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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

TANYA MARSHALL and MARIA
ANDRADE, individually, and on behalf of
other members of the general public similarly
situated,

Plaintiff,

v.

WATTS HEALTHCARE CORPORATION, a
California Corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 19STCV27737

**DECLARATION OF JOANNA GHOSH, ESQ.
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT AND MOTION
FOR CLASS COUNSEL FEES, CLASS
COUNSEL LITIGATION EXPENSES, AND
CLASS REPRESENTATIVE SERVICE
PAYMENTS**

Date: August 25, 2025
Time: 10:30 a.m.

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1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, co-counsel of record for Plaintiffs Tanya Marshall and Maria Andrade (together, “Plaintiffs”) and the Class in the above-captioned wage and hour class action (“Action”) filed against Watts Healthcare Corporation (hereinafter “Defendant”). 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 thereto.

2. Generally, Plaintiffs claim that Defendant failed to pay for all time worked and all wages due, failed to provide compliant meal and rest periods, failed to reimburse for required business expenses, failed to furnish accurate itemized wage statements, failed to maintain requisite payroll records, and failed to timely pay all wages when due. Defendant denies liability for each of Plaintiffs' claims. Further, Defendant asserts that Plaintiffs and some of the putative class members are subject to collective bargaining agreements that cover the hours of labor, wages, and basic working conditions of Plaintiffs and other putative class members, which include grievance and arbitration procedures that cover the claims asserted in the Action, and that many putative class members have availed themselves of the grievance and arbitration procedures so as to resolve disputes regarding their wages and hours and working conditions. Defendant also asserts that it fully complied with all of its obligations under any collective bargaining agreements and applicable state and federal wage and hour laws, and Defendant had raised several other significant defenses to Plaintiffs' claims. In the course of litigation, Defendant asserted that it intended to file motions (including inter alia, a motion for judgment on the pleadings or motion for summary judgment), seeking to have the Court determine whether the claims asserted in the Action are preempted by section 301(a) of the Labor Management Relations Act and whether Plaintiffs were required to exhaust administrative remedies and/or internal grievance procedures, including the grievance and arbitration remedies provided by the collective bargaining agreements.

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1 3. On August 8, 2019, Plaintiff Tanya Marshall filed her complaint against Defendant in
2 Los Angeles County Superior Court, alleging: (1) failure to pay overtime pursuant to California Labor
3 Code sections 510 and 1198; (2) failure to provide compliant meal periods and associated premiums in
4 violation of California Labor Code sections 226.7 and 512(a); (3) failure to provide compliant rest
5 periods and associated premiums in violation of California Labor Code section 226.7; (4) failure to pay
6 minimum wages pursuant to California Labor Code sections 1194, 1197, and 1197.1; (5) failure to
7 timely pay wages upon termination in violation of California Labor Code sections 201 and 202; (6)
8 failure to timely pay wages during employment in violation of California Labor Code section 204; (7)
9 failure to provide accurate and itemized wage statements in violation of California Labor Code section
10 226(a); (8) failure to keep requisite payroll records in violation of California Labor Code section
11 1174(d); (9) failure to reimburse business expenses in violation of California Labor Code sections 2800
12 and 2802; and (10) violations of California Business and Professions Code section 17200, *et seq.*

13 4. On November 12, 2020, Defendant filed a Notice of Related Case, identifying *Sonika*
14 *Flournoy v. Watts Healthcare Corporation*, Los Angeles County Superior Court Case No.
15 20STCV08186 (“Flournoy Action”), filed on March 2, 2020, as a related case. On November 23, 2020,
16 the Court entered an order finding that this Action and the Flournoy Action are related under California
17 Rules of Court, rule 3.300(a) and the Court further deemed this Action as the lead case. Eventually, the
18 Flournoy Action resolved by way of settlement on an individual basis and was dismissed.

19 5. On December 8, 2021, the Parties participated in an all-day mediation presided over by
20 Eve Wagner, Esq., however, the Parties did not reach a settlement at that time and the Action continued
21 to be litigated. On July 31, 2023, the Parties stipulated to an order granting Plaintiff Tanya Marshall
22 leave to file a first amended complaint adding Maria Andrade as a named plaintiff in this Action, and
23 the Court granted leave on August 1, 2023. The First Amended Class Action Complaint for Damages
24 was filed on August 3, 2023.

25 6. The Parties continued to engage in settlement negotiations, including Defendant
26 providing documentation and information, on a confidential basis, regarding its business and financial
27 circumstances to further facilitate settlement discussions, with the Mediator’s assistance, between
28 approximately December 2021 and June 2024. Specifically, Defendant has contended that it is a non-

1 profit charitable organization and designated Federally Qualified Health Center that provides medical,
2 social, and behavioral services to the indigent and/or under-served communities in Los Angeles,
3 California, and that its operations are primarily funded way of Federal funding, and to some extent State
4 and County special grants and contracts, that are earmarked for particular purposes and use, and that
5 these funds may not be diverted to non-service related issues. Defendant has also contended that it was
6 economically impacted by the COVID-19 pandemic. In the course of litigation and mediation and
7 settlement negotiations, Defendant has provided Plaintiffs' counsel with, on a confidential basis,
8 documentation and information regarding its business and financial condition.

