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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

PENNY A. SCOTT, on behalf of
herself and other similarly-situated
employees,

Plaintiff,

vs.

BLACKSTONE CONSULTING, INC.,
a California Corporation; and DOES 1
Through 10, inclusive,

Defendants.

Case No.: 21CV1470 MMA (KSC)

Honorable Michael M. Anello
Department 3C

CLASS ACTION

**DECLARATION OF EDWIN
AIWAZIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN
ORDER GRANTING FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND ENTERING
JUDGMENT**

Date: December 11, 2023
Time: 2:30 p.m.
Department: 3C

Complaint filed: May 21, 2021
FAC Filed: May 17, 2023
Trial Date: None Set

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DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, 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 for Plaintiff Ahmir Ringo (“Plaintiff Ringo”) and Plaintiff Kawana Anderson (“Plaintiff Anderson”) in the above-captioned action. 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 August 1, 2023, in Department 3C of the above-entitled Court, the Honorable Michael M. Anello preliminarily approved the Class Action and PAGA Settlement Agreement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs Ahmir Ringo, Kawana Anderson, Penny A. Scott, Tiffany Lockett, and Tocashema Williams (together, “Plaintiffs”) and Blackstone Consulting, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court also preliminarily appointed Plaintiffs Ahmir Ringo, Kawana Anderson, Penny A. Scott, Tiffany Lockett, and Tocashema Williams to represent the Class (together, “Class Representatives”) and preliminarily appointed and designated Lawyers *for* Justice, PC, Cohelan Khoury & Singer, Diversity Law Group, P.C., and Polaris Law Group as counsel for the Class (together, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement and Hearing Date for Final Court Approval (“Class Notice”), and adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed CPT Group, Inc. (“Settlement Administrator”) to serve as the third-party administrator and handle the notice and settlement administration process.

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WORK PERFORMED BY CLASS COUNSEL

3. Myself and several other attorneys and staff members at Lawyers for Justice, PC have been actively engaged in this litigation since the inception of Plaintiff Ahmir Ringo’s representative action under the Private Attorneys General Act (“PAGA”) entitled *Ahmir Ringo v. Blackstone Consulting, Inc.*, Los Angeles County Superior Court Case No. 22SMCV00066 (“*Ringo Action*”), which was commenced on January 18, 2022, Plaintiff Kawana Anderson’s putative class action entitled *Kawana Anderson v. Blackstone Consulting, Inc.*, Los Angeles County Superior Court Case No. 22STCV31450 (“*Anderson Class Action*”), which was commenced on September 26, 2022, and Plaintiff Kawana Anderson’s representative PAGA action entitled *Kawana Anderson v. Blackstone Consulting, Inc.*, Los Angeles County Superior Court Case No. 22SMCV01667 (“*Anderson PAGA Action*”), which was commenced on September 26, 2022. Lawyers for Justice, PC actively participated in, *inter alia*, drafting, reviewing, and revising the pleadings and motion-related papers (including, and not limited to, engaging in successful motion practice that resulted in the *Ringo Action* being remanded back to state court from federal court), case strategy and analysis, investigation and research, and claims assessment and evaluation. Lawyer for Justice, PC joined forces with other plaintiff’s counsel Cohelan Khoury & Singer, counsel for Plaintiff Penny A. Scott (“*Plaintiff Scott*”), who initiated the above-captioned action, and with other plaintiff’s counsel Diversity Law Group, P.C. and Polaris Law Group, counsel for Tiffany Lockett and Tocashema Williams (“*Plaintiffs Lockett and Williams*”), who initiated the action entitled *Tiffany Lockett, et al. v. Blackstone Consulting, Inc.*, Riverside County Superior Court, Case No. CVRI2201443 (“*Lockett Action*”). Lawyers for Justice, PC joined forces with, and have worked cooperatively with, the other plaintiffs’ firms (together, Lawyer for Justice, PC, Cohelan Khoury & Singer, Diversity Law Group, P.C., and Polaris Law Group are referred to as “*Class Counsel*”), to strategize and prosecute the

1 cases, and our work with them has been a coordinated and combined effort.
2 Ultimately, Class Counsel's efforts and the efforts of Plaintiffs have been
3 successful in reaching the Settlement, which resolves the above-captioned action,
4 the *Ringo* Action, the *Anderson* Class Action, the *Anderson* PAGA Action, and the
5 *Lockett* Action.

