

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

1 Edwin Aiwazian (Cal. State Bar No. 232943)
 edwin@calljustice.com
2 Arby Aiwazian (Cal. State Bar No. 269827)
 arby@calljustice.com
3 Joanna Ghosh (Cal. State Bar No. 272479)
 joanna@calljustice.com
4 **LAWYERS for JUSTICE, PC**
410 West Arden Avenue, Suite 203
5 Glendale, California 91203
Telephone: (818) 265-1020
6 Facsimile: (818) 265-1021

7 *Attorneys for Plaintiff and the Class*

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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

Plaintiff,

vs.

BLOOD CENTERS OF THE PACIFIC, a
California corporation; BLOOD SYSTEMS,
an unknown business entity; VITALANT, and
unknown business entity; and DOES 2
through 100, inclusive,

Defendants.

Case No.: 3:19-cv-04592-JCS

Honorable Joseph C. Spero

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR ATTORNEYS' FEES AND COSTS**

[Notice of Motion and Motion for Attorneys'
Fees and Costs and [Proposed] Order filed
concurrently herewith]

Date: August 19, 2022
Time: 9:30 a.m.
Courtroom: F

Complaint Filed: March 29, 2019
FAC Filed: June 4, 2021
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 Plaintiff Ruby Danielsson (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On November 17, 2021, Plaintiff filed the Motion for Preliminary Approval of Class Action Settlement (“Motion for Preliminary Approval”) and supporting documents (Docket Nos. 66, 66-1, 66-2, 66-3, & 66-4). On January 21, 2021, a hearing was held on Plaintiff’s Motion for Preliminary Approval, during which the Court raised multiple points of inquiry with regards to the Motion for Preliminary Approval and ordered supplemental briefing to be filed in support of Plaintiff’s Motion for Preliminary Approval by February 25, 2022. On February 25, 2022, Plaintiff filed supplemental papers in support of Plaintiff’s Motion for Preliminary Approval. (Docket Nos. 72, 72-1, & 72-2). On April 8, 2022, the Court entered an Order Granting Preliminary Approval of Class Action Settlement (“Preliminary Approval Order”) (Docket No. 73), thereby preliminarily approving the First Amended Stipulation of Settlement of Class Action and Release of Claims (“Settlement Agreement,” “Settlement,” or “Agreement”), and conditionally certifying the Class for settlement purposes. The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as Class Counsel, Plaintiff Ruby Danielsson as Class Representative, and Phoenix Settlement Administrators to serve as the Settlement Administrator for handling the notice and settlement administration process.

WORK PERFORMED BY CLASS COUNSEL

3. I have been actively engaged in litigating this matter since prior to the commencement of the action on March 29, 2019, as have several other attorneys and members in our firm.

///

1 4. Before initiating the action, Class Counsel investigated and researched the facts
 2 and circumstances underlying the pertinent factual and legal issues and applicable law. This
 3 required thorough discussions and interviews between attorneys at our firm and Plaintiff, and
 4 research into the various legal issues involved in the case, namely, the current state of the law as
 5 it applied to class certification, off-the-clock theory, meal and rest periods, wage-and-hour
 6 enforcement, the claims of Plaintiff, and potential defenses. After conducting initial
 7 investigation, Class Counsel determined that the claims of Plaintiff were well-suited for class-
 8 wide adjudication owing to what appeared to be a common course of conduct affecting a
 9 similarly-situated group of current and former non-exempt employees who worked for
 10 Defendant Vitalant, f/k/a Blood Systems, Inc. formerly d/b/a Blood Systems of the Pacific
 11 (“Defendant”), within the State of California, who were not properly compensated for, *inter alia*,
 12 all hours worked, non-compliant meal and rest periods, and business expenses.

13 5. Prior to reaching the Settlement, Class Counsel investigated the veracity, strength,
 14 and scope of the claims, and was actively preparing the matter for class certification and trial.
 15 The parties conducted significant formal and informal discovery and investigation into the facts
 16 of the case, and also informally exchanged information and data in preparation for mediation.
 17 Class Counsel propounded multiple sets of written discovery requests in various forms
 18 (specifically, Requests for Production of Documents (Set One); Special Interrogatories (Sets One
 19 & Two); and Form Interrogatories – General (Set One)) and noticed the depositions of
 20 Defendants’ Person Most Knowledgeable designees regarding organizational structure and wage
 21 and hour practices. Class Counsel additionally worked with Plaintiff to provide responses and
 22 documents as a part of initial disclosures, and reviewed Defendant’s initial disclosures. Class
 23 Counsel also interviewed and obtained information from Plaintiff and other Class Members,
 24 including and not limited to the names of potential witnesses, and reviewed and analyzed a large
 25 amount of data and documents obtained from Defendant, Plaintiff, and other sources. The
 26 documents and data reviewed and analyzed by Class Counsel included, and were not limited to,
 27 Plaintiff and other Class Members’ employment records, a detailed sampling of Class Members’
 28 time data, multiple iterations Defendant’s Employee Handbook, Defendant’s Collective

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

1 Bargaining Agreements, company policy acknowledgements (including, but not limited to, Meal
2 and Rest Period Policy Acknowledgement, Employee Acknowledgement of Receipt of Meal
3 Period and Rest Period Policy, California Meal Period and Rest Breaks Policy
4 Acknowledgement, and Employee Acknowledgement of Receipt of California Policy Regarding
5 Meal Period and Rest Breaks), internal memoranda, job descriptions, new hire orientation
6 checklist, Defendant's operations and employment practices, agreements (including, but not
7 limited to, Revocation of Meal Period Waivers, California Exceptions Record for Missed Meal
8 Period and/or Rest Breaks, California Consent and Agreement for Waiver of Meal Periods, and
9 California Revocation of Meal Period Waivers), forms, procedures, and policies (including, but
10 not limited to, California Meal Period and Rest Breaks Policy, Overtime Compensation policy,
11 and Payroll Time Reports policy), among other information and documents. Class Counsel
12 researched applicable law, developed damages/valuation models in preparation for mediation,
13 and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues
14 relating to the pleadings, motion practice, discovery, jurisdiction, and the production of various
15 documents and data prior to mediation. Other work performed by Class Counsel included, and
16 was not limited to, case strategy and analysis; drafting, reviewing, and revising pleadings,
17 moving and opposing papers for motion practice, and the mediation brief; preparing and
18 appearing for court proceedings; and preparing for and attending mediation and settlement
19 negotiations.

