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16 *Attorneys for Plaintiffs*

17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
18 **FOR THE COUNTY OF TULARE**

19 LUCI GILLESPIE and ILEANA
20 SUASTEGUI, on behalf of themselves and all
21 others similarly situated,

22 Plaintiffs,

23 vs.

24 PLUM HEALTHCARE GROUP, LLC, a
25 California limited liability company; and
26 DOES 1-100, inclusive,

27 Defendants.

ELECTRONICALLY FILED
Superior Court of California,
County of Tulare
03/29/2024

By: Jose Angel De Luna Romero,
Deputy Clerk

Case No.: VCU285376

Honorable Bret Hillman
Department 2

CLASS ACTION

**DECLARATION OF JOANNA GHOSH
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT**

Date: April 23, 2024
Time: 9:30 a.m.
Department: 2

Complaint Filed: December 17, 2020
Trial Date: None Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers for Justice, PC, attorneys of record for Plaintiffs 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.

2. On February 8, 2024, Plaintiffs filed the Motion for Preliminary Approval for Class and PAGA Action Settlement (“Motion for Preliminary Approval”) and supporting documents seeking preliminary approval of the settlement reached by Plaintiffs and Defendants Plum Healthcare Group, LLC (“Plum”), Flax Holdings LLC d/b/a River Valley Care Center, Gladiolus Holdings, LLC d/b/a The Pines at Placerville Healthcare Center, Jujube Holdings, LLC d/b/a Sunnyvale Post-Acute Center, Douglas Fir Holdings, LLC d/b/a Huntington Valley Healthcare Center, Olive Holdings, LLC d/b/a Aviara Healthcare Center, and Rosebud Holdings, LLC d/b/a Western Slope Health Center (collectively, Plum and the other referenced defendant entities are “Defendants”) (together with Plaintiffs, the “Parties”).

3. On March 11, 2024, the Court issued a tentative ruling regarding the Motion for Preliminary Approval (“March 11, 2024 Tentative Ruling”), directing Plaintiffs’ Counsel to provide information regarding attorney rates and hours to calculate the lodestar, the presently incurred costs, and proof of submission of the settlement to the LWDA, and directing the Parties to provide for a sixty day notice period. By way of this declaration, undersigned counsel at Lawyers for Justice, PC hereby provides information regarding attorney rates and hours for Lawyers for Justice, PC.

WORK PERFORMED BY LAWYERS FOR JUSTICE, PC

4. Several attorneys at Lawyers for Justice, PC have performed work in this matter since prior to the commencement of the above-captioned action entitled *Luci Gillespie, et al. v. Plum Healthcare Group, LLC*, Tulare County Superior Court, Case No. VCU285376 (“Tulare Class Action”), and prior to the commencement of *Luci Gillespie v. Flax Holdings, LLC d/b/a*

1 *River Valley Care Center*, Sutter County Superior Court, Case No. CVCS22-0001058 (“Sutter
2 Class Action”); *Ileana Suastegui v. Plum Healthcare Group, LLC*, Alameda County Superior
3 Court, Case No. RG21092158 (“Suastegui PAGA Action”); *Luci Gillespie v. Flax Holdings, LLC*
4 *d/b/a River Valley Care Center*, Alameda County Superior Court, Case No. RG21093104
5 (“Gillespie PAGA Action”); *Trevor Harding v. Plum Healthcare Group, LLC*; *Gladiolus*
6 *Holdings, LLC d/b/a The Pines at Placerville Healthcare Center*, Alameda County Superior
7 Court, Case No. RG21097877 (“Harding PAGA Action”); *Esther Corona v. Jujube Holdings,*
8 *LLC d/b/a Sunnyvale Post-Acute Center*; *Plum Healthcare Group, LLC*, Alameda County
9 Superior Court, Case No. RG21111905 (“Corona PAGA Action”), and *Mildred Arriaga v. Olive*
10 *Holdings, LLC d/b/a Aviara Healthcare Center*; *Plum Healthcare Group, LLC*, Alameda County
11 Superior Court, Case No. 22CV006835 (“Arriaga PAGA Action”).

12 5. Before the filing of the cases, Lawyers for Justice, PC investigated and researched
13 the facts and circumstances underlying the pertinent factual and legal issues and applicable law.
14 Extensive discussions and interviews were conducted between attorneys at Lawyers for Justice,
15 PC and close to two dozen individuals, including, *inter alia*, Plaintiffs Luci Gillespie, Ileana
16 Suastegui, Trevor Harding, Esther Corona, and Mildred Arriaga and other putative class
17 members, aggrieved employees, and percipient witnesses. Lawyers for Justice, PC also
18 performed research into various relevant legal issues, e.g., the current state of the law as it applied
19 to, *inter alia*, joint employer/integrated enterprise/alter ego, class certification factors (including
20 adequacy, typicality, superiority, commonality, and manageability), off-the-clock theory, meal
21 and rest periods, representative PAGA claims, wage-and-hour law and enforcement, the claims,
22 allegations, and potential defenses, and Defendants’ potential damages and penalties exposure.
23 After conducting thorough, robust, and targeted initial investigations regarding the facts relevant
24 to these issues, as well as legal research and analysis, it was determined that the claims of
25 Plaintiffs were well-suited for class-wide and representative adjudication, owing to what
26 appeared to be a common course of conduct affecting a similarly-situated group of current and
27 former non-exempt employees of Plum who worked at facilities in California, who were not
28 properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods,