6 4. Before initiating the *Ringo* Action, *Anderson* Class Action, and
7 *Anderson* PAGA Action, Lawyers for Justice, PC conducted extensive
8 investigation and research into the facts and circumstances underlying the pertinent
9 factual and legal issues and applicable law. This required thorough discussions
10 and interviews between attorneys at our firm and Plaintiff Ringo and Plaintiff
11 Anderson, and research into the various legal issues involved in the cases, namely,
12 the current state of the law as it applied to off-the-clock theory, meal and rest
13 periods, representative PAGA claims, wage-and-hour enforcement, Plaintiff Ringo
14 and Plaintiff Anderson's claims and damages, and potential defenses. After
15 conducting initial investigation, our firm determined that Plaintiff Ringo and
16 Plaintiff Anderson's claims were well-suited for representative and class
17 adjudication owing to what appeared to be a common course of conduct affecting a
18 similarly situated group of individuals who are or previously were employed by
19 Defendant in California as non-exempt employees, who were not properly
20 compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods,
21 and unreimbursed business expenses.

22 5. Collectively, Class Counsel investigated the veracity, strength, and
23 scope of the claims, and worked on preparing the cases for class certification and
24 trial, prior to reaching the Settlement. This matter has involved extensive and
25 ongoing investigations and research into legal and factual issues, informal
26 discovery, motion practice, and court proceedings. Class Counsel reviewed and
27 analyzed a volume of information, documents, and data obtained from Plaintiffs,
28 Defendant, and other sources, researched applicable law, and undertook analyses

1 and calculations of the value of claims, damages, and penalties exposure. Class
2 Counsel also met and conferred with Defendant's counsel on numerous occasions,
3 e.g., to discuss issues relating to the pleadings, case management, court
4 proceedings, venue, motion practice, informal discovery and production of
5 information, documents, and data in the course of litigation and mediation and
6 settlement negotiations, and mediation and settlement negotiations. Other work
7 that Class Counsel performed, collectively, included, and was not limited to, case
8 strategy and analysis; drafting, reviewing, and revising the pleadings and motion-
9 related papers; case management; claims assessment and evaluation; and preparing
10 for and attending mediation and settlement negotiations.

11 6. As outlined herein, the parties have conducted significant
12 investigations and discovery during the course of this litigation. Class Counsel
13 analyzed a volume of information, documents, and data obtained from Plaintiffs,
14 Defendant, and other sources, which provided a critical understanding of the nature
15 of the work performed by putative class members and aggrieved employees, as
16 well as Defendant's operations and employment policies, practices, and
17 procedures. The information, documents, and data were used in analyzing liability,
18 damages, and penalties valuation issues in connection with all phases of the
19 litigation, and ultimately, in connection with the mediation and settlement
20 negotiation process. Accordingly, sufficient investigation and review of
21 information has taken place in order for the parties to be adequately informed of
22 the nature and extent of the claims, and to enable all parties to fully evaluate the
23 Settlement for its fairness, adequacy, and reasonableness.

24 7. By way of the accompanying motion for final approval of the
25 Settlement, Class Counsel seek attorneys' fees in the amount of \$333,333.33,
26 which is one-third (1/3) of the Gross Settlement Amount of \$1,000,000.00.
27 Pursuant to the contingency-fee agreements entered into by Plaintiff Ringo and
28 Plaintiff Anderson and Lawyers for Justice, PC, Plaintiff Ringo and Plaintiff

Anderson have each agreed to a contingency fee of at least one-third (1/3) of the recovery.

8. The attorneys' fees that are sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel have shown; (4) the results that Class Counsel have achieved throughout the litigation of the cases; (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 cases.

9. I am aware that common and acceptable rates for contingency representation in wage and hour class and representative action litigation are normally in the range from 33.3% to 50%.

10. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel have incurred many hours of work in connection with prosecuting the cases, 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 **320.80 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart for Lawyers *for* Justice, PC that sets forth in detail the nature of the legal services provided by attorneys at the firm and the time incurred in performing those services. The hours attributable to Lawyers *for* Justice, PC include work done by me and several other attorneys at the firm. 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.

