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6  
7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

8 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

9  
10 ARTURO GONZALEZ, individually, and on  
11 behalf of other members of the general public  
12 similarly situated,

13  
14 **Plaintiff,**

15 vs.

16 HUNT ENTERPRISES, INC., a California  
17 corporation; and DOES 1 through 100,  
18 inclusive,

19  
20 **Defendants.**

Case No.: 22STCV15057

Honorable Lawrence P. Riff  
Department SSC-7

**CLASS ACTION**

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

Date: June 12, 2023  
Time: 10:00 a.m.  
Dept.: SSC-7

Complaint Filed: May 5, 2022  
Trial Date: Not Set

1 **DECLARATION OF JOANNA GHOSH**

2 I, Joanna Ghosh, hereby declare as follows:

3 1. I am an attorney licensed to practice law in the State of California. I am a member  
4 of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Arturo Gonzalez (“Plaintiff”) in the  
5 above-captioned action. The facts set forth in this declaration are within my personal knowledge  
6 or based on information and belief, and, if called as a witness, I could and would competently  
7 testify thereto.

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

9 ***EDUCATION***

10 2. Since October 2008, Lawyers *for* Justice, PC has almost exclusively focused on the  
11 prosecution of consumer and employment class actions, involving wage-and-hour claims, race  
12 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC  
13 is attorney of record in well over a dozen employment-related putative class actions in both state  
14 and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys  
15 who focus on litigating complex wage-and-hour class and Private Attorneys General Act  
16 (“PAGA”) representative actions. The firm has successfully litigated cases involving the  
17 executive, administrative, and other overtime exemptions to the State of California and federal  
18 overtime compensation requirements. During a relatively short time, in association with other law  
19 firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of  
20 individuals in California.

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

1 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable  
2 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From  
3 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the  
4 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.  
5 In December of 2004, he obtained a license to practice law from the California State Bar. From  
6 approximately December 2004 to approximately August 2008, he was employed by Girardi &  
7 Keese. At Girardi & Keese, his practice focused on class actions and other complex cases  
8 involving toxic torts and products liability. In addition, he gained substantial experience on cases  
9 involving insurance bad faith, premises liability, and medical negligence. While employed by  
10 Girardi & Keese, he argued approximately one hundred (100) motions, took or defended  
11 approximately one hundred fifty (150) depositions, and prepared dozens of expert witnesses for  
12 deposition or trial. Since in or around October of 2008, through his work at Lawyers *for* Justice,  
13 PC, he has almost exclusively focused on the prosecution of consumer and employment class  
14 actions, involving wage-and-hour claims, race discrimination, unfair business practices, or  
15 consumer fraud. While employed by Lawyers *for* Justice PC, he has argued over one hundred  
16 (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of  
17 expert witnesses for deposition or trial, and attended over one hundred seventy-five (175)  
18 mediations. Together with other attorneys at the firm, and in many cases in conjunction with co-  
19 counsel, he has successfully litigated cases involving the executive, administrative, and other  
20 overtime exemptions to the State of California and federal overtime compensation requirements.  
21 Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by  
22 contested motion practice in approximately fifteen (15) cases in the last decade and litigated over  
23 1,000 class action or representative action cases.

24 4. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He  
25 received his Bachelor of Arts degree from University of California, Los Angeles and graduated  
26 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.  
27 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the  
28 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.

1 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern  
2 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.  
3 He was admitted to practice law in California in 2010. He is admitted to practice before all courts  
4 of the State of California and all United States District Courts in the State of California. He has  
5 worked on many wage-and-hour class action and representative action cases, taking the lead in  
6 taking and defending depositions, arguing motions, and attending mediations. He has played an  
7 integral role in preparing matters for class certification, including and not limited to, successful  
8 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.  
9 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.  
10 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.  
11 RG13680477). He has worked on over one hundred (100) class action or representative action  
12 cases which have resulted in settlement and been granted court approval, including, but not limited  
13 to, those listed in paragraph 7 herein.

