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

KHAYO SISHI, SANDEEP PUREWAL,
VANESSA BARBER, and CHERRA REDD
on behalf of the Putative Class, the State of
California and Aggrieved Employees;

Plaintiffs,

vs.

ESKATON PROPERTIES
INCORPORATED, CALIFORNIA
HEALTHCARE CONSULTANTS, INC.,
and DOES 1-100, inclusive;

Defendants.

Case No.: RG21100764

Hon. Eumi Lee
Dept. 512

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Date: July 28, 2023
Hearing Time: 9:30 a.m.
Dept: 512

Complaint Filed: June 2, 2021
FAC Filed: July 28, 2021
SAC Filed: September 13, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, 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 Plaintiffs Sandeep Purewal, Vanessa Barber, and Cherra Redd and the Class in the above-captioned action. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On January 20, 2023, in Department 512 of the above-entitled Court, the Honorable Eumi Lee preliminarily approved the Class Action Settlement Agreement and Release and Addenda A and B thereto (collectively, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs Khayo Sishi, Sandeep Purewal, Cherra Redd, and Zenaya White (“Plaintiffs”) and Defendants Eskaton Properties Incorporated and California Healthcare Consultants, Inc. (“Defendants”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Khayo Sishi, Sandeep Purewal, Cherra Redd, and Zenaya White to represent the Class (together, “Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC, Schneider Wallace Cottrell Konecky LLP, and Capstone Law APC as counsel for the Class (together, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Settlement Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Settlement Services, Inc. (“Settlement Administrator”) to serve as the third-party administrator and handle the notice and settlement administration process.

WORK PERFORMED BY CLASS COUNSEL

3. Myself and several other attorneys and staff members at Lawyers *for* Justice, PC have been actively engaged in this litigation from the inception of Plaintiff Sandeep Purewal’s putative class action case entitled *Sandeep Purewal v. Eskaton Properties Incorporated*, Sacramento Superior Court, Case No. 34-2021-00306621-CU-OE-GDS (“*Purewal* Action”)

1 which was filed on August 23, 2021, and Plaintiffs Vanessa Barber and Cherra Redd’s notices to
2 the Labor and Workforce Development Agency which were submitted on September 28, 2021,
3 LWDA Case Nos. LWDA-CM-846338-21 and LWDA-CM-846388-21, respectively, and their
4 Private Attorney General Act representative action case entitled *Vanessa Barber, et al., v.*
5 *Eskaton Properties Incorporated*, Sacramento County Superior Court, Case No. 34-2021-
6 00312015-CU-OE-GDS (“*Barber Action*”) which was filed on December 2, 2021. Lawyers for
7 Justice, PC joined forces with other plaintiff’s counsel Schneider Wallace Cottrell Konecky LLP,
8 who had commenced the above-captioned action (“*Sishi Action*”), which was filed June 2, 2021,
9 and Capstone Law APC, that commenced Plaintiff Zenaya White’s Private Attorney General Act
10 representative action case entitled *Zenaya White, v. Eskaton Properties Incorporated*,
11 Sacramento County Superior Court, Case No. 34-2021-00302048-CU-OE-GDS (“*White*
12 *Action*”)(collectively the *Purewal Action*, *Barber Action*, *Sishi Action*, and *White Action* are
13 referred to as the “*Actions*”), which was commenced June 7, 2021. Lawyers for Justice, PC
14 actively participated in the litigation of the *Purewal Action* and *Barber Action*, including and not
15 limited to, preparing the pleadings, litigation and case strategy, discovery, investigation and
16 research, and claims evaluation and analysis.