20 6. As outlined herein, the parties have conducted significant formal and informal
21 discovery and investigation during the course of this litigation. Class Counsel analyzed a large
22 amount of documents and data obtained from Plaintiff, Defendant, and through other sources.
23 These documents and data provided a critical understanding of the nature of the work performed
24 by the Class Members, as well as Defendant's operations and employment policies, practices,
25 and procedures, and were used in analyzing liability, damages, and valuation issues in
26 connection with all phases of the litigation, and ultimately with the mediation and settlement
27 negotiation process. Class Counsel also performed significant research into the law concerning
28 Defendant's defenses.

LAWYERS for JUSTICE, PC
 410 West Arden Avenue, Suite 203
 Glendale, California 91203

1 7. After conducting significant investigation into the facts and law during the
 2 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
 3 try to resolve the matter. These efforts included participating in a formal, full-day mediation
 4 conducted by Mark S. Rudy, Esq., a well-regarded mediator experienced in mediating complex
 5 wage-and-hour matters. During all settlement discussions, the parties conducted their
 6 negotiations at arm's length in an adversarial position. Prior to and during mediation and
 7 settlement negotiations, the parties exchanged documents, information and data, and discussed
 8 various aspects of the case, including the risks and delays of further litigation, the risks to the
 9 parties of proceeding with class certification, representative adjudication, and trial; the law
 10 relating to off-the-clock theory, meal and rest periods, representative PAGA claims, collective
 11 bargaining agreements (and related grievance and ADR provisions and exemption and pre-
 12 emption issues), and wage-and-hour enforcement; the evidence produced and analyzed; and the
 13 possibility of appeals, among other things. Arriving at a settlement that was acceptable to the
 14 parties was not easy. Defendant contended that individualized questions of fact predominate
 15 over any common issues, and these issues would pose challenges to certification and
 16 representative adjudication. Defendant and its counsel felt very strongly about Defendant's
 17 ability to prevail on the merits and to obtain a denial of class certification, while Plaintiff and
 18 Class Counsel believed that class certification would be obtained and that they would prevail at
 19 trial. With the aid of the mediator's evaluation, the parties agreed that the case was well-suited
 20 for settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs
 21 and risks to the parties that would attend further litigation. These risks of further litigation
 22 include, and are not limited to, a determination that the claims were unsuitable for class
 23 treatment and/or representative adjudication, and failure to obtain certification, class de-
 24 certification after certification of a class, allowing a jury to decide the claims asserted in the case,
 25 appeals, and the real possibility of no recovery after years of litigation.

26 8. As set forth more fully in the accompanying Motion for Attorneys' Fees and
 27 Costs, Class Counsel seeks attorneys' fees in the amount of \$805,000.00 which is thirty-five
 28 percent (35%) of the Gross Settlement Amount of \$2,300,000.00, as set forth in the Settlement

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

1 Agreement and Class Notice. Pursuant to the contingency-fee agreement entered into by and
2 between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-
3 five percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the
4 risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class
5 Counsel dedicated to the matter; (3) the skill and determination that Class Counsel has shown;
6 (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the
7 settlement that Class Counsel has achieved for the Class Members and State of California; and
8 (6) the other cases that Class Counsel has turned down in order to devote its time and efforts to
9 this matter.

10 9. I am aware that the common and acceptable rate for contingency representation in
11 wage and hour class action litigation is normally 40% before trial, with the range being from
12 33.3% up to 50%.

13 10. While not necessarily required to be demonstrated because the percentage fee that
14 is sought is proper for this settlement, Class Counsel has incurred many hours of work in
15 connection with this matter such that the request for an award of attorneys' fees is also justified
16 under a lodestar analysis with a multiplier (for the reasons briefing in the accompanying motion,
17 a multiplier is warranted). As of the Final Approval Hearing that is scheduled for August 19,
18 2022, Class Counsel will have spent a total of **769.70 hours** performing tasks and obtaining
19 recovery on behalf of Plaintiff, the Class Members, and State of California. Attached hereto as
20 "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal
21 services provided by attorneys at Lawyers for Justice, PC and the time incurred in performing
22 those services and the time anticipated to be incurred in performing services leading up to the
23 Final Approval Hearing. The hours include work performed by myself and several other
24 attorneys at the firm. Additionally, litigation support personnel at Lawyers for Justice, PC have
25 actively engaged in assisting with the prosecution of this matter.

26 11. The following hourly rates of compensation are commensurate with the individual
27 background, training, and experience of the attorneys that are listed below, who worked on this
28 matter, as well as our firm, in litigation and class actions and complex wage-and-hour matters:

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	\$975	254.50	\$248,137.50
Arby Aiwazian	Shareholder	269827	2010	\$850	133.50	\$113,475.00
Joanna Ghosh	Senior Attorney	272479	2010	\$800	44.30	\$35,440.00
Elizabeth M. R-H Parker-Fawley	Attorney	301592	2014	\$675	25.10	\$16,942.50
Stephanie S. Ponck	Attorney (former)	306205	2015	\$675	6.20	\$4,185.00
Jeffrey D. Klein	Attorney (former)	297296	2014	\$575	83.40	\$47,955.00
Tiffany J. Hyun	Attorney (former)	311743	2016	\$575	32.30	\$18,572.50
Brian J. St. John	Attorney	304112	2015	\$500	5.90	\$2,950.00
Melissa A. Huether	Attorney (former)	316604	2017	\$500	18.20	\$9,100.00
Alik S. Ourfalian	Attorney (former)	322686	2018	\$500	40.10	\$20,050.00
Alexandra Rose	Attorney	329407	2019	\$450	99.60	\$44,820.00
Christie E. Yang	Attorney (former)	328901	2019	\$450	26.60	\$11,970.00
Total:					769.70	\$573,597.50

