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*Attorneys for Plaintiff and the Class*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE**

MIRANDA LOPEZ, individually, and on  
behalf of other members of the general public  
similarly situated;

Plaintiff,

vs.

BEHAVIOR FRONTIERS, LLC, a  
California limited liability company; and  
DOES 1 through 100, inclusive,

Defendants.

Case No.: 22STCV15331

Honorable Elihu M. Berle  
Department SSC-6

**CLASS ACTION**

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

Date: April 9, 2024  
Time: 9:00 a.m.  
Department: SSC-6

Complaint Filed: May 9, 2022  
FAC Filed: October 23, 2023  
Trial Date: None Set

**DECLARATION OF JOANNA GHOSH**

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

**PRELIMINARY APPROVAL OF SETTLEMENT**

2. On December 6, 2023, in Department SSC-6 of the above-entitled Court, the Honorable Elihu M. Berle preliminarily approved the Class Action and PAGA Settlement Agreement and Class Notice (collectively “Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Behavior Frontiers, LLC (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff to represent the Class (“Plaintiff” or “Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC, JCL Law Firm, APC, and Zakay Law Group, APLC as counsel for the Class (together, “Class Counsel”). The Court approved and ordered the mailing of the Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Apex Class Action LLC (“Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

**WORK PERFORMED BY CLASS COUNSEL**

3. Attorneys at Lawyers *for* Justice, PC have been actively engaged in performing work in the above-captioned putative class action (the “Action”) since prior to its commencement on May 9, 2022.

4. Lawyers *for* Justice, PC’s work has included, and is not limited to, preparing the pleadings, case strategy, undertaking investigation and formal and informal discovery, performing legal research, and conducting claims evaluation and analysis. Since joining forces

1 with and associating in JCL Law Firm, APC and Zakay Law Group, APLC, as co-counsel in the  
2 Action, we have worked cooperatively with them to strategize and prosecute the matter, and our  
3 work with them has been a coordinated and combined effort. Ultimately, Class Counsel's efforts  
4 and the efforts of Plaintiff have been successful in reaching the Settlement.

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

16 6. Class Counsel conducted significant formal and informal discovery and  
17 investigation into the facts of the Action, and exchanged a large volume of information,  
18 documents, and data throughout the course of the litigation and in connection with mediation and  
19 settlement negotiations. Class Counsel reviewed and analyzed a large volume of information,  
20 data, and documents obtained from Plaintiff, Defendant, and other sources. Class Counsel  
21 researched applicable law, developed liability, damages, and penalties valuation models in  
22 preparation for mediation and settlement negotiations, and met and conferred with Defendant's  
23 counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case  
24 management, discovery, and the production of information, documents, and data in the course of  
25 litigation and in connection with mediation and settlement negotiations. Other work performed  
26 by Class Counsel included, and was not limited to, case strategy and analysis; drafting,  
27 reviewing, and revising the pleadings, the mediation brief, and settlement documents; drafting  
28 and propounding multiple sets of formal written discovery requests on Defendant; reviewing

1 Defendant's responses and objections to written discovery requests; working with Plaintiff to  
2 provide responses to formal written discovery requests propounded by Defendant; preparing for  
3 and attending court proceedings; and engaging in mediation and settlement negotiations, among  
4 other tasks.

5         7. As outlined herein, the parties have conducted significant investigation and  
6 formal and informal discovery during the course of litigating the Action and mediation and  
7 settlement negotiations. Class Counsel analyzed a volume of information, documents, and data  
8 obtained from Plaintiff, Defendant, and other sources. The information, documents, and data  
9 provided a critical understanding of the nature of the work performed by the Class Members and  
10 Aggrieved Employees, as well as Defendant's operations and employment policies, practices,  
11 and procedures, and were used in analyzing liability, damages, penalties, and valuation issues in  
12 connection with all phases of the litigation, and ultimately, in connection with the mediation and  
13 settlement negotiation process. Class Counsel also performed significant research into the  
14 applicable law, which is evolving as it relates to class certification, manageability, off-the-clock  
15 theory, rounding, meal and rest periods, regular rate of pay, wage-and-hour enforcement, Private  
16 Attorneys General Act claims and penalties, arbitration agreements, Plaintiff's claims and  
17 allegations, and Defendant's defenses thereto, as well as facts discovered.

