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Attorneys for Plaintiffs, the Putative Class, and the Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF STANISLAUS

SHARRY BOLLINGER-FELT and JENNIFER
U. YANG, individuals on behalf of themselves,
the State of California, as a private attorneys
general, and on behalf of all others similarly
situated,

Plaintiffs,

v.

PACIFIC BELLS, LLC, a Washington Limited
Liability Company; and DOES 1 TO 50,
Defendants.

CASE NO.: CV-20-000680
[Unlimited Jurisdiction]

*Assigned for all purposes to the
Honorable Stacy P. Speiller, Dept. 22*

**DECLARATION OF MARTIN SULLIVAN IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

*[Filed concurrently with Plaintiffs' Motion for
Final Approval of Class Action Settlement and
Supporting Documents]*

Date: January 25, 2022
Time: 8:30 a.m.

Dept.: 22

1
2 **DECLARATION OF MARTIN SULLIVAN**

3 I, Martin Sullivan, Esq., declare as follows:

4 1. I am an attorney licensed to practice law before this Court and the federal and state courts
5 of California. I am over 18 years of age. I have personal knowledge of the facts set forth in this
6 declaration and could and would testify competently to them.

7 2. I am an attorney affiliated with the law firm of Melmed Law Group P.C., (“MLG,” “Class
8 Counsel” or “Plaintiff’s Counsel”), attorneys for record for Plaintiffs Sharry Bollinger-Felt and Jennifer
9 U. Yang (“Plaintiffs” or “Class Representatives”) and the proposed settlement classes (the “Classes”) in
10 the above-captioned matter. I submit this Declaration in support of Plaintiff’s Motions for Final
11 Approval of Class Action Settlement and Attorneys’ Fees and Costs.

12 3. I have no knowledge of the existence of any conflicting interests between my firm and
13 any of its attorneys on the one hand, and Plaintiffs or any other Class Member, on the other.

14 Attorney Experience and Contributions

15 4. My co-counsel and I are experienced in wage-and-hour class actions. Numerous courts
16 have certified my firm as adequate and competent class counsel in class actions. Defense counsel shares
17 the view that the Class is represented by counsel with extensive experience in wage-and-hour litigation.
18 Furthermore, Defense counsel shares the view that this is a fair and reasonable settlement in light of the
19 complexities of the case, the state of the law, and uncertainties of class certification and litigation. Given
20 the risks inherent in litigation, and the strong defenses asserted, this settlement is fair, adequate, and
21 reasonable and in the best interests of the Class Members. The settlement is also consistent with other
22 settlements that received approval of the Courts.

23 Attorney Experience and Contributions

24 5. In 2004, I received a B.A. from Duke University, in Durham, North Carolina. In 2010, I
25 received a J.D. from University of Southern California, in Los Angeles, California. I became a member
26 of the Bar of the State of California in December 2010.

27 6. In 2010, I joined Hernandez Schaedel and Associates, an employment law firm in
28 Pasadena, California, where I tried a class action before a federal jury (*Nunag-Tanedo v. E. Baton Rouge*

1 *Par. Sch. Bd.*, Case No. SACV 10–1172–AG (MLGx) (CD Cal. 2011).

2 7. Between 2013 and 2018, I was an employment defense attorney with Ogletree Deakins,
3 an international employment law firm, where I litigated numerous class action and PAGA employment
4 cases.

5 8. In October 2018, I joined Melmed Law Group P.C. to represent employees in class and
6 representative actions. At Melmed Law Group, P.C., I have served as lead Class and/or PAGA counsel
7 on numerous cases, including the following resolved matters:

- 8 • *Tami Pearl v. F&B Innovations, LLC*, San Bernardino Superior Court Case No. CIVDS1912944
9 (PAGA Approval granted August 15, 2019) (Judge David Cohn);
- 10 • *Ramirez v. William J. Wickwire M.D., Inc. et al.*, San Bernardino Superior Court Case No.
11 CIVDS1913102 (final approval granted on November 25, 2019) (Judge David Cohn);
- 12 • *Leavitt v. J's Maintenance Service, Inc. et al.*, San Bernardino Superior Court Case No.
13 CIVDS1917363 (final approval granted on December 23, 2019) (Judge David Cohn);
- 14 • *Walters v. Mondelez Global, LLC*, Santa Clara Superior Court Case No. 19CV354170 (final
15 approval granted September 30, 2020) (Judge Patricia Lucas);
- 16 • *Ayala v. Scott Kirschenmann Farms, Inc.*, Kern County Superior Court Case No. BCV-20-
17 100338 (PAGA approval granted March 3, 2021) (Judge David R. Lampe);
- 18 • *Thompson v. Draeger's Super Markets*, San Mateo County Superior Court Case No. 20-CIV-
19 03222 (final approval granted May 3, 2021) (Judge. Marie S. Weiner);
- 20 • *Cornejo v. Weidner Property Management*, San Bernardino Superior Court Case No.
21 CIVDS2016465 (final approval granted on May 25, 2021) (Judge David Cohn);
- 22 • *Chimal v. AP Precision Metals, Inc.*, San Diego County Superior Court Case No. 37-2019-
23 00045108-CU-OE-CTL (PAGA approval granted June 11, 2021) (Judge Richard E. L. Strauss);
- 24 • *Matysiak v. Ted Baker Limited*, Los Angeles County Superior Court Case No. 21STCV01545
25 (PAGA approval granted July 16, 2021) (Judge Richard L. Fruin);
- 26 • *Pence et al. v. Sober Living By The Sea, Inc. et al.*, Orange County Superior Court Case No. 30-
27 2018-00988742-CU-OE-CXC (final approval granted September 24, 2021) (Judge Randall
28 Sherman);

- 1 • *Rico v. Western Mesquite Mines, Inc.*, Imperial County Superior Court Case No. ECU000873)
2 (final approval granted October 14, 2021) (Judge Jeffrey B. Jones); and
- 3 • *Guillen-Rivas v. San Diego Farms, LLC*, San Diego County Superior Court Case No. 37-2019-
4 00024215-CU-OE-CTL (preliminary approval granted June 3, 2021; final approval hearing
5 scheduled for March 8, 2022) (Judge Richard S. Whitney).

6 9. In addition, I have represented numerous individual employees in cases brought under
7 various state and federal statutes, including the California Labor Code and the California Fair
8 Employment and Housing Act, and have obtained favorable results in many of those cases.

9 10. I am also an active of member of the plaintiff's employment bar association called the
10 California Employment Lawyers Association ("CELA") and a member of the Los Angeles County Bar
11 Association's Labor and Employment Law Section Executive Committee and Annual Symposium
12 Committee.

13 11. I am also adjunct faculty with University Gould School of Law where I co-lead the
14 Employment Mediation Clinic.

15 12. Mr. Jonathan Melmed is the founder and managing shareholder of Melmed Law Group.

16 1. Throughout my career, Mr. Melmed has gained significant experience regarding the
17 obligations and burdens of representing a class. This knowledge has allowed him and his firm, Melmed
18 Law Group P.C., to successfully represent plaintiffs in many class actions in the past years. Numerous
19 state and federal courts in California have found that Melmed Law Group P.C. is competent and capable
20 of representing as Class Counsel large classes similar to the one here at issue.

21 2. In 2007, Mr. Melmed received a B.A. from New York University, in New York, New
22 York. In 2012, Mr. Melmed received a J.D. from Loyola Law School, Los Angeles. Mr. Melmed
23 became a member of the Bar of the State of California in June 2013.

24 3. From 2012 through 2014, Mr. Melmed was an associate attorney at Von Behren &
25 Hunter, LLP ("VBH") in Manhattan Beach, California. At VBH, he litigated complex commercial
26 litigation matters where he represented life and health insurers in bad faith, ERISA, breach of contract
27 and related disputes. At VBH, he also represented and assisted in the representation of hotels, restaurants
28 and real estate development groups in state and federal commercial litigation, including class action

1 cases (*see, i.e. Daniel Flannery v. McCormick & Schmicks Seafood Restaurants*, Los Angeles County
2 Superior Court, Case No. BC487942).