17 4. Before initiating the *Purewal Action* and *Barber Action*, Lawyers for Justice, PC
18 conducted extensive investigation and research into the facts and circumstances underlying the
19 pertinent factual and legal issues and applicable law. This required thorough discussions and
20 interviews between attorneys at our firm and Plaintiff Sandeep Purewal (“*Plaintiff Purewal*”),
21 Plaintiff Vanessa Barber (“*Plaintiff Barber*”) and Plaintiff Cherra Redd (“*Plaintiff Redd*”), and
22 research into the various legal issues involved in the case, namely, the current state of the law as
23 it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour
24 enforcement, Private Attorney General Act (“*PAGA*”) claims, Plaintiff Purewal, Plaintiff Barber,
25 and Plaintiff Redd’s claims, and potential defenses. After conducting initial investigation, our
26 firm determined that Plaintiff Purewal, Plaintiff Barber, and Plaintiff Redd’s claims were well-
27 suited for class action treatment and representative adjudication owing to what appeared to be a
28 common course of conduct affecting a similarly situated group of current and former non-exempt

1 employees who worked for Defendants within the State of California, who were not properly
2 compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and
3 unreimbursed business expenses.

4 5. Class Counsel investigated the veracity, strength, and scope of the claims, and
5 were preparing the cases for class certification and trial, prior to reaching the settlement.
6 Collectively, the litigation of the cases has involved ongoing investigations, extensive research
7 into legal and factual issues, and formal and informal discovery regarding the facts of the cases,
8 including and not limited to, the exchange, review, and analysis of a large volume of
9 information, documents and data obtained from Plaintiffs, Defendants, and other sources. Class
10 Counsel interviewed Plaintiffs and other Class Members to gather facts and to identify potential
11 witnesses. Counsel for the Parties also met and conferred on numerous occasions, e.g., to discuss
12 issues relating to the pleadings, discovery, contemplated motion practice, and the production of
13 information, documents, and data in the course of litigation and in connection with the mediation
14 and settlement negotiations. Class Counsel also drafted pleadings, and prepared for and attended
15 court proceedings, mediation, and settlement negotiations, among other tasks. Class Counsel also
16 invested time researching and investigating the applicable law, which is constantly evolving as it
17 relates to certification, off-the-clock theory, meal and rest periods, rounding PAGA claims and
18 penalties, Plaintiffs' claims and damages, and Defendants' defenses thereto, as well as facts
19 discovered.

20 6. As outlined herein, the parties have conducted significant investigations and
21 formal and informal discovery during the course of this litigation. Class Counsel interviewed
22 putative class members and analyzed a large volume of information, documents, and data
23 obtained from Plaintiffs, Defendants, and other sources. These documents and data provided a
24 critical understanding of the nature of the work performed by the Class Members and Aggrieved
25 Employees, as well as Defendants' operations and employment policies, practices, and
26 procedures, and were used in analyzing liability, damages, and penalties valuation issues in
27 connection with all phases of the litigation, and ultimately, in connection with the mediation and
28 settlement negotiation process. Accordingly, sufficient investigation and review of information

1 has taken place in order for the parties to be adequately informed of the nature and extent of the
2 claims, and to enable all parties to fully evaluate the Settlement for its fairness, adequacy, and
3 reasonableness.

4 7. As set forth more fully in the accompanying motion for final approval of the
5 Settlement, Class Counsel seek attorneys' fees in the amount of \$1,833,333.33, which is one-
6 third (1/3) of the Gross Settlement Amount of \$5,500,000.00. Pursuant to the contingency-fee
7 agreement entered into by and between Plaintiff Purewal, Plaintiff Barber, Plaintiff Redd, and
8 Class Counsel, Plaintiff Purewal, Plaintiff Barber, and Plaintiff Redd have agreed to a
9 contingency fee of at least one-third (1/3) of the recovery.

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

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

18 10. While not necessarily required to be demonstrated because the percentage fee is
19 proper for this settlement, Class Counsel have incurred many hours of work in connection with
20 prosecuting the Actions, such that the award of attorneys' fees is also justified under a lodestar
21 analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **330.70 hours** performing
22 tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney
23 Task and Time Chart for Lawyers *for* Justice, PC that sets forth in detail the nature of the legal
24 services provided by attorneys at the firms, and the time incurred in performing those services.
25 The hours attributable to Lawyers *for* Justice, PC include work done by myself and several other
26 attorneys at the firm. Additionally, separate from the hours of work reference herein and in the
27 attached chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in
28 assisting with the prosecution of this matter.

