

Arby Aiwazian (SBN 269827)
Yasmin Hosseini (SBN 326399)
Ryan Slinger (SBN 351297)
Harris Koepenick (SBN 364423)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

WAFA MOWANNES, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

v.

STATER BROS. MARKETS, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. CIVSB2332884

Honorable Stephanie Tanada
Department S33

CLASS ACTION

**DECLARATION OF YASMIN HOSSEINI
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT PAYMENT**

Date: April 21, 2026
Time: 8:30 a.m.
Department: S33

Complaint Filed: December 21, 2023
FAC Filed: October 30, 2024
Trial Date: None Set

DECLARATION OF YASMIN HOSSEINI

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

PRELIMINARY APPROVAL OF SETTLEMENT

2. On October 24, 2025, in Department S33 of the above-entitled Court, the Honorable Stephanie Tanada preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release and the Amendment No. 1 to Joint Stipulation of Class Action and PAGA Settlement and Release (together, “Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Stater Bros. Markets, (“Defendant”) (together with Plaintiff referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Wafa Mowannes as the representative of the Class (“Class Representative”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above-captioned action entitled *Wafa Mowannes v. Stater Bros. Markets*, San Bernardino County Superior Court, Case No. CIVSB2332884 (“Class Action”), which was filed on December 21, 2023, and the representative Private Attorneys General Act (“PAGA”) action entitled *Wafa Mowannes v. Stater Bros. Markets*, Los Angeles County Superior Court, Case No. 24AHCv00404 (“PAGA Action”), which was filed on February 26,

2024, since prior to their commencement. Together, the Class Action and PAGA Action are referred to as the “Actions.”

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

6. Collectively, Class Counsel conducted significant formal and informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and were preparing the cases for class certification and trial, prior to reaching the Settlement. The Parties exchanged a volume of information, documents, and data throughout the course of the litigation and in connection with the mediations and settlement negotiations. Class Counsel served multiple sets of formal written discovery requests onto Defendant (specifically, Form Interrogatories – General (Set One), Requests for Production of Documents (Sets One and Two), and Special Interrogatories (Sets One, Two, and Three)) and reviewed Defendant’s responses thereto. Additionally, Class Counsel noticed the depositions of Defendant’s Person Most Knowledgeable designees along with accompanying requests for production of documents and reviewed Defendant’s responses and objections thereto. On July 31, 2024, Class Counsel took the deposition of Defendant’s Person Most Knowledgeable designee Sasha Schroeder. The

1 volume of records and documents that Class Counsel reviewed and analyzed included, and were
2 not limited to: a sampling of Class Members time and payroll data, Plaintiff's personnel records,
3 multiple Collective Bargaining Agreements, company policy acknowledgments and forms,
4 internal memorandum, and other operations and employment policies, practices, and procedures
5 documents, among other information and documents. Class Counsel had the opportunity to
6 interview and obtain information from Plaintiff and percipient witnesses, and reviewed and
7 analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and
8 other sources. Class Counsel developed liability, damages, violation, and penalties valuation
9 models in the course of litigation and in connection with the mediations and settlement
10 negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to
11 discuss issues relating to the pleadings, case management, motion practice, formal and informal
12 discovery, and the production of information, documents, and data in the course of litigation and
13 in connection with mediations and settlement negotiations, and settlement. Other work
14 performed by Class Counsel included, and was not limited to, case strategy and analysis;
15 researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the
16 mediation briefing and supporting materials, and settlement documents; drafting and
17 propounding multiple sets of formal written discovery requests on Defendant and notices of
18 depositions of Defendant's persons most knowledgeable designees; reviewing Defendant's
19 responses and objections to written discovery requests and deposition notices; and preparing for
20 and attending court proceedings, two mediations, and settlement negotiations, among other tasks.