9 7. Based on extensive additional settlement negotiations and the mediator's evaluation, the
10 Parties ultimately reached a settlement by accepting the mediator's proposal and, thereafter, executed a
11 Memorandum of Understanding—Class Action and PAGA Settlement on July 29, 2024, and entered
12 the Class Action and PAGA Settlement Agreement ("Agreement," "Settlement," and "Settlement
13 Agreement") on January 29, 2025.

14 8. This matter involved extensive investigations and research into legal and factual issues,
15 and extensive formal and informal discovery. Class Counsel obtained class contact information from
16 Defendant as well as other information from Plaintiffs and percipient witnesses. Class Counsel
17 reviewed and analyzed a volume of information, documents, and data obtained from Plaintiffs,
18 Defendant, and other sources, researched applicable law, and undertook analyses and calculations of
19 the value of claims, damages, and penalties exposure. Class Counsel also met and conferred with
20 Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case
21 management, contemplated motion practice, formal and informal discovery, production of information,
22 documents, and data in the course of litigation and mediation and settlement negotiations, and the
23 mediation and settlement negotiations. Other work that Class Counsel has performed and/or will
24 perform include, *inter alia*, case strategy and analysis; drafting, reviewing, and revising the pleadings,
25 motion-related papers, and settlement-related papers; case management; and preparing for, participating
26 in, and/or attending court proceedings and the mediation and settlement negotiations.

27 9. The Parties first negotiated and agreed to the Gross Settlement Amount and many other
28 terms, and eventually, also the amount of the Class Representative Service Payments.

1 10. The Class Representative Service Payments requested are in exchange for Plaintiffs’
2 broader general release of claims and California Civil Code section 1542 waiver. The requested service
3 payments are fair and reasonable, especially in light of Plaintiffs’ efforts and time expended in pursuing
4 the Action, assisting Class Counsel with the litigation and settlement, regularly conferring with Class
5 Counsel on the status of their case and the strategies for prosecuting the claims, and reviewing the
6 proposed Settlement to ensure that its terms are fair and provide adequate relief for the Class Members,
7 Aggrieved Employees, and State of California. For example, Plaintiffs expended significant time
8 responding to and gathering and producing documents responsive to multiple sets of formal written
9 discovery requests propounded on them by Defendant.

10 11. Additionally, Plaintiffs remained available and responsive throughout the entire litigation
11 to address all case needs. Plaintiffs willingly came forward to protect and advance the rights of the
12 Class and the interests of the State of California and Aggrieved Employees, with respect to an important
13 legal dispute affecting California workers. Furthermore, Plaintiffs themselves faced significant
14 litigation risk, e.g., imposition of fees and costs, if unsuccessful.

15 12. In reaching this Settlement, Class Counsel carefully considered the strength of the case
16 versus the amount offered in settlement, as well as the risk, expense, and complexity of maintaining
17 class certification through trial. Plaintiffs are confident about the strength of their claims. Nonetheless,
18 Plaintiffs recognize that Defendant has factual and legal defenses that, if successful, would potentially
19 defeat or substantially impair the value of the lawsuit.

20 13. The issues presented in this case required more than just a general appreciation of wage
21 and hour law and class action procedure. The legal landscape surrounding some of Plaintiffs’ key
22 claims, namely, meal and rest period violations, is in flux. Nevertheless, Class Counsel successfully
23 navigated these legal development and successfully negotiated a significant monetary recovery for the
24 Class, Aggrieved Employees, and State of California.

25 14. Class Counsel only agreed to enter the Settlement following their evaluation of Plaintiffs’
26 claims based on thorough investigation of the facts, applicable law, and marketplace for similar
27 settlements, and considering the risk of significant delay, uncertainty associated with litigation, the
28 various defenses asserted by Defendant. The Settlement was possible only because Class Counsel was

1 able to convince Defendant that Plaintiffs could potentially prevail on the contested issues regarding
2 liability, achieve class certification through trial, overcome difficulties in proof as to monetary relief,
3 and take the case to trial if need be. In navigating these hurdles Class Counsel displayed the necessary
4 skill set to achieve a successful outcome.

5 15. Class Counsel were opposed in this litigation by experience counsel at Littler Mendelson,
6 P.C., a highly regarded defense firm, who vigorously advocated on behalf of Defendant. In the face of
7 such experienced opposition, Class Counsel was able to develop an effective case strategy to combat
8 Defendant's defenses and negotiate with counsel for Defendant to settle the case for an amount that
9 provides real benefit to the Class, Aggrieved Employees, and the State of California with reasonable
10 hours expended.

11 16. Class Counsel undertook this litigation on a contingent-fee basis, assuming a significant
12 risk that the litigation would yield no recovery after many years of work. Unlike counsel for Defendant,
13 who are paid an hourly rate and reimbursed for their expenses on an ongoing, regular basis, Class
14 Counsel have not been compensated for any time or expenses to date and has lent their services to the
15 Plaintiffs, Class, Aggrieved Employees, and the State of California.

16 17. Here, Class Counsel undertook this litigation on a purely contingency basis, thereby
17 bearing the risk that they would only receive remuneration for the substantial investment of time and
18 resources and hours and costs expended if Plaintiffs were successful.

