

JCL LAW FIRM, APC

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Attorneys for Plaintiff JACOB GRIFFIN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JACOB GRIFFIN, on behalf of the State of
California, as a private attorney general,

Plaintiff,

vs.

COURTESY CHEVROLET CENTER, a
California Corporation; and DOES 1 through
10, inclusive,

Defendants.

Case No: 37-2022-00005485-CU-OE-CTL

Action Filed: February 14, 2022

**DECLARATION OF JEAN-CLAUDE
LAPUYADE, ESQ. IN SUPPORT OF
PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT
AND JUDGMENT**

Date: July 7, 2023

Time: 10:30 a.m.

Dept.: C-64

Judge: Hon. Loren G. Freestone

I, JEAN-CLAUDE LAPUYADE, declare as follows:

1. I am the managing partner of JCL Law Firm, APC, and co-counsel of record for Plaintiff JACOB GRIFFIN, on behalf of himself, and on behalf of all persons similarly situated, and in his representative capacity on behalf of the State of California and fellow Aggrieved Employees, in this matter. As such, I am fully familiar with the facts, pleadings and history of the matter.

2. I am submitting this declaration in support of Plaintiffs' Motion for Approval of PAGA Settlement.

3. Attached hereto as **Exhibit "1"** is a true and correct copy of the JCL Law Firm, APC's "Transaction Summary" detailing Plaintiff's Counsel's actually incurred litigation expenses for this matter as of June 12, 2023. As shown in detail in the attached transaction summary, Counsel has incurred a total of \$5,032.96 in litigation costs prosecuting this action. I anticipate incurring an additional \$150 - \$200 for the filing, service and appearance at this motion.

4. Attached hereto as **Exhibit "2"** is a true and correct copy of the Time and Billing Journal for the attorneys and staff at the JCL Law Firm, APC. To the best of my knowledge, each entry was made contemporaneously by the applicable attorney and/or staff members and in the ordinary course of their usual course of business. The attached Billing Journal shows that the JCL Law Firm, APC, billed a total of 53.28 hours for a total of \$28,576.67 successfully litigating this action at \$550 per hour for attorney Jean-Claude Lapuyade, Esq.

5. The JCL Law Firm's rates are comparable to those judicially approved for other plaintiff's firms, such as Baron & Budd (rates ranging from \$775 for the requested partner to \$390-\$630 for non-partners), Western Comden Casselman & Essensten (rates ranging from \$670-\$750 for partners and \$300-\$500 for associates), and Blood Hurst & Rearden (\$510-\$695 for partners). See *Aarons v. BMW of North America*, No. 11-7667-PSG, 2014 U.S. Dist. LEXIS 118442, *40-41 (C.D. Cal. Apr. 29, 2014). Other Southern California courts have approved hourly rates in the requested range. See e.g., *Kearney v. Hyundai Motor Am.*, 2013 U.S. Dist. LEXIS 91636, *24 (C.D. Cal. June 28, 2013) (approving hourly rates of \$650 -\$800 for senior attorneys in consumer class action); *Parkinson v. Hyundai Motor America*, 796 F.Supp.2d 1160, 1172 (C.D. Cal. 2010)(approving hourly

1 rates between \$445 and \$675); *Faigman v. AT&T Mobility, LLC*, 2011 U.S. Dist. LEXIS 15825, *2
2 (N.D. Cal. Feb. 15, 2011)(Approving hourly rates of \$650 an hour for partners and \$500 for associates);
3 *Richard v. Ameri-Force Mgmt. Servs., Inc.*, No 37-2008-00096019 (San Diego Superior Court, August
4 27, 2010)(\$695 to \$750 an hour for partners and \$495 for associates); *Barrera v. Gamestop*, No. CV
5 09-1399 (C.D. Cal. Nov. 29, 2010)(\$700 for partners and \$475 for associates); *Anderson v. Nextel*
6 *Retail Stores, LLC*, No. CV 07-4480 (C.D. Cal. June 20, 2010)(\$655- \$750 for partners and \$300 –
7 515 for associates); *Luquetta v. Regents of Cal.*, CGC-05-443007 (San Francisco Sup. Ct.) (approving
8 2012 partner rates between \$550 and \$850 per hour); and *Holoway v. Best Buy Co.*, C-05-5056-PJH
9 (MEJ)(N.D. Cal.)(approving 2011 partner rates between \$825 and \$700, and associates hourly rates
10 between \$355 and \$405 an hour).