1 unreimbursed business expenses, waiting-time penalties, and wage statement penalties. Based
2 on its findings and assessments, Lawyers for Justice, PC assisted with framing facts and
3 contemplated theories and allegations by preparing initial drafts of notices to the California Labor
4 and Workforce Development Agency, required by California Labor Code 2699.3, and initial
5 drafts of complaints, to be pursued by the plaintiffs. Even after the cases were commenced,
6 attorneys at Lawyers for Justice, PC continued to actively engage in investigation, case strategy,
7 and legal research and analysis, e.g., to assess defense contentions that Plum is not the employer
8 because the holding companies that technically owned the medical facilities paid the workers and
9 that there are arbitration agreements that the holding companies and Plum may seek to enforce.
10 For example, before and after the cases were filed, Lawyers for Justice, PC performed extensive
11 investigation and research regarding Defendants' written and non-written employment and
12 operations policies, practices, and procedures applicable to the putative class members and
13 aggrieved employees; Defendants' executives, officers, and leadership; their litigation and
14 agency proceedings history and involvement in wage-and-hour issues and other issues indicative
15 of employment issues; their organizational, corporate, and executive reporting structures; their
16 ownership and capital structures; their business portfolios, acquisitions, and financial dealings;
17 their footprint both in terms of the locations, layout, resident characteristics, and workforce and
18 staffing levels for facilities and operations; and information regarding conditions, quality
19 outcomes, and deficiencies/complaints/enforcement actions at or involving facilities.

20 6. The attorneys' fees contemplated to be sought in the above-captioned action, at the
21 final approval stage of the class action court approval process for the settlement, are
22 commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time,
23 effort, and expense that Class Counsel have dedicated to the cases; (3) the skill and determination
24 that Class Counsel have shown; (4) the results that Class Counsel have achieved throughout the
25 litigation; (5) the value of the settlement that Class Counsel have achieved in the cases; and (6)
26 the other cases that Class Counsel have turned down in order to devote their time and efforts to
27 this matter. The nature of the work performed, skill exercised, and the outcome in this matter
28 support the contemplated request for attorneys' fees.

7. The attorneys identified below have performed work in this matter to date.

LAWYERS for JUSTICE, PC – Attorney Hours, Rates, and Lodestar

Attorney	Title	CA Bar No.	Admit Year	Rate	Total Hours	Lodestar
Edwin Aiwazian	Managing Attorney & Shareholder	232943	2004	\$1,495	221.60	\$331,292.00
Arby Aiwazian	Shareholder	269827	2010	\$1,295	30.50	\$39,497.50
Joanna Ghosh	Managing Attorney	272479 (CA); 518149 (NY)	2010 (CA); 2013 (NY)	\$1,295	23.30	\$30,173.50
Arman Marukyan	Attorney	327150	2019	\$575	108.60	\$62,445.00
Selena L. Matavosian	Attorney	348044	2022	\$575	2.60	\$1,495.00
Total:					386.60	\$464,903.00

8. The billing rates for each of the attorneys listed above, who worked on this matter, are reasonable and commensurate with the individual backgrounds, training, and experience of the attorneys, in litigating complex wage-and-hour actions, and in particular, employment class actions and representative actions. The work performed in this 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, support a reasonable blended hourly rate of compensation of at least \$850 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys’ fees, compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and/or representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys’ fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative 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; and final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.

1 SCV258764) was granted on February 6, 2019, and the award of attorneys’ fees involved
2 compensation at the rate of \$855.96 per hour.

3 **EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC**

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

18 10. Edwin Aiwazian is a Managing Member and Shareholder of Lawyers *for* Justice,
19 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
20 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
21 extensive formal training in dispute resolution and negotiation from the Straus Institute for
22 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
23 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
24 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
25 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
26 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
27 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
28 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial

1 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
2 Appellate District. In December of 2004, he obtained a license to practice law from the California
3 State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he
4 has almost exclusively focused on the prosecution of consumer and employment class actions.
5 While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken
6 or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for
7 deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with
8 other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully
9 litigated cases involving the executive, administrative, and other overtime exemptions to the State
10 of California and federal overtime compensation requirements. Under his supervision, Lawyers
11 *for* Justice, PC has successfully obtained class certification by contested motion practice in
12 approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or
13 representative action cases.