14 5. I, Joanna Ghosh, am a Senior Member of Lawyers for Justice, PC. I received a  
15 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of  
16 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from  
17 Georgetown University Law Center in 2010. I am admitted to practice in California (since 2010)  
18 and in New York (since 2013) and am also admitted to practice in all U.S. District Courts in  
19 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme  
20 Court. I have taken and defended dozens of depositions and successfully handled motion practice  
21 in class action cases regarding discovery (including and not limited to, regarding class contact  
22 information), class certification (both contested class certification and stipulated class  
23 certification), arbitration agreements, coordination, and intervention. I have successfully handled  
24 briefing and oral argument on appeal and obtained notable decisions regarding the Private  
25 Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential*  
26 *Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017),  
27 cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. I also have  
28 extensive experience with class action and/or representative action cases. Under my, Edwin

1 Aiwazian, and Arby Aiwazian’s supervision, the firm has handled the class certification and court  
2 approval process for hundreds of class action and/or representative action matters that have  
3 successfully resolved. I am a member of the California Employment Lawyers Association.

4 6. Yasmin is a Member of Lawyers *for* Justice, PC. She received her Bachelor of Arts  
5 degree from University of California, Santa Barbara in 2013 and earned her Juris Doctor degree  
6 from Pepperdine University School of Law in 2017. She was admitted to practice law in  
7 California in 2019. She is admitted to practice before all courts of the State of California and all  
8 federal district courts in the State of California. She has worked on many wage and hour class  
9 action and PAGA representative matters, and her work has included, *inter alia*, researching and  
10 drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing  
11 stipulations and settlement agreements, engaging in motion practice, claims evaluation and  
12 analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, she was an  
13 attorney at a prominent boutique entertainment law firm, where she represented filmmakers and  
14 talent, negotiating and structuring various types of agreements on their behalf. She is a member  
15 of the California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian  
16 American Bar Association.

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

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

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

26 b) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
27 wage-and-hour class action against a national retailer of household items involving allegations of  
28 misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court

1 granted final approval of the class action settlement. The Los Angeles County Superior Court  
2 Case Number is BC413498.

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

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

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

18 f) LFJ, in association with co-counsel therein, represented the plaintiff in a  
19 wage-and-hour class and PAGA representative action against a national wholesale distributor of  
20 plumbing and builder supplies, involving allegations of misclassification of multiple salaried  
21 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA  
22 representative action settlement. The Sacramento County Superior Court Case Number is 34-  
23 2012-00136285.

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

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

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

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

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

22 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
23 wage-and-hour class action against a national retailer of apparel, accessories, and home products,  
24 involving allegations of misclassification of the “Department Manager” position. On August 12,  
25 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class. On  
26 August 6, 2019, the court granted final approval of the class action settlement. The Alameda  
27 County Superior Court Case Number is RG13680477.  
28

1 m) LFJ represented the plaintiff in a PAGA representative action against a real  
2 estate and property management company, on behalf of non-exempt employees. On November 4,  
3 2016, the court granted approval of the PAGA representative action settlement. The Orange  
4 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

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

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

26 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
27 wage-and-hour class and PAGA representative action against a manufacturer of food service  
28 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final



1 approval of the class and PAGA representative action settlement. The Orange County Superior  
2 Court Case Number is 30-2015-00810013-CU-OE-CXC.

3 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
4 wage-and-hour class and PAGA representative action against a lumber and hardware company on  
5 behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class  
6 and PAGA representative action settlement. The Orange County Superior Court Case Number is  
7 30-2014-00747750-CU-OE-CXC.

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

13 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA  
14 representative action against a food company on behalf of non-exempt employees. On June 30,  
15 2017, the court granted final approval of the class and PAGA representative action settlement. The  
16 Sacramento County Superior Court Case Number is 34-2015-00175871.

