

8 14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice,
9 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
10 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
11 extensive formal training in dispute resolution and negotiation from the Straus Institute for
12 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
13 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
14 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
15 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
16 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
17 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
18 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
19 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
20 Appellate District. In December of 2004, he obtained a license to practice law from the
21 California State Bar. Since in or around October of 2008, through his work at Lawyers *for*
22 Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment
23 class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
24 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
25 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.
26 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
27 has successfully litigated cases involving the executive, administrative, and other overtime
28 exemptions to the State of California and federal overtime compensation requirements. Under

1 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
2 contested motion practice in approximately fifteen (15) cases in the last decade and litigated over
3 1,000 class action or representative action cases.

4 15. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
5 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
6 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
7 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
8 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
9 From approximately August 2008 to approximately December 2008, he served as a Judicial
10 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the
11 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
12 before all courts of the State of California and all United States District Courts in the State of
13 California. He has worked on many wage-and-hour class action and representative action cases,
14 taking the lead in taking and defending depositions, arguing motions, and attending mediations.
15 He has played an integral role in preparing matters for class certification, including and not
16 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
17 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
18 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
19 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
20 representative cases have resulted in settlements that have been granted court approval, including
21 and not limited to, those listed in paragraph 18 herein. He has handled over one hundred and
22 fifty (150) mediations and worked on over two hundred and fifty (250) class action or
23 representative action cases which have resulted in settlement.

24 16. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
25 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
26 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
27 Georgetown University Law Center in 2010. She is admitted to practice in California (since
28 2010) and in New York (since 2013), and is admitted to practice in all U.S. District Courts in

California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th 175 (2019). She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and has handled this process in over three hundred (300) cases. Under Edwin Aiwazian, Arby Aiwazian, and her supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. She is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

17. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree in Economics from the University of California, San Diego in 2007, and a Juris Doctor degree from Loyola Law School in 2011, graduating with Cum Laude and Order of the Coif honors. I am admitted to practice before all courts in the State of California and all U.S. District Courts in California. I externed for the Honorable Victoria S. Kaufman of the United States Bankruptcy Court, Central District of California, from June 2009 to August 2009. I externed for the Honorable Gary A. Feess of the United States District Court, Central District of California, from January 2010 to May 2010. From 2011 through and including the present, my practice

consisted almost exclusively of complex wage and hour class action and PAGA action matters in California. From October 2011 to June 2013, I was an Associate at Littler Mendelson's Century City, California office, working for one of the largest employer-side labor and employment law firms in the United States. From July 2013 to March 2014, I was an Associate at Sheppard, Mullin, Richter & Hampton's Century City, California office. From March 2014 to July 2023, I worked as an Associate and then as Counsel at Baker Hostetler LLP's Los Angeles office. From August 2023 to the present, I have been a Member of Lawyers *for* Justice, PC. I have taken and defended dozens of depositions and has successfully handled motion practice in class action and PAGA cases regarding discovery (including and not limited to motions regarding class contact information), class certification (both contested class certification and stipulated class certification), dispositive motions, arbitration agreements, coordination, and intervention. I have successfully handled a complex wage and hour class action and PAGA case through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange County Superior Court, Case No. 30-2013-00692890. I also successfully handled briefing on appeal regarding employer efforts to compel arbitration. *TitleMax of Cal. v. Pena*, California Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28, 2023) (unpublished decision). Further, I have extensive experience with settlements of class actions and PAGA actions and have handled and supervised this process in over one hundred (100) cases.

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

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

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

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

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

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

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

21 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
22 wage-and-hour class and PAGA representative action against a national wholesale distributor of
23 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
24 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
25 representative action settlement. The Sacramento County Superior Court Case Number is 34-
26 2012-00136285.

27 g) LFJ, in association with co-counsel therein, represented the plaintiff in a
28 wage-and-hour class action against a multinational corporation that provides global workplace

1 solutions, involving allegations of misclassification of the “Operations Manager” position. On
2 September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles
3 County Superior Court Case Number is BC478769.

4 h) LFJ, in association with co-counsel therein, represented the plaintiff in a
5 wage-and-hour class and PAGA representative action against a national retailer of household
6 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted
7 final approval of the class and PAGA representative action settlement. The San Francisco
8 County Superior Court Case Number is CGC-13-532344.

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

15 j) 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 upscale
17 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
18 court granted final approval of the class and PAGA representative action settlement. The Los
19 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
20 Council Coordination Proceeding Number is 4794.

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

25 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
27 involving allegations of misclassification of the “Department Manager” position. On August 12,
28 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.

On August 6, 2019, the court granted final approval of the class action settlement. The Alameda County Superior Court Case Number is RG13680477.

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

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

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

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

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

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

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

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

16 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
17 representative action against a food company on behalf of non-exempt employees. On June 30,
18 2017, the court granted final approval of the class and PAGA representative action settlement.
19 The Sacramento County Superior Court Case Number is 34-2015-00175871.

20 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
21 representative action against a chocolate company on behalf of non-exempt employees. On July
22 19, 2017, the court granted final approval of the class and PAGA representative action
23 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

1 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
2 representative action against a manufacturer of plastic containers on behalf of non-exempt
3 employees. On October 31, 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 BC577233.

6 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
7 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
8 employees. On December 11, 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 BC569646.

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

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

22 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
23 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
24 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.
25 The Tulare County Superior Court Case Number is VCU264528.

26 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
27 representative action against a behavioral health service provider on behalf of non-exempt
28 employees. On November 13, 2018, the court granted final approval of the class and PAGA

1 representative action settlement. The Alameda County Superior Court Case Number is
2 RG16811450.