14 11. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
15 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
16 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
17 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
18 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
19 From approximately August 2008 to approximately December 2008, he served as a Judicial
20 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the
21 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
22 before all courts of the State of California and all United States District Courts in the State of
23 California. He has worked on many wage-and-hour class action and representative action cases,
24 taking the lead in taking and defending depositions, arguing motions, and attending mediations.
25 He has played an integral role in preparing matters for class certification, including and not
26 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
27 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
28 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County

1 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
2 representative cases have resulted in settlements that have been granted court approval, including
3 and not limited to, those listed in paragraph 14 herein. He has handled over one hundred and fifty
4 (150) mediations and worked on over two hundred and fifty (250) class action or representative
5 action cases which have resulted in settlement.

6 12. Arman Marukyan is a Member of Lawyers *for* Justice, PC. He earned his
7 undergraduate degree from Loyola Marymount University and earned his Juris Doctor degree
8 from Penn State Law. During law school, he served as the Vice President and Treasurer of the
9 Law and Education Alliance, was a member of Phi Alpha Delta, and participated in Penn State
10 Law’s Civil Rights Appellate Clinic, where he worked on several briefs that were filed with the
11 United States Court of Appeals for the Third Circuit and the Supreme Court of the United States.
12 He was admitted to practice law in California in 2019. At Lawyers *for* Justice, PC, he has worked
13 on many complex wage-and-hour class and representative action cases in state and federal court,
14 and he has handled all aspects of litigation on such matters, including and not limited to,
15 discovery, taking and defending depositions, and preparing, briefing, and arguing motions and
16 oppositions to motions.

17 13. Selena Matavosian is a Member of Lawyers *for* Justice, PC. She received a
18 Bachelor of Science degree from California State University, Northridge in 2019 and earned a
19 Juris Doctor degree from Southwestern Law School in 2022. She was admitted to practice law
20 in California in 2022. She is admitted to practice before all courts of the State of California and
21 all federal district courts in the State of California. She has worked on many wage-and-hour class
22 action and PAGA representative cases, and her work on these cases has included researching and
23 drafting pleadings and motions, administrative notice exhaustion, drafting, negotiating, and
24 finalizing stipulations and settlement agreements, claims evaluation and analysis, and making
25 court appearances.

26 14. I am a Managing Member of Lawyers *for* Justice, PC. I received a Bachelor of Arts
27 degree from California State University, Los Angeles in 2006, a Master of Science degree from
28 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University

1 Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since
2 2013) and am admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy
3 Court for the Central District of California, and the U.S. Supreme Court. I have taken and
4 defended dozens of depositions and successfully handled motion practice in class action cases
5 regarding discovery (including and not limited to, regarding class contact information), class
6 certification (both contested class certification and stipulated class certification), arbitration
7 agreements, coordination, and intervention. I have successfully handled briefing and oral
8 argument on appeal and obtained notable decisions regarding the Private Attorneys General Act
9 and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential Overall Supply*, 9
10 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied
11 (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). I have significant
12 experience with class actions, including and not limited to working on cases to obtain class
13 certification through contested motion practice and working on cases in the post-certification
14 stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial
15 preparation in conjunction with co-counsel in a case involving a certified class consisting of
16 approximately 2,600 individuals). I also have extensive experience with class action and/or
17 representative action settlements, and have handled this process in over three hundred (300) cases.
18 Under Edwin Aiwazian, Arby Aiwazian, and my supervision, Lawyers for Justice, PC has
19 handled the class certification and court approval process for hundreds of class action and/or
20 representative action matters that have successfully resolved. I am a member of the California
21 Employment Lawyers Association.

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

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

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

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

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

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

e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a bank, involving allegations of misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court granted final approval of the class and PAGA representative action settlement. The Kern County

1 Superior Court Case Number is S-1500-CV-273194-LHB.

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

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

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

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

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

1 Council Coordination Proceeding Number is 4794.

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

6 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
7 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
8 involving allegations of misclassification of the “Department Manager” position. On August 12,
9 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
10 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
11 County Superior Court Case Number is RG13680477.

12 m) LFJ represented the plaintiff in a PAGA representative action against a real
13 estate and property management company, on behalf of non-exempt employees. On November
14 4, 2016, the court granted approval of the PAGA representative action settlement. The Orange
15 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

25 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
26 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
27 the employer’s motion to compel arbitration, which resulted in a published opinion by the
28 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*

1 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
2 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
3 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
4 5046.

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

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

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

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

25 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
26 representative action against a food company on behalf of non-exempt employees. On June 30,
27 2017, the court granted final approval of the class and PAGA representative action settlement.
28 The Sacramento County Superior Court Case Number is 34-2015-00175871.

1 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
2 representative action against a chocolate company on behalf of non-exempt employees. On July
3 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
4 The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

1 BC498401.

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

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

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

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

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

26 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a national retailer of apparel and
28 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted

1 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the
2 court granted final approval of the class and PAGA representative action settlement. The
3 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

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

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

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

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1 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class action against manufacturer and supplier of power products and services on
3 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
4 motion for class certification and certified a class. On August 27, 2021, the court granted final
5 approval of the class action settlement. The San Diego County Superior Court Case Number is
6 37-2015-00025968-CU-OE-CTL.

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

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

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

18 Executed this 29th day of March 2024, at Glendale, California.

19 

20 _____
Joanna Ghosh