11 6. Moreover, my billing rate has been approved multiple times within the last couple years
12 by California Superior Court judges. (See generally *Rodriguez v. RSI Home Products, Inc.*, San
13 Bernardino Superior Court Case No. CIVDS 2023354 (July 30, 2021 – Hon. David Cohn approved
14 \$550 billing rate and appointed Jean-Claude Lapuyade, Esq. as Counsel in a \$1,450,000 wage and hour
15 class action settlement); *Nunes v. Home Depot U.S.A., Inc.*, San Joaquin Superior Court Case No. STK-
16 CV-UOE-2020-0011011 (October 20, 2021 – Hon. Roger Ross approved \$550 billing rate and
17 appointed Jean-Claude Lapuyade, Esq. as Counsel in a \$1,500,000 wage and hour class action
18 settlement); *Pillsbury v. T&T Restaurants CA, Inc.*, Del Norte Superior Court Case No. CVUJ-20-
19 1214 (December 14, 2021 – Hon. Darren McElfresh approved \$550 billing rate and appointed Jean-
20 Claude Lapuyade, Esq. as Counsel in a wage and hour class action settlement); *Elias Kaser v. Aviation*
21 *Consultants, Inc.*, Orange County Superior Court Case No. 30-2021-01191204-CU-OE-CXC
22 (September 22, 2021 – Hon. Peter J. Wilson approved \$550 billing rate in a representative California
23 Labor Code Private Attorney General Act settlement).

24 7. Further, Counsel will be performing additional work, including finalizing the orders and
25 judgment and monitoring the completion of the settlement process over the course of the next coming
26 months.

27 ///

8. All of Counsel's out-of-pocket expenses are the types of expenses normally charged to paying clients including the following: filing fees; copying; telephone; postage; factual and legal research charges; mediation fees; expert costs and travel expenses, which were all incurred during, and were necessary for the successful prosecution of, the litigation and, therefore, should be reimbursed.

9. Counsel now requests reimbursement for those incurred litigation expenses and costs as provided for in the Settlement Agreement and based upon Counsel's billing records.

10. Attached hereto as “**Exhibit 3**” is a true and correct copy of the JCL Law Firm “Firm Resume” detailing some of the major cases the JCL Law Firm has undertaken.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 12th day of June 2023, at San Diego, California.

JCL LAW FIRM, APC

By: JCL
Jean-Claude Lapuyade
Attorneys for Plaintiff

EXHIBIT 1

JCL Law Firm

Transaction Report

All Dates

DATE	TRANSACTION TYPE	NUM	NAME	MEMO/DESCRIPTION	ACCOUNT	SPLIT	AMOUNT	BALANCE
Griffin v. Courtesy Chevy (002-273)								
12/31/2021	Journal Entry	Dec 2021	Postage	Copies for Dec 2021	Client costs deferred	-Split-	2.20	2.20
12/31/2021	Journal Entry	Dec 2021	Postage	Postage for Dec 2021	Client costs deferred	-Split-	14.66	16.86
01/31/2022	Journal Entry	Jan 2022	Postage	Copies for Jan 2022	Client costs deferred	-Split-	0.50	17.36
02/14/2022	Expense		One Legal LLC	One Legal Order Number: 17683014 - Filing Fee Re: Complaint, Civil Case Cover Sheet, Original Summons	Client costs deferred	Chase Card 7349	1,489.69	1,507.05
02/28/2022	Journal Entry	Feb 2022	Postage	Copies for Feb 2022	Client costs deferred	-Split-	0.10	1,507.15
03/08/2022	Expense		One Legal LLC	One Legal Order Number: 17814916 - Filing Fee Re: Motion - Notice and Acknowledgment of Receipt	Client costs deferred	Chase Card 7349	12.35	1,519.50
03/31/2022	Journal Entry	Mar 2022	Postage	Copies for Mar 2022	Client costs deferred	-Split-	0.20	1,519.70
08/31/2022	Journal Entry	August 2022	Postage	Copies for August 2022	Client costs deferred	-Split-	0.30	1,520.00
09/30/2022	Journal Entry	Sept. 2022	Postage	Copies for September 2022	Client costs deferred	-Split-	0.30	1,520.30
10/13/2022	Expense		One Legal LLC	One Legal Order Number: 18988135 - Filing Fee Re: Stipulation - Other, Fee Due, Proof of Service	Client costs deferred	Chase Card 7349	33.46	1,553.76
10/31/2022	Journal Entry	Oct. 2022	Postage	Copies for October 2022	Client costs deferred	-Split-	0.40	1,554.16
11/30/2022	Journal Entry	Nov. 2022	Postage	Copies for November 2022	Client costs deferred	-Split-	0.20	1,554.36
12/31/2022	Journal Entry	Dec 2022	Postage	Copies for December 2022	Client costs deferred	-Split-	0.60	1,554.96
01/31/2023	Journal Entry	Jan 2023	Postage	Copies for January 2023	Client costs deferred	-Split-	0.40	1,555.36
02/06/2023	Check	3120	JAMS	Invoice - 1110028515	Client costs deferred	US Bank-Checking - 4270	237.50	1,792.86
02/06/2023	Check	3121	JAMS	Invoice - 6412418	Client costs deferred	US Bank-Checking - 4270	2,487.50	4,280.36
02/28/2023	Journal Entry	Feb 2023	Postage	Postage for February 2023	Client costs deferred	-Split-	0.60	4,280.96
02/28/2023	Journal Entry	Feb 2023	Postage	Copies for February 2023	Client costs deferred	-Split-	0.80	4,281.76
03/27/2023	Check	3205	Berger Consulting Group	Inv. 8327	Client costs deferred	US Bank-Checking - 4270	1,225.00	5,506.76
03/31/2023	Journal Entry	Mar 2023	Postage	Postage for March 2023	Client costs deferred	-Split-	0.60	5,507.36
03/31/2023	Journal Entry	Mar 2023	Postage	Copies for March 2023	Client costs deferred	-Split-	0.60	5,507.96
04/10/2023	Deposit		Griffin v. Courtesy Chevy (002-273)	JAMS Refund for Mediation	Client costs deferred	US Bank-Checking - 4270	-475.00	5,032.96
Total for Griffin v. Courtesy Chevy (002-273)							\$5,032.96	
TOTAL							\$5,032.96	