12. The billing rates for each of the attorneys who worked on this case, which range from \$450 to \$950 per hour, are reasonable. The California Supreme Court has held that the reasonable hourly rate used for the lodestar calculation is the “prevailing [rate] in the community for similar work.” *PLCM Group v. Drexler* (2000) 22 Cal.4th 1084, 1095; see also *Ketchum v. Moses* (2001) 24 Cal.4th 1122, 1132 (stating that “the lodestar is the basic fee for comparable legal services in the community”). Courts in California have approved comparable hourly rates for similar work performed by other attorneys in the community. See *Lopez v. Management and Training Corporation* (S.D. Cal. 2020) No. 17cv1624 JM(RBM), 2020 WL 1911471, at *8-9 (approving rates up to \$900 for a partner and a rate of \$500 for an associate as reasonable in a wage-and-hour class action filed in southern California); *Hartless v. Clorox Co.* (S.D. Cal. 2011) 273 F.R.D. 630, 643-44, aff’d in part, 473 Fed.Appx. 716 (9th Cir. 2012) (approving rates of \$675-\$795 for partners and up to \$410 for associates in complex litigation involving product

1 misrepresentation filed in San Diego County); see, e.g., *Campbell v. Best Buy Stores, L.P.* (C.D.
 2 Cal. 2016) No. LA CV12-07794 JAK (JEMx), 2016 WL 6662719, at *9 (finding that hourly
 3 rates between \$375 and \$875 for attorneys were reasonable in a wage-and-hour class action filed
 4 in Los Angeles County).

5 13. Lawyers *for* Justice, PC has been awarded attorneys' fees multiple times,
 6 compensating the firm for legal services performed in similar wage and hour matters, by courts
 7 granting approval of settlements in other cases: final approval of the class action settlement in
 8 final approval of the class and representative action settlement in *David Dugan v. TEC*
 9 *Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on
 10 July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval
 11 of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan*
 12 (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award
 13 of attorneys' fees involved an hourly rate of \$919.57; *Thereasa Carrozzella v. Basalite Concrete*
 14 *Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS)
 15 was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of
 16 \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al.*
 17 *v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was
 18 granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82;
 19 final approval of the class and representative action settlement in *Seth Swan v. Pace Supply*
 20 (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and
 21 the award of attorneys' fees involved an effective hourly rate of \$855.96; final approval of the
 22 class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation*
 23 (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018,
 24 and the award of attorneys' fees involved an effective hourly rate of \$831.38; final approval of
 25 the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett*
 26 *Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018,
 27 and the award of attorney's fees involved an effective hourly rate of \$780.77; and final approval
 28 of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond*

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

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

4 ***EDUCATION***

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

13 ***JUDICIAL EXTERNSHIPS***

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

19 ***LITIGATION AND CLASS ACTION EXPERIENCE***

20 16. In December of 2004, I obtained a license to practice law from the California
21 State Bar. From approximately December 2004 to approximately August 2008, I was employed
22 by *Girardi & Keese*.

23 17. At *Girardi & Keese*, my practice focused on class actions and other complex
24 cases involving toxic torts and products liability. In addition, I gained substantial experience on
25 cases involving insurance bad faith, premises liability, and medical negligence. While employed
26 by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150
27 depositions, and prepared dozens of expert witnesses for deposition or trial.

28 ///

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

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

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

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

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

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

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

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

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

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

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

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

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

27 ///

28 ///

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

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

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

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

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

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

27 ///

28 ///

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

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.

28 ///

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

1 s) LFJ in association with co-counsel, represented the plaintiffs in a wage-
2 and-hour class and PAGA representative action against a lumber and hardware company on
3 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) Our firm represented the plaintiff in a PAGA representative action, against
20 the 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.

28 ///

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

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 entered an order granting final approval of the
4 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
5 Number is 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 entered an
9 order granting final approval of the class and PAGA representative action settlement. The Los
10 Angeles County Superior Court Case Number is JCCP4819 and the Judicial Council
11 Coordination Proceeding 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 entered an order granting final approval of the
15 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
16 Number is 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

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

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 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, on behalf of the plaintiff and
20 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
21 and argued an appeal with respect to the employer’s motion to compel arbitration, resulting in a
22 notable decision from the California Supreme Court clarifying the law and finding, in part, that
23 employer arbitration agreements are unenforceable where they block a PAGA claim from
24 proceeding, *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court
25 granted approval of the PAGA representative action settlement. The San Diego County Superior
26 Court Case Number is 34-2015-00175330.

27 ///

28 ///

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

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

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

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

17 ll) LFJ, in association with co-counsel therein, represents the plaintiffs in a
18 wage-and-hour class and PAGA representative action against a plastic packaging company on
19 behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs'
20 motion for class certification and certified a class. On November 8, 2021, the court granted
21 approval of the partial settlement of the action. The San Bernardino County Superior Court Case
22 Number is CIVDS1507361.

23 mm) LFJ, in association with co-counsel therein, represents the plaintiffs in a
24 wage-and-hour class action against manufacturer and supplier of power products and services on
25 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
26 motion for class certification and certified a class. The San Diego County Superior Court Case
27 Number is 37-2015-00025968-CU-OE-CTL.

28 ///

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

5 oo) LFJ represents the plaintiff in a wage-and-hour class action against an
6 iconic lifestyle accessories brand and retailer on behalf of non-exempt employees. On March 15,
7 2022, the court granted the plaintiff’s motion for class certification in part and certified a class.
8 The San Francisco Superior Court Case Number is CGC-16-550794.