21 7. As outlined herein, the Parties have conducted significant investigation and
22 formal and informal discovery during the course of litigating this matter, mediation, and
23 extensive settlement negotiations. Class Counsel analyzed a volume of information, documents,
24 and data obtained from Plaintiff, Defendant, and other sources that provided a critical
25 understanding of the nature of the work performed by the Class Members and PAGA
26 Employees, as well as Defendant's organizational structure and their operations and employment
27 policies, practices, and procedures. The information, documents, and data were used in analyzing
28 liability, damages, penalties, and other valuation issues in connection with all phases of the

1 litigation, and ultimately, in connection with the mediations and settlement negotiations process.
2 Class Counsel also performed significant research into the applicable law, which is evolving as it
3 relates to class certification, manageability, off-the-clock theory, meal and rest periods,
4 representative PAGA claims and penalties, wage-and-hour enforcement, regular rate, Plaintiff's
5 claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

6 8. After conducting significant investigation of the facts and law during the
7 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to
8 try to resolve the cases. These efforts included participating in two mediation sessions conducted
9 by James W. Johnston, Esq., a well-regarded mediator experienced in handling complex labor
10 and employment matters. During all settlement discussions, the Parties conducted their
11 negotiations at arm's length in an adversarial position. In the course of the mediations and
12 settlement negotiations, the Parties exchanged documents and data, and discussed various
13 aspects of the cases, including and not limited to, the risks and delays of further litigation, the
14 risks and expenses to the Parties of proceeding with class certification, representative
15 adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory,
16 regular rates of pay, meal and rest periods (including *inter alia*, on premises breaks), expense
17 reimbursements, recordkeeping and wage statement requirements, representative PAGA claims
18 and penalties, and wage-and-hour law and enforcement; Plaintiff's claims and allegations, and
19 Defendant's defenses thereto, as well as the evidence produced and analyzed; and the possibility
20 of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was
21 not easy. Defendant contended that individualized questions of fact predominate over any
22 common issues, and these issues would pose challenges to class certification and representative
23 adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class
24 certification prevail on the merits and, while Plaintiff and Class Counsel believed that they
25 would be able to obtain class certification and prevail at trial. With the aid of the mediator's
26 evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the
27 legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that
28 would attend further litigation. These risks of further litigation include, and are not limited to, a

determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation.

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$1,587,092.56, which is thirty-three percent (33%) of the Escalated Maximum Settlement Amount of \$4,809,371.38. 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 thirty-three percent (33%) of the recovery.

10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to these cases. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving an Escalated Maximum Settlement Amount of \$4,809,371.38 (with a Net Settlement Amount of approximately at least \$1,761,716.82 to be paid to Settlement Class Members (with gross Individual Settlement Payments averaging approximately more than \$40.41), payment of \$337,500.00 to PAGA Employees (with Individual PAGA Payment averaging approximately \$9.98) and payment of \$1,012,500.00 to the State of California)—support the percentage fee sought.

11. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter 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 **432.10 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT 1**" 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 by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the 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 Lawyers *for* Justice, PC, 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 action and representative action cases, 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 representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour.

EXPERIENCE AND ADEQUACY OF

LAWYERS *for* JUSTICE, PC

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

1 attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General
2 Act (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly
3 every aspect of California wage and hour law, including payment of overtime and minimum
4 wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of
5 wages, provision of compliant wage statements, reimbursement of business expenses, executive,
6 administrative, and other overtime exemptions to the State of California and federal overtime
7 compensation requirements, PAGA claims, and sister statutes under federal law. During a
8 relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered
9 millions of dollars on behalf of thousands of individuals in California.

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

1 has successfully litigated cases involving the executive, administrative, and other overtime
2 exemptions to the State of California and federal overtime compensation requirements. Under his
3 supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested
4 motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000
5 class action or representative action cases.