11. The work performed in this matter, the background of the firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, 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 \$750 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 \$750 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; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved compensation at the rate of \$780.77 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.

ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

12. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

JUDICIAL EXTERNSHIPS

13. From approximately September 2002 to approximately December 2002, I served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal for the Second Appellate District*.

LITIGATION AND CLASS ACTION AND REPRESENTATIVE ACTION

EXPERIENCE

14. In December of 2004, I obtained a license to practice law from the California State Bar.

15. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class and representative actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state

1 and federal courts in the State of California. Lawyers *for* Justice, PC has
2 successfully litigated cases involving the executive, administrative, and other
3 overtime exemptions to the State of California and federal overtime compensation
4 requirements. In association with other law firms, Lawyers *for* Justice, PC has
5 recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

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

25 d) LFJ, in association with co-counsel therein, represented the
26 plaintiffs in a wage-and-hour class action against a national retailer involving
27 allegations of misclassification of the “Store Manager” position. On June 10,
28 2011, the court granted plaintiffs’ motion for class certification. On August 26,

1 2013, the court granted final approval of the class action settlement. The Los
2 Angeles County Superior Court Case Number is BC424012.

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

9 f) LFJ, in association with co-counsel therein, represented the
10 plaintiff in a wage-and-hour class and PAGA representative action against a
11 national wholesale distributor of plumbing and builder supplies, involving
12 allegations of misclassification of multiple salaried “manager” positions. On May
13 22, 2014, the court granted final approval of the class and PAGA representative
14 action settlement. The Sacramento County Superior Court Case Number is 34-
15 2012-00136285.

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

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

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

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

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

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

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

6 n) LFJ, in association with co-counsel therein, represented the
7 plaintiffs in a wage-and-hour class and PAGA representative action against a full-
8 service bank, on behalf of non-exempt employees. On November 18, 2016, the
9 court granted final approval of the class and PAGA representative action
10 settlement. The San Francisco County Superior Court Case Number is CJC-13-
11 004839 and the Judicial Council Coordination Proceeding Number is 4839.

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

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

26 q) LFJ, in association with co-counsel therein, represented the
27 plaintiffs in a wage-and-hour class and PAGA representative action against a
28 consumer packaging company, on behalf of non-exempt employees. On March 10,

1 2017, the court granted final approval of the class and PAGA representative action
2 settlement. The Los Angeles County Superior Court Case Number is BC590429.

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

9 s) LFJ, in association with co-counsel therein, represented the
10 plaintiffs in a wage-and-hour class and PAGA representative action against a
11 lumber and hardware company on behalf of non-exempt employees. On April 26,
12 2017, the court granted final approval of the class and PAGA representative action
13 settlement. The Orange County Superior Court Case Number is 30-2014-
14 00747750-CU-OE-CXC.

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

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

25 v) LFJ represented the plaintiffs in a wage-and-hour class and
26 PAGA representative action against a chocolate company on behalf of non-exempt
27 employees. On July 19, 2017, the court granted final approval of the class and
28 PAGA representative action settlement. The Alameda County Superior Court Case

Number is RG15764300.

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

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

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

z) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a property management company on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County 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.

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

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

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

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

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

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

8 hh) LFJ, in association with co-counsel therein, represents the
9 plaintiff in a wage-and-hour class and PAGA representative action against a
10 medical equipment supplier on behalf of non-exempt employees. On February 13,
11 2020, the court granted the plaintiff's motion for class certification and certified a
12 class. The San Bernardino County Superior Court Case Number is
13 CIVDS1505744.

14 ii) LFJ, in association with co-counsel therein, on behalf of the
15 plaintiff and respondent in a PAGA representative action, successfully opposed in
16 the trial court, and briefed and argued an appeal with respect to the employer's
17 motion to compel arbitration, resulting in a notable decision from the California
18 Supreme Court clarifying the law regarding PAGA claims, *ZB, N.A. v. Superior*
19 *Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval of
20 the PAGA representative action settlement. The San Diego County Superior Court
21 Case Number is 34-2015-00175330.