18         8. After conducting significant investigation of the facts and law during the  
19 prosecution of the Action, counsel for the parties engaged in extensive settlement negotiations to  
20 try to resolve the Action. These efforts included participating in a formal, full-day mediation  
21 conducted by Steven Rottman, Esq., a well-regarded mediator experienced in mediating complex  
22 labor and employment matters. During all settlement discussions, the parties conducted their  
23 negotiations at arm's length in an adversarial position. With the assistance of the mediator, the  
24 parties ultimately agreed to a settlement that is now memorialized in the Parties' Settlement  
25 Agreement.

26         9. Plaintiff moves for an award of attorneys' fees to Class Counsel in the amount of  
27 \$666,666.67, which is one-third (1/3) of the Gross Settlement Amount of \$2,000,000.00.  
28 Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class

Counsel, Plaintiff has agreed to a contingency fee of at least one-third (1/3) of the recovery.

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

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the Action such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **194.50 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred in performing those services. The hours include work done by myself and several other attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the attached chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class and representative actions, support a reasonable blended hourly rate of compensation of at least \$850 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 \$850 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

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

7 **EXPERIENCE AND ADEQUACY OF**  
8 **LAWYERS *for* JUSTICE, PC**

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

23 14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice,  
24 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and  
25 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has  
26 extensive formal training in dispute resolution and negotiation from the Straus Institute for  
27 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he  
28 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In

October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he 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, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or representative action cases.

15. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases,

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

11 16. Vartan S. Madoyan is a Member of Lawyers *for* Justice, PC. He received his  
12 Bachelor of Arts degree in Economics from the University of California, San Diego in 2007, and  
13 a Juris Doctor degree from Loyola Law School in 2011, graduating with Cum Laude and Order  
14 of the Coif honors. He is admitted to practice before all courts in the State of California and all  
15 U.S. District Courts in California. He externed for the Honorable Victoria S. Kaufman of the  
16 United States Bankruptcy Court, Central District of California, from June 2009 to August 2009.  
17 He externed for the Honorable Gary A. Feess of the United States District Court, Central District  
18 of California, from January 2010 to May 2010. From 2011 through and including the present, he  
19 has practiced almost exclusively on complex wage and hour class action and PAGA action  
20 matters in California. From October 2011 to June 2013, he was an Associate at Littler  
21 Mendelson's Century City, California office, working for one of the largest employer-side labor  
22 and employment law firms in the United States. From July 2013 to March 2014, he was an  
23 Associate at Sheppard, Mullin, Richter & Hampton's Century City, California office. From  
24 March 2014 to July 2023, he worked as an Associate and then as Counsel at Baker Hostetler  
25 LLP's Los Angeles office. From August 2023 to the present, he has been a Member of Lawyers  
26 *for* Justice, PC. He has taken and defended dozens of depositions and has successfully handled  
27 motion practice in class action and PAGA cases regarding discovery (including and not limited  
28 to motions regarding class contact information), class certification (both contested class

certification and stipulated class certification), dispositive motions, arbitration agreements, coordination, and intervention. He has successfully handled a complex wage and hour class action and PAGA case through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange County Superior Court, Case No. 30-2013-00692890. He also successfully handled briefing on appeal regarding employer efforts to compel arbitration. *TitleMax of Cal. v. Pena*, California Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28, 2023) (unpublished decision). Further, he has extensive experience with settlements of class actions and PAGA actions and has handled and supervised this process in over seventy-five (75) cases.

17. I am a Managing Member of Lawyers for Justice, PC. I received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since 2013) and am admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. I have taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. I have successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), *cert. denied* (Cal., May 24, 2017), *cert. denied* (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). I have significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). I also have extensive experience with class

1 action and/or representative action settlements, and I have handled this process in over three  
2 hundred (300) cases. Under Edwin Aiwarzian, Arby Aiwarzian, and my supervision, Lawyers *for*  
3 Justice, PC has handled the class certification and court approval process for hundreds of class  
4 action and/or representative action matters that have successfully resolved. I am a member of the  
5 California Employment Lawyers Association.

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

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

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

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

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

25 d) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
26 wage-and-hour class action against a national retailer involving allegations of misclassification  
27 of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class  
28 certification. On August 26, 2013, the court granted final approval of the class action settlement.