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

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

2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

17. I am a Member of Lawyers for Justice, PC. I received a Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from Pepperdine University School of Law in 2017. I was admitted to practice law in California in 2019. I am admitted to practice before all courts of the State of California and all federal district courts in the State of California. I have worked on many wage and hour class action and PAGA representative matters, and my work has included, *inter alia*, researching and drafting pleadings,

administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation and analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, I was an attorney at a prominent boutique entertainment law firm, where she represented filmmakers and talent, negotiating and structuring various types of agreements on their behalf. I am a member of the California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian American Bar Association.

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

18. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to \$30,000.00. Lawyers *for* Justice, PC incurred \$33,193.95 in litigation costs and expenses and seeks reimbursement of **\$30,000.00** in litigation costs and expenses incurred in the matter, as reflected in “**EXHIBIT 2**” attached hereto. Class Counsel submitted a case cost detail at the preliminary approval stage in which the first entry, for attorney service on April 3, 2024, was listed as \$167.30. In the final cost detail submitted herewith, Class Counsel split this entry into three: \$135.00 for attorney service on April 3, 2024 in the Class Action and two \$16.15 entries for attorney service on April 3, 2024 in the PAGA Action. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

19. In recognition of her efforts and work spearheading the prosecution of this matter and serving as the Class Representative, the Settlement provides for an Enhancement Payment, in the amount of up to \$5,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing her employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is

1 appropriate for Plaintiff to receive \$2,500.00 as a reasonable Enhancement Payment for her
2 services performed in this matter, in addition to her individual settlement payments.

3 20. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
4 interests of Plaintiff, the Class, and the State of California.

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

7 Executed this 27th day of March 2026, at Glendale, California.

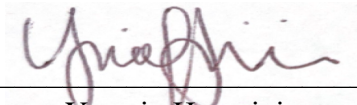
8 
9 _____
10 Yasmin Hosseini

EXHIBIT 1

Wafa Mowannes v. Stater Bros. Market
San Bernardino County Superior Court Case No. CIVSB2332884 (“Class Action”)
Los Angeles County Superior Court Case No. 24AHCV00404 (“PAGA Action”)

Stater Bros. Wage and Hour Cases
Orange County Superior Court Case No. JCCP5330, Judicial Council Coordination Proceeding No. 5330 (“Coordinated Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Wafa Mowannes (“Plaintiff”)	14.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	24.50
Review and Analyze Court Filings in <i>Perla Morales v. Stater Bros. Markets</i> , Orange County Superior Court Case No. 30-2024-01375624-CU-OE-CXC	1.20
Pleadings and Court Filings	
Draft, Review, and/or Revise Plaintiff’s Substitution of Attorney – Civil (Without Court Order) Re: JCL Law Firm, APC (filed on April 2, 2024) (Class Action)	0.10
Draft, Review, and/or Revise Plaintiff’s Substitution of Attorney – Civil (Without Court Order) Re: JCL Law Firm, APC (filed on April 2, 2024) (PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff’s Substitution of Attorney – Civil (Without Court Order) Re: Zakay Law Group, APLC (filed on April 2, 2024) (Class Action)	0.10

Draft, Review, and/or Revise Plaintiff's Substitution of Attorney – Civil (Without Court Order) Re: Zakay Law Group, APLC (filed on April 2, 2024) (PAGA Action)	0.10
Review and Analyze Defendant Stater Bros. Markets' ("Defendant") Answer to Class Action Complaint (served on April 24, 2024), and Research Affirmative Defenses in Defendant's Answer (Class Action)	1.40
Review Court's Minute Order Re: Order to Show Cause Re: Failure to File Proof of Service and Minute Order Re: <i>Nunc Pro Tunc</i> Order Re: Minute Order Dated 04/29/24 (filed on April 29, 2024) (PAGA Action)	0.20
Review and Analyze Defendant's Answer to Complaint (served on May 10, 2024), and Research Affirmative Defenses in Defendant's Answer (PAGA Action)	1.10
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on July 10, 2024) (PAGA Action)	0.80
Review Defendant's Case Management Statement (served on July 10, 2024) (PAGA Action)	0.20
Draft, Review, and/or Revise Declaration of Arman Marukyan (filed on July 16, 2024) (PAGA Action)	1.10
Review Court's Minute Order Re: Case Management Conference and Order to Show Cause Re: Sanctions in the Amount up to \$1,500 Against Plaintiff Pursuant to Code of Civil Procedure § 177.5 for Failure to Appear (filed on July 25, 2024) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Statement and Notice of Settlement (filed on August 30, 2024) (Class Action)	0.90
Review Court's Order Re: Discovery Conference and Minute Order Re: Case Management Conference (filed on September 5, 2024) (Class Action)	0.20
Review Defendant's Notice of Ruling Re: Case Management Conference (served on September 6, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on October 30, 2024), Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint	2.50