22 jj) LFJ, in association with co-counsel therein, represented the
23 plaintiff in a wage-and-hour class and PAGA representative action against a large
24 national drug testing laboratory on behalf of non-exempt employees. On February
25 21, 2020, the court granted the plaintiff's motion for class certification and
26 certified a class. On October 28, 2022, the court granted final approval of the class
27 and PAGA representative action settlement. The San Diego County Superior
28 Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

8 ll) LFJ, in association with co-counsel therein, represented the
9 plaintiffs in a wage-and-hour class action against manufacturer and supplier of
10 power products and services on behalf of non-exempt employees. On July 31,
11 2020, the court granted in part the plaintiffs' motion for class certification and
12 certified a class. On August 27, 2021, the court granted final approval of the class
13 action settlement. The San Diego County Superior Court Case Number is 37-
14 2015-00025968-CU-OE-CTL.

15 mm) LFJ represents the plaintiff in a wage-and-hour class action
16 against a nutritional products manufacturer on behalf of non-exempt production
17 line employees. On December 13, 2021, the court granted the plaintiff's motion for
18 class certification in part and certified a class. The Solano County Superior Court
19 Case Number is FCS051001.

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

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**LITIGATION COSTS AND EXPENSES INCURRED BY
LAWYERS for JUSTICE, PC**

17. To date, Lawyers for Justice, PC has borne all of the risks and costs of litigation and will not receive any compensation until a recovery is obtained in this matter. Lawyers for Justice, PC seeks reimbursement of **\$3,578.11** in litigation costs and expenses incurred in this matter, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of the *Ringo* Action, *Anderson* Class Action, and *Anderson* PAGA Action and to obtain the settlement.

CLASS REPRESENTATIVE SERVICE PAYMENTS TO PLAINTIFFS

18. In recognition of their efforts and work expended in the cases and serving as the Class Representatives, the settlement provides for service payments in the amount of \$10,000 each to Plaintiffs Ahmir Ringo, Kawana Anderson, Penny A. Scott, Tiffany Lockett, and Tocashema Williams. The requested service payments are fair and appropriate. Plaintiffs Ahmir Ringo and Kawana Anderson spent a substantial amount of time and effort in providing relevant documents, past employment records, and the facts and evidence necessary to attempt to prove the allegations in the cases. Plaintiffs Ahmir Ringo and Kawana Anderson were available whenever their attorneys needed them and actively tried to obtain and provide information that would facilitate the pursuit of the class and PAGA claims. Plaintiffs Ahmir Ringo and Kawana Anderson spent numerous hours speaking with their attorneys about their claims, describing their work experiences with Defendant, and gathering, providing, and reviewing documents. Accordingly, it is appropriate and just for Plaintiffs Ahmir Ringo, Kawana Anderson, Penny A. Scott, Tiffany Lockett, and Tocashema Williams to each receive \$10,000.00 as reasonable service payments for their services on behalf of the Class, Aggrieved Employees, and the State of California, in addition to their individual settlement payments.

PROPOSED CY PRES RECIPIENT

19. I have made a reasonable inquiry of other members at Lawyers for Justice, PC regarding any involvement that they may have regarding Legal Aid at Work, the proposed cy pres recipients. Joanna Ghosh of Lawyers for Justice, PC has given a few guest lectures regarding California wage and hour law, class actions, and pursuing a career in the field, to law students who are participating in legal clinics at UCLA Law School, UC Hastings College of Law, Stanford Law School, and USC Law School, that were organized to some extent by Legal Aid at Work. To the best of my knowledge, neither I nor other members at Lawyers for Justice, PC have any interest, involvement, or relationship with Legal Aid at Work that would create a conflict of interest.

20. I submit that the settlement is fair, reasonable, and adequate. In addition, the settlement is in the best interests of Plaintiffs, the Class, Aggrieved Employees, and the State of California.

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

Executed this 15th day of November 2023, at Glendale, California.