9 **LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL**

10 20. Lawyers *for* Justice, PC has incurred \$21,696.82 in litigation costs and expenses
11 as reflected in the Case Cost Detail attached hereto as “**EXHIBIT B.**” These expenses were
12 reasonable and necessary in the prosecution of this matter and to obtain the Settlement, and is
13 less than the maximum amount of \$50,000 allocated toward reimbursement of litigation costs
14 and expenses under the Settlement Agreement. The cost savings of \$28,303.18 will remain part
15 of the Net Settlement Amount and distributed to Settlement Class Members. It should be noted
16 that Class Counsel has borne all of the risks and costs of litigation and will not receive any
17 compensation until recovery is obtained under the Settlement.

18 21. Additionally, the Settlement Administrator has informed the parties that there are
19 five hundred and fifty (550) Class Members who will be eligible to receive the monetary benefits
20 of the Settlement. Further, the Settlement Administrator has informed the parties that the highest
21 gross Individual Settlement Payment is currently estimated to be \$6,560.16, the average gross
22 Individual Settlement Payment is currently estimated to be \$2,130.00, the highest Individual
23 PAGA Payment is currently estimated to be \$349.99, and the average estimated Individual
24 PAGA Payment is currently estimated to be \$113.64. These are significant individual
25 recoveries, particularly in light of the risks of litigation.

26 ///

27 ///

28 ///

1 22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
2 Settlement is in the best interests of Plaintiff, the Class, and the State of California.

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

5 Executed this23rd day of May 2022, at Glendale, California.

6 

7

Edwin Aiwazian

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

DANIELSSON V. BLOOD CENTERS OF THE PACIFIC, ET AL.
(SAN FRANCISCO COUNTY SUPERIOR COURT CASE NO. CGC-19-574926) (“STATE ACTION”)

DANIELSSON V. BLOOD CENTERS OF THE PACIFIC, ET AL.
(UNITED STATES DISTRICT COURT OF THE NORTHERN DISTRICT OF CALIFORNIA CASE NO. 3:19-CV-04592-JCS) (“FEDERAL ACTION”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR 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, and Commonality <ul style="list-style-type: none"> • Edwin Aiwazian – 8.60 hours • Arby Aiwazian – 6.20 hours 	14.80
Pre-Lawsuit Investigation of the Merits of Plaintiff Ruby Danielsson’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members <ul style="list-style-type: none"> • Edwin Aiwazian – 7.20 hours • Elizabeth M. R-H Parker-Fawley – 4.90 hours 	12.10
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Vitalant, f/k/a Blood Systems, Inc. formerly d/b/a Blood Centers of the Pacific (“Defendant”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members <ul style="list-style-type: none"> • Edwin Aiwazian – 8.10 hours • Arby Aiwazian – 5.60 hours 	13.70

<p>Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, Certification, Exemption, and Wage Order Decisions in California, Including all New and Relevant DLSE Materials</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 12.20 hours 	12.20
<p>Investigation of Defendant, Defendant’s Business Relationships, and the Industry in Which Defendant Operates</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 6.80 hours 	6.80
<p>Investigation of Defendant’s Organizational and Corporate Structures, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members</p> <ul style="list-style-type: none"> • Arby Aiwazian – 6.90 hours 	6.90
<p>Investigation of Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 5.70 hours 	5.70
<p>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</p> <ul style="list-style-type: none"> • Arby Aiwazian – 7.10 hours 	7.10
<p>Research and Investigation Re: Collective Bargaining Agreements, Grievance/Alternative Dispute Resolution Provisions, and Factors for Labor Code Exemptions</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 6.50 hours 	6.50
<p>Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Operated, and/or Serviced by Defendant in California During the Class Period, Including Differences</p>	5.10

<p>Between the Various Location(s), Division(s), and/or Department(s) to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues</p> <ul style="list-style-type: none"> Edwin Aiwazian – 9.20 hours 	
<p>Comparative Analysis and Cross-Checking of All Available Job Postings by 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</p> <ul style="list-style-type: none"> Edwin Aiwazian – 7.90 hours 	7.90
<p>Comparative Analysis and Cross-Checking of All Available Job Reviews and Consumer/Patient Reviews for Defendant in Order to Determine Wage and Hour Issues, Variation, and Job Duties and Responsibilities Involving Performance of Work Off-the-Clock or During Meal or Rest Breaks</p> <ul style="list-style-type: none"> Edwin Aiwazian – 4.10 hours 	4.10
<p>Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Defendant’s Locations at which Putative Class Members Worked Throughout California</p> <ul style="list-style-type: none"> Edwin Aiwazian – 8.40 hours 	8.40
<p>Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Impact on Putative Class Members’ Work</p> <ul style="list-style-type: none"> Edwin Aiwazian – 8.60 hours 	8.60
<p>Research and Investigation Re: Defendant’s Written and Unwritten Policies, Practices, and Procedures Relating to Bonuses/Incentive/Shift Differential Pay, Timekeeping, Rounding, Scheduling, Meal/Rest Breaks, On-Premises Breaks, Meal/Rest Premiums, Overtime Compensation, Personal Cell Phone Use, Reimbursement of Business-Related Expenses, and Wage and Hour Compliance</p> <ul style="list-style-type: none"> Edwin Aiwazian – 15.60 hours Arby Aiwazian – 12.80 hours Elizabeth M. R-H Parker-Fawley – 11.30 hours 	39.70