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

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

25 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
26 representative action against a manufacturer of plastic containers on behalf of non-exempt  
27 employees. On October 31, 2017, the court granted final approval of the class and PAGA  
28

1 representative action settlement. The Los Angeles County Superior Court Case Number is  
2 BC577233.

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

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

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

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

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

28

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

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

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

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

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

27           ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and  
28 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed

1 and argued an appeal with respect to the employer’s motion to compel arbitration, resulting in a  
2 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,  
3 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval  
4 of the PAGA representative action settlement. The San Diego County Superior Court Case  
5 Number is 34-2015-00175330.

6           jj) LFJ, in association with co-counsel therein, represented 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. On October 28, 2022, the court  
10 granted final approval of the class and PAGA representative action settlement. The San Diego  
11 County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

18           ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
19 wage-and-hour class action against manufacturer and supplier of power products and services on  
20 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs’ motion  
21 for class certification and certified a class. On August 27, 2021, the court granted final approval  
22 of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-  
23 00025968-CU-OE-CTL.

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

28 ///

1 **SUMMARY OF WORK PERFORMED**

2 8. Lawyers *for Justice*, PC has been actively engaged in the litigation of this matter  
3 since its inception and throughout the pendency of this matter.

4 9. This case was commenced on May 5, 2022, and on August 26, 2022, Parker &  
5 Minne, LLP was associated as co-counsel for Plaintiff. Since joining forces with Parker & Minne,  
6 LLP, we have worked cooperatively with them to strategize and prosecute the case, and our work  
7 with them has been a coordinated and combined effort. Together, Lawyers *for Justice*, PC and  
8 Parker & Minne, LLP are referred to as “Class Counsel.”

9 10. Before initiating the lawsuit on behalf of Plaintiff, Lawyers *for Justice*, PC  
10 conducted extensive investigation and research into the facts and circumstances underlying the  
11 pertinent factual and legal issues and applicable law. This required thorough discussions and  
12 interviews between attorneys at our firm and Plaintiff, and research into the various legal issues  
13 involved in the case, namely, the current state of the law as it applied to class certification, off-  
14 the-clock theory, meal and rest periods, wage-and-hour enforcement, Plaintiff’s claims and  
15 damages, and Defendant’s defenses. After conducting initial investigation, our firm determined  
16 that Plaintiff’s claims were well-suited for class action treatment owing to what appeared to be a  
17 common course of conduct affecting a similarly situated group of current and former hourly-paid  
18 or non-exempt employees who worked for Defendant Hunt Enterprises, Inc. (“Defendant”) within  
19 the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-  
20 compliant meal and rest periods, and unreimbursed business expenses.

21 11. Collectively, Class Counsel investigated the veracity, strength, and scope of the  
22 claims, and worked on preparing the case for class certification and trial, prior to reaching the  
23 Settlement. This matter has involved extensive and ongoing investigations, research into legal and  
24 factual issues, formal and informal discovery, and court proceedings. Class Counsel obtained  
25 information, documents, and data in the course of litigation and in connection with mediation and  
26 settlement negotiations. Class Counsel reviewed and analyzed a volume of information,  
27 documents, and data obtained from Plaintiff, Defendant, and other sources, researched applicable  
28 law, and undertook analyses and calculations of the value of claims, damages, and penalties

1 exposure. Class Counsel also met and conferred with Defendant’s counsel on numerous  
2 occasions, e.g., to discuss issues relating to the pleadings, case management, contemplated motion  
3 practice, discovery and production of information, documents, and data in the course of litigation  
4 and mediation and settlement negotiations, and mediation and settlement negotiations. Other work  
5 that Class Counsel has performed includes, and is not limited to, case strategy and analysis;  
6 drafting, reviewing, and revising the pleadings and motion-related papers; claims assessment and  
7 evaluation; and preparing for and attending mediation and settlement negotiations.