3 4. From February 2015 through the present, he has been the founding and managing
4 shareholder in the firm of Melmed Law Group P.C. where he represented and continues to represent
5 thousands of employees in wage and hour class actions, and other employment-related matters. Melmed
6 Law Group P.C. has extensive experience in the litigation of complex cases, including California-wide
7 class actions. he am also an active of member of the plaintiff's employment bar association called the
8 California Employment Lawyers Association ("CELA").

9 5. In addition to the instant case, he has served as class counsel in a variety of wage and
10 hour class actions. Mr. Melmed, along with my co-counsel, have developed extensive litigation
11 experience in complex employment litigation matters, particularly in California class actions
12 representing employees, such as:

- 13 • Blan v. Button Transportation, Inc., Case No. FCS045949, Solano County Superior Court (final
14 approval granted on December 8, 2016) (Hon. Michael Mattice);
- 15 • Plimpton et al. v. Gordon Trucking, Inc., Case No. CIVDS1511918, San Bernardino County
16 Superior Court (final approval granted on February 16, 2017) (Hon. Donald Alvarez);
- 17 • Cleary v. Penske Truck Leasing Co., L.P., Case No. CIVDS1600144, San Bernardino County
18 Superior Court (final approval granted on February 8, 2017) (Hon. Janet M. Frangie);
- 19 • Upton v. Coremark International, Inc., Case No. CGC 15-549348, San Francisco County
20 Superior Court (final approval granted on May 10, 2017) (Hon. Curtis E.A. Karnow);
- 21 • Mark Broner v. Michael Dusi Trucking, Inc., Case No. 16CVP-0044, San Luis Obispo County
22 Superior Court (final approval granted on March 15, 2017) (Hon. Donald G. Umhofer);
- 23 • Anthony Riley v. Pacific Tank Lines, Inc., Case No. CIVDS1603263, San Bernardino County
24 Superior Court (final approval granted on March 28, 2017) (Hon. John M. Pacheco);
- 25 • Alex Pena v. Inner Valley Transport, Inc., Case No. BCV-100625-LHB, Kern County Superior
26 Court (final approval granted on May 5, 2017) (Hon. Thomas S. Clark);
- 27 • William Haynes v. Reliable Trucking, Inc., Case No. C16-01237, Contra Costa County Superior
28 Court (final approval granted on May 26, 2017) (Hon. Barry P. Goode);

- 1 • Ramirez v. Castlewood West, LLC, Case No. 16CV01137, Monterey County Superior Court
2 (final approval granted on May 18, 2017) (Hon. Lydia Villarreal);
- 3 • Tami Long v. Covenant Transport, Inc., Case No. 1:15-cv-278, Eastern District of Tennessee,
4 Chattanooga Division (final approval granted on April 28, 2017) (Hon. Travis R. McDonough);
- 5 • Bruce Waddell v. Dalton Trucking, Inc., Case No. CIVDS1603262, San Bernardino County
6 Superior Court (final approval granted on August 7, 2017) (Hon. John M. Pacheco);
- 7 • Nigel Davis v. Western Merchandise Express, Inc., Case No. BCV-16-101216, Kern County
8 Superior Court (final approval granted on April 26, 2017) (Hon. Sidney P. Chapin);
- 9 • Nigel Davis v. Transforce, Inc., Case No. BCV-16-101393, Kern County Superior Court (final
10 approval granted on June 5, 2017) (Hon. Thomas S. Clark);
- 11 • Elson et al v. Covey Auto Express, Inc., Case No. STK-CV-UOE-2016-0009114, San Joaquin
12 County Superior Court, (final approval granted on September 18, 2017) (Hon. Linda L. Lofthus);
- 13 • Jarrod P. Asplund v. White Timber Industries, Inc., Case No. 16-2-00870-5, Cowlitz County
14 Superior Court (Washington State) (final approval granted on September 13, 2017) (Hon.
15 Michael Evans);
- 16 • Ruben Campos v. Black Eagle Trucking, Inc., Case No. 37-2016-00023781-CU-OE-CTL, San
17 Diego County Superior Court (final approval granted on August 25, 2017) (Hon. Timothy
18 Taylor);
- 19 • John Powers v. Estenson Logistics, LLC, Case No. CIVDS1602295, San Bernardino County
20 Superior Court (final approval granted on July 12, 2017) (Hon. David Cohn);
- 21 • Gerald W. Harris et al v. Jerry DeBriac Logging Co., Inc., Case No. 16-2-00402-5, Cowlitz
22 County Superior Court (final approval granted on June 7, 2017) (Hon. Stephen M. Warning);
- 23 • Christopher P. Young v. First Class Service Trucking Company, Inc., Case No. STK-CV-2016-
24 10381, San Joaquin County Superior Court (final approval granted on December 8, 2017) (Hon.
25 Elizabeth Humphreys);
- 26 • Hugues v. The Morning Star Trucking Company, LLC, et al. Case No. CV16-1215, Yolo County
27 Superior Court, (final approval granted on August 3, 2017);