EXHIBIT 2

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
Griffin v. Courtesy Chevy (002-273)							
12/02/2021	No	Jean Claude Lapuyade	Legal Research - Claim Analysis	550.00	2:54	1,595.00	1,595.00
12/08/2021	No	Jean Claude Lapuyade	Drafted, Reviewed and Revised LWDA Notice	550.00	3:12	1,760.00	3,355.00
01/21/2022	No	Jean Claude Lapuyade	Fact Investigation - Reviewed Client File and Documents	550.00	3:24	1,870.00	5,225.00
02/10/2022	No	Jean Claude Lapuyade	Pleadings - Drafted, Revised and Finalized Complaint	550.00	2:54	1,595.00	6,820.00
04/24/2022	No	Jean Claude Lapuyade	Pleadings - Reviewed and Analyzed Answer	550.00	1:58	1,081.67	7,901.67
06/07/2022	No	Jean Claude Lapuyade	Discovery - Emails to /from OC Re Mediation Data	550.00	0:12	110.00	8,011.67
07/14/2022	No	Jean Claude Lapuyade	Case Management - Emails to/from OC Re CMC M&C	550.00	0:42	385.00	8,396.67
07/27/2022	No	Jean Claude Lapuyade	Case Management - Drafted, Revised and Edited CMS	550.00	1:00	550.00	8,946.67
07/29/2022	No	Jean Claude Lapuyade	Drafted Stip to Stay Pending Mediation.	400.00	1:30	600.00	9,546.67
07/29/2022	No	Jean Claude Lapuyade	Case Management - Emails to/from OC Re Mediation and Viking	550.00	0:42	385.00	9,931.67
08/02/2022	No	Jean Claude Lapuyade	Case Management - Revised and Edited Stip to Stay	550.00	0:48	440.00	10,371.67
08/05/2022	No	Jean Claude Lapuyade	Case Management - Emails to/from OC RE Mediation	550.00	0:18	165.00	10,536.67
08/21/2022	No	Jean Claude Lapuyade	Case Management - Emails to/from OC Re Mediation	550.00	0:36	330.00	10,866.67
08/21/2022	No	Jean Claude Lapuyade	Case Management - Emails to/from OC Re Mediation	550.00	0:42	385.00	11,251.67
08/22/2022	No	Jean Claude Lapuyade	Case Management - Emails to/from OC Re Mediation	550.00	0:24	220.00	11,471.67
09/23/2022	No	Jean Claude Lapuyade	Law and Motion - Drafted and Revised Stip to Stay	550.00	0:42	385.00	11,856.67
10/27/2022	No	Jean Claude Lapuyade	Case Management - Emails to/from OC Re Stip to Stay	550.00	0:12	110.00	11,966.67
10/31/2022	No	Jean Claude Lapuyade	Discovery - Emails to/from OC Re Mediation Data	550.00	0:24	220.00	12,186.67
11/11/2022	No	Jean Claude Lapuyade	Discovery - Emails to/from OC Re Data Sample	550.00	0:18	165.00	12,351.67
01/08/2023	No	Sydney Castillo-Johnson	File Maintenance	300.00	0:10	50.00	12,401.67
01/30/2023	No	Jean Claude Lapuyade	Discovery - Emails to/from OC Re Mediation Data	550.00	0:24	220.00	12,621.67
02/10/2023	No	Jean Claude Lapuyade	Discovery -Emails to/from OC Re Re Mediation Data	550.00	0:24	220.00	12,841.67