11. The work performed in this matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate of at least \$725 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 \$725 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour 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 an hourly rate of \$936.47; 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 an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; 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 an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v.*

1 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
2 granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

3 12. Applying the blended rate of \$725 per hour to 330.70 hours would place a
4 reasonable value of \$239,757.50 based on lodestar, for the work performed by Lawyers for
5 Justice.

6 **ADEQUACY OF LAWYERS for JUSTICE, PC**

7 ***EDUCATION***

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

16 ***JUDICIAL EXTERNSHIPS***

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

22 ***LITIGATION AND CLASS ACTION EXPERIENCE***

23 15. December of 2004, I obtained a license to practice law from the California State
24 Bar. From approximately December 2004 to approximately August 2008, I was employed by a
25 prominent plaintiff-side law firm. At the prominent plaintiff-side law firm, my practice focused
26 on class actions and other complex cases involving toxic torts and products liability. In addition,
27 I gained substantial experience on cases involving insurance bad faith, premises liability, and
28 medical negligence. While employed by the prominent plaintiff-side law firm, I argued

1 approximately 100 motions, took or defended approximately 150 depositions, and prepared
2 dozens of expert witnesses for deposition or trial.

3 16. Since its inception, in or around October of 2008, Lawyers *for* Justice, PC has
4 almost exclusively focused on the prosecution of consumer and employment class actions,
5 involving wage-and-hour claims, race discrimination, unfair business practices or consumer
6 fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen
7 employment-related putative class actions in both state and federal courts in the State of
8 California. Lawyers *for* Justice, PC has successfully litigated cases involving the executive,
9 administrative, and other overtime exemptions to the State of California and federal overtime
10 compensation requirements. During this relatively short time, in association with other law
11 firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of
12 individuals in California.

13 ***EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND***
14 ***REPRESENTATIVE ACTION CASES***

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

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

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

27 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class action against a national property management company involving

1 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court
2 granted final approval of the class action settlement. The Los Angeles County Superior Court
3 Case Number is BC430918.

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

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

14 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
15 wage-and-hour class and PAGA representative action against a national wholesale distributor of
16 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
17 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
18 representative action settlement. The Sacramento County Superior Court Case Number is 34-
19 2012-00136285.

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

25 h) LFJ, in association with co-counsel therein, represented the plaintiff in a
26 wage-and-hour class and PAGA representative action against a national retailer of household
27 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted
28

1 final approval of the class and PAGA representative action settlement. The San Francisco
2 County Superior Court Case Number is CGC-13-532344.

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

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

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

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

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

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

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

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

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

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

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

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

11 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
12 representative action against a food company on behalf of non-exempt employees. On June 30,
13 2017, the court granted final approval of the class and PAGA representative action settlement.
14 The Sacramento County Superior Court Case Number is 34-2015-00175871.

15 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a chocolate company on behalf of non-exempt employees. On July
17 19, 2017, the court granted final approval of the class and PAGA representative action
18 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

6 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a
7 wage-and-hour class and PAGA representative action against a property management company
8 on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
9 approval of the class and PAGA representative action settlement. The Los Angeles County
10 Superior Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding
11 Number is 4819.

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

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

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

26 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 PAGA representative action against a global provider of products and services to the energy
28 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court

1 granted approval of the PAGA representative action settlement. The Kern County Superior
2 Court Case Number is S-1500-CV-280215-SDC.

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

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

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

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

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

1 approval of the PAGA representative action settlement. The San Diego County Superior Court
2 Case Number is 34-2015-00175330.

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

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

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

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

25 **LITIGATION COSTS AND EXPENSES INCURRED BY**

26 **LAWYERS for JUSTICE, PC**

27 18. To date, Class Counsel have borne all the risks and costs of litigation and will not
28 receive any compensation until a recovery is obtained in this matter. Lawyers for Justice, PC

1 seeks reimbursement of **\$5,223.95** in litigation costs and expenses incurred in the Actions, as
2 reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in
3 the prosecution of the Actions and to obtain the Settlement.