3 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
4 PAGA representative action against a global provider of products and services to the energy
5 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court
6 granted approval of the PAGA representative action settlement. The Kern County Superior
7 Court Case Number is S-1500-CV-280215-SDC.

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

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

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

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

1 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
2 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
3 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
4 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
5 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
6 approval of the PAGA representative action settlement. The San Diego County Superior Court
7 Case Number is 34-2016-00005578-CU-OE-CTL.

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

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

20 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
21 wage-and-hour class action against manufacturer and supplier of power products and services on
22 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
23 motion for class certification and certified a class. On August 27, 2021, the court granted final
24 approval of the class action settlement. The San Diego County Superior Court Case Number is
25 37-2015-00025968-CU-OE-CTL.

26 mm) LFJ represents the plaintiff in a wage-and-hour class action against a
27 nutritional products manufacturer on behalf of non-exempt production line employees. On
28

December 13, 2021, the court granted the plaintiff's motion for class certification in part and certified a class. The Solano County Superior Court Case Number is FCS051001.

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

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS FOR JUSTICE, PC

19. To date, Class Counsel have borne all the risks and costs of litigation and will not receive any compensation until recovery is obtained in the Action. Lawyers *for* Justice, PC seeks reimbursement of **\$2,502.54** in litigation costs and expenses incurred in the Action, as reflected in **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the prosecution of the Action and to obtain the Settlement.

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

Executed this 21st day of October 2024, at Glendale, California.

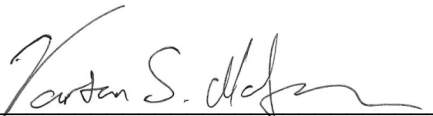

Vartan Madoyan

EXHIBIT A

MARK DUTILLIEUL V. METHODOLOGY, INC.
Contra Costa County Superior Court Case No. C22-00759

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Mark Dutillieul During the Case	14.30
Investigate, Communicate with, and/or Interview Class Members, Aggrieved Employees, and/or Percipient Witnesses	8.50
Pleadings and Court Filings	
Research and Draft Plaintiff Mark Dutillieul's ("Plaintiff") Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on April 19, 2022)	7.50
Review Court's Notice of Assignment to Department 39 for Case Management Determination (filed on April 19, 2022)	0.10
Draft Notice of Association of Counsel (filed on June 14, 2022)	0.10
Review and Analyze Defendant Methodology, Inc.'s ("Defendant") Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on June 17, 2022)	0.50
Review Defendant's Case Management Statement (served on August 11, 2022)	0.10
Draft, Review, and Revise Plaintiff's Case Management Statement (filed on August 12, 2022)	0.10
Draft, Review, and Revise Plaintiff's Case Management Statement (filed on March 13, 2023)	0.10
Review Defendant's Case Management Statement (served on March 24, 2023)	0.10
Draft, Review, and Revise Plaintiff's Case Management Statement (filed on July 21, 2023)	0.10

Review Defendant's Case Management Conference Statement (filed on July 24, 2023)	0.10
Draft, Review, and Revise Plaintiff's Case Management Statement (filed on January 23, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement and Request to Continue Case Management Conference Due to Settlement (filed on January 25, 2024)	0.10
Draft, Review, and/or Revise Plaintiff's First Amended Class Action Complaint for Damages (filed on May 17, 2024), Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order for Leave to File First Amended Complaint (submitted on March 19, 2024)	0.10
Review Defendant's Statement of Non-Opposition to Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement (served on June 27, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on July 23, 2024)	0.10
Review Court's Minute Order Re: Further Case Management Conference (filed on July 29, 2024)	0.10
Appearances	
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement (July 11, 2024)	0.90

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Mark Dutillieul (served on November 3, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Mark Dutillieul (served November 29, 2021)	2.80
Review Defendant's Response to Plaintiff's Special Interrogatories, Set One (served on November 15, 2022)	0.10
Mediation/Settlement	
Draft, Review, and/or Revise Joint Stipulation of Class and Representative Action Settlement (executed on March 20, 2024) and Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	0.50
Law and Motion	
Research and Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class and PAGA Action Settlement; Memorandum of Points and Authorities; and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on March 26, 2024)	0.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class and PAGA Action Settlement (published on July 10, 2024)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class and PAGA Action Settlement (filed on July 11, 2024)	0.10
Review Supplemental Declaration of Jean-Claude Lapuyade, Esq. in Support of Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement (filed on July 15, 2024)	0.50
Review Court's Minute Order Re: Motion for Preliminary Approval of Class and PAGA Action Settlement (filed on July 18, 2024)	0.10
Draft, Review, and/or Revise [Proposed] Order Granting Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement (submitted on July 23, 2024)	0.10

Review Court's Order Granting Preliminary Approval of Class and PAGA Action Settlement (filed on July 25, 2024)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice and Administration; and Draft, Review, and/or Revise Plaintiff's Motion for Final Approval of Class and PAGA Settlement, Declaration of Vartan Madoyan in Support Thereof, and [Proposed] Final Approval Order and Judgment	2.10
Total Hours:	42.00

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Dutillieul vs. Methodology, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/3/2021	U.S. Postmaster	Postage	\$7.38
4/19/2022	ProLegal	Attorney Service	\$196.80
4/19/2022	Legal Document Server, Inc.	Attorney Service	\$286.86
4/19/2022	Contra Costa Superior Court	Complex Filing Fee	\$1,000.00
4/19/2022	Contra Costa Superior Court	Complaint Filing Fee	\$435.00
5/3/2022	ProLegal	Attorney Service	\$220.80
6/15/2022	Legal Document Server, Inc.	Attorney Service	\$170.00
6/17/2022	Legal Document Server, Inc.	Attorney Service	\$170.00
7/23/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
		Total:	\$2,502.54