

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
Selena Matavosian (SBN 348044)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

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

PASSION MORRIS, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

v.

HABERFELDE FORD, a California
corporation; JIM BURKE FORD LINCOLN,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: BCV-23-100471

Honorable Thomas S. Clark
Department 17

CLASS ACTION

**DECLARATION OF SELENA
MATAVOSIAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: January 17, 2025
Time: 8:30 a.m.
Dept: 17

Complaint Filed: February 14, 2023
FAC Filed: July 3, 2024
Trial Date: None Set

DECLARATION OF SELENA MATAVOSIAN

I, Selena Matavosian, 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 Passion Morris (“Plaintiff”) and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and if called as a witness, I could and would competently testify thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On August 13, 2024, in Department 17 of the above-entitled Court, the Honorable Thomas S. Clark preliminarily approved the Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff, and Defendants Habermel Ford and Jim Burke Ford Lincoln (together, “Defendants”) (together with Plaintiff, the “Parties”). For purposes of the Settlement, the Court conditionally certified the Class, appointed Plaintiff as the representative of the Class (“Class Representative”), and appointed and designated JCL Law Firm, APC, Zakay Law Group, APLC, and Lawyers *for* Justice, PC as counsel for the Class (collectively, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Pendency of Class Action Settlement and Final Hearing Date (“Notice Packet”), 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 the Administrator for handling the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement (“Motion for Final Approval”), no Settlement Class Members have objected to the Settlement or the contemplated Attorneys’ Fees, Attorneys’ Expenses, Enhancement Award, Administration Costs, and the allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

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WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC has been actively engaged in performing work in the Action since prior to its commencement on February 14, 2023. Since joining forces with and associating in JCL Law Firm, APC and Zakay Law Group, APLC as co-counsel for Plaintiff, we have worked cooperatively with them to strategize and prosecute the case, and our work with them has been a coordinated and combined effort. Ultimately, Class Counsel’s efforts and efforts of Plaintiff have been successful in reaching the Settlement.

5. Before initiating the Action, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff, and research into the various legal issues involved in the case namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, Private Attorneys General Act (“PAGA”) claims, Plaintiff’s claims and allegations, and potential defenses. After conducting initial investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiff were well-suited for class-wide and representative adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former non-exempt employees of Defendants in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Collectively, Class Counsel investigated the veracity, strength, and scope of the claims, and was preparing the case for class certification and trial prior to reaching the Settlement. This matter has involved extensive and ongoing investigations, research into legal and factual issues, formal and informal discovery, and court proceedings. Class Counsel reviewed and analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendants, and other sources, researched applicable law, and undertook analyses and calculations of the value of the claims, damages, and penalties exposure. Class Counsel propounded multiple sets of written discovery requests on Defendants (including, but not limited to Form Interrogatories—General (Set One), Special Interrogatories (Sets One, Two, and

Three), and Requests for Production of Documents (Set One)), and the Parties eventually agreed to engage in, and did engage in, formal and informal discovery. Class Counsel also met and conferred with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, discovery and production of various information, documents, and data in the course of litigation and mediation and settlement negotiations, and mediation and settlement negotiations. Other work that Class Counsel has performed includes, and is not limited to, case strategy and analysis; case management; drafting, reviewing, and/or revising the pleadings and motion-related papers; claims assessment and evaluation; and preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

7. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery. The Parties exchanged, reviewed, and analyzed a volume of information, documents, and data obtained from Plaintiff, Defendants, and other sources during the course of litigating the case and in connection with mediation and settlement negotiations, which provided a critical understanding of the nature of the work performed by the Class Members and Aggrieved Employees, as well as Defendants' operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing liability, damages, penalties, and valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest periods, representative PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and Defendants' defenses thereto, as well as facts discovered. Accordingly, there has been sufficient investigation and review of information in order for the parties to be informed of the nature and extent of the claims and to enable all parties to evaluate the Settlement for its fairness, adequacy, and reasonableness.

8. By way of the accompanying Motion for Final Approval, Plaintiff seeks attorneys' fees in the amount of \$525,000.00 which is thirty-five percent (35%) of the Gross Settlement Amount of \$1,500,000.00. Pursuant to the contingency-fee agreement entered into by and

1 between Plaintiff and Lawyers *for* Justice, PC, Plaintiff has agreed to a contingency fee of at
2 least thirty-five percent (35%) of the recovery.