<p>Research and Investigation Re: Various Software Programs and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Patient Care, CRM, Logistics, Inventory, and Computer Systems with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks</p> <ul style="list-style-type: none"> • Arby Aiwazian – 5.60 hours 	5.60
<p>Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Exemptions, Waiver, Pre-Emption, and Compliant Policies</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 10.70 hours 	10.70
<p>Research and Investigation Re: Post-<i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 8.40 hours 	8.40
<p>Research and Analysis of Defendant’s Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues</p> <ul style="list-style-type: none"> • Arby Aiwazian – 5.50 hours 	5.50
<p>Prepare a Discovery Strategy Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 7.10 hours 	7.10
<p>Research and Outline Anticipated Class Certification Motion and Trial Plan</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 29.70 hours • Arby Aiwazian – 8.90 hours • Elizabeth M. R-H Parker-Fawley – 5.20 hours 	43.80

<p>Meet and Communicate with Plaintiff Ruby Danielsson Throughout the Pendency of the Case</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 21.30 hours • Arby Aiwazian – 15.60 hours • Elizabeth M. R-H Parker-Fawley – 3.70 hours • Jeffrey D. Klein – 0.20 hour • Alexandra Rose – 2.70 hour 	43.50
<p>Meet and Communicate with Putative Class Members</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 15.40 hours • Arby Aiwazian – 8.50 hours 	23.90
Pleadings and Court Filings	
<p>Research and Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on March 29, 2019) (State Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 8.70 hours 	8.70
<p>Review Court's Notice to Plaintiff (filed on March 29, 2019) (State Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.20 hour 	0.20
<p>Review Court's Order Denying Complex Designation for Failure to File Application Requesting Designation (filed on May 6, 2019) (State Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.10 hour 	0.10
<p>Draft Plaintiff's Notice of Posting Jury Fees (filed on July 31, 2019) (State Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.20 hour 	0.20
<p>Review and Analyze Defendant's Answer to Plaintiff's Complaint and Research Affirmative Defenses in Defendant's Answer (served on August 6, 2019) (State Action)</p>	3.40

<ul style="list-style-type: none"> Edwin Aiwazian – 3.40 hours 	
<p>Review and Analyze Defendant’s Notice of Removal of Civil Action to Federal Court and Exhibits A-C, Certificate of Interested Parties or Persons, Disclosure Statement Pursuant to FRCP 7.1, Declaration of Elizabeth Sweeley in Support of Removal, and Declaration of Bhavi A. Shah in Support of Removal (served on August 7, 2019) (Federal Action)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 4.90 hours 	4.90
<p>Review Court’s Notice of Case Assignment and Order Setting Initial Case Management Conference and ADR Deadlines (filed on August 7, 2019) (Federal Action)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 0.10 hour 	0.10
<p>Review Defendant’s Notice of Related Cases Pursuant to Local Rule 3-12 (served on August 7, 2019) (Federal Action)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 0.10 hour 	0.10
<p>Review Court’s Order Setting Initial Case Management Conference and ADR Deadlines (filed on August 8, 2019) (Federal Action)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 0.30 hour 	0.30
<p>Review Court’s Order Continuing Case Management Conference (filed on August 12, 2019) (State Action)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 0.10 hour 	0.10
<p>Draft Plaintiff’s Consent or Declination to Magistrate Judge Jurisdiction (filed on August 12, 2019) (Federal Action)</p> <ul style="list-style-type: none"> Jeffrey D. Klein – 0.20 hour 	0.20

<p>Review and Analyze Defendant's Notice to Plaintiff and Clerk of the California Superior Court of Removal of Civil Action to United States District Court (served on August 13, 2019) (State Action)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 1.10 hour 	1.10
<p>Review Defendant's Consent or Declination to Magistrate Judge Jurisdiction (served on August 21, 2019) (Federal Action)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 0.10 hour 	0.10
<p>Review Court's Order That Hearing is Off Calendar (filed on September 23, 2019) (State Action)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 0.10 hour 	0.10
<p>Review Defendant's [Proposed] Order and the Court's Order Regarding Stipulation Regarding Defendant Vitalant's Affirmative Defenses and Prayer for Relief (served on September 25, 2019) (Federal Action)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 0.20 hour 	0.20
<p>Review Defendant's Supplemental Filing Regarding Affirmative Defenses (served on September 26, 2019) (Federal Action)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 0.30 hour 	0.30
<p>Review Clerk's Notice Continuing Motion to Remand Hearing (filed on October 2, 2019) (Federal Action)</p> <ul style="list-style-type: none"> Jeffrey D. Klein – 0.10 hour 	0.10
<p>Prepare Plaintiff's ADR Certification by Parties and Counsel (filed on October 15, 2019) (Federal Action)</p> <ul style="list-style-type: none"> Jeffrey D. Klein – 0.20 hour 	0.20
<p>Draft Plaintiff's Local Rule 3-15 Certification of Interested Entities or Persons (filed on October 31, 2019) (Federal Action)</p>	0.20

<ul style="list-style-type: none"> • Jeffrey D. Klein – 0.20 hour 	
<p>Meet and Confer with Defendant’s Counsel, and Draft Joint L.R. 16-9/Fed. R. Civ. P. 26(f) Report (filed on October 31, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 1.80 hours 	1.80
<p>Review Court’s Notice to Set/Reset Deadlines as to Motion to Remand (filed on November 4, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 0.10 hour 	0.10
<p>Review Clerk’s Notice Continuing Initial Case Management Conference (filed on November 4, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 0.10 hour 	0.10
<p>Review Defense Counsel’s Letter to Judge Re: Request for Telephonic Appearance (served on December 16, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 0.10 hour 	0.10
<p>Review Court’s Order Granting Letter Re: Request for Telephonic Appearance (filed on December 17, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 0.10 hour 	0.10
<p>Meet and Confer with Defendant’s Counsel, and Draft Joint Letter on Mediation Status (filed on January 10, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 1.10 hour 	1.10
<p>Meet and Confer with Defendant’s Counsel, and Draft Joint Case Management Statement (filed on March 12, 2020) (Federal Action)</p>	0.80