19 18. Additionally, in taking this case on a purely contingency basis, Class Counsel had to turn
20 away other fee generating work because the case required Class Counsel to not only devote considerable
21 time and resources to effectively prosecute and settle this Action, but also wait until the Settlement is
22 fully funded before finally receiving compensation for their services and reimbursement of costs and
23 expenses incurred.

24 **ATTORREYS' FEES**

25 19. Several attorneys at Lawyers *for* Justice, PC have worked on the Action since its
26 inception.

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1 20. Lawyers *for* Justice, PC has worked closely with JCL Law Firm, APC and Zakay Law
2 Group, APLC in the pursuit of the Action since they were associated in as co-counsel, and our work
3 with them has been a coordinated and combined effort. Together, Lawyers *for* Justice, PC, JCL Law
4 Firm, APC, and Zakay Law Group, APLC are referred to herein as “Class Counsel.”

5 21. Ultimately, the efforts of Plaintiffs and Class Counsel have resulted in a settlement
6 recovery.

7 22. By way of the accompanying motion for final approval of the Settlement, Class Counsel
8 seek attorneys’ fees in the amount of \$666,000.00, which is 33.3% of the Gross Settlement Amount of
9 \$2,000,000.00.

10 23. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs and
11 Lawyers *for* Justice, PC, Plaintiffs have each agreed to a contingency fee of at least 33.3% of the
12 recovery.

13 24. Plaintiffs have each been given written notice regarding, and Plaintiffs have provided
14 written consent to, fee sharing between Class Counsel.

15 25. The attorneys’ fees that are sought are commensurate with: (1) the risk that Class Counsel
16 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case;
17 (3) the skill and determination that Class Counsel have shown; (4) the results that Class Counsel have
18 achieved throughout the litigation of the case; (5) the value of the settlement that Class Counsel have
19 achieved; and (6) the other cases that Class Counsel have turned down in order to devote their time and
20 efforts to the case.

21 26. While not necessarily required to be demonstrated because the percentage fee is proper
22 for this settlement, Class Counsel have incurred many hours of work in connection with prosecuting
23 the case, such that the award of attorneys’ fees is also justified under a lodestar analysis. Attorneys at
24 Lawyers *for* Justice, PC have spent a total of **385.70 hours** performing tasks and obtaining recovery in
25 this matter. The Attorney Task and Time Chart that is attached here to as “**EXHIBIT A**” sets forth in
26 detail the nature of the legal services provided by attorneys at for Lawyers *for* Justice, PC, and the time
27 incurred in performing those services. The hours attributable to Lawyers *for* Justice, PC include work
28 done by several attorneys at Lawyers *for* Justice, PC. Additionally, separate from the hours of work

1 referenced in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in
2 assisting with the prosecution of this matter.

3 27. The work performed in this particular matter, the background of Lawyers *for* Justice, PC,
4 as well as the individual backgrounds, training, and experience of the attorneys who worked on this
5 matter, in litigating complex wage-and-hour actions, and in particular, employment class action and
6 representative action cases, support a reasonable blended hourly rate of compensation of at least \$850
7 per hour for work performed by Lawyers *for* Justice, PC.

8 28. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the
9 rate of at least \$850 per hour for legal services performed, in other wage-and-hour class action and
10 representative action cases: final approval of the class and representative action settlement in *David*
11 *Dugan v. TEC Equipment, Inc., et al.* (Los Angeles County Superior Court Case No. 19STCV01591)
12 was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of
13 \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood,*
14 *et al. v. Scan Health Plan* (Los Angeles County Superior Court Case No. BC715157) was granted on
15 April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour;
16 and final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.*
17 (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award
18 of attorneys' fees involved compensation at the rate of \$855.96 per hour.

19 **EXPERIENCE AND ADEQUACY**

20 **OF LAWYERS *for* JUSTICE, PC**

21 29. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
22 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
23 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is
24 attorney of record in dozens of employment-related putative class actions in both state and federal courts
25 in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating
26 complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions.
27 The firm has successfully litigated cases involving nearly every aspect of California wage and hour law,
28 including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums

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

6 30. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice, PC. He
7 received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris
8 Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal
9 training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of
10 its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono
11 mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation
12 Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal
13 Writing at Harvard University. From approximately September 2002 to approximately December 2002,
14 he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of
15 Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served
16 as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
17 Appellate District. In December of 2004, he obtained a license to practice law from the California State
18 Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost
19 exclusively focused on the prosecution of consumer and employment class actions. While employed
20 by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one
21 hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended
22 over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some
23 cases in conjunction with co-counsel, he has successfully litigated cases involving the executive,
24 administrative, and other overtime exemptions to the State of California and federal overtime
25 compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained
26 class certification by contested motion practice in approximately sixteen (16) cases in the last decade
27 and litigated over 1,000 class action or representative action cases.