- 1 • Oscar Torres et al v. Salinas Farm Labor Contractor, Inc., Case No. 2018173, Stanislaus County
2 Superior Court (final approval granted on December 19, 2017) (Hon. Roger M. Beauchesne);
- 3 • Christopher P. Young v. First Class Service Trucking, Inc., Case No. STK-CV-UOE-2016-
4 10381, San Joaquin County Superior Court (final approval granted January 2, 2018) (Hon.
5 Elizabeth Humphreys);
- 6 • Rocco Isabella v. Equinox Holdings, Inc., Case No. BC578960, Los Angeles Superior Court
7 (final approval granted on January 4, 2018) (Hon. Ann I. Jones);
- 8 • Erick Grumm v. T.J.S. Leasing & Holding, Co., Inc., Case No. DR160492, Humboldt County
9 Superior Court (final approval granted on February 6, 2018) (Hon. Kelly L. Neel);
- 10 • Robins, Jr., et al. v. Versa Logistics, LLC, Case No. BC644321, Los Angeles Superior Court,
11 (final approval granted on March 26, 2018) (Hon. Carolyn B. Kuhl);
- 12 • Chavez v. Shamrock Foods Company, Case No. 5:17-cv-00731-SVW-AFM, US District Court,
13 Central District of California, (final approval granted on April 11, 2018) (Hon. Stephen V.
14 Wilson);
- 15 • Diaz, et al. v. Absolute West, LLC, Case No. BC647126, Los Angeles Superior Court (final
16 approval granted on April 19, 2018) (Hon. Maren E. Nelson);
- 17 • Herman v. Andrus Transportation Services, Inc., Case No. EDCV 16-02365 AG (DTBx), US
18 District Court, Central District of California, (final approval granted on May 14, 2018) (Hon.
19 Andrew J. Guilford);
- 20 • Hernandez v. J.V.C. Truck Lines, Inc., Case No. CIVDS1714857, San Bernardino Superior
21 Court, (final approval granted on May 22, 2018) (Hon. Brian S. McCarville);
- 22 • Happell v. Hercules Forwarding, Inc., Case No. BC639636, Los Angeles Superior Court (final
23 approval granted on June 14, 2018) (Hon. Carolyn B. Kuhl);
- 24 • Medina v. Timmerman Starlite Trucking, Inc., Case No. 2023292, Stanislaus County Superior
25 Court, (final approval granted on June 15, 2018) (Hon. Roger M. Beauchesne);
- 26 • Jarel Brown v. Saks & Company, LLC, Case No. 2:17-cv-04210 (SJO), US District Court,
27 Central District of California, (final approval granted on July 16, 2018) (Hon. S. James Otero);
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- 1 • Flores v. Aqua Terra Culinary, Inc., Case No. 17CV002672, Monterey County Superior Court,
2 (final approval granted on July 18, 2018) (Hon. Lydia Villarreal);
- 3 • Myers v. LBC Limited Partnership, Case No. CIVDS1715068, San Bernardino Superior Court,
4 (final approval granted on July 25, 2018) (Hon. Janet M. Frangie);
- 5 • Westphal v. New York Life Insurance Company, Case No. SCV0040562, Placer County Superior
6 Court, (final approval granted on August 30, 2018) (Hon. Michael W. Jones);
- 7 • Hollis v. Union Pacific Railroad Company, Case No. 5:17-cv-02449-JGB, US District Court,
8 Central District of California (final approval granted on September 17, 2018) (Hon. Jesus G.
9 Bernal);
- 10 • Cheifer v. WHGM, Inc., Case No. LC104900, Los Angeles Superior Court (final approval
11 granted on September 21, 2018) (Hon. Rupert A. Byrdsong);
- 12 • Hernandez-Chulo v. E&R Trucking, Inc., et al., Case No. 18CV-00882, Merced County Superior
13 Court, (final approval granted on October 29, 2018) (Hon. Brian McCabe);
- 14 • Westbrook v. Winco Holdings, Inc., Case No. RIC1710168, Riverside County Superior Court,
15 (final approval granted on November 5, 2018) (Hon. Raquel A. Marquez);
- 16 • Freeman v. Redwood Wise Riders, Inc., et al., Case No. FCS050140, Solano County Superior
17 Court, (approval granted on December 4, 2018) (Hon. Wendy G. Getty);
- 18 • Ricci v. HSS, Inc., Case No. CVCV17-00967, Yuba County Superior Court, (final approval
19 granted on December 4, 2018) (Hon. Stephen W. Berrier);
- 20 • Antonov, et al. v. GL HHR, Inc., et al., Case No. CIVDS1724725, San Bernardino Superior
21 Court, (final approval granted on December 11, 2018) (Hon. David Cohn);
- 22 • Pena v. Keystone Freight Corp., Case No. VCU269897, Tulare County Superior Court, (final
23 approval granted on January 14, 2019) (Hon. Melinda M. Reed);
- 24 • Westbrook v. Winco Holdings, Inc., Case No. RIC171068, Riverside County Superior Court,
25 (final approval granted on January 17, 2019) (Hon. Raquel A. Marquez);
- 26 • Jackie Thompson v. Cheema Freightlines, LLC, Case No. STK-CV-UOE-2017-01011658, San
27 Joaquin Superior Court, (final approval granted on February 6, 2019) (Hon. Roger Ross);