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
02/16/2023	No	Jean Claude Lapuyade	Discovery - R&R Mediation Data	550.00	5:18	2,915.00	15,756.67
02/27/2023	No	Jean Claude Lapuyade	Discovery - Emails to/from Expert Re Damage Analysis	550.00	0:18	165.00	15,921.67
02/27/2023	No	Jean Claude Lapuyade	Discovery - R&R Expert Damage Analysis	550.00	1:30	825.00	16,746.67
03/01/2023	No	Jean Claude Lapuyade	Discovery - Emails to/from OC Re Mediation Data	550.00	0:18	165.00	16,911.67
03/01/2023	No	Sydney Castillo-Johnson	Calls and texts to client re: case information	350.00	0:15	87.50	16,999.17
03/03/2023	No	Sydney Castillo-Johnson	Follow up call to client re: mediation	350.00	0:06	35.00	17,034.17
03/07/2023	No	Sydney Castillo-Johnson	Intraoffice meeting re: mediation brief and claims	300.00	0:30	150.00	17,184.17
03/07/2023	No	Sydney Castillo-Johnson	Follow up call to client re: mediation	350.00	0:06	35.00	17,219.17
03/08/2023	No	Jean Claude Lapuyade	Case Management - Emails to/from Client Re Status	550.00	1:00	550.00	17,769.17
03/13/2023	No	Jean Claude Lapuyade	Discovery - Emails to/from OC Re Mediation Data	550.00	0:18	165.00	17,934.17
03/15/2023	No	Jean Claude Lapuyade	Mediaton - Attended Mediation	550.00	8:00	4,400.00	22,334.17
03/30/2023	No	Jean Claude Lapuyade	Settlement - Emails to/from Admin Re Bids	550.00	0:18	165.00	22,499.17
03/31/2023	No	Jean Claude Lapuyade	Case Management - Drafted, Revised and Edited Stip to Amend	550.00	1:18	715.00	23,214.17
03/31/2023	No	Jean Claude Lapuyade	Settlement - Emails to/from Admin Re Bid for Admin	550.00	0:18	165.00	23,379.17
04/03/2023	No	Jean Claude Lapuyade	Settlement - Emails to/from OC Re SAR	550.00	0:18	165.00	23,544.17
04/28/2023	No	Jean Claude Lapuyade	Settlement - Emails to/from OC Re SAR	550.00	0:18	165.00	23,709.17
05/08/2023	No	Jean Claude Lapuyade	Settlement - Revised and Edited SAR w Defense Edits	550.00	1:24	770.00	24,479.17
05/09/2023	No	Jean Claude Lapuyade	Settlement - Emails to/from OC Re Edits to SAR	550.00	0:42	385.00	24,864.17
05/23/2023	No	Jean Claude Lapuyade	Legal Research - PAGA Approval Motions (Cases and Statutes)	550.00	2:06	1,155.00	26,019.17
05/23/2023	No	Sydney Castillo-Johnson	Texts with client re case update	350.00	0:12	70.00	26,089.17
05/23/2023	No	Sydney Castillo-Johnson	Call with client re: case update	350.00	0:06	35.00	26,124.17
05/26/2023	No	Maria Watters	File maintenance	175.00	0:30	87.50	26,211.67
06/01/2023	No	Jean Claude Lapuyade	Law and Motion - Reviewed, Revised and Edited Approval Motion	550.00	2:24	1,320.00	27,531.67

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
06/05/2023	No	Jean Claude Lapuyade	Law and Motion - Revised and Edited Approval Motion	550.00	1:54	1,045.00	28,576.67
Total for Griffin v. Courtesy Chevy (002-273)					53:17	\$28,576.67	

EXHIBIT 3

JCL LAW FIRM, APC
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Tel: (619) 599-8292
Fax: (619) 599-8291

FIRM RESUME

Areas of Practice: Employee Class Actions, Wage and Hour Class Actions, Civil Litigation, and Unlawful Housing Practices.