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

19 32. I am a Managing Member of Lawyers *for* Justice, PC. I received a Bachelor of Arts
20 degree from California State University, Los Angeles in 2006, a Master of Science degree from the
21 London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law
22 Center in 2010. I am admitted to practice in California (since 2010) and in New York (since 2013) and
23 I am also admitted to practice in all U.S. District Courts in California, the U.S. Ninth Circuit Court of
24 Appeals, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court.
25 I have taken and defended dozens of depositions and successfully handled motion practice in class
26 action cases regarding discovery (including and not limited to, regarding class contact information),
27 class certification (both contested class certification and stipulated class certification), arbitration
28 agreements, coordination, and intervention. I have successfully handled briefing and oral argument on

1 appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer
2 efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal.
3 Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec.
4 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. I have significant experience with class
5 actions, including and not limited to working on cases to obtain class certification through contested
6 motion practice and working on cases in the post-certification stage (e.g., post-certification discovery,
7 appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a
8 case involving a certified class consisting of approximately 2,600 individuals). I have extensive
9 experience with class action and/or representative action settlements, and have handled this process in
10 over five hundred (500) cases. Under Edwin Aiwasian, Arby Aiwasian, and my supervision, Lawyers
11 *for Justice*, PC has handled the class certification and court approval process for hundreds of class action
12 and/or representative action matters that have successfully resolved. I am a member of the California
13 Employment Lawyers Association and, on several occasions, have been a speaker regarding topics in
14 wage and hour law at the organization's continuing legal education events.

15 **LITIGATION COSTS AND EXPENSES INCURRED**

16 **BY LAWYERS *for JUSTICE*, PC**

17 33. To date, Class Counsel have borne all of the risks and costs of litigation and will not
18 receive any compensation until a recovery is obtained in this matter. Lawyers *for Justice*, PC seeks
19 reimbursement of **\$13,936.28** in litigation costs and expenses incurred in the case, as reflected in
20 **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the prosecution of
21 the case and to obtain the Settlement.

22 34. I submit that the settlement is fair, reasonable, and adequate, and in the best interests of
23 Plaintiff, the Class, Aggrieved Employees, and the State of California.

24 I declare under the penalty of perjury under the laws of the State of California that the foregoing
25 is true and correct. Executed this 31st day of July 2025, at Los Angeles, California.

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27 _____
28 Joanna Ghosh, Esq.

EXHIBIT A

TANYA MARSHALL, ET AL. V. WATTS HEALTHCARE CORPORATION
Los Angeles County Superior Court Case No. 19STCV27737

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Tanya Marshall (“Plaintiff Marshall”) During the Case	16.50
Meet and Communicate with Plaintiff Maria Andrade (“Plaintiff Andrade”) During the Case	15.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees and Percipient Witnesses	13.50
Review and Analyze Register of Actions and Court Filings in <i>Sonika Flournoy v. Watts Healthcare Corporation</i> , Los Angeles County Superior Court Case No. 20STCV08186 (“Flournoy Action”) Prior to Being Deemed Related to the Marshall Action	1.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Marshall’s Claims, Legal Research and Analysis of All Claims Involved, and Draft Plaintiff Marshall’s Class Action Complaint for Damages (filed on August 8, 2019)	8.50
Review Court’s Notice of Case Assignment (filed on August 8, 2019)	0.10
Review Court’s Class Action Initial Status Conference Order and Order Re: Setting Initial Status Conference (filed on August 15, 2019)	0.10
Draft, Review, and/or Revise Plaintiff’s Proof of Service Re: Class Action Initial Status Conference Order and Minute Order of August 15, 2019 (filed on September 10, 2019)	0.10
Draft, Review, and/or Revise Plaintiff’s Initial Status Conference Class Action Response Statement (filed on September 24, 2019)	1.20

Draft, Review and/or Revise Plaintiff's Notice of Posting Jury Fees (filed on September 30, 2019)	0.10
Review Court's Nunc Pro Tunc Order and Minute Order Re: Initial Status Conference (filed on October 9, 2019)	0.10
Draft, Review, and/or Revise Plaintiff's Notice Regarding October 9, 2019 Initial Status Conference (filed on October 10, 2019)	0.20
Review and Analyze Watt's Healthcare Corporation's ("Defendant") Answer to Plaintiff's Class Action Complaint (served on October 11, 2019), and Research Affirmative Defenses in Defendant's Answer	1.40
Draft, Review, and/or Revise Plaintiff's Notice of October 9, 2019 Minute Order (filed on October 16, 2019)	0.20
Review Court's Initial Status Conference Order (issued November 20, 2019)	0.10
Draft, Review, and/or Revise Plaintiff's Proof of Service Re: Initial Status Conference Order (filed on November 27, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on December 6, 2019)	1.50
Review Court's Initial Status Conference Order and Order Authorizing Electronic Service (filed on December 13, 2019)	0.10
Review Court's Notice Re: Continuance of Hearing and Order (filed on January 29, 2020)	0.10
Draft, Review, and/or Revise Plaintiff's Proof of Service Re: Notice Re: Continuance of Hearing and Order to April 6, 2020 (filed on February 5, 2020)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Continuance (filed on April 20, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Statement (filed on June 22, 2020)	1.50
Review Court's Case Management Order and Minute Order Re: Non-Appearance Case Review Re: Hearing on Initial Status Conference (filed on June 25, 2020)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation Requesting Leave for Defendant to File Amended Answer to Plaintiff's Complaint (served on August 6, 2020)	1.30
Review and Analyze [Proposed] Order Granting Leave for Defendant to File Amended Answer to Plaintiff's Complaint (served on August 18, 2020)	0.10
Review Court's Order Granting Leave for Defendant to File Amended Answer to Plaintiff's Complaint (filed on August 21, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on September 21, 2020)	1.40
Review Court's Minute Order Re: Status Conference (filed on September 28, 2020)	0.10
Review Defendant's Notice of Related Case (served on November 12, 2020)	0.10
Review Court's Order Re: Notice of Related Case (Deeming Flournoy Action Related and Designating Marshall Action Lead Case) (filed on November 23, 2020)	0.10
Draft, Review, and/or Revise Plaintiff's Status Conference Statement (filed on December 30, 2020)	0.10
Review Plaintiff's Initial Status Conference Class Action Response Statement (served on December 30, 2020) (Flournoy Action)	0.20
Review Defendant's Status Conference Statement (served on December 31, 2020)	0.10
Review Defendant's Initial Status Conference Class Action Statement (served on December 31, 2020) (Flournoy Action)	0.20
Review Court's Order Re: Continuance of Status Conference (filed on January 4, 2021)	0.10
Review Notice and Acknowledgment of Receipt—Civil (served on March 23, 2021) (Flournoy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on April 1, 2021)	0.10
Review Court's Minute Order Re: Status Conference (filed on April 8, 2021)	0.10