- 1 • Pazo v. Incredible Adventures, Case No. CGC-16-555971, San Francisco Superior Court, (final
- 2 approval granted on February 25, 2019) (Hon. Anne-Christine Massullo);
- 3 • Reboucas v. Trans International Trucking, Inc., Case No. BC644182, Los Angeles Superior
- 4 Court, (final approval granted on May 9, 2019) (Hon. Maren E. Nelson);
- 5 • Myers v. Jerome's Furniture Warehouse, Case No. CIVDS1710569, San Bernardino Superior
- 6 Court (final approval granted on June 11, 2019) (Hon. Janet M. Frangie);
- 7 • Juarez v. Magic Laundry Services, Inc., et al., Case No. BC713767, Los Angeles Superior Court
- 8 (approval granted on June 14, 2019) (Hon. William F. Highberger);
- 9 • Rangel v. Guard-Systems, Inc., Case No. 19STCV19613, Los Angeles Superior Court, (approval
- 10 granted on June 18, 2019) (Hon. Yolanda Orozco);
- 11 • Castaing, et al. v. East Bay Automotive Company, et al., Case No. RG17879115, Alameda
- 12 County Superior Court, (final approval granted on June 24, 2019) (Hon. Brad Seligman);
- 13 • Lopez Juarez v. Mike Lowrie Trucking, Inc., Case No. BCV-18-100177TSC, Kern County
- 14 Superior Court (final approval granted on August 8, 2019) (Hon. Thomas S. Clark);
- 15 • Pia v. 5G's Automotive, Inc., Case No. VCU274628, Tulare County Superior Court, (final
- 16 approval granted on September 6, 2019) (Hon. Brett D. Hillman);
- 17 • Burnham v. DGDGI, et al., Case No. 2018-1-CV-331434, Santa Clara Superior Court,
- 18 (preliminary approval granted on September 9, 2019) (final approval set to be heard on January
- 19 17, 2020) (Hon. Thomas E. Kuhnle);
- 20 • Thomas v. Commercial Protective Services, Inc., Case No. CIVDS1821925, San Bernardino
- 21 Superior Court, (final approval granted on September 16, 2019) (Hon. David Cohn);
- 22 • Berbano, et al. v. Ingram Micro, Inc., Case No. CIVDS1826085, San Bernardino Superior Court,
- 23 (final approval granted on September 17, 2019) (Hon. David Cohn);
- 24 • Guerra v. U.S. Polymers, Inc., Case No. CIVDS1829174, San Bernardino Superior Court,
- 25 (approval granted on September 20, 2019) (Hon. David Cohn);
- 26 • Lopez-Urrutia v. Southwest V-Ditch Inc., Case No. CIVDS1833332, San Bernardino Superior
- 27 Court, (final approval granted on October 16, 2019) (Hon. David Cohn);
- 28