ATTORNEY BIOGRAPHIES

Jean-Claude Lapuyade, Esq.
California Bar Number 248676
Founding Partner

Biography:

Mr. Lapuyade is a San Diego based labor and employment attorney representing aggrieved California employees and the victims of unlawful housing practices throughout the State of California. Mr. Lapuyade's litigation practice focuses on representing California employees in wage and hour class actions for unpaid wages, missed meal and rest breaks, and misclassification, wrongful termination cases and tenants in unlawful housing class actions. Mr. Lapuyade prides himself on providing his clients with aggressive, attentive and result driven representation through the litigation process, trial and arbitration. Since 2007, Mr. Lapuyade successfully recovered in excess of \$200 million in monetary awards for his clients.

Mr. Lapuyade served as co-editor of the Insurance Column for Consumer Attorneys of San Diego from 2011 to 2014. As editor, Mr. Lapuyade was responsible for publishing monthly articles in the Trial Bar News periodical analyzing complex insurance coverage issues. Mr. Lapuyade is a four-time recipient of the Super Lawyers Rising Star by Thomson Reuters. To be eligible for inclusion in Rising Stars, a candidate must be either 40 years old or younger or in practice for 10 years or less. While up to 5 percent of the lawyers in a state are named to Super Lawyers, no more than 2.5 percent are named to Rising Stars.

Bar Admissions:

- California
- U.S. District Court Southern District of California
- U.S. District Court Central District of California
- U.S. District Court Eastern District of California
- U.S. District Court Northern District of California

Professional Associations:

- California Employment Lawyers Association, 2007 to Present
- Consumer Attorneys of San Diego, 2007 to 2020
- American Bar Association, Section of Litigation, Member, 2007 to 2020
- American Bar Association, Labor & Employment Section, Member, 2007 to 2020
- American Bar Association, Tort, Trial & Insurance Section, Member, 2007 to 2020
- California Bar Association, Labor & Employment Section, Member, 2007 to Present
- California Bar Association, Litigation Section, Member, 2007 to Present

Education:

- **California Western School of Law**
 - J.D. - 2006
 - Honors: Deans Merit Scholarship, California Western School of Law 2005 - 2006
- **University of Arizona**
 - B.A. - 2001
 - Major: History

Honors:

- Super Lawyers Rising Star, Thomson Reuters, 2015 - 2018
- Distinguished Advocate Award for Outstanding Oral Advocacy, 2005 - 2006

Sydney Castillo-Johnson, Esq.
California Bar Number 343881
Associate Attorney

Biography:

Ms. Castillo-Johnson is a San Diego based labor and employment attorney representing California employees throughout the state of California. Ms. Castillo-Johnson's litigation practice focuses on representing current and former employees in wage and hour class actions for unpaid wages, missed meal and rest breaks, misclassification, and wrongful termination.

Ms. Castillo-Johnson volunteered her time at California Western School of Law first as a student intern and later as a student manager with the Community Law Project which offers legal services to the low-income community of San Diego.

Education:

- **California Western School of Law**
 - J.D.- 2022
 - Honors:
 - Dean's Honor List: Spring 2021, Fall 2021
 - Public Service Honor Society Fall 2021
 - 3L Academic Merit Scholarship
 - Dean's Diversity, Service, and Leadership Scholarship
 - Activities: Community Law Project Student Manager
- **Azusa Pacific University**
 - B.A. – 2018
 - Major: Criminal Justice

Monnett De La Torre, Esq.
California Bar Number 272884
Senior Associate

Biography:

Ms. De La Torre is a San Diego and Ventura County based labor and employment attorney representing aggrieved California employees throughout the State of California. Ms. De La Torre's litigation practice focuses on representing California employees in wage and hour class and representative actions for unpaid wages, missed meal and rest breaks, misclassification, penalties, and wrongful termination cases. Ms. De La Torre has extensive experience handling internal workplace investigations. Ms. De La Torre has handled matters before the Department of Fair Employment and Housing, Equal Employment Opportunity Commission and Department of Labor.

Ms. De La Torre is a two-time recipient of the Super Lawyers Rising Star by Thomas Reuters. To be eligible for inclusion in Rising Stars, a candidate must be either 40 years old or younger or in practice for 10 years or less. While up to five percent of the lawyers in a state are named to Super Lawyers, no more than 2.5 percent are named to Rising Stars.