<ul style="list-style-type: none"> • Jeffrey D. Klein – 0.80 hour 	
<p>Review Clerk’s Notice Continuing Case Management Conference (filed on March 18, 2020) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 0.10 hour 	0.10
<p>Review Clerk’s Notice Setting Zoom Hearing (filed on August 4, 2020) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 0.10 hour 	0.10
<p>Meet and Confer with Defendant’s Counsel, and Draft Notice of Settlement and Stipulation and Order to Vacate Case Management Conference (submitted on August 6, 2020) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 1.20 hours 	1.20
<p>Review Court’s Notice of Settlement and Stipulation and Order to Continue Case Management Conference (filed on August 7, 2020) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 0.10 hour 	0.10
<p>Meet and Confer with Defendant’s Counsel, and Draft Joint Stipulation and Order to Continue Case Management Conference (submitted on November 6, 2020) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 1.10 hours 	1.10
<p>Review Court’s Order to Continue Case Management Conference (filed on November 9, 2020) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.10 hour 	0.10
<p>Review Defendant’s Notice of Change of Address (served on December 28, 2020) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.10 hour 	0.10

<p>Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and Order to Continue Case Management Conference (submitted on January 8, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.10 hour • Melissa A. Huether – 0.80 hour 	0.90
<p>Review Court's Order to Continue Case Management Conference (filed on January 8, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Melissa A. Huether – 0.10 hour 	0.10
<p>Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and Order to Continue Case Management Conference (submitted on March 16, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.10 hour • Melissa A. Huether – 0.80 hour 	0.90
<p>Review Court's Order to Continue Case Management Conference (filed on March 17, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Melissa A. Huether – 0.10 hour 	0.10
<p>Meet and Confer with Defendant's Counsel, and Draft Joint Case Status Update and Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (submitted on May 19, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.10 hour • Joanna Ghosh – 0.70 hour 	0.80
<p>Review Court's Order to Continue Case Management Conference (filed on May 20, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Alexandra Rose – 0.10 hour 	0.10

<p>Research and Draft Plaintiff's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, Cal. Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved; Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order Thereon (submitted on June 3, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.30 hour • Joanna Ghosh – 2.10 hours • Melissa A. Huether – 1.30 hours • Alexandra Rose – 3.10 hours 	6.80
<p>Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed on June 4, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Alexandra Rose – 0.20 hour 	0.20
<p>Meet and Confer with Defendant's Counsel, and Draft Joint Case Status Update and Stipulation to Continue Case Management Conference; [Proposed] Order Thereon (submitted on July 29, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.10 hour • Brian J. St. John – 0.20 hour • Alexandra Rose – 0.60 hour 	0.90
<p>Review Court's Order to Continue Case Management Conference (filed on August 2, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Alexandra Rose – 0.10 hour 	0.10
<p>Meet and Confer with Defendant's Counsel, and Draft Joint Case Status Update and Stipulation to Continue Further Case Management Conference; [Proposed] Order Thereon (submitted on September 3, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.10 hour 	0.70

<ul style="list-style-type: none"> • Brian J. St. John – 0.10 hour • Alexandra Rose – 0.50 hour 	
<p>Review Court’s Order to Continue Further Case Management Conference (filed on September 7, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Alexandra Rose – 0.10 hour 	0.10
<p>Meet and Confer with Defendant’s Counsel, and Draft Joint Case Status Update and Stipulation to Continue Further Case Management Conference; [Proposed] Order Thereon (submitted on October 8, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.10 hour • Brian J. St. John – 0.10 hour • Alexandra Rose – 0.30 hour 	0.50
<p>Review Court’s Order to Continue Further Case Management Conference (filed on October 8, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Alexandra Rose – 0.10 hour 	0.10
<p>Meet and Confer with Defendant’s Counsel, and Draft Joint Case Status Update and Stipulation to Continue Further Case Management Conference; [Proposed] Order Thereon (filed on November 15, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.10 hour • Brian J. St. John – 0.10 hour • Alexandra Rose – 0.20 hour 	0.40
<p>Review Court’s Order Denying Stipulation to Continue Further Case Management Conference (filed on November 16, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Alexandra Rose – 0.10 hour 	0.10

Review Defendant's Notice of Withdrawal of Counsel of Record for Defendant (filed on November 16, 2021) (Federal Action)	0.10
<ul style="list-style-type: none"> Alexandra Rose – 0.10 hour 	
Appearances	
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion to Remand and Initial Case Management Conference (December 20, 2019) (Federal Action)	1.20
<ul style="list-style-type: none"> Jeffrey D. Klein – 1.20 hours 	
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (January 21, 2022) (Federal Action)	6.90
<ul style="list-style-type: none"> Joanna Ghosh – 2.80 hours Alexandra Rose – 4.10 hours 	
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement (August 19, 2022) (Federal Action) (Anticipated)	4.40
<ul style="list-style-type: none"> Joanna Ghosh – 2.20 hours Alexandra Rose – 2.20 hours 	
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on January 24, 2019)	1.90
<ul style="list-style-type: none"> Edwin Aiwazian – 1.90 hours 	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ruby Danielsson (served on February 13, 2019)	1.70

<ul style="list-style-type: none"> Edwin Aiwazian – 1.70 hours 	
<p>Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on February 14, 2019)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 3.10 hours 	3.10
<p>Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ruby Danielsson (served on March 7, 2019)</p> <ul style="list-style-type: none"> Edwin Aiwazian – 8.20 hours 	8.20
<p>Draft Plaintiff’s Notice of Deposition of Person Most Knowledgeable at Defendant Blood Centers of the Pacific and Requests for Production of Documents (August 6, 2019; Organizational Structure) (served on June 14, 2019)</p> <ul style="list-style-type: none"> Alik S. Ourfalian – 4.50 hours 	4.50
<p>Draft Plaintiff’s Notice of Deposition of Person Most Knowledgeable at Defendant Blood Centers of the Pacific and Requests for Production of Documents (August 7, 2019; Wage and Hour Practices) (served on June 14, 2019)</p> <ul style="list-style-type: none"> Alik S. Ourfalian – 5.20 hours 	5.20
<p>Draft Plaintiff’s Notice of Deposition of Person Most Knowledgeable at Defendant Blood Systems and Requests for Production of Documents (August 8, 2019; Organizational Structure) (served on June 14, 2019)</p> <ul style="list-style-type: none"> Alik S. Ourfalian – 3.10 hours 	3.10
<p>Draft Plaintiff’s Notice of Deposition of Person Most Knowledgeable at Defendant Blood Systems and Requests for Production of Documents (August 9, 2019; Wage and Hour Practices) (served on June 14, 2019)</p> <ul style="list-style-type: none"> Alik S. Ourfalian – 3.60 hours 	3.60