- 1 • Guy v. California Lutheran University, Case No. 56-219-00524415-CU-OE-VTA, Ventura
- 2 County Superior Court, (final approval granted on November 6, 2019) (Hon. Mark C. Borrell);
- 3 • Moseby v. Renzenberger, Inc., Case No. CIVDS1725125, San Bernardino Superior Court, (final
- 4 approval granted on November 7, 2019) (Hon. Janet M. Frangie);
- 5 • Woodard v. AH 2005 Management, L.P., Case No. 18CV001986, Monterey County Superior
- 6 Court, (approval granted on November 21, 2019) (Hon Lydia M. Villarreal);
- 7 • Ramirez v. William J. Wickwire M.D., Case No. CIVDS1913102, San Bernardino Superior
- 8 Court, (final approval granted on November 25, 2019) (Hon. David Cohn);
- 9 • Lyons v. SAIA Motor Freight Line, LLC, Case No. CIVDS1828225, San Bernardino Superior
- 10 Court, (final approval granted on December 9, 2019) (Hon. David Cohn);
- 11 • Baker v. Vallejo CJD, LLC, Case No. VCU273830, Tulare County Superior Court, (final
- 12 approval granted on December 16, 2019) (Hon. David C. Mathias);
- 13 • Tsao v. Giorgio Armani Corporation, Case No. 30-218-01000817-CU-OE-CXC, Orange County
- 14 Superior Court, (final approval granted on December 20, 2019) (Hon. Peter J. Wilson);
- 15 • Martinez v. E&A Protective Services-Bravo, LLC, Case No. 1:18-cv-00658-BAM, US District
- 16 Court, Eastern District of California (final approval granted on January 17, 2020) (Hon. Barbara
- 17 A. McAuliffe);
- 18 • Cardoso v. Rogers & Rogers, Inc., et al., Case No. ECU000637, Imperial County Superior Court,
- 19 (final approval granted on January 27, 2020) (Hon. Brooks Anderholt);
- 20 • Cesario Mora v. The Complete Logistics Company, Case No. CIVDS1833922, San Bernardino
- 21 Superior Court, (final approval granted on February 10, 2020) (Hon. David Cohn);
- 22 • Lopez v. Ruiz Food Products, Inc., Case No. VCU 275105, Tulare County Superior Court, (final
- 23 approval granted on March 10, 2020) (Hon. Bret D. Hillman);
- 24 • Jaurigue v. Knights of Columbus, Case No. CIVDS1824508, San Bernardino Superior Court,
- 25 (final approval granted on July 10, 2020) (Hon. David Cohn);
- 26 • Amalia Lopez v. Unitek College NCP, LLC, Case No. BCV-19-102146, Kern County Superior
- 27 Court, (final approval granted on July 15, 2020) (Hon. Stephen D. Schuett);
- 28