1 The Los Angeles County Superior Court Case Number is BC424012.

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

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

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

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

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

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

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

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

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

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

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

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 represented the plaintiff in a PAGA representative action, against the  
11 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, represents 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. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding Number is 4886.

ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt employees. On September 27, 2019, the court granted the plaintiffs' motion for class

certification in part and certified a class. The Alameda County Superior Court Case Number is RG15757606 and the Judicial Council Coordination Proceeding Number is 4921.

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

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

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

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

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

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

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

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

22                   **LITIGATION COSTS AND EXPENSES INCURRED BY**

23                           **LAWYERS FOR JUSTICE, PC**

24           19.    To date, Class Counsel have borne all of the risks and costs of litigation and will  
25 not receive any compensation until recovery is obtained in this matter. Lawyers for Justice, PC  
26 seeks reimbursement of **\$2,619.12** in litigation costs and expenses incurred in this matter, as  
27 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in  
28 the prosecution of the Action and to obtain the Settlement.

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 4th day of February 2023, at Glendale, California.

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7 Joanna Ghosh  
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## **EXHIBIT A**

**MIRANDA LOPEZ V. BEHAVIOR FRONTIERS, LLC**  
**Los Angeles County Superior Court Case No. 22STCV15331**

**ATTORNEY TASK AND TIME CHART**

| <b>TASK</b>                                                                                                                                                                                                                                                | <b>LAWYERS FOR JUSTICE, PC</b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                                                                                          |                                |
| Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality, and Manageability                                                                                       | 10.90                          |
| Pre-Lawsuit Investigation of the Merits of Plaintiff Miranda Lopez’s (“Plaintiff”) Claims and the Merits of the Claims of With Respect to the Putative Class Members and Aggrieved Employees                                                               | 8.50                           |
| Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Behavior Frontiers, LLC (“Defendant”) With Respect to Plaintiff and the Putative Class Members                                                                          | 8.60                           |
| Legal Research and Analysis of Latest Off-the-Clock, Regular Rate of Pay, Rounding, Sick Pay, Reporting Time Pay, Meal and Rest Break, Private Attorneys General Act Arbitration Agreement, Manageability, and Class Certification Decisions in California | 8.20                           |
| Investigation of Defendant, Its Business Relationships, Its Certifications and Registrations, Its Contracts, and the Industry in Which It Operates                                                                                                         | 5.70                           |
| 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                                                           | 3.90                           |

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| 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                                                                                                                                                                                                                          | 4.50  |
| 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                                                                                                                                                                                                                                                             | 4.10  |
| 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 Layout, Configuration, and Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues                                                                                                                                                                 | 4.50  |
| Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Other Reviews and Postings Regarding 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                                                                                                                                                                                                | 6.90  |
| Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California                                                                                                                                                                                                                                                                                                                              | 4.80  |
| Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Regarding Timekeeping, Rounding, Reporting Time Pay, Overtime Pay, Non-Discretionary Bonus/Shift Differential/Performance/Incentive Pay, Regular Rate of Pay, Meal Waivers, On-Premises/On-Duty Meal and Rest Breaks, Meal/Rest Premiums, Sick Pay, Scheduling and Shifts, Use of Personal Cell Phones, Use of Personal Vehicles, Reimbursement of Business-Related Expenses, and Arbitration Agreements | 16.50 |
| Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Timekeeping, Scheduling, Patient Care, Communications, Document and Information Sharing, 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, Piece-Rate Work, and Time Worked During Meal Breaks  | 4.30  |