Review Joint Stipulation to Stay Class Action Pending Mediation (served on April 30, 2021) (Flournoy Action)	0.10
Review and Analyze Defendant's Declaration of Brandie N. Charles Regarding Order to Show Cause Regarding Failure to Timely Appear at April 8, 2021 Status Conference (served on May 3, 2021)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on May 4, 2021)	1.10
Review Court's Order Re: Continuance of Status Conference (filed on May 10, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on June 14, 2021)	1.30
Review Court's Minute Order Re: Status Conference; Order to Show Cause Re: Sanctions Against Defendant for Failure to Appear (filed on June 21, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Stay Class Action Pending Mediation, [Proposed] Order Thereon (filed on June 28, 2021)	1.20
Review Court's Order Granting Stay of Class Action Pending Mediation (filed on July 1, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on January 14, 2022)	1.10
Review Court's Minute Order Re: Continuance (filed on January 20, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; and [Proposed] Order (filed on April 19, 2022)	0.90
Review Court's Minute Order Re: Status Conference Continuance (filed on April 26, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; and [Proposed] Order (filed on June 24, 2022)	0.90
Review Court's Order Granting Continuance of Status Conference (filed on June 24, 2022)	0.10

Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Continue Status Conference (filed on June 27, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; and [Proposed] Order (filed on August 19, 2022)	0.90
Review Joint Stipulation to Continue Status Conference; [Proposed] Order Thereon (served on August 22, 2022) (Flournoy Action)	0.10
Review Court's Order Granting Continuance of Status Conference (filed on August 23, 2022)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Continue Status Conference (filed on August 24, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; and [Proposed] Order (filed on November 14, 2022)	0.10
Review Court's Order Granting Continuance of Status Conference (filed on November 17, 2022)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Continue Status Conference (filed on November 17, 2022)	0.10
Review Court's Minute Order Continuing Status Conference (filed on November 23, 2022) (Flournoy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Status Conference; and [Proposed] Order (filed on January 23, 2023)	0.90
Review Joint Report In Advance of Status Conference (served on January 27, 2023) (Flournoy Action)	0.10
Review Court's Minute Order Re: Status Conference (filed on January 30, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on May 25, 2023)	0.80
Review Plaintiff Sonika Flournoy's ("Plaintiff Flournoy") Notice of Settlement (filed on May 26, 2023) (Flournoy Action)	0.10

Review Court's Minute Order Re: Status Conference (filed on June 2, 2023)	0.10
Draft, Review, and/or Revise First Amended Class Action Complaint for Damages, Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order Granting Plaintiff Leave to File a First Amended Class Action Complaint for Damages (filed on July 31, 2023)	2.50
Review Court's Order Granting Plaintiff Leave to File a First Amended Class Action Complaint for Damages (filed on August 1, 2023)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Plaintiff Leave to File a First Amended Class Action Complaint for Damages (filed on August 2, 2023)	0.10
Review and Analyze Defendant's Answer to Plaintiffs Tanya Marshall and Maria Andrade's First Amended Complaint (served on September 1, 2023)	1.50
Review and Analyze Plaintiff Flournoy's Request for Dismissal of Individual Claims with Prejudice and Dismissal of Class Claims Without Prejudice, Declaration S. Phillip Song in Support Thereof, Proposed Order Thereon (served on September 1, 2023) (Flournoy Action)	1.10
Review Court's Order for Plaintiff Flournoy's Request for Dismissal of Individual Claims with Prejudice and Dismissal of Class Claims Without Prejudice (filed on September 5, 2023) (Flournoy Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on September 13, 2023)	1.10
Review Court's Order Re: Further Status Conference (filed on September 19, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review and/or Revise Joint Status Conference Statement (filed on January 18, 2024)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Toll Five Year Deadline Under Code of Civil Procedure Section 583.310 and [Proposed] Order Thereon (filed on January 22, 2024)	1.60
Review Court's Order to Toll Five Year Deadline Under Code of Civil Procedure Section 583.310 (filed on January 22, 2024)	0.10