- 1 • Martin Ashe v. Farmers Insurance Group, Case No. 18STCV00453, Los Angeles Superior
2 Court, (final approval granted on July 20, 2020) (Hon. Steven J. Kleinfeld);
- 3 • Martin, et al. v. Break the Floor Productions LLC, Case No. 37-2019-00029711-CU-OE-CTL,
4 San Diego Superior Court, (final approval granted on October 23, 2020) (Hon. Kenneth J.
5 Medel);
- 6 • Jesus H. Robles v. Winsford II Corporation, et al., Case No. CIVDS1902903, San Bernardino
7 Superior Court, (final approval granted on November 3, 2020) (Hon. David Cohn);
- 8 • Juan Cazares Lopez v. RTS Holdings, LLC et al., Case No. CIVDS1934904, San Bernardino
9 Superior Court (final approval granted on November 24, 2020) (Hon. David Cohn);
- 10 • Romero v. Carl Zeiss Meditec Production, Case No. CIVDS1907556, San Bernardino Superior
11 Court, (final approval on December 3, 2020) (Hon. David Cohn);
- 12 • Soto v. Britz Farming Corp., Case No. 19CV04182, Merced County Superior Court, (preliminary
13 granted on June 17, 2020) (final approval granted on December 8, 2020) (Hon. Brian L.
14 McCabe);
- 15 • Martinez v. Global Sales & Warehousing, LLC, Case No. 56-2019-00534178-CU-OE-VTA,
16 Ventura County Superior Court, (final approval granted on December 18, 2020), (Hon. Matthew
17 P. Guasco);
- 18 • Gaxiola, et al. v. Lloyd's Manufacturing Services, Inc. dba Calspas, Case No. CIVDS1939269,
19 San Bernardino Superior Court, (final approval granted on February 2, 2021) (Hon. David
20 Cohn);
- 21 • Ancona, et al. v. Populus Financial Group, Inc., dba Ace Cash Express, Case No.
22 19STCV41065, Los Angeles Superior Court, (approval granted on February 18, 2021) (Hon.
23 Maurice A. Leiter);
- 24 • Urquiza v. Santos Montemayor FLC, Inc., et al., Case No BCV-20-101587, Kern County
25 Superior Court, (preliminary approval granted on February 22, 2021), (final approval set to be
26 heard on June 23, 2021) (Hon. Thomas S. Clark);
- 27 • Elayda v. Physassist Scribes, Inc., Case No. CIVDS2002023, San Bernardino Superior Court,
28 (final approval granted on March 1, 2021) (Hon. David Cohn);

- 1 • Lee, et al. v. Home Delivery Logistics, Inc., et al., Case No. RG18927149, Alameda County
2 Superior Court, (final approval granted on March 2, 2021) (Hon. Winifred Y. Smith);
- 3 • Garcia, et al. v. Cardenas Markets, LLC, et al., Case No. CIVDS1917380, San Bernardino
4 Superior Court, (preliminary approval granted on March 3, 2021), (final approval set to be heard
5 on July 1, 2021) (Hon. David Cohn);
- 6 • Pagh v. Wyndham Vacation Ownership, Inc., Case No. 8:19-cv-00812-JWH-ADSx, US District
7 Court, Central District of California, (final approval granted on March 23, 2021) (Hon. John W.
8 Holcomb);
- 9 • Robinson v. Paragon Systems, Inc., Case No. BC720142, (final approval granted on April 1,
10 2021) (Hon. Elihu Berle);
- 11 • Lachman, et al. v. Berlitz Languages, Inc., Case No. 19STCV01533, Los Angeles Superior
12 Court, (final approval granted on April 1, 2021) (Hon. Carolyn Kohl);
- 13 • Murray v. Scelzi Enterprises, Inc., Case No. RIC2002545, Riverside County Superior Court,
14 (final approval granted on April 13, 2021);
- 15 • Cuevas v. Action Embroidery Corp., Case No. CIVDS2012230, San Bernardino Superior Court,
16 (preliminary approval granted on April 2, 2021) (final approval set to be heard on July 29, 2021)
17 (Hon. David Cohn);
- 18 • Correa v. Newell Brands, Inc., et al., Case No. CIVDS1901381, San Bernardino Superior Court,
19 (preliminary approval granted on May 10, 2021) (final approval set to be heard on October 5,
20 2021) (Hon. David Cohn);
- 21 • Ruiz v. SAIA Motor Freight Line, LLC, Case No. CIVDS2014796, San Bernardino Superior
22 Court, (final approval granted on May 19, 2021) (Hon. David Cohn);
- 23 • Gallegos v. TST, Inc., Case No. CIVDS1933834, San Bernardino Superior Court, (final approval
24 granted on May 20, 2021) (Hon. David Cohn);
- 25 • Cornejo v. Weidner Property Management LLC, Case No. CIVDS2016465, San Bernardino
26 Superior Court, (final approval granted on May 25, 2021) (Hon. David Cohn);
- 27 • Aguirre v. Swinerton Builders, et al., Case No. CIVDS 1925363, San Bernardino Superior
28 Court, (final approval granted on May 26, 2021) (Hon. David Cohn);