<p>Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Blood Centers of the Pacific (served on June 14, 2019)</p> <ul style="list-style-type: none"> • Alik S. Ourfalian – 9.80 hours 	9.80
<p>Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Blood Systems (served on June 14, 2019)</p> <ul style="list-style-type: none"> • Alik S. Ourfalian – 8.10 hours 	8.10
<p>Review and Analyze Defendant Vitalant's Initial Disclosures and Research Witnesses Identified Therein (served on October 31, 2019)</p> <ul style="list-style-type: none"> • Alik S. Ourfalian – 5.80 hours 	5.80
<p>Draft Plaintiff's Initial Disclosures and Gather Documents Produced (served on December 16, 2019)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 8.40 hours 	8.40
Letters and Correspondence	
<p>Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on October 5, 2020)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.90 hour • Melissa A. Huether – 4.40 hours 	5.30
<p>Meet and Confer with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 7.30 hours • Joanna Ghosh – 5.50 hours 	26.60

<ul style="list-style-type: none"> • Melissa A. Huether – 2.10 hours • Stephanie S. Ponek - 1.80 hours • Tiffany J. Hyun – 1.30 hours • Christie E. Yang – 1.40 hours • Jeffrey D. Klein – 2.30 hours • Brian J. St. John – 0.10 hour • Alexandra Rose – 4.80 hours 	
Mediation/Settlement	
<p>Review and Analyze Mediation Data and Documents Produced by Defendant (including, <i>inter alia</i>, Employee Handbooks and Policies, Union Agreements, and Sampling of Employee Time Data) (served on November 3, 2019, December 6, 2019, June 23, 2020, July 2, 2020, July 9, 2020, July 13, 2020, and July 15, 2020)</p> <ul style="list-style-type: none"> • Arby Aiwazian – 32.70 hours • Tiffany J. Hyun – 20.20 hours • Christie E. Yang – 16.90 hours 	69.80
<p>Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Civil Penalties Analysis/Calculations (submitted on July 14, 2020)</p> <ul style="list-style-type: none"> • Arby Aiwazian – 9.60 hours • Tiffany J. Hyun – 8.40 hours • Christie E. Yang – 8.30 hours 	26.30
<p>Attend Mediation Session and Confer with Consulting Expert (July 16, 2020; Zoom Video Conference)</p> <ul style="list-style-type: none"> • Arby Aiwazian – 8.50 hours 	8.50
<p>Draft, Review, Revise, Negotiate, and Finalize Memorandum of Agreement (July 17, 2021)</p>	2.90

<ul style="list-style-type: none"> • Edwin Aiwazian – 0.50 hour • Tiffany J. Hyun – 2.40 hours 	
<p>Draft, Review, Revise, Negotiate, and Finalize Stipulation of Settlement of Class Action and Release of Claims and Exhibits (executed on August 19, 2021)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 1.10 hours • Joanna Ghosh – 5.20 hours • Stephanie S. Ponek – 4.40 hours • Melissa A. Huether – 8.60 hours • Alexandra Rose – 3.50 hours 	22.80
<p>Draft, Review, Revise, Negotiate, and Finalize Amendment No. 1 to Stipulation of Settlement of Class Action and Release of Claims and Exhibits (executed on October 4, 2021)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.30 hour • Brian J. St. John – 0.40 hour • Alexandra Rose – 3.20 hours 	3.90
<p>Draft, Review, Revise, Negotiate, and Finalize First Amended Stipulation of Settlement of Class Action and Release of Claims and Exhibits (February 22, 2022)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 0.30 hour • Joanna Ghosh – 2.30 hours • Brian J. St. John – 0.50 hour • Alexandra Rose – 10.10 hours 	13.20
<p>Meet and Confer with Defendant’s Counsel Regarding Distribution of Class Action Fairness Act Notice to Attorney Generals (U.S., California, and Arizona)</p> <ul style="list-style-type: none"> • Joanna Ghosh – 0.90 hour • Alexandra Rose – 2.20 hours 	3.10

<p>Meet and Confer with Defendant's Counsel and Settlement Administrator, Evaluate Whether Escalator Clause (Section 4.D of Settlement Agreement) Has Been Triggered, and Review and Monitor Process for Distribution of Notice of Class Action Settlement to Class Members and Weekly Reports</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 1.30 hours • Joanna Ghosh – 3.90 hours • Alexandra Rose – 5.30 hours 	10.50
Law and Motion	
<p>Draft Plaintiff's Notice of Motion and Motion to Strike Portions of Defendant's Answer to Plaintiff's Class Action Complaint for Damages; Memorandum of Points and Authorities in Support Thereof, and [Proposed] Order Thereon (filed on August 28, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 11.40 hours 	11.40
<p>Review Court's Order to Meet and Confer Regarding Motion to Strike Affirmative Defenses (filed on August 29, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 0.10 hour 	0.10
<p>Draft Plaintiff's Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. §1447; Memorandum of Points and Authorities in Support Thereof (filed on September 4, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 12.10 hours 	12.10
<p>Review and Analyze Defendant's Opposition to Plaintiff's Motion for Remand and Supplemental Declaration of Elizabeth Sweeley in Support Thereof (served on September 18, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 4.50 hours 	4.50
<p>Draft Plaintiff's Reply in Support of Plaintiff's Motion to Remand Pursuant to 28 U.S.C. § 1447 (filed on September 25, 2019) (Federal Action)</p>	8.50