Edwin Aiwanian

EXHIBIT A

Ahmir Ringo v. Blackstone Consulting, Inc.
Los Angeles County Superior Court Case No. 22SMCV00066 (“Ringo State Action”); United States District Court for the
Central District of California, Case No: 2:22-cv-01908-RGK-RAOx) (“Ringo Federal Action”)

Kawana Anderson v. Blackstone Consulting, Inc.
Los Angeles County Superior Court Case No. 22STCV31450 (“Anderson Class Action”)

Kawana Anderson v. Blackstone Consulting, Inc.
Los Angeles County Superior Court Case No. 22SMCV01667 (“Anderson PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, including Adequacy, Typicality, Superiority, Commonality, and Manageability	8.50
Pre-Lawsuit Investigation of the Key Facts with a Focus on the Merits of Plaintiff Ahmir Ringo’s (“Plaintiff Ringo”) and Plaintiff Kawana Anderson’s (“Plaintiff Anderson”) Private Attorneys General Act (“PAGA”) Claims on Behalf of the State of California with Respect to the Aggrieved Employees	7.30
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant Blackstone Consulting, Inc. (“Defendant”) with Respect to Plaintiff Ringo and Plaintiff Anderson and the Aggrieved Employees	6.90
Pre-Lawsuit Investigation of the Merits of Plaintiff Anderson’s Claims and the Merits of the Claims of the Putative Class Members	7.50

Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant with Respect to the Damages Sustained by Plaintiff Anderson and the Putative Class Members	7.10
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, Manageability, and Class Certification Decisions in California, Including all New and Relevant DLSE Materials	7.50
Investigation of Defendant, Defendant's Business Relationships, and the Industry in which Defendant Operates	3.50
Investigation of Defendant's Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	3.10
Investigation, Research, and Analysis Regarding Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity; and Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	3.30
Analysis of Competitors in Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	3.50
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between the Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	4.10
Comparative Analysis and Cross-Checking of All Available Job Postings and Job Reviews Regarding Working for Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	6.80

Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Defendant's Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California	3.30
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Timekeeping, Rounding, Overtime Compensation, Bonuses/Incentive/Shift Differential Pay, Rounding, Vacation Pay, On-Call, Meal/Rest Breaks, On-Premises Breaks, On Duty Meal Agreements, Meal Waivers, Union and Non-Union Contracts, Communication Devices, Personal Cell Phone/Device Usage, Tools/Equipment, Dress Code, Uniforms, Laundry Expenses, Reimbursement of Business-Related Expenses, Collective Bargaining Agreements, and Arbitration Agreements	13.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant and Its Clients/Customers Use to Conduct Their Everyday Business, Including Timekeeping, Communications, Security, and Surveillance Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	3.70
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, Collective-Bargaining Agreements and Related Federal Pre-Emption and California Labor Code Exemptions/Exceptions, and Compliant Policies	6.50
Review Register of Actions and Filings in <i>Penny Scott et. al. v. Blackstone Consulting Inc.</i> , United States District Court, Southern District of California, Case No. 21-cv-1470-MM ("Scott Federal Action")	1.30
Meet and Communicate with Plaintiff Ahmir Ringo Throughout the Pendency of the Case	32.50
Meet and Communicate with Plaintiff Kawana Anderson Throughout the Pendency of the Case	39.50
Investigate, Meet with, and Communicate with Putative Class Members and/or Percipient Witnesses	11.50

Pleadings and Court Filings	
Draft Plaintiff Ringo's Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on January 18, 2022) (Ringo State Action)	7.10
Review Court's Notice of Case Assignment (filed on January 18, 2022) (Ringo State Action)	0.10
Review Court's Notice of Case Management Conference (filed on January 19, 2022) (Ringo State Action)	0.10
Draft Plaintiff Ringo's Notice and Acknowledgment of Receipt (filed on March 11, 2022) (Ringo State Action)	0.10
Review Defendant's Certification and Notice of Interested Parties (served on March 23, 2022) (Ringo Federal Action)	0.10
Review Defendant's Notice of Pendency of Other Actions or Proceedings (served on March 23, 2022) (Ringo Federal Action)	0.10
Review Court's Notice of Assignment to United States Judges and Notice to Parties of Court-Directed Program, Notice to Counsel Re: Consent to Proceed Before a United States Magistrate Judge, and (filed on March 24, 2022) (Ringo Federal Action)	0.10
Review Defendant's Notice to State Court of Removal of Civil Action to Federal Court (served on March 24, 2022) (Ringo State Action)	0.10
Review Court's Order Returning Case for Reassignment (filed on March 25, 2022) (Ringo Federal Action)	0.10
Draft Plaintiff's Notice of Appearance (filed on March 28, 2022) (Ringo Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Stipulation to Extend Time to Respond to Initial Complaint by No More Than 30 Days (L.R. 8-3) (filed on March 29, 2022) (Ringo Federal Action)	1.20