- 1 • Garcia v. Construction Innovations Group, LLC, Case No. 34-2020-00285239, Sacramento
- 2 County Superior Court, (final granted on May 27, 2021) (Hon. Shama H. Mesiwala);
- 3 • Pease v. Wattrans, Inc., Case No. CIVDS1919832, San Bernardino Superior Court, (final
- 4 approval granted on June 3, 2021) (Hon. Thomas Garza);
- 5 • Moreira v. University of Redlands, Case No. CIVDS1913813, San Bernardino Superior Court,
- 6 (final approval granted on June 8, 2021) (Hon. David Cohn);
- 7 • Rico v. Western Mesquite Mines, Inc., et al., Case No. ECU000873, Imperial County Superior
- 8 Court, (preliminary approval granted on June 24, 2021) (final approval set to be heard on October
- 9 14, 2021) (Hon. Jeffrey B. Jones);
- 10 • Garcia, et al. v. Cardenas Markets, LLC, et al., Case No. CIVDS1917380, San Bernardino
- 11 Superior Court, (final approval granted on July 1, 2021) (Hon. David Cohn).

12 13. I, along with the legal staff at Melmed Law Group P.C., have diligently investigated and
13 prosecuted this case to a successful conclusion. Our work, resulted in the creation of a significant and
14 non-reversionary settlement amount for the benefit of the Class. We avoided protracted litigation by
15 conducting considerable investigation before filing suit related to the class claims, and efficiently
16 communicated and exchanged information with Defense counsel such that the parties could successfully
17 settle the case after being fully informed of the merits of each sides' position. As a result of our efforts,
18 we were able to obtain a favorable Settlement for the Class. Because of the risks involved in litigating
19 the case, particularly the contested legal and factual issues, I believe this settlement is fair, reasonable,
20 and favorable to the Class, particularly in light of the risks posed.

21 Attorneys' Fees

22 14. As noted, Class Counsel is seeking final approval of attorney's fees in the amount of one-
23 third of the Gross Settlement Fund, which is a reasonable fee and within the normal range of fee awards
24 for wage and hour class actions where fees are awarded as a percentage of the common fund. Moreover,
25 if it becomes necessary to litigate this matter further, my firm and our co-counsel have the financial
26 resources and are prepared to devote whatever time and effort are required to zealously advocate on
27 behalf of Plaintiffs and the Class. The Retainer Agreement in this case also provides for fees of 1/3 the
28 amount recovered on behalf of the class.

15. The following table summarizes the time each timekeeper at our firm expended on this case, their respective years of experience, and hourly billing rates, which have been approved by California state and federal Courts in other wage and hour class actions:

Melmed Law Group P.C. Lodestar Summary					
	Title	Yrs.	Hours	Rate	Amount
Martin Sullivan, Esq.	Attorney	10	157.9	\$600.00	\$94,740.00
Jonathan Melmed, Esq.	Attorney	7	20.2	\$550.00	\$11,110.00
Lorie Gutierrez	Paralegal	5	11.5	\$225.00	\$2,587.50
TOTAL					\$108,437.50

16. Our paralegal Lorie Gutierrez received her paralegal certificate through the ABA Approved Paralegal Studies Program at West Los Angeles College. Pursuant to California Business and Professions Code 6450, Ms. Gutierrez (1) maintains a certificate of completion of a paralegal program approved by the American Bar Association; (2) maintains a bachelor's degree (B.S. in Communication from California State University, Northridge); (3) has almost five years of law-related experience under the supervision of an attorney who has been an active member of the State Bar of California for at least the preceding three years (almost exclusively working on complex litigation and labor & employment matters (class actions and PAGA cases); and (4) has successfully completed all required hours of mandatory continuing legal education in legal ethics and mandatory required hours of mandatory continuing legal education in either general law or in an area of specialized law. All continuing legal education courses meet the requirements of Section 6070 of the B&P Code. She expended 42.6 hours at the