4 **SERVICE AWARDS TO PLAINTIFFS**

5 19. In recognition of their efforts and work expended in the Actions and serving as
6 the Class Representatives, the Settlement provides for Service Awards in the amount of \$10,000
7 to Plaintiff Khayo Sishi and \$5,000.00 each to Plaintiffs Sandeep Purewal, Cherra Redd, and
8 Zenaya White. The requested service awards are fair and appropriate. Plaintiffs spent a
9 substantial amount of time and effort in producing relevant documents and past employment
10 records and provided the facts and evidence necessary to attempt to prove the allegations in the
11 Actions. Plaintiffs were available whenever Class Counsel needed them and actively tried to
12 obtain and provide information that would facilitate the pursuit of the class and PAGA claims.
13 Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their
14 work experience with Defendants, and gathering, providing, and reviewing documents.
15 Accordingly, it is appropriate and just for Plaintiff Khayo Sishi to receive \$10,000.00 and
16 Plaintiffs Sandeep Purewal, Cherra Redd, and Zenaya White as each to receive \$5,000.00 as
17 reasonable service awards for their services on behalf of the Class, State of California, and
18 Aggrieved Employees, in addition to their individual settlement payments.

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

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

24 Executed this 3rd day of July 2023, at Glendale, California.

25 
26 Edwin Aiwanian

EXHIBIT A

SANDEEP PUREWAL V. ESKATON PROPERTIES INCORPORATED
SACRAMENTO SUPERIOR COURT CASE NO. 34-2021-00306621-CU-OE-GDS (“PUREWAL ACTION”)

VANESSA BARBER ET AL, V. ESKATON PROPERTIES INCORPORATED
SACRAMENTO SUPERIOR COURT CASE NO. 34-2021-00312015-CU-OE-GDS (“BARBER ACTION”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, including Adequacy, Typicality, Superiority, Commonality, and Manageability	8.10
Pre-Lawsuit Investigation of the Merits of Plaintiff Sandeep Purewal’s (“Plaintiff Purewal”) Claims and the Merits of the Claims of the Putative Class Members	7.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Vanessa Barber (“Plaintiff Barber”) and Plaintiff Cherra Redd (“Plaintiff Redd”) Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Aggrieved Employees	7.20
Pre-Lawsuit Investigation of Potential Damages and Civil Penalties Exposure of Defendant Eskaton Properties Incorporated (“Defendant”) with Respect to the Damages Sustained by Plaintiffs Purewal, Barber, and Redd (collectively, “Plaintiffs”), Putative Class Members, and Aggrieved Employees	6.80
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Breaks, Rounding, PAGA, and Class Certification in California, including all New and Relevant DLSE Materials	2.70
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	2.40

Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	2.10
Investigation, Research and Analysis Regarding Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity	2.60
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	3.50
Research and Investigation Re: Location(s), Department(s), and/or Division(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	3.20
Comparative Analysis and Cross-Checking of All Available Job Postings and/or Job Reviews Regarding Work With Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	2.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at which Putative Class Members and Aggrieved Employees Worked Throughout California	3.10
Research and Investigation Re: Defendant's Policies, Practices, and Procedures Relating to Reporting Time, Scheduling, Timekeeping, Attendance, Meal/Rest Breaks, On-Premises Breaks, Overtime Compensation, and Reimbursement of Business-Related Expenses	14.20
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping Software, with a Focus on What	3.90

Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post Shift, and During Meal Breaks	
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Fair and Neutral Rounding, Waiver, and Compliant Policies	6.20
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	4.40
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Business Operations, and Putative Class Members' Work	2.80
Review Register of Actions and Filings in <i>Sishi v. Eskaton Properties Incorporated et al</i> , Alameda County Superior Court, Case No. RG21100764 (" <i>Sishi</i> Action")	3.10
Meet and Communicate with Plaintiff Sandeep Purewal throughout the Pendency of the Case	26.70
Meet and Communicate with Plaintiff Vanessa Barber throughout the Pendency of the Case	24.20
Meet and Communicate with Plaintiff Cherra Redd throughout the Pendency of the Case	23.80
Meet, Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	15.50
Pleadings and Court Filings	
Draft Plaintiff Purewal's Class Action Complaint for Restitution (filed on August 23, 2021) (<i>Purewal</i> Action)	7.80
Review Court's Notice and Order of Complex Case Determination (filed on September 28, 2021) (<i>Purewal</i> Action)	0.10