Review Court's Order Returning Case for Reassignment (filed on April 5, 2022) (Ringo Federal Action)	0.10
Review Court's Standing Order Regarding Newly Assigned Cases (filed on April 5, 2022) (Ringo Federal Action)	0.20
Review Court's Order Setting Scheduling Conference (filed on April 7, 2022) (Ringo Federal Action)	0.10
Review Court's Notice to All Parties and Order (In Chambers) (filed on April 8, 2022) (Ringo Federal Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff Ringo's Complaint for Enforcement Under the Private Attorneys General Act and Legal Research and Analysis of Allegations and Affirmative Defenses in Defendant's Answer (served on June 1, 2022) (Ringo State Action)	1.50
Draft Plaintiff Ringo's Case Management Statement (filed on July 1, 2022) (Ringo State Action)	0.80
Review Defendant's Case Management Statement (served on July 1, 2022) (Ringo State Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on July 18, 2022) (Ringo State Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation and [Proposed] Protective Order (submitted on August 4, 2022) (Ringo State Action)	1.40
Review Court's Protective Order (filed on August 18, 2022) (Ringo State Action)	0.10
Draft Plaintiff Anderson's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on September 26, 2022) (Anderson Class Action)	7.30
Review Court's Notice of Case Assignment (filed on September 26, 2022) (Anderson Class Action)	0.10

Review Court's First Amended General Order Re: Mandatory Electronic Filing (filed on September 26, 2022) (Anderson Class Action)	0.10
Draft Plaintiff Anderson's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq., and Legal Research and Analysis of All Allegations Involved (filed on September 26, 2022) (Anderson PAGA Action)	6.80
Review Court's Notice of Case Assignment (filed on September 26, 2022) (Anderson PAGA Action)	0.10
Review Court's Notice of Case Management Conference (filed on September 27, 2022) (Anderson PAGA Action)	0.10
Draft Plaintiff Ringo's Case Management Statement (filed on October 4, 2022) (Ringo State Action)	0.80
Review Defendant's Case Management Statement (served on October 4, 2022) (Ringo State Action)	0.10
Review Court's Initial Status Conference Order and Minute Order Re: Initial Status Conference (Complex Litigation Program) (filed on October 10, 2022) (Anderson Class Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Trial Setting Conference [Proposed] Order (submitted on October 14, 2022) (Ringo State Action)	1.10
Review Court's Order to Continue Trial Setting Conference (filed on October 18, 2022) (Ringo State Action)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on December 13, 2022) (Anderson Class Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Stay the Case and Continue Case Management Conference; [Proposed] Order (submitted on March 15, 2023) (Anderson PAGA Action)	1.20

Review Court's Order to Stay the Case and Continue Case Management Conference (filed on March 21, 2023) (Anderson PAGA Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation for Motion to Stay Case and Vacate Motion for Preliminary Approval Hearing; [Proposed] Order Thereon (submitted on April 14, 2023) (Anderson Class Action)	1.20
Review Court's Order for Motion to Stay Case and Vacate Motion for Preliminary Approval Hearing (filed on April 25, 2023) (Anderson Class Action)	0.10
Draft, Review, and/or Revise Second Amended Class Action Complaint for Damages and Restitution and Representative Action Pursuant to the Private Attorneys General Act ("PAGA") (filed on May 17, 2023); Meet and Confer with Defendant's Counsel and Other Plaintiffs' Counsel and Draft, Review, and/or Revise Joint Motion for an Order Granting Plaintiff Leave to File Second Amended Complaint (filed May 15, 2023) (Scott Federal Action)	0.80
Review Court's Order Granting Leave to File Second Amended Complaint (filed May 16, 2023) (Scott Federal Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Vacate Trial Setting Conference and Stay Case; [Proposed] Order (submitted on May 19, 2023) (Ringo State Action)	1.10
Review Court's Order to Vacate Trial Setting Conference and Stay Case (filed on May 25, 2023) (Ringo State Action)	0.10
Review Defendant's Answer to Second Amended Complaint and Legal Research and Analysis of All Allegations and Affirmative Defenses in Defendant's Answer (filed on June 6, 2023) (Scott Federal Action)	1.10
Review Court's Minute Order Re: Order to Show Cause Re: Settlement (filed on June 30, 2023) (Anderson Class Action)	0.10