<ul style="list-style-type: none"> • Jeffrey D. Klein – 8.50 hours 	
<p>Review Court’s Order to File Additional Evidence Regarding Motion to Remand (filed on November 1, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 0.10 hour 	0.10
<p>Review and Analyze Defendant’s Supplemental Pleading and Evidence Regarding Remand (served on December 6, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 7.80 hours 	7.80
<p>Research and Draft Plaintiff’s Response to Order to Submit Additional Evidence Support of Plaintiff’s Motion to Remand and Declaration of Jeffrey D. Klein in Support Thereof (filed on December 6, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 9.90 hours 	9.90
<p>Review and Analyze Defendant’s Declaration of Lisa M. Bowman in Response to Plaintiff’s Response to Order to Submit Additional Evidence Related to Plaintiff’s Motion to Remand (served on December 9, 2020) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 3.80 hours 	3.80
<p>Draft Declaration of Jeffrey D. Klein in Response to the Unauthorized, Late-Filed Declaration of Lisa M. Bowman in Response to Order to Submit Additional Evidence Related to Plaintiff’s Motion to Remand (filed on December 9, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 5.90 hours 	5.90
<p>Review and Analyze Court’s Order Denying Motion to Remand (filed on December 30, 2019) (Federal Action)</p> <ul style="list-style-type: none"> • Jeffrey D. Klein – 0.90 hour 	0.90

<p>Research and Draft Plaintiff's Motion for Preliminary Approval of Class Settlement, Declaration of Edwin Aiwazian in Support Thereof, Declaration of Ruby Danielsson in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement; Review and Analyze Settlement Administrator's Declaration Regarding Proposed Settlement Notice Administration (filed on November 12, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 1.20 hours • Joanna Ghosh – 3.10 hours • Brian J. St. John – 4.40 hours • Alexandra Rose – 16.50 hours 	25.20
<p>Review Court's Notice Continuing Motion Hearing (filed on November 18, 2021) (Federal Action)</p> <ul style="list-style-type: none"> • Alexandra Rose – 0.10 hour 	0.10
<p>Review Defendant's Notice of Appearance of Counsel (served on January 21, 2022) (Federal Action)</p> <ul style="list-style-type: none"> • Alexandra Rose – 0.10 hour 	0.10
<p>Review Court's Zoom Civil Minute Order (filed on January 21, 2022) (Federal Action)</p> <ul style="list-style-type: none"> • Alexandra Rose – 0.10 hour 	0.10
<p>Research and Draft Plaintiff's Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Edwin Aiwazian in Support Thereof, and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on February 25, 2022) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 2.10 hours • Joanna Ghosh – 3.80 hours • Alexandra Rose – 13.90 hours 	19.80

<p>Review Court’s Order Granting Preliminary Approval of Class Action Settlement (filed on April 8, 2022) (Federal Action)</p> <ul style="list-style-type: none"> • Joanna Ghosh – 0.20 hour • Alexandra Rose – 0.30 hour 	0.50
<p>Research and Draft Plaintiff’s Notice of Motion and Motion for Attorneys’ Fees and Costs; Declaration of Edwin Aiwazian in Support Thereof; and [Proposed] Order Awarding Attorneys’ Fees and Costs to Class Counsel (filed on May 23, 2022) (Federal Action)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 2.10 hours • Joanna Ghosh – 5.70 hours • Alexandra Rose – 14.70 hours 	22.50
<p>Review and Analyze Settlement Administrator’s Declaration Regarding Settlement Notice and Administration; and Research and Draft Plaintiff’s Motion for Final Approval of Class Action Settlement, Class Representative Enhancement Payment, and Settlement Administration Fees and Costs, Declaration of Edwin Aiwazian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on July 25, 2022) (Federal Action) (Anticipated)</p> <ul style="list-style-type: none"> • Edwin Aiwazian – 2.90 hours • Joanna Ghosh – 5.80 hours • Alexandra Rose – 10.40 hours 	19.10
Total Hours:	769.70

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Danielsson v. Blood Centers of the Pacific

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/29/2019	One Legal	Attorney Service	157.85
3/29/2019	San Francisco County Superior Court	Filing Fee	450.00
3/29/2019	San Francisco County Superior Court	Complex Fee	1,000.00
4/25/2019	ProLegal	Attorney Service	177.45
5/24/2019	File & ServeXpress	Attorney Service	32.40
6/14/2019	General Logistics Systems US, Inc.	Courier Service	31.77
7/23/2019	File & ServeXpress	Attorney Service	32.30
8/14/2019	Legal Document Server, Inc.	Attorney Service	115.00
8/14/2019	San Francisco County Superior Court	Jury Fee	150.00
8/29/2019	Legal Document Server, Inc.	Attorney Service	115.00
9/25/2019	General Logistics Systems US, Inc.	Courier Service	16.04
12/10/2019	Legal Document Server, Inc.	Attorney Service	230.00
12/16/2019	General Logistics Systems US, Inc.	Courier Service	31.64
12/20/2019	Jeffrey Klein	Travel Reimbursement	2,229.62
3/13/2020	Legal Document Server, Inc.	Attorney Service	52.38
7/15/2020	Mark S. Rudy	Mediation Fee	10,000.00
7/16/2020	Robert A. Parris	Damages Consulting Expert	6,600.00
11/19/2021	Legal Document Server, Inc.	Attorney Service	150.75
2/1/2022	General Logistics Systems US, Inc.	Courier Service	22.77
2/1/2022	Katherine Antonette Powell Sullivan	Court Reporter	101.85
Total:			21,696.82