Stipulation for Leave to File First Amended Complaint; [Proposed] Order Thereon (submitted on October 15, 2024) (Class Action)	
Review Notice of Ruling (served on October 28, 2024) (PAGA Action)	0.20
Review Court's Order Granting Joint Stipulation for Leave to File First Amended Complaint (filed on October 29, 2024) (Class Action)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Joint Stipulation for Leave to File First Amended Complaint (filed on October 30, 2024) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Change of Address or Other Contact Information (filed on January 17, 2025) (PAGA Action)	0.20
Review Defendant's Case Management Statement (served on January 17, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Request for Dismissal (submitted on January 17, 2025) (PAGA Action)	0.30
Review Court's Order Granting Request for Dismissal (filed on January 17, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Entry of Dismissal and Proof of Service (filed on January 22, 2025) (PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Change of Address or Other Contact Information (filed on February 3, 2025) (Class Action)	0.20
Review Court's Notice of Continued Hearing (filed on June 25, 2025) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Statement (filed on July 31, 2025) (Class Action)	0.80
Appearances	
Prepare for and Remotely Attend Case Management Conference and Order to Show Cause Hearing (July 25, 2024) (PAGA Action)	0.70
Prepare for and Remotely Attend Case Management Conference (September 5, 2024) (Class Action)	0.70

Prepare for and Remotely Attend <i>Ex Parte</i> Hearing (December 3, 2024) (Class Action)	1.10
Discovery and Deposition	
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant (served on May 22, 2024) (Class Action)	3.90
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant (served on May 22, 2024) (PAGA Action)	3.10
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 June 11, 2024) (served on May 22, 2024) (Class Action)	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 June 12, 2024) (served on May 22, 2024) (Class Action)	1.30
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Affirmative Defenses; noticed for June 13, 2024) (served on May 22, 2024) (Class Action)	1.50
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 June 17, 2024) (served on May 22, 2024) (PAGA Action)	1.10
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 June 18, 2024) (served on May 22, 2024) (PAGA Action)	1.20

Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Affirmative Defenses; noticed for June 19, 2024) (served on May 22, 2024) (PAGA Action)	1.40
Review Defendant's Response and Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Organizational Structure) (served on June 6, 2024) (Class Action)	0.80
Review Defendant's Response and Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Wage and Hour Practices) (served on June 6, 2024) (Class Action)	0.90
Review Defendant's Response and Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Affirmative Defenses) (served on June 6, 2024) (Class Action)	1.10
Review Defendant's Response and Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Organizational Structure) (served on June 13, 2024) (Class Action)	0.70
Review Defendant's Response and Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Wage and Hour Practices) (served on June 13, 2024) (Class Action)	0.90
Review Defendant's Response and Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Affirmative Defenses) (served on June 13, 2024) (Class Action)	1.10
Review Defendant's Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) (served July 9, 2024) (Class Action)	2.80
Review Defendant's Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests	2.10