Draft Plaintiff Barber and Plaintiff Redd's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Analysis of All Claims Involved (filed on December 2, 2021) (<i>Barber</i> Action)	7.70
Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint for Restitution and Research Affirmative Defenses in Defendant's Answer (served on December 7, 2021) (<i>Purewal</i> Action)	2.90
Review Court's Notice of Case Management Conference and Complex Case Management Procedures Including Covid-19 Protocols (filed on December 17, 2021) (<i>Purewal</i> Action)	0.20
Review and Analyze Defendant's Answer to Plaintiff's Complaint and Research Affirmative Defenses in Defendant's Answer (served on January 12, 2022) (<i>Barber</i> Action)	3.10
Review Defendant's Notice of Related Case (served on February 10, 2022) (<i>Purewal</i> Action)	0.10
Review Defendant's Notice of Related Case (served on February 10, 2022) (<i>Barber</i> Action)	0.10
Review Court's Minute Order Re: Order and Notice Reassigning Case (filed on March 21, 2022) (<i>Purewal</i> Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Initial Case Management Conference Statement (filed on March 24, 2022) (<i>Purewal</i> Action)	1.90
Review Court's Minute Order Re: Case Management Conference – Complex (filed on April 6, 2022) (<i>Purewal</i> Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on April 7, 2022) (<i>Purewal</i> Action)	0.20
Review Court's Minute Order Re: Case Management Conference – Complex (filed on April 8, 2022) (<i>Purewal</i> Action)	0.10

Draft Plaintiff Barber and Plaintiff Redd's Notice of Posting Jury Fees (filed on April 18, 2022) (<i>Barber Action</i>)	0.20
Review Court's Order Scheduling of Case Management Conference (filed on April 19, 2022) (<i>Barber Action</i>)	0.10
Draft Plaintiff Purewal's Notice of Posting Jury Fees (filed on April 29, 2022) (<i>Purewal Action</i>)	0.20
Review Defendant's Case Management Statement (served on May 27, 2022) (<i>Barber Action</i>)	0.20
Draft Plaintiff Barber and Plaintiff Redd's Case Management Statement (filed on May 27, 2022) (<i>Barber Action</i>)	0.80
Review Court's Tentative Ruling Re: Case Management Conference (filed on May 31, 2022) (<i>Barber Action</i>)	0.10
Review Court's Minute Order (filed on June 10, 2022) (<i>Barber Action</i>)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (filed on June 20, 2022) (<i>Barber Action</i>)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on July 1, 2022) (<i>Barber Action</i>)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Case Management Conference Statement (filed on July 27, 2022) (<i>Purewal Action</i>)	1.40
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed August 10, 2022) (<i>Purewal Action</i>)	0.10
Review Court's Minute Order Re: Case Management Conference – Complex (filed on August 11, 2022) (<i>Purewal Action</i>)	0.10

Review Court's Notice of Hearing of Settlement Conference (filed on September 7, 2022) (<i>Barber</i> Action)	0.10
Review Court's Notice of Hearing (filed on September 7, 2022) (<i>Barber</i> Action)	0.10
Research and Draft, Revise, and/or Review Plaintiff Khayo Sishi ("Plaintiff Sishi"), Plaintiff Purewal, Plaintiff Barber, and Plaintiff Redd's (together, "Plaintiffs") Second Amended Class Action Complaint (filed on September 13, 2022) (<i>Sishi</i> Action)	2.70
Meet and Confer with Defendant's Counsel and Draft Joint Notice of Settlement (filed on October 20, 2022) (<i>Purewal</i> Action)	1.20
Review Court's Tentative Ruling Re: Case Management Conference – Case Management Program (filed on November 2, 2022) (<i>Purewal</i> Action)	0.10
Review Court's Minute Order Re: Case Management Conference - Case Management Program (filed on November 3, 2022) (<i>Purewal</i> Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Case Management Conference Statement (filed on March 9, 2023) (<i>Purewal</i> Action)	1.80
Review Court's Tentative Ruling Re: Case Management Conference – Complex (filed on March 22, 2023) (<i>Purewal</i> Action)	0.10
Review Court's Minute Order Re: Case Management Conference – Complex (filed on March 23, 2023) (<i>Purewal</i> Action)	0.10
Draft Plaintiff Purewal's Notice of Continuance of Case Management Conference (filed on March 29, 2023) (<i>Purewal</i> Action)	0.30
Appearances	