Review Court's Notice of Case Reassignment and Order for Plaintiff Ringo to Give Notice (Dates Remain) (filed on July 17, 2023) (Ringo State Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Status Report Re: Settlement (filed on July 26, 2023) (Anderson Class Action)	1.20
Review Court's Minute Order Re: Order to Show Cause Re: Settlement (filed on August 2, 2023) (Anderson Class Action)	0.10
Review Court's Notice of Case Reassignment and Order for Plaintiff Anderson to Give Notice (filed on August 17, 2023) (Anderson PAGA Action)	0.10
Review Court's Minute Order Re: Status Conference Re: Dismissal (filed on September 13, 2023) (Ringo State Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Status Report Re: Settlement; [Proposed] Order Vacating September 28, 2023 Status Conference (filed on September 26, 2023) (Anderson PAGA Action)	1.10
Review Court's Order Vacating September 28, 2023 Status Conference (filed on September 26, 2023) (Anderson PAGA Action)	0.10
Appearances	
Prepare for and Telephonically Attend Initial Case Management Conference (July 18, 2022) (Ringo State Action)	0.80
Prepare for and Telephonically Attend Case Management Conference (December 13, 2022) (Anderson Class Action)	0.50
Prepare for and Telephonically Attend Status Conference (June 30, 2023) (Anderson Class Action)	0.40

Prepare for and Telephonically Attend Status Conference (August 2, 2023) (Anderson Class Action)	0.40
Prepare for and Telephonically Attend Status Conference (September 28, 2023) (Anderson PAGA Action)	0.80
Prepare for and Attend Hearing on Plaintiffs' Motion for an Order Granting Final Approval of Class Action Settlement and Entering Judgment (December 11, 2023) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ahmir Ringo (served on October 26, 2021) (Ringo State Action)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ahmir Ringo (served on March 18, 2022) (Ringo State Action)	3.20
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kawana Anderson (served on May 17, 2022) (Anderson Class Action)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kawana Anderson (served on June 7, 2022) (Anderson Class Action)	4.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Ringo for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on November 12, 2021)	4.10
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Anderson for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on July 7, 2022)	4.40
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	13.50

Meet with, Draft Correspondence to, and Respond to Correspondence from, Other Plaintiffs' Counsel	9.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources, Perform Damages and Penalties Analysis and Calculations, and Evaluate Claims Prior to Reaching Settlement	14.50
Confer with Other Plaintiffs' Counsel Regarding December 1, 2022 Mediation With Louis M. Marlin, Esq., and Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding (fully executed on or about December 12, 2022)	0.80
Draft, Review, Revise, Negotiate, and/or Finalize Class Action and PAGA Settlement Agreement (fully executed on April 5, 2023) and Class Notice	1.10
Monitor Settlement Administration and Review Weekly Reports from Settlement Administrator	2.10
Law and Motion	
Review and Analyze Defendant's Notice of Removal of Action by Defendant and Declaration of Stephanie Hickman in Support Thereof (served on March 23, 2022) (Ringo Federal Action)	1.10
Review and Analyze Defendant's Notice of Motion and Motion to Dismiss Plaintiff Ringo's Complaint, Memorandum of Points and Authorities in Support Thereof, Declaration of Pankit Doshi in Support Thereof, Request for Judicial Notice in Support Thereof, and [Proposed} Order Thereon (served on April 6, 2022) (Ringo Federal Action)	1.50
Research and Draft Plaintiff Ahmir Ringo's Opposition to Defendant's Motion to Dismiss Plaintiff Ringo's Complaint; Memorandum of Points and Authorities in Support Thereof (filed on April 18, 2022) (Ringo Federal Action)	10.50