for Production of Documents (Set One), and Requests for Production of Documents (Set Two) (served July 9, 2024) (PAGA Action)	
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 July 31, 2024) (served on July 22, 2024) (Class Action)	0.80
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 July 31, 2024) (served on July 22, 2024) (Class Action)	0.90
Review Defendant's Response and Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Organizational Structure and Wage and Hour Practices) (served on July 24, 2024) (Class Action)	0.90
Prepare for and Take the Deposition of Defendants' Person Most Knowledgeable Sasha Schroeder (Video Conference; July 31, 2024) and Review Deposition Transcript	9.50
Draft, Review, and/or Revise Plaintiff's Deposition Subpoenas for Personal Appearances for 111 Putative Class Members (served on September 9, 2024)	56.50
Letters and Correspondence	
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with Defendant's Counsel	21.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (over 86,000 pages), and Other Sources Prior to Mediations	88.50
Prepare for First Mediation Session, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations (submitted on March 29, 2024)	30.50
Attend Mediation Session (April 1, 2024; via Zoom Video Conference)	8.50

Prepare for Second Mediation Session, Including Researching Settlement and Merits-Related Issues, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations	20.50
Attend Second Mediation Session (April 30, 2024; via Zoom Video Conference)	10.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on August 29, 2024), and Draft, Review, and/or Revise Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval, Request for Exclusion Form, Workweek Dispute Form, and Notice of Objection Form	13.50
Draft, Review, and/or Revise Amendment No. 1 to Joint Stipulation of Class Action and PAGA Settlement and Release (executed March 5, 2025)	0.80
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	7.50
Law and Motion	
Review Petitioner Perla Morales' ("Petitioner Morales") Notice of Submission of Petition for Coordination and Application for Stay Order, Petition for Coordination, and Application for Stay Order, Memorandum of Points and Authorities in Support Thereof, and Declaration of Paul K. Haines in Support Thereof (served on April 25, 2024) (PAGA Action)	2.10
Review and Analyze Defendant's Opposition to Plaintiff Perla Morales' Petition for Coordination and Application for Stay and Request for Hearing; Memorandum of Points and Authorities, and Declaration of Richard D. Marca in Support Thereof (served on May 1, 2024) (Coordinated Action)	1.30
Research, Draft, Review, and/or Revise Plaintiff's Opposition to Petitioner Morales' Application for Stay and Declaration of Gabriella Sole in Support Thereof (filed May 7, 2024) (Coordinated Action)	12.50
Review and Analyze Court's Order Assigning Coordination Motion Judge (filed on June 4, 2024) (Coordinated Action)	0.20
Review Court's Order Assigning Coordination Motion Judge (filed on June 10, 2024) (Coordinated Action)	0.20

Review Court's Notice of Hearing on Petition for Coordination (filed on June 21, 2024) (Coordinated Action)	0.10
Research, Draft, Review, and/or Revise Plaintiff's Opposition to Petitioner Perla Morales's Petition for Coordination and Application for Stay and Request for Hearing, Declaration of Arman Marukyan in Support Thereof, and Request for Judicial Notice in Support Thereof (filed on September 30, 2024) (Coordinated Action)	13.50
Review and Analyze Defendant's Updated Opposition to Plaintiff Morales' Petition for Coordination and Application for Stay; Memorandum of Points and Authorities and Declaration of Richard D. Marca in Support Thereof (served on September 30, 2024) (Coordinated Action)	1.10
Review Court's Tentative Ruling Re: Motion for Coordination (issued on October 11, 2024) (Coordinated Action)	0.20
Review Court's Minute Order Re: Motion for Coordination (filed on October 11, 2024) (Coordinated Action)	0.10
Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Arman Marukyan in Support Thereof, Declaration of Plaintiff Wafa Mowannes in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on November 4, 2024) (Class Action)	16.50
Review and Analyze Defendant's Notice of Unopposed <i>Ex Parte</i> Application and <i>Ex Parte</i> Application to Advance Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Christopher S. Milligan in Support Thereof, and [Proposed] Order Thereon (served on November 22, 2024) (Class Action)	0.60
Review Court's Minute Order Re: <i>Ex Parte</i> Hearing (filed on December 3, 2024) (Class Action)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval, Guidelines for Approval of Class Action Settlements and PAGA Settlements, and Worksheet Motion for Preliminary Approval (filed on January 2, 2025) (Class Action)	0.60
Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Renewed Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement;	5.80