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

9 10. While not necessarily required to be demonstrated because the percentage fee
10 from the common fund is proper for this settlement, Class Counsel have incurred many hours of
11 work in connection with prosecuting the case, such that the requested award of attorneys' fees
12 is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a
13 total of **164.40 hours** performing tasks and obtaining recovery in the Action. Attached hereto
14 as "**EXHIBIT A**" is an Attorney Task and Time Chart for Lawyers *for* Justice, PC that sets
15 forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC,
16 and the time incurred them in performing those services. The hours attributable to Lawyers *for*
17 Justice, PC include work done by me and several other attorneys at the firm. Additionally,
18 separate from the hours of work referenced herein and in the chart, Lawyers *for* Justice, PC had
19 litigation support personnel actively engaged in assisting with the prosecution of this matter.

20 11. The work performed in this particular matter, the background of Lawyers *for*
21 Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who
22 worked on this matter, in litigating complex wage-and-hour cases, and in particular, employment
23 class actions and representative actions, support a reasonable blended hourly rate of
24 compensation at the rate of at least \$850 per hour for work performed by Lawyers *for* Justice,
25 PC. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the
26 rate of at least \$850 per hour for legal services performed, by courts granting approval of
27 settlements in other wage-and-hour class action and/or representative action cases: final
28 approval of the class and representative action settlement in *David Dugan v. TEC Equipment*,

1 *Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021,
2 and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final
3 approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan*
4 *Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021,
5 and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final
6 approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.*
7 (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and
8 the award of attorneys' fees involved compensation at the rate of \$855.96 per hour.

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

10 12. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
11 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
12 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC
13 is the attorney of record in well over a dozen employment-related putative class actions in both
14 state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of
15 attorneys who focus on litigating complex wage-and-hour class and PAGA representative
16 actions. The firm has successfully litigated cases involving nearly every aspect of California
17 wage and hour law, including payment of overtime and minimum wages, provision of meal and
18 rest breaks and/or premium wages for same, timely payment of wages, provision of compliant
19 wage statements, reimbursement of business expenses, executive, administrative, and other
20 overtime exemptions to the State of California and federal overtime compensation requirements,
21 PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has recovered
22 (sometimes in association with other law firms) millions of dollars on behalf of thousands of
23 individuals in California.

24 13. Edwin Aiwazian is the Managing Member and Shareholder of Lawyers *for*
25 Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of
26 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of
27 2004. He has extensive formal training in dispute resolution and negotiation from the Straus
28 Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In

1 addition, he has previously served as a pro bono mediator for the Los Angeles County Superior
2 Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA
3 Extension Program. During the summer of 2000, he studied Legal Writing at Harvard
4 University. From approximately September 2002 to approximately December 2002, he served
5 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of
6 Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002,
7 he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of
8 Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice
9 law from the California State Bar. Since in or around October of 2008, through his work at
10 Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and
11 employment class actions, involving wage-and-hour claims, race discrimination, unfair business
12 practices, or consumer fraud. While employed by Lawyers *for* Justice PC, he has argued over
13 one hundred (100) motions, taken or defended over one hundred fifty (150) depositions,
14 prepared dozens of expert witnesses for deposition or trial, and attended over one hundred
15 seventy-five (175) mediations. Together with other attorneys at the firm, and in many cases in
16 conjunction with co-counsel, he has successfully litigated cases involving the executive,
17 administrative, and other overtime exemptions to the State of California and federal overtime
18 compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully
19 obtained class certification by contested motion practice in approximately fifteen (15) cases in
20 the last decade, and litigated over 1,000 class action or representative action cases.

21 14. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He
22 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
23 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
24 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to
25 the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate
26 District. From approximately August 2008 to approximately December 2008, he served as a
27 Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals
28 for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to

1 practice before all courts of the State of California and all United States District Courts in the
2 State of California. He has worked on many wage-and-hour class action and representative
3 action cases, taking the lead in taking and defending depositions, arguing motions, and attending
4 mediations. He has played an integral role in preparing matters for class certification, including
5 and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles
6 County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles
7 County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda
8 County Superior Court Case No. RG13680477). Under his supervision, dozens of class action
9 or representative action cases have resulted in settlements that have been granted court approval,
10 including and not limited to, those listed in paragraph 18 herein. He has handled over one
11 hundred and fifty (150) mediations and has worked on over two hundred and fifty (250) class
12 action or representative action cases which have resulted in settlement.