8 12. As outlined herein, the parties have conducted significant investigations and  
9 exchange, review, and analysis of a volume of information, documents, and data obtained from  
10 Plaintiff, Defendant, and other sources during the course of litigating the case and in connection  
11 with mediation and settlement negotiations. This information, documents, and data provided a  
12 critical understanding of the nature of the work performed by putative class members, as well as  
13 Defendant’s operations and employment policies, practices, and procedures, and were used in  
14 analyzing liability, damages, and penalties valuation issues in connection with all phases of the  
15 litigation, and ultimately, in connection with the mediation and settlement negotiation process.  
16 Accordingly, sufficient investigation and review of information has taken place in order for the  
17 parties to be sufficiently informed of the nature and extent of the claims, and to enable all parties  
18 to fully evaluate the Settlement for its fairness, adequacy, and reasonableness.

19 13. After conducting significant investigation of the facts and law during the prosecution  
20 of the case, counsel for the parties engaged in mediation and extensive settlement negotiations to  
21 try to resolve the case. These efforts included participating in mediation conducted by Phyllis  
22 Cheng, Esq., a well-regarded mediator who is experienced in mediating complex labor and  
23 employment matters, on March 6, 2023. During all settlement discussions, the parties conducted  
24 their negotiations at arm’s length in an adversarial position. In the course of mediation and  
25 settlement negotiations, the parties discussed and considered all aspects of the case, including the  
26 risks and delays of further litigation, the risks to the parties of proceeding with class certification,  
27 and/or trial, the law relating to class certification, off-the-clock theory, meal and rest periods,  
28 rounding, regular rate, arbitration agreements, PAGA representative claims, and wage-and-hour

1 enforcement, as well as the evidence produced and analyzed, and the possibility of appeals, among  
2 other things. Arriving at a settlement that was acceptable to the parties was not easy. After  
3 conducting extensive investigations and settlement negotiations, and with the aid of the mediator's  
4 evaluation, the parties have agreed to resolve the case given the legal issues relating to Plaintiff's  
5 principal claims, as well as the costs and risks to both sides that would attend further litigation,  
6 and the real possibility of no recovery after years of litigation.

7 14. The Settlement provides for a Class Representative Service Payment in an amount  
8 not to exceed Seven Thousand Five Hundred Dollars and Zero Cents (\$7,500.00) for Plaintiff.  
9 The contemplated service payment is fair and appropriate in light of the time and effort that  
10 Plaintiff expended to pursue the case. Plaintiff was available whenever Class Counsel needed  
11 him, actively tried to obtain and provide information, and spent a substantial amount of time and  
12 effort providing the facts and evidence necessary to facilitate prosecution of the case.  
13 Accordingly, it is appropriate and just for Plaintiff to receive a reasonable service payment for his  
14 services in the case, in addition to his individual settlement payment under the Settlement.

15 15. I have made reasonable inquiry regarding any interest or involvement that Lawyers  
16 *for Justice, PC* and/or Plaintiff may have with Phoenix Settlement Administrators, the proposed  
17 settlement administrator. I have confirmed that, while Lawyers *for Justice, PC* has worked with  
18 Phoenix Settlement Administrators on prior occasions in connection with their administration of  
19 settlements in other unrelated cases, Lawyers *for Justice, PC* does not have any interest or  
20 involvement, financial or otherwise, with Phoenix Settlement Administrators that could create an  
21 actual or potential conflict of interest with the proposed settlement administrator.

22 16. I am not aware of any actions currently pending against Defendant asserting  
23 overlapping or similar wage and hour claims.

24 17. I submit that the Settlement is fair, reasonable, and adequate. In addition, the  
25 Settlement is in the best interests of Plaintiff, other Class Members, the State of California, and  
26 Aggrieved Employees.

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

Executed on this 16 day of May 2023, at Glendale, California.



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Joanna Ghosh