Draft Plaintiff Ringo's Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. § 1447; Memorandum of Points and Authorities in Support Thereof and Declaration of Jacquelyn Silva in Support Thereof (filed on April 22, 2022) (Ringo Federal Action)	11.50
Review and Analyze Defendant's Reply to Plaintiff Ringo's Opposition to Defendant's Motion to Dismiss (served on April 25, 2022) (Ringo Federal Action)	1.50
Review and Analyze Defendant's Opposition to Plaintiff Ringo's Motion for Remand and Declaration of Stephanie Hickman in Support Thereof (filed on May 2, 2022) (Ringo Federal Action)	1.70
Review Court's Order Remanding Action to State Court (filed on May 3, 2022) (Ringo Federal Action)	0.10
Meet and Confer with Defendant's Counsel and Other Plaintiffs' Counsel, Review Declarations of Plaintiffs' Counsel Isam C. Khoury, Plaintiffs' Counsel Max W. Gavron, Plaintiff Penny A. Scott, Plaintiff Tiffany Lockett, Plaintiff Tocashema Williams, Julie Green of CPT Group, Inc., and Defendant's Counsel Pankit J. Doshi, and Draft, Review, and/or Revise Memorandum of Points and Authorities in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Declaration of Joanna Ghosh in Support Thereof, Declaration of Ahmir Ringo in Support Thereof, and Declaration of Kawana Anderson in Support Thereof (filed on May 17, 2023) (Scott Federal Action)	2.50
Review Court's Order Granting Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (filed on August 1, 2023) (Scott Federal Action)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research, Draft, Review, and/or Revise Plaintiffs' Motion for an Order Granting Final Approval of Class Action Settlement and Entering Judgment, and Declaration of Edwin Aiwazian in Support Thereof (filed on or about November 17, 2023) (Anticipated)	4.30
Total Hours:	320.80

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Ringo v. Blackstone Consulting, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/12/2021	U.S. Postmaster	Postage	8.00
11/12/2021	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
1/19/2022	Legal Document Server, Inc.	Attorney Service	35.86
1/19/2022	Los Angeles Superior Court	Court Filing Fee	435.00
3/15/2022	Legal Document Server, Inc.	Attorney Service	15.20
4/19/2022	Legal Document Server, Inc.	Attorney Service	160.00
4/25/2022	Legal Document Server, Inc.	Attorney Service	160.00
7/1/2022	Legal Document Server, Inc.	Attorney Service	15.95
10/4/2022	Legal Document Server, Inc.	Attorney Service	15.95
10/17/2022	Legal Document Server, Inc.	Attorney Service	17.30
10/17/2022	Los Angeles Superior Court	Filing Fee	20.00
5/19/2023	Legal Document Server, Inc.	Attorney Service	17.54
5/19/2023	Los Angeles Superior Court	Stipulation Fee	20.00
Total:			<u>995.80</u>

LAWYERS for JUSTICE PC CASE COST DETAIL
Anderson v. Blackstone Consulting, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/17/2022	U.S. Postmaster	Postage	7.38
9/27/2022	Legal Document Server, Inc.	Attorney Service	112.81
9/27/2022	Los Angeles Superior Court	Court Filing Fee	435.00
9/27/2022	Los Angeles Superior Court	Complex Filing Fee	1,000.00
10/14/2022	Los Angeles Superior Court	Document Download Fee	3.00
11/4/2022	ProLegal	Attorney Service	221.75
11/28/2022	Legal Document Server, Inc.	Attorney Service	15.95
Total:			<u><u>1,795.89</u></u>

LAWYERS for JUSTICE PC CASE COST DETAIL
Anderson v. Blackstone Consulting, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/7/2022	U.S. Postmaster	Postage	15.16
7/7/2022	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
9/27/2022	Legal Document Server, Inc.	Attorney Service	45.31
9/27/2022	Los Angeles Superior Court	Court Filing Fee	435.00
11/28/2022	Legal Document Server, Inc.	Attorney Service	15.95
11/4/2023	ProLegal	Attorney Service	200.00
Total:			<u><u>786.42</u></u>