Review Court's Minute Order Re: Further Status Conference (filed on January 23, 2024)=	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order to Toll Five Year Deadline Under Code of Civil Procedure Section 583.310 (filed on January 30, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement and Notice of Settlement (filed on June 26, 2024)	0.50
Review Court's Order Re: Notice of Settlement (filed on June 28, 2024)	0.10
Draft, Review, and/or Revise Notice of Association of Counsel (filed on August 23, 2024)	0.10
Draft, Review, and/or Revise Joint Status Conference Statement (filed on October 21, 2024)	0.10
Review Court's Order Vacating Status Conference (filed on October 29, 2024)	0.10
Draft, Review, and/or Revise Plaintiffs' Second Amended Class Action Complaint for Damages (filed on March 17, 2025) and Joint Stipulation and [Proposed] Order for Leave to File Second Amended Complaint (filed on January 23, 2025)	0.20
Review Court's Order for Leave to File Second Amended Complaint (filed on January 28, 2025)	0.10
Draft, Review, and/or Revise Notice of Address or Other Contact Information (filed on February 26, 2025)	0.10
Review and Analyze Defendant's Answer to Plaintiffs' Second Amended Class Action Complaint (served on April 1, 2025)	0.30
Appearances	
Prepare for and Remotely Attend Initial Status Conference (December 13, 2019)	2.10
Prepare for and Remotely Attend Status Conference (April 8, 2021)	2.10
Prepare for and Remotely Attend Status Conference (June 21, 2021)	0.90
Prepare for and Remotely Attend Status Conference (January 30, 2023)	0.80
Prepare for and Remotely Attend Status Conference (June 2, 2023)	1.10

Prepare for and Remotely Attend Further Status Conference (September 19, 2023)	1.60
Prepare for and Remotely Attend Further Status Conference (January 23, 2024)	1.20
Prepare for and Remotely Attend Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement (February 26, 2025)	1.10
Discovery and Deposition	
Draft, Review and/or Revise <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (Drafted on June 29, 2020), and Review Contact List Voluntarily Produced by Defendant Without <i>Belaire-West</i> Administration Process (Produced on February 2, 2021)	2.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Tanya Marshall	5.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Maria Andrade	2.20
Draft, Review, and/or Revise Plaintiff Tanya Marshall's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on August 17, 2020)	4.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for September 30, 2020) (served on August 17, 2020)	1.20
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for October 1, 2020) (served on August 17, 2020)	1.40
Draft, Review, and/or Revise Plaintiff Tanya Marshall's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant (served on August 19, 2020)	2.10
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Affirmative Defenses; noticed for October 2, 2020) (served on August 19, 2020)	1.90

Draft, Review, and/or Revise Plaintiff Tanya Marshall's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Special Interrogatories (Set Four), Requests for Production of Documents (Set One), Requests for Production of Documents (Set Two), and Requests for Production of Documents (Set Three) to Defendant (served on September 23, 2020)	5.10
Review and Analyze Defendant's Special Interrogatories (Set One), Requests for Production of Documents (Set One), and Request for Admission (Set One) to Plaintiff Tanya Marshall (served on September 29, 2020)	1.10
Review and Analyze Defendant's Notice of Videotaped Deposition of Plaintiff Tanya Marshall for December 15, 2020 (served on September 29, 2020)	0.20
Review and Analyze Defendant's Responses to Plaintiff Tanya Marshall's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Special Interrogatories (Set Four), Requests for Production of Documents (Set One), Requests for Production of Documents (Set Two), and Requests for Production of Documents (Set Three) (served on November 18, 2020)	5.20
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Organizational Structure; noticed for November 5, 2020) (served on September 23, 2020)	1.10
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Wage and Hour Practices; noticed for November 6, 2020) (served on September 23, 2020)	1.20
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Affirmative Defenses; noticed for November 9, 2020) (served on September 23, 2020)	1.40
Review and Analyze Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for November 5, 2020) (served on October 29, 2020)	1.10

Review and Analyze Defendant's Objections to Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for November 6, 2020) (served on October 30, 2020)	1.20
Review and Analyze Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Affirmative Defenses; noticed for November 9, 2020) (served on November 11, 2020)	2.80
Review and Analyze Defendant's Document Production (served November 18, 2020)	4.50
Draft, Review, and/or Revise Plaintiff's Responses to Defendant's Requests for Admission (Set One), Special Interrogatories (Set One), and Request for Production of Documents (Set One) to Tanya Marshall (served on November 30, 2020)	11.50
Draft, Review, and/or Revise Plaintiff Tanya Marshall's Objections to Notice of Deposition of Plaintiff Tanya Marshall by Defendant (served on December 8, 2020)	1.80
Review and Analyze Defendant's Responses to Plaintiff Tanya Marshall's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) and Document Production (served on February 19, 2021)	5.10
Draft, Review, and/or Revise Plaintiff's Deposition Subpoena for Personal Appearance and Notice of Taking Deposition of Starla Mabin (filed on April 30, 2021)	1.90
Review and Analyze Defendant's Objection to Plaintiff's Notice of Taking Deposition of Starla Mabin (served on May 27, 2021)	0.20
Draft, Review, and/or Revise Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Maria Andrade (served on June 14, 2022)	1.90
Draft, Review, and/or Revise First Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Maria Andrade (served on July 21, 2022)	1.10
Draft, Review, and/or Revise Second Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Maria Andrade (served on November 7, 2022)	1.10