Memorandum of Points and Authorities in Support Thereof, Declaration of Arman Marukyan in Support Thereof, Declaration of Plaintiff in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on May 30, 2025) (Class Action)	
Review Court's Order Continuing Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement and Order for Revisions (filed August 28, 2025) (Class Action)	0.40
Research, Draft, Review, and/or Revise Plaintiff's First Amended Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, First Amended Declaration of Arman Marukyan in Support Thereof, and [First Amended Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 14, 2025) (Class Action)	3.50
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on October 24, 2025) (Class Action)	0.10
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 24, 2025) (Class Action)	0.20
Draft, Review, and/or Revise Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 28, 2025) (Class Action)	0.20
Review Petitioner Morales' Notice of Ruling Re: Petition for Coordination and Application for Stay Order (served on October 28, 2025) (Coordinated Action)	0.20
Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Payment; Memorandum of Points and Authorities in Support Thereof, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Final Approval Order and Judgment (Coordinated Action)	22.50
Total Hours:	432.10

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Mowannes vs. Stater Bros. Market (Class)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/3/2024	Legal Document Server, Inc.	Attorney Service	\$135.00
4/17/2024	FedEx Express	Courier Service	\$60.92
4/19/2024	James W. Johnston	Mediation Fee	\$8,000.00
5/3/2024	Berger Consulting Group, LLC	Analysis of Sampling of Time Records	\$5,310.00
5/7/2024	Orange County Superior Court	Document Download Fee	\$16.05
5/8/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
5/8/2024	General Logistics Systems US, Inc.	Courier Service	\$39.58
5/23/2024	FedEx Express	Courier Service	\$65.90
7/3/2024	San Bernardino Superior Court	Document Download Fee	\$72.00
7/8/2024	Drogin, Kakigi & Associates	Expert	\$11,175.00
7/31/2024	Esquire Deposition Solutions, LLC	Court Reporter	\$3,276.21
7/31/2024	Esquire Deposition Solutions, LLC	Videographer Cancellation	\$250.00
8/15/2024	Drogin, Kakigi & Associates	Expert	\$2,550.00
8/23/2024	CourtCall, LLC	Attorney Service	\$72.00
8/30/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
10/28/2024	Legal Document Server, Inc.	Attorney Service	\$18.59
10/28/2024	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
10/30/2024	San Bernardino Superior Court	Document Download Fee	\$23.00
10/31/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
11/14/2024	Legal Document Server, Inc.	Attorney Service	\$21.37
11/14/2024	San Bernardino Superior Court	Motion Fee	\$60.00
11/22/2024	Los Angeles Superior Court	Document Download Fee	\$4.00
12/27/2024	Legal Document Server, Inc.	Attorney Service	\$17.20
3/6/2025	Legal Document Server, Inc.	Attorney Service	\$18.15
3/13/2025	CPAnalytics	Data Analysis of Sampling of Time Records	\$1,267.50
6/3/2025	Legal Document Server, Inc.	Attorney Service	\$23.06
6/3/2025	San Bernardino Superior Court	Motion Fee	\$60.00
6/4/2025	Legal Document Server, Inc.	Attorney Service	\$18.89
8/1/2025	Legal Document Server, Inc.	Attorney Service	\$18.89
10/14/2025	Legal Document Server, Inc.	Attorney Service	\$280.00
10/24/2025	Legal Document Server, Inc.	Attorney Service	\$23.06
10/24/2025	San Bernardino Superior Court	Motion Fee	\$60.00
11/10/2025	Legal Document Server, Inc.	Attorney Service	\$18.89
Total:			<u>\$33,026.75</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Mowannes vs. Stater Bros. Market (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/3/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
4/3/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
5/8/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
5/10/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
7/10/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
7/16/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
9/30/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
1/17/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
1/17/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
1/22/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
Total:			\$167.20