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| Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Exemption, Waiver, and Compliant Policies.                                                                                                                    | 8.10  |
| Research and Investigation Re: Post- <i>Duran v. U.S. Bank</i> Trial Manageability Issues, Including Research Regarding Which Experts to Retain and For What Purpose                                                                                                                                 | 5.40  |
| Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members and Aggrieved Employees' Work                                                                                                                                                     | 6.50  |
| Meet and Communicate with Plaintiff Throughout the Pendency of the Case                                                                                                                                                                                                                              | 10.50 |
| Investigate, Meet, Communicate With, and/or Conduct Interviews of Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses                                                                                                                                                           | 11.50 |
| <b>Pleadings and Court Filings</b>                                                                                                                                                                                                                                                                   |       |
| Draft, Review, and/or Revise Plaintiff's Class Action Complaint for Damages, and Legal Research and Analysis of All Claims Involved (filed on May 9, 2022)                                                                                                                                           | 7.10  |
| Review Court's Notice of Case Assignment – Unlimited Civil Case, Alternative Dispute Resolution (ADR) Package, First Amended General Order, and Voluntary Efficient Litigation Stipulations and General Order Re Use of Voluntary Efficient Litigation Stipulations (filed or issued on May 9, 2022) | 0.10  |
| Review Court's Order Re Initial Status Conference (Served on May 13, 2022)                                                                                                                                                                                                                           | 0.10  |
| Draft, Review, and/or Revise Notice of Association of Counsel (filed on June 30, 2022)                                                                                                                                                                                                               | 0.10  |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on July 7, 2022)                                                                                                                                                                 | 0.10  |
| Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of Affirmative Defenses in Defendant's Answer (served on July 28, 2022)                                                                                                      | 0.80  |

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| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on October 10, 2022)                                                                                                                                                        | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on November 17, 2022)                                                                                                                                                       | 0.10 |
| Review Court's Minute Order Re: Status Conference (filed November 29, 2022)                                                                                                                                                                                                                     | 0.10 |
| Review Joint Stipulation and Order to Stay (filed February 21, 2023)                                                                                                                                                                                                                            | 0.10 |
| Review Court's Notice of Continuance of Post-Mediation Status Conference (filed February 27, 2023)                                                                                                                                                                                              | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on May 24, 2023)                                                                                                                                                            | 0.10 |
| Review Notice of Ruling Regarding Hearing on Plaintiff's Motion for Preliminary Approval of Settlement (served on June 1, 2023)                                                                                                                                                                 | 0.10 |
| Draft, Review, and/or Review Stipulation and Order to Continue Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on August 4, 2023)                                                                                                                        | 0.10 |
| Meet and Confer with Defendant's Counsel, Draft, Review, and/or Revise Contemplated First Amended Class Action Complaint for Damages and Stipulation and [Proposed] Order For Leave to Amend Complaint, and/or Review Order Thereon (submitted on August 23, 2023; order filed August 24, 2023) | 0.50 |
| Review Notice of Continuance of Hearing on Motion for Preliminary Approval of Settlement (filed on September 25, 2023)                                                                                                                                                                          | 0.10 |
| Review Notice of Ruling Re: Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed December 8, 2023)                                                                                                                                                            | 0.10 |

| <b>Appearances</b>                                                                                                                                                                                                                                                                                           |      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Prepare for and Remotely Attend Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement (December 6, 2023)                                                                                                                                                                            | 0.80 |
| Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement (April 9, 2024) (Anticipated)                                                                                                                                                     | 1.50 |
| <b>Discovery and Deposition</b>                                                                                                                                                                                                                                                                              |      |
| Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on July 19, 2021)                                                                                                                                                                                | 1.90 |
| Draft First Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on August 30, 2021)                                                                                                                                                              | 2.10 |
| Draft Second Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on November 10, 2021)                                                                                                                                                           | 2.10 |
| Review and Analyze Documents Produced by Defendant in Response to Plaintiff's Personnel File, Pay Stubs, and Time Records (served on November 18, 2021)                                                                                                                                                      | 4.10 |
| Draft Plaintiff's Form Interrogatories-General (Set One), Requests for Production of Documents (Set One), Special Interrogatories (Set One), and Special Interrogatories (Set Two), and serve Requests for Production of Documents (Set One) and Special Interrogatories (Set One) (served on July 21, 2022) | 4.10 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (Organizational Structure) (noticed for August 22, 2022) (served on July 21, 2022)                                                                                                              | 2.10 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (Wage and Hour Practices) (noticed for August 23, 2022) (served on July 21, 2022)                                                                                                               | 2.30 |