13 15. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a
14 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
15 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
16 Georgetown University Law Center in 2010. She is admitted to practice in California (since
17 2010) and in New York (since 2013) and is admitted to practice in all U.S. District Courts in
18 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S.
19 Supreme Court. She has taken and defended dozens of depositions and successfully handled
20 motion practice in class action cases regarding discovery (including and not limited to, regarding
21 class contact information), class certification (both contested class certification and stipulated
22 class certification), arbitration agreements, coordination, and intervention. She has successfully
23 handled briefing and oral argument on appeal and obtained notable decisions regarding the
24 Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Roberto*
25 *Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert.
26 denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*
27 (2019) 8 Cal.5th 175. She has significant experience with class actions, including and not limited
28 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 five hundred (500) 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.

16. Yasmin Hosseini is a Member of Lawyers *for* Justice, PC. She received her Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned her Juris Doctor degree from Pepperdine University School of Law in 2017. She was admitted to practice law in California in 2019. She is admitted to practice before all courts of the State of California and all federal district courts in the State of California. She has worked on many wage and hour class action and PAGA representative matters, and her work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation and analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, she represented filmmakers and talent, negotiating and structuring various types of agreements on their behalf. She is a member of the California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian American Bar Association.

17. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Science degree from California State University, Northridge in 2019 and earned a Juris Doctor degree from Southwestern Law School in 2022. I was admitted to practice law in California in 2022. I am admitted to practice before all courts of the State of California and all federal district courts in the State of California. I have worked on many wage-and-hour class action and PAGA representative cases, and my work on these cases has included researching and drafting

1 pleadings and motions, administrative notice exhaustion, drafting, negotiating, and finalizing
2 stipulations and settlement agreements, claims evaluation and analysis, and making court
3 appearances.

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

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

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

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

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

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

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

6 f. LFJ, in association with co-counsel therein, represented the plaintiff in a
7 wage-and-hour class and PAGA representative action against a national wholesale distributor
8 of plumbing and builder supplies, involving allegations of misclassification of multiple salaried
9 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
10 representative action settlement. The Sacramento County Superior Court Case Number is 34-
11 2012-00136285.

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

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

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

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

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

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

17 m. LFJ represented the plaintiff in a PAGA representative action against a real
18 estate and property management company, on behalf of non-exempt employees. On November
19 4, 2016, the court granted approval of the PAGA representative action settlement. The Orange
20 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

26 o. LFJ represented the plaintiffs in a wage-and-hour class and PAGA
27 representative action against a foodservice distributor, on behalf of non-exempt employees. On
28 January 26, 2017, the court granted final approval of the class and PAGA representative action

1 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

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

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

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

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

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

1 BC586234.

2 u. LFJ represented the plaintiff in a wage-and-hour class and PAGA
3 representative action against a food company on behalf of non-exempt employees. On June 30,
4 2017, the court granted final approval of the class and PAGA representative action settlement.
5 The Sacramento County Superior Court Case Number is 34-2015-00175871.

6 v. LFJ represented the plaintiffs in a wage-and-hour class and PAGA
7 representative action against a chocolate company on behalf of non-exempt employees. On July
8 19, 2017, the court granted final approval of the class and PAGA representative action
9 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

Number is 4819.

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

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

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

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

ee. LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class action against a parking company on behalf of non-exempt employees. On September 3, 2019, the court granted the plaintiff's motion for class certification and certified a class. On November 18, 2024, the court granted final approval of the class and PAGA representative action settlement. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding Number is 4886.

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

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

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

18 ii. LFJ, in association with co-counsel therein, on behalf of the plaintiff and
19 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
20 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
21 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
22 ZB, N.A. v. Superior Court (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
23 approval of the PAGA representative action settlement. The San Diego County Superior Court
24 Case Number is 37-2016-00005578-CU-OE-CTL.