Draft, Review, and/or Revise Third Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Maria Andrade (served on January 24, 2023)	1.10
Review and Analyze Defendant's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Requests for Production of Documents (Set One), Requests for Production of Documents (Set One), and Requests for Admission (Set One) to Plaintiff Maria Andrade (served on September 1, 2023)	1.20
Plaintiff's Second Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Organizational Structure; noticed for October 30, 2023) (served on September 25, 2023)	1.10
Plaintiff's Second Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Wage and Hour Practices; noticed for October 31, 2023) (served on September 25, 2023)	1.20
Review and Analyze Defendant's Objections to Plaintiff's Second Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Organizational Structure; noticed for October 30, 2023) (served on October 25, 2023)	0.80
Review and Analyze Defendant's Objections to Plaintiff's Second Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Wage and Hour Practices; noticed for October 31, 2023) (served on October 26, 2023)	0.90
Review and Analyze Defendant's Supplemental Responses to Plaintiff Tanya Marshall's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three - Amended), Special Interrogatories (Set Four), Requests for Production of Documents (Set One), Requests for Production of Documents (Set Two), and Requests for Production of Documents (Set Three) and Document Production (served on April 12, 2024)	12.50
Draft, Review, and/or Revise Plaintiff Maria Andrade's Responses to Defendant's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Requests for Admission (Set One), and Request for Production of Documents and Gather Document Production (served on April 19, 2024)	14.50
Draft, Review, and/or Revise Plaintiff Tanya Marshall's Supplemental Responses to Defendant's Special Interrogatories (Set One) and Request for Production of Documents (Set One) (served on April 19, 2024)	8.50

Draft, Review, and/or Revise Plaintiff Tanya Marshall's Third Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Organizational Structure; noticed for June 27, 2024) (served on May 7, 2024)	1.10
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiffs Under the Private Attorneys General Act (served on January 9, 2025)	0.10
Draft Correspondence to, Meet with, and/or Respond to Correspondence from, Defendant's Counsel	22.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to Mediation	59.50
Prepare for Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on December 2, 2021)	34.50
Attend Mediation Session (December 8, 2021; via Zoom Video Conference)	9.50
Engage in Additional Settlement Negotiations, Investigation of Defendant's Financial Circumstances, and Claims Evaluation and Analysis from December 2021 to June 2024	20.50
Review and Analyze Defendant's Confidential Declaration of Haregewoin Yohannes (served on July 14, 2023)	1.80
Review and Analyze Mediator's Proposal (issued June 12, 2024; accepted June 19, 2024)	2.10
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed July 29, 2024)	4.50
Draft, Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement Agreement (executed on January 29, 2025), and Draft Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	2.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and/or Respond to Class Inquiries	3.50

Law and Motion	
Review and Analyze Defendant Watts Healthcare Corporation's Motion for Peremptory Disqualification; Declaration of Brandie N. Charles in Support Thereof (served on October 22, 2019)	0.20
Review Court's Order Re: Peremptory Challenge (filed on October 29, 2019)	0.10
Review and Analyze Defendant's Notice of Ruling Regarding Motion for Peremptory Disqualification (served on November 5, 2019)	0.20
Review Court's Order re: Peremptory Challenge (filed on November 14, 2019)	0.10
Review Declaration of Sean Hartranft of Apex Class Action, LLC, and Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion for Preliminary Approval of Class Action and PAGA Settlement, Memorandum of Points and Authorities in Support Thereof, Declaration of Tanya Marshall in Support Thereof, Declaration of Maria Andrade in Support Thereof, Declaration of Shani O. Zakay, Esq. in Support Thereof, Declaration of Joanna Ghosh, Esq. in Support Thereof, Declaration of Jean Claude Lapuyade, Esq. in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on January 30, 2025)	4.50
Review and Analyze Defendant's Declaration of Barrett Hatches in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (served on February 25, 2025)	0.20
Review Court's Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement and Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on February 26, 2025)	0.10
Review Declaration of Settlement Administrator, and Research, Draft, Review, and/Revise Plaintiffs' Memorandum of Points and Authorities in Support of Motion for Final Approval, Declaration of Joanna Ghosh in Support of Motion for Final Approval of Class Action and PAGA Settlement and Motion for Attorneys' Fees, Litigation Costs, and Class Representative Service Payments, [Proposed] Order Granting Final Approval, and [Proposed] Judgment	5.50
Total Hours:	385.70

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Marshall, et al. vs. Watts Healthcare Corporation