Bar Admissions:

- California
- U.S. District Court Southern District of California

Professional Associations:

- California Employment Lawyers Association, 2022 to Present
- Consumer Attorneys of San Diego, 2010-2015
- American Bar Association, Labor & Employment Section, Member, 2015 to Present
- California Bar Association, Labor & Employment Section, Member, 2015 to Present
- San Diego La Raza Lawyers Association, 2010-2015
- Ventura County Bar Association, 2015-Present
- Women Lawyers of Ventura County, 2015-Present

Education:

- **New England School of Law**
 - J.D.- 2010

- Honors:
 - Dean's List Consecutive years
- **University of California, San Diego**
 - B.A.- 2006
 - Major: Economics
 - Minor: Latin American Studies

Honors:

- Super Lawyers Rising Star, Thomson Reuters, 2021 and 2022
- Pacific Cost Business Times, "Top 40 under 40" Award
- Daily Transcripts "Top Young Attorney: nominee, consecutive years"

REPORTED CASES

- *Blanchette et al., v. Superior Court (GHA Homes)*, 8 Cal.App.5th 521, 2017
- *Chmurny v. State*, 392 Md. 159, 2006

EXAMPLES OF THE JCL LAW FIRM'S
REPRESENTATIVE CLASS ACTION & REPRESENTATIVE CASES

- *Garces, et al. v. DriverDo, LLC*, Los Angeles Superior Court Case No. 19STCV32773 (January 24, 2023) Hon. Carolyn B. Kuhl approved a \$700,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *De Jesus v. Guardian Angel Home Care, Inc.*, San Diego Superior Court Case No. 37-2020-00021049-CU-OE-CTL (July 29, 2022) Hon. Ronald F. Frazier approved a \$300,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Kaur v. Aces 2020 I, LLC, et al.*, Contra Costa Superior Court Case No. MSC20-02482 (December 22, 2022) Hon. Edward G. Weil approved a \$585,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Molina v. Hawaiian Airlines, Inc.*, Los Angeles Superior Court Case No. 20STCV28079 (November 23, 2022) Hon. Maren Nelson approved a \$250,000 class action settlement for meal and rest period violations. The JCL Law Firm, APC, represented the Plaintiff.
- *Lang Jr. v. Pathways Community Services LLC*, San Diego Superior Court Case No. 37-2019-00049969-CU-OE-CTL (September 9, 2022) Hon. James A. Mangione approved a \$160,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Martinello v. Century Wilshire, Inc.*, Los Angeles Superior Court Case No. 20STCV32613 (March 1, 2022) Hon. Carolyn Kuhl approved a \$550 billing rate and appointed Jean Claude Lapuyade, Esq. of the JCL Law Firm, APC, as Class Counsel.
- *Wilson v. Spreen Inc. (dba Spreen Honda)*, San Bernardino Superior Court Case No. CIVSB2119857 (April 6, 2022) Hon. David Cohn approved a \$300,000 PAGA action settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Ledesma v. TVJ Sons I, Inc.; Porter and Howard, Inc.* Santa Barbara Superior Court Case No. 20CV03573 (November 10, 2021) Hon. Jed Beebe approved a \$350,000 PAGA action settlement for meal and rest period violations. The JCL Law Firm, APC represented the State of California and the Aggrieved Employees.
- *Jacobs v. Rush Media Company, LLC; XLT Management Services, Inc.*, Los Angeles Superior Court Case No. 20STCV32350 (May 2, 2022) Hon. Daniel J. Buckley appointed the JCL Law Firm, APC as Class Counsel and approved a \$330,000 class action settlement for, *inter alia*, independent contractor misclassification.
- *Chavez v. HTL Conrad Domestic, LLC; HTL Conrad Domestic Employer, LLC*, San Diego Superior Court Case No. 37-2020-00016193-CU-OE-CTL (June 9, 2022) Hon. John S. Meyer approved a \$850,000 PAGA action settlement for, *inter alia*, failure to compensate overtime at the regular rate of pay. The JCL Law Firm, APC acted as representative PAGA counsel for the State of California and the Aggrieved Employees.
- *Renteria v. Love's Country Stores of California*, San Bernardino Superior Court Case No. CIVDS20164481 (June 14, 2022) Hon. David Cohn approved a \$2.2 million dollar class action and PAGA action settlement for, *inter alia*, unpaid overtime and sick pay. The JCL Law Firm, APC acted as Class Counsel and as representative PAGA counsel for the State of California.