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| Review Defendant's Form Interrogatories-General (Set One), Form Interrogatories-Employment Law (Set One), Requests for Production (Set One), and Special Interrogatories (Set One) Propounded on Plaintiff (served on July 21, 2022)                                                                                                                                                                                                                                                                                                                                            | 0.40  |
| Review and Analyze Defendant's Responses to Requests for Production of Documents (Set One), Special Interrogatories (Set One), and Documents Produced in Response Thereto (September 12, 2022)                                                                                                                                                                                                                                                                                                                                                                                  | 1.50  |
| <b>Letters and Correspondence</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |       |
| Meet With, Draft Correspondence to, and Respond to Correspondence from Defendant's Counsel                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 5.10  |
| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |       |
| Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources, and Perform Analysis, Calculations, and Evaluation of Claims Prior to Reaching Settlement                                                                                                                                                                                                                                                                                                                                                                            | 13.50 |
| Draft, Review, and/or Revise Confidential Memorandum of Understanding (executed July 18, 2023)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 0.20  |
| Draft, Review, Revise, Negotiate, and/or Finalize Class Action and PAGA Settlement Agreement (executed on August 31, 2023) and Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval                                                                                                                                                                                                                                                                                                                                                       | 0.50  |
| Review and Monitor Communications Regarding Settlement Notice Administration Process and Administration Status Reports                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 0.90  |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |       |
| Draft, Review, and/or Revise Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement, Points and Authorities in Support Thereof, Declaration of Miranda Lopez in Support Thereof, Declaration of Jean-Claude Lapuyade, Esq. in Support Thereof, Declaration of Shani O. Zakay, Esq. in Support Thereof, Declaration of Sean Hartranft in Support Thereof, Declaration of Theresa A. in Support Thereof, and Proposed Order Granting Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement (filed on August 31, 2023) | 0.50  |

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| Draft, Review, and/or Revise Amended Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on September 27, 2023)                                                                                                                                                                                | 0.10          |
| Draft, Review, and/or Revise Supplemental Declaration of Jean-Claude Lapuyade in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on October 16, 2023)                                                                                                                                    | 0.10          |
| Draft Declaration of Vartan Madoyan in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on November 7, 2023)                                                                                                                                                                                          | 1.50          |
| Draft, Review, and/or Revise Proposed Order Granting Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement (filed on December 7, 2023)                                                                                                                                                                           | 0.10          |
| Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; Draft, Review, and/or Revise Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on February 5, 2024) | 5.90          |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                        | <b>194.50</b> |

## **EXHIBIT B**

**LAWYERS for JUSTICE PC CASE COST DETAIL**  
**Lopez vs. Behavior Frontiers, LLC**

| <u>Date</u>   | <u>Payee</u>                | <u>Expense Description</u> | <u>Amount</u>     |
|---------------|-----------------------------|----------------------------|-------------------|
| 7/19/2021     | U.S. Postmaster             | Postage                    | \$7.50            |
| 8/30/2021     | U.S. Postmaster             | Postage                    | \$7.50            |
| 11/10/2021    | U.S. Postmaster             | Postage                    | \$8.16            |
| 11/24/2021    | U.S. Postmaster             | Postage                    | \$7.78            |
| 5/9/2022      | Los Angeles Superior Court  | Complex Filing Fee         | \$1,000.00        |
| 5/9/2022      | Los Angeles Superior Court  | Complaint Filing Fee       | \$435.00          |
| 5/9/2022      | Legal Document Server, Inc. | Attorney Service           | \$112.06          |
| 5/10/2022     | ProLegal                    | Attorney Service           | \$124.72          |
| 6/8/2022      | Legal Document Server, Inc. | Attorney Service           | \$110.20          |
| 7/1/2022      | Legal Document Server, Inc. | Attorney Service           | \$15.95           |
| 10/6/2022     | Case Anywhere LLC           | Attorney Service           | \$105.30          |
| 1/4/2023      | Legal Document Server, Inc. | Attorney Service           | \$125.00          |
| 1/5/2023      | Legal Document Server, Inc. | Attorney Service           | \$15.95           |
| 1/6/2023      | Case Anywhere LLC           | Attorney Service           | \$135.00          |
| 4/15/2023     | Case Anywhere LLC           | Attorney Service           | \$135.00          |
| 7/3/2023      | Case Anywhere LLC           | Attorney Service           | \$135.00          |
| 8/10/2023     | Los Angeles Superior Court  | Document Download Fee      | \$4.00            |
| 10/4/2023     | Case Anywhere LLC           | Attorney Service           | \$135.00          |
| <b>Total:</b> |                             |                            | <b>\$2,619.12</b> |