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/28/2019	U.S. Postmaster	Postage	\$6.85
4/9/2019	U.S. Postmaster	Postage	\$7.80
5/15/2019	U.S. Postmaster	Postage	\$7.85
8/8/2019	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
8/8/2019	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
9/30/2019	Los Angeles Superior Court	Jury Fee	\$150.00
11/26/2019	General Logistics Systems US, Inc.	Courier Service	\$19.18
12/13/2019	Joanna Ghosh	Travel Reimbursement	\$9.35
4/9/2020	Case Anywhere LLC	Attorney Service	\$110.40
6/22/2020	Legal Document Server, Inc.	Attorney Service	\$90.00
7/8/2020	Case Anywhere LLC	Attorney Service	\$126.00
8/17/2020	General Logistics Systems US, Inc.	Courier Service	\$23.87
8/19/2020	General Logistics Systems US, Inc.	Courier Service	\$21.34
9/21/2020	ProLegal	Attorney Service	\$173.46
9/22/2020	Los Angeles Superior Court	Document Download Fee	\$3.00
9/23/2020	General Logistics Systems US, Inc.	Courier Service	\$18.47
10/1/2020	General Logistics Systems US, Inc.	Courier Service	\$18.98
10/3/2020	Los Angeles Superior Court	Remote Appearance Fee	\$23.00
10/3/2020	Los Angeles Superior Court	Remote Appearance Fee	\$23.00
10/7/2020	Case Anywhere LLC	Attorney Service	\$132.00
10/24/2020	FedEx Express	Courier Service	\$24.61
11/12/2020	Los Angeles Superior Court	Document Download Fee	\$18.80
12/30/2020	Legal Document Server, Inc.	Attorney Service	\$95.00
12/30/2020	Legal Document Server, Inc.	Attorney Service	\$110.00
1/7/2021	Case Anywhere LLC	Attorney Service	\$168.00
4/1/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
4/2/2021	Case Anywhere LLC	Attorney Service	\$120.00
4/13/2021	Los Angeles Superior Court	Remote Appearance Fee	\$23.00
4/13/2021	Los Angeles Superior Court	Remote Appearance Fee	\$23.00
4/29/2021	ProLegal	Attorney Service	\$154.13
5/4/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
6/14/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
6/21/2021	Los Angeles Superior Court	Remote Appearance Fee	\$15.00
7/2/2021	Case Anywhere LLC	Attorney Service	\$150.00
10/4/2021	Case Anywhere LLC	Attorney Service	\$120.00
11/11/2021	Los Angeles Superior Court	Document Download Fee	\$4.00
11/19/2021	Los Angeles Superior Court	Document Download Fee	\$7.00
11/23/2021	Signature Resolution LLC	Mediation Fee	\$6,450.00

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1/5/2022	Case Anywhere LLC	Attorney Service	\$120.00
1/14/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
4/8/2022	Case Anywhere LLC	Attorney Service	\$126.00
4/20/2022	Legal Document Server, Inc.	Attorney Service	\$16.55
4/20/2022	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
6/14/2022	U.S. Postmaster	Postage	\$7.38
6/20/2022	Legal Document Server, Inc.	Attorney Service	\$16.55
6/20/2022	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
6/27/2022	Legal Document Server, Inc.	Attorney Service	\$15.20
7/6/2022	Case Anywhere LLC	Attorney Service	\$132.00
7/21/2022	U.S. Postmaster	Postage	\$8.09
8/12/2022	U.S. Postmaster	Postage	\$15.70
8/22/2022	Legal Document Server, Inc.	Attorney Service	\$17.30
8/22/2022	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
8/25/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
9/6/2022	U.S. Postmaster	Postage	\$16.18
9/14/2022	U.S. Postmaster	Postage	\$17.86
10/6/2022	Case Anywhere LLC	Attorney Service	\$132.00
11/7/2022	U.S. Postmaster	Postage	\$16.66
11/14/2022	Legal Document Server, Inc.	Attorney Service	\$17.30
11/14/2022	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
11/18/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
1/6/2023	U.S. Postmaster	Postage	\$16.18
1/9/2023	Case Anywhere LLC	Attorney Service	\$131.20
1/24/2023	Legal Document Server, Inc.	Attorney Service	\$17.30
1/24/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
1/24/2023	U.S. Postmaster	Postage	\$17.22
3/29/2023	Signature Resolution LLC	Supplemental Mediation Fee	\$900.00
4/16/2023	Case Anywhere LLC	Attorney Service	\$126.00
5/26/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
7/3/2023	Case Anywhere LLC	Attorney Service	\$126.00
8/1/2023	Legal Document Server, Inc.	Attorney Service	\$145.00
8/1/2023	Legal Document Server, Inc.	Attorney Service	\$17.54
8/1/2023	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
8/2/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
8/3/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
8/9/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
9/13/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
10/4/2023	Case Anywhere LLC	Attorney Service	\$180.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
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1/4/2024	Case Anywhere LLC	Attorney Service	\$120.00
1/18/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
1/22/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
1/22/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
1/30/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
4/2/2024	Case Anywhere LLC	Attorney Service	\$144.00
4/5/2024	General Logistics Systems US, Inc.	Courier Service	\$39.70
6/19/2024	General Logistics Systems US, Inc.	Courier Service	\$20.34
6/27/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
7/2/2024	Case Anywhere LLC	Attorney Service	\$192.00
8/23/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
8/26/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
10/3/2024	Case Anywhere LLC	Attorney Service	\$126.00
1/8/2025	Case Anywhere LLC	Attorney Service	\$120.00
1/29/2025	Los Angeles Superior Court	Document Download Fee	\$3.00
2/5/2025	Case Anywhere LLC	Attorney Service	\$40.00
3/5/2025	Case Anywhere LLC	Attorney Service	\$46.00
4/4/2025	Case Anywhere LLC	Attorney Service	\$40.00
5/2/2025	Case Anywhere LLC	Attorney Service	\$40.00
6/2/2025	Case Anywhere LLC	Attorney Service	\$40.00
7/1/2025	Case Anywhere LLC	Attorney Service	\$40.00
Total:			<u>\$13,936.28</u>