- *Lopez v. Adidas America, Inc.*, Ventura Superior Court Case No. 56-2021-005498444-CU-OE-VTA (April 4, 2022) Hon. Mark Borrell approved a \$1.5 million dollar class action and PAGA action settlement for, *inter alia*, inaccurate overtime calculations, and appointed the JCL Law Firm, APC as Class Counsel.
- *Felix v. TVI, Inc., d.b.a. Savers*, Santa Clara Superior Court Case No. 21CV376407 (February 18, 2022) Hon. Sunil R. Kulkarni approved a \$1.8 million dollar class action and PAGA action settlement for, *inter alia*, unpaid off-the-clock work. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Munoz v. AMTCR*, San Bernardino Superior Court Case No. CIV-DS2001914 (August 24, 2021) Hon. David Cohn approved a \$1.8 million dollar class and PAGA settlement for, *inter alia*, inaccurate itemized wage statements. The JCL Law Firm, APC acted as class counsel for the settlement class and as representative PAGA counsel the State of California and the Aggrieved Employees.)
- *Nunes v. Home Depot U.S.A., Inc.*, San Joaquin Superior Court Case No. STK-CV-UOE-2020-0011011 (October 20, 2021 – Hon. Roger Ross approved a \$1.5 million dollar class and PAGA settlement for, *inter alia*, miscalculated meal period premiums and appointed Jean-Claude Lapuyade, Esq. as Class Counsel.)
- *Pillsbury v. T&T Restaurants CA, Inc.*, Del Norte Superior Court Case No. CVUJ-20-1214 (December 14, 2021 – Hon. Darren McElfresh approved \$550 billing rate and appointed Jean-Claude Lapuyade, Esq. as Class Counsel in a wage and hour class action settlement.)
- *Latin v. OneMain General Service Corporation*, Stanislaus County Superior Court Case No. CV-20-002498 (October 22, 2021) Hon. Stacy Speiller approved a PAGA action settlement for \$700,000 wage statement violations. The JCL Law Firm, APC acted as counsel for the plaintiff, the State of California and the Aggrieved Employees.
- *Elias Kaser v. Aviation Consultants, Inc.*, Orange County Superior Court Case No. 30-2021-01191204-CU-OE-CXC (September 22, 2021 – Hon. Peter J. Wilson approved \$550 billing rate in a representative California Labor Code Private Attorney General Act settlement).
- *Rodriguez v. RSI Home Products, Inc.*, San Bernardino Superior Court Case No. CIVDS2023354 (July 30, 2021 – Hon. David Cohn approved a \$1.45 million class and PAGA settlement for, *inter alia*, failure to comply with piece-rate laws, and appointed the JCL Law Firm, APC as Class Counsel)
- *Jer Vang v. Bridge Property Management*, Alameda County Superior Court, Case No RG19047434 (January 8, 2021 – Hon. Winifred Smith approved a class and PAGA settlement for, *inter alia*, unpaid off the clock work. The JCL Law Firm, APC acted as class counsel for the settlement class and as representative PAGA counsel the State of California and the Aggrieved Employees.)
- *Johnson v. Volt Management Corp., Inc. et al.*, Los Angeles County Superior Court, Case No. 19STCV16466 (December 11, 2020 – Hon. Amy Hogue approved a PAGA Settlement negotiated on behalf of the State of California and the aggrieved employees by the JCL Law Firm, APC.)
- *Salazar v. Frontier Auto Sales Inc., dba Frontier Toyota*, Los Angeles Superior Court, Case No. 19STCV20382 (November 24, 2020 – Hon. John P. Doyle appointed the JCL Law Firm, APC as class counsel and approved a class and PAGA settlement for, *inter alia*, missed meal and rest periods.)
- *Villalobos v. Alterra Group, LLC et al.*, Los Angeles County Superior Court, Case No. 19STCV19448 (November 11, 2020 – Hon. Richard Fruin approved a PAGA Settlement for, *inter alia*, unreimbursed business expenses. The JCL Law Firm, APC acted as counsel for the plaintiff, the State of California and the Aggrieved Employees.)
- *Stevens et al., v. Bank of England*, San Diego County Superior Court Case No. 37-2019-00018662-CU-OE-CTL (October 16, 2020 – Hon. John Meyer appointed JCL Law Firm as Class Counsel and granted final approval of wage and hour class action for, *inter alia*, off-the-clock work.)
- *Frazier v. ASA Carlton, Inc.*, San Diego Superior Court Case No. 37-2019-00036147 (October 9, 2020 Hon. Kenneth Medel appointed the JCL Law Firm as Class Counsel and granted final approval of wage and hour class action for off-the-clock work.)
- *Krake et al., v. Central Valley Diner, Inc.*, Placer County Superior Court Case No. SCV0041645 (September 4, 2020 – Hon. Michael Jones appointed JCL Law Firm as class counsel and granted final approval of wage and hour class action for meal period violations.)
- *Conner v. Ascendant Marketing, LLC et al.*, San Diego Superior Court Case No. 37-2019-00026864-CU-OE-CTL (July 24, 2020 Hon. Joel Wohlfeil granted approval of PAGA Settlement for, among other things, off-the-clock work. JCL Law Firm, APC acted as lead counsel.)
- *Guerrero v. Estancia Operations, LLC.*, San Diego Superior Court Case No. 37-2019-00028963 (August 25, 2020 – Hon. Katherine Bacal approved PAGA Settlement for, *inter alia*, missed meal and rest periods. JCL Law Firm, APC, acted as lead counsel.)
- *Moreno v. Dash Lube, et al.*, United States District Court, Southern District of California, Case No. 18cv1922 DMS (AHG) (December 13, 2019 – Granted class certification of Labor Code Section 226 claim and appointed JCL Law Firm, APC, as Class Counsel.)
- *Perkins et al., v. Tahiti Enterprises, Inc., et al.*, Orange County Superior Court Case No. 30-2016-00863095 (October 22, 2019 – Hon. Peter Wilson appointed JCL Law Firm, APC, as Class Counsel and granted final approval for an unlawful housing class action settlement arising out of Civil Code Section 1940.1.)