Prepare for, Travel to/from, and Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Fee Award, Class Counsel Costs, and Service Awards (July 28, 2023) (<i>Sishi</i> Action) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sandeep Purewal (served on June 17, 2020) (<i>Purewal</i> Action)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sandeep Purewal (served on July 6, 2020) (<i>Purewal</i> Action)	2.80
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sandeep Purewal (served on December 7, 2020) (<i>Purewal</i> Action)	1.30
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Vanessa Barber (served on August 10, 2021) (<i>Barber</i> Action)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Cherra Redd (served on August 10, 2021) (<i>Barber</i> Action)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Vanessa Barber (served on September 3, 2021) (<i>Barber</i> Action)	3.30
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Cherra Redd (served on September 7, 2021) (<i>Barber</i> Action)	3.90
Draft Plaintiff Purewal'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 January 14, 2022) (<i>Purewal</i> Action)	6.50

Draft Plaintiff Purewal's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for February 15, 2022; Organizational Structure) (served on January 14, 2022) (<i>Purewal</i> Action)	3.40
Draft Plaintiff Purewal's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for February 16, 2022; Wage and Hour Practices) (served on January 14, 2022) (<i>Purewal</i> Action)	4.10
Draft Plaintiff Barber'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 February 3, 2022) (<i>Barber</i> Action)	6.70
Draft Plaintiff Barber's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for March 9, 2022; Organizational Structure) (served on February 3, 2022) (<i>Barber</i> Action)	3.20
Draft Plaintiff Barber's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for March 10, 2022; Wage and Hour Practices) (served on February 3, 2022) (<i>Barber</i> Action)	3.90
Review Defendant's Objection to Plaintiff Purewal's Notice of Deposition of Person Most Knowledgeable and Response to Requests for Production (Organizational Structure) (served on February 9, 2022) (<i>Purewal</i> Action)	2.10
Review Defendant's Objection to Plaintiff Purewal's Notice of Deposition of Person Most Knowledgeable and Response to Requests for Production (Wage and Hour Practices) (served on February 9, 2022) (<i>Purewal</i> Action)	2.60
Review Defendant Response to Plaintiff Purewal's Special Interrogatories (Set One) (served on February 15, 2022) (<i>Purewal</i> Action)	1.50

Review Defendant's Objection to Plaintiff Barber's Notice of Deposition of Person Most Knowledgeable and Response to Requests for Production (Wage and Hour Practices) (served on March 3, 2022) (<i>Barber Action</i>)	2.70
Review Defendant's Objection to Plaintiff Barber's Notice of Deposition of Person Most Knowledgeable and Response to Requests for Production (Organizational Structure) (served on March 3, 2022) (<i>Barber Action</i>)	2.20
Review Defendant Responses to Plaintiff Purewal's Form Interrogatories – General (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on March 8, 2022) (<i>Purewal Action</i>)	3.10
Review Defendant's Responses to Plaintiff Barber's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on March 22, 2022) (<i>Barber Action</i>)	3.80
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Vanessa Barber for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 28, 2021) (<i>Barber Action</i>)	4.20
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Cherra Redd for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 28, 2021) (<i>Barber Action</i>)	4.20
Meet with, Draft Correspondence to, and Respond to Correspondence from, Co-Counsel	10.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	22.50
Mediation/Settlement	