25 jj. LFJ, in association with co-counsel therein, represented the plaintiff in a
26 wage-and-hour class and PAGA representative action against a large national drug testing
27 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
28 plaintiff's motion for class certification and certified a class. On October 28, 2022, the court

1 granted final approval of the class and PAGA representative action settlement. The San Diego
2 County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

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

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

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

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

6 pp. LfJ represents the plaintiffs in a wage-and-hour class action against a
7 chain of restaurants on behalf of non-exempt employees. On July 22, 2024, the court granted in
8 part the plaintiffs' motion for class certification and certified a class. The San Francisco
9 Superior Court Cast Number is CGC-20-582809.

10 **LITIGATION COSTS AND EXPENSES INCURRED BY**
11 **LAWYERS *FOR* JUSTICE, PC**

12 19. To date, Class Counsel have borne all of the risks and costs of litigation and will
13 not receive any compensation until recovery is obtained in the actions. Lawyers *for* Justice, PC
14 seeks reimbursement of **\$6,823.99** in litigation costs and expenses incurred in the Action, as
15 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in
16 the prosecution of the matter and to obtain the Settlement.

17 **ENHANCEMENT AWARD TO PLAINTIFF**

18 20. In recognition of her efforts and work serving as the Class Representative, the
19 Settlement provides for an Enhancement Award in the amount of \$10,000.00 to Plaintiff. The
20 requested enhancement award is fair and appropriate. For example, Plaintiff spent a considerable
21 amount of time and effort to produce relevant documents and information and to provide the
22 facts and evidence necessary to attempt to prove the allegations. Plaintiff was available
23 whenever Class Counsel needed her and actively tried to obtain and provide information that
24 would facilitate the pursuit of the claims in this matter. Accordingly, it is appropriate for
25 Plaintiff to receive \$10,000.00 as a reasonable enhancement award, for her efforts in this matter,
26 in addition to her individual settlement payments.

27 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
28 interests of the Plaintiff, Class Members, Aggrieved Employees, and the State of California.

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

3 Executed this 18th day of December 2024, at Glendale, California.

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6 Selena Matavosian
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EXHIBIT A

PASSION MORRIS V. HABERFELDE FORD, ET AL.
Kern County Superior Court, Case No. BCV-23-100471

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>FOR</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Passion Morris (“Plaintiff”) During the Case	18.50
Investigate, Communicate with, and/or Interview Class Members, Aggrieved Employees, and/or Percipient Witnesses	8.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft Plaintiff Passion Morris’ Class Action Complaint for Damages (filed on February 14, 2023)	7.50
Review Court’s Notice of Assignment to Judge for All Purposes and Notice of Order to Show Cause Re: CRC Rule 3.110 and Notice of Case Management Conference (filed on February 16, 2023)	0.10
Review and Analyze Defendants Haberfelde Ford and Jim Burke Ford Lincoln’s (together, “Defendants”) Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendants’ Answer (served on May 1, 2023)	1.60
Draft Plaintiff’s Notice of Posting Jury Fees (filed on July 27, 2023)	0.10
Draft Plaintiff’s Case Management Statement (filed on July 31, 2023)	0.80
Review Defendants’ Case Management Statement (served on July 31, 2023)	0.10
Review Court’s Minute Order Re: Case Management Conference (filed on August 15, 2023)	0.10
Draft Plaintiff’s Case Management Statement (filed on October 30, 2023)	0.80

Review Defendants' Case Management Statement (served on October 30, 2023)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on November 16, 2023)	0.10
Draft Plaintiff's Notice of Association of Counsel (filed on February 29, 2024)	0.10
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on April 30, 2024)	0.10
Review Defendants' Case Management Statement (served on April 30, 2024)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on May 15, 2024)	0.10
Draft, Review, and/or Revise Plaintiff's First Amended Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on July 3, 2024); Meet and Confer with Co-Counsel and Defendants' Counsel and Draft, Review, and/or Revise Stipulation and [Proposed] Order for Leave to File First Amended Complaint (filed on June 11, 2024)	2.40
Review Court's Order Granting Leave to File First Amended Complaint (filed on June 24, 2024)	0.10
Draft, Review, and/or Revise Plaintiff's Case Management Statement for Plaintiff (filed on July 29, 2024)	0.10
Appearances	
Prepare for and Telephonically Attend Case Management Conference (August 15, 2023)	0.50
Prepare for and Telephonically Attend Case Management Conference (November 16, 2023)	0.50
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (August 13, 2024)	1.20
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on November 1, 2021)	2.10
Draft Follow Up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on June 28, 2022)	1.90

Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served December 12, 2022)	5.10
Review and Analyze Defendant Haberfelde Ford's Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), Requests for Admission (Set One), Requests for Production of Documents (Set One), and Special Interrogatories (Set One) to Plaintiff (served on June 21, 2023)	0.90
Review Defendant Haberfelde Ford's Notice of Taking Videotaped Deposition of Plaintiff (served on June 21, 2023)	0.10
Draft Plaintiff's Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Production of Documents (Set One), and Form Interrogatories – General (Set One) to Defendant Haberfelde Ford (served on August 9, 2023)	4.80
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Haberfelde Ford and Requests of Production (Organizational Structure) (served on August 15, 2023)	3.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Haberfelde Ford and Requests of Production (Wage and Hour Practices) (served on August 15, 2023)	3.90
Outline Plaintiff's Responses to Defendant's Discovery Requests	9.50
Draft Plaintiff's Special Interrogatories (Set Three) to Defendant Haberfelde Ford and Special Interrogatories (Set Three) to Defendant Jim Burke Ford Lincoln (served on October 25, 2023)	3.10
Letters and Correspondence	
Draft, Review, and/or Revise Plaintiff's Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> ("PAGA") (served on March 18, 2024)	0.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	21.50

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources in Connection with Mediation and Settlement Negotiations, Perform Investigation and Research Regarding Merits of Claims and Other Settlement-Related Issues, Perform Claims Evaluations and Analysis, and Evaluate Mediator's Proposal	55.50
Review, Revise, Negotiate, and Finalize Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims (executed on July 17, 2024) and Notice of Pendency of Class Action Settlement and Final Hearing Date	0.50
Law and Motion	
Draft, Revise, and/or Review Plaintiff's Notice of Motion for Preliminary Approval of Class Action and PAGA Settlement, Memorandum of Points and Authorities in Support Thereof, Declaration of Jean-Claude Lapuyade in Support Thereof, Declaration of Jackland K. Hom in Support Thereof, Declaration of Passion Morris in Support Thereof, Declaration of Shani O. Zakay in Support Thereof, Declaration of Sean Hartranft in Support Thereof, Declaration of Selena Matavosian in Support Thereof, and [Proposed] Order Granting Plaintiff's Preliminary Approval of Class Action and PAGA Settlement (filed on July 19, 2024)	3.50
Review Declaration of Proposed Administrator Madely Nava in Support Preliminary Approval of Class Action Settlement (filed on August 5, 2024)	0.10
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement and Minute Order Re: Motion (Pre-Disposition) for Preliminary Approval and Case Management Conference (filed on August 13, 2024)	0.20
Review Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Draft, Review, and/or Revise Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Declaration of Selena Matavosian in Support Thereof, Declaration of Jean-Claude Lapuyade in Support Thereof, Declaration of Shani Zakay in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on December 19, 2024)	4.50
Total Hours:	164.40

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Morris vs. Haberfelde Ford, et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/1/2021	U.S. Postmaster	Postage	\$7.38
6/28/2022	U.S. Postmaster	Postage	\$7.58
1/13/2023	General Logistics Systems US, Inc.	Courier Service	\$23.19
2/16/2023	Legal Document Server, Inc.	Attorney Service	\$112.36
2/16/2023	Kern County Superior Court	Complex Filing Fee	\$1,000.00
2/16/2023	Kern County Superior Court	Complaint Filing Fee	\$435.00
4/26/2023	Legal Document Server, Inc.	Attorney Service	\$15.70
7/28/2023	Legal Document Server, Inc.	Attorney Service	\$26.13
7/28/2023	Kern County Superior Court	Jury Fee	\$150.00
7/31/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
10/30/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
12/5/2023	RUTAN & TUCKER, LLP	Mediation Fee	\$5,000.00
2/29/2024	Legal Document Server, Inc.	Attorney Service	\$15.55
Total:			<u>\$6,823.99</u>