- *Hill v. Stemak Holdings, Ltd.*, San Diego Superior Court Case No., 37-2018-00000747 (January 28, 2020 – Hon. Kenneth Medel appointed JCL Law Firm, APC as class counsel and granted final approval of wage and hour class action for unpaid overtime.)
- *Shachno et al., v. KT Hotels, LLC, et al.* San Diego Superior Court Case No. 37-2018-00043601 (May 31, 2019 – Hon. Gregory Pollack appointed JCL Law Firm, APC, as Class Counsel and granted preliminary approval for the wage and hour class action settlement involving nearly 900 current and former employees. Final approval scheduled for October 4, 2019)
- *Almanza v. The Express Group, Inc.*, San Bernardino Superior Court Case No. CIVDS1722542 (April 19, 2019 – Hon. David Cohn appointed the JCL Law Firm, APC, as Class Counsel and granted final approval for a wage and hour class action settlement for *inter alia*, missed meal and rest periods and independent contractor misclassification.)
- *Moschetto v. Pillow Global, Inc.* San Diego Superior Court, Case No. 37-2017-00024031-CU-OE-CTL (April 5, 2019 – Hon. John S. Meyer appointed JCL LAW Firm, APC, as Class Counsel and granted final approval for a wage and hour wage class action settlement involving misclassified house cleaners.)
- *Burke v. Friendship Hotel, LLC*, San Diego County Superior Court Case No. 37-2017-00022517-CU-OE-CTL (March 10, 2019 – final approval granted on for an unlawful housing class action arising under Civil Code Section 1940.2)
- *Terrado et al., v. Accredited Debt Relief, LLC*, San Diego County Superior Court Case No. 37-2018-00014181-CU-OE-CTL (February 8, 2019 – Hon. Gregory W. Pollock appointed JCL Law Firm, APC as Class Counsel and granted final approval for a wage and hour class action settlement for meal and rest period violations);
- *Macaspac v. San Antonio Regional Hospital*, San Bernardino Superior Court Case No. CIVDS1512625, (July 27, 2018 – Hon. Thomas S. Garza appointed JCL Law Firm, APC, as Class Counsel and granted final approval for a wage and hour class action settlement involving claims for on duty meal and rest periods.);
- *Summerlin et al. v. Maplebear, Inc. dba Instacart*, Los Angeles Superior Court Case No. BC603030 (2018 - certified and settled wage and hour class action.)
- *Ortega v. Prime Healthcare*, San Diego Superior Court Case No. 37-2014-00011240-CU-OE-CTL (2018 – Approved PAGA only settlement for on duty meal and rest periods)
- *Engstrom v. Bender-Rosenthal, Inc.* San Diego Superior Court Case No. 37-2016-00012373-CU-OE-CTL (2017 - Certified and settled class action for employee misclassification);
- *Crawford v. Outlook Amusements, Inc.*, Los Angeles Superior Court Case No. BC617160 (2017 - Certified and settled wage and hour class action.);
- *Hernandez v. Sunglass Hut Trading, LLC*, San Bernardino Superior Court Case No. CIVDS1505181 (2016 - Certified and settled wage and hour class action);
- *Burns v. Shalom, LLC*, San Diego Superior Court, Case No., 37-2013-00058356-CU-BT-CTL (2015 - certified and settled class action for unlawful housing practices arising out of Civil Code Section 1940.1);