Review, Revise, Negotiate, and/or Finalize Class Action Settlement Agreement and Release (executed on November 22, 2022)	2.30
Review, Revise, Negotiate, and/or Finalize Addendum A to Class Action Settlement Agreement and Release (executed on December 12, 2022)	1.0
Review, Revise, Negotiate, and/or Finalize Addendum B to Class Action Settlement Agreement and Release (executed on January 11, 2022)	0.80
Law and Motion	
Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Certification of Settlement Class, Approval of Notice of Settlement, and Setting of Hearing for Final Approval, Memorandum of Points and Authorities in Support Thereof, Declaration of Carolyn Hunt Cottrell in Support Thereof, and [Proposed] Order Thereof (filed on December 23, 2022) (<i>Sishi</i> Action)	2.10
Review Declaration of Ori Edelstein in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Certification of Settlement Class, Approval of Notice of Settlement, and Setting of Hearing for Final Approval (filed on January 13, 2023) (<i>Sishi</i> Action)	0.80
Review Minute Order Granting Preliminary Approval of Settlement (filed on January 20, 2023) (<i>Sishi</i> Action)	0.10
Research, Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Action Settlement, Fee Award, Class Counsel Costs, and Service Awards, Declaration of Carolyn Hunt Cottrell in Support Thereof, Declaration of Raul Perez in Support Thereof, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Khayo Sishi in Support Thereof, Declaration of Sandeep Purewal in Support Thereof, Declaration of Cherra Redd in Support Thereof, Declaration of Zenaya White in Support Thereof, and [Proposed] Final Approval Order and Judgment; and Review Declaration of Settlement Administrator in Support Thereof (filed on July 3, 2023) (<i>Sishi</i> Action) (Anticipated)	6.90

Total Hours:	330.70
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EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Purewal v. Eskaton Properties Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
6/17/2020	U.S. Postmaster	Postage	7.00
12/20/2020	U.S. Postmaster	Postage	7.10
8/20/2021	Legal Document Server, Inc.	Attorney Service	180.23
8/20/2021	Sacramento Superior Court	Court Filing Fee	435.00
8/20/2021	Sacramento Superior Court	Complex Filing Fee	1,000.00
10/18/2021	ProLegal	Attorney Service	150.50
12/16/2021	Legal Document Server, Inc.	Attorney Service	110.00
12/21/2021	Legal Document Server, Inc.	Attorney Service	110.00
1/6/2022	Legal Document Server, Inc.	Attorney Service	110.00
3/24/2022	Legal Document Server, Inc.	Attorney Service	120.00
3/25/2022	Legal Document Server, Inc.	Attorney Service	120.00
4/7/2022	Legal Document Server, Inc.	Attorney Service	120.00
4/7/2022	Sacramento Superior Court	Document Download Fee	2.00
4/11/2022	Legal Document Server, Inc.	Attorney Service	120.00
4/11/2022	Sacramento Superior Court	Document Download Fee	2.00
4/12/2022	Legal Document Server, Inc.	Attorney Service	120.00
5/4/2022	Legal Document Server, Inc.	Attorney Service	130.13
5/4/2022	Sacramento Superior Court	Jury Fee	150.00
7/28/2022	Legal Document Server, Inc.	Attorney Service	125.00
9/20/2022	Sacramento Superior Court	Document Download Fee	2.00
10/20/2022	Legal Document Server, Inc.	Attorney Service	125.00
3/8/2023	Alameda Superior Court	Document Download Fee	137.00
3/9/2023	Legal Document Server, Inc.	Attorney Service	125.00
3/29/2023	Legal Document Server, Inc.	Attorney Service	125.00
Total:			3,632.96

LAWYERS for JUSTICE PC CASE COST DETAIL
Barber v. Eskaton Properties Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/28/2021	Labor & Workforce Development Agency	PAGA Fee	150.00
9/28/2021	U.S. Postmaster	Postage	7.00
9/28/2021	U.S. Postmaster	Postage	7.00
12/2/2021	Legal Document Server, Inc.	Attorney Service	148.49
12/2/2021	Sacramento Superior Court	Complaint Filing Fee	435.00
12/13/2021	ProLegal	Attorney Service	199.00
1/26/2022	Legal Document Server, Inc.	Attorney Service	110.00
2/4/2022	General Logistics Systems US, Inc.	Courier Service	14.37
5/2/2022	Legal Document Server, Inc.	Attorney Service	130.13
5/2/2022	Sacramento Superior Court	Jury Fee	150.00
5/4/2022	Legal Document Server, Inc.	Attorney Service	120.00
5/27/2022	Legal Document Server, Inc.	Attorney Service	120.00
Total:			<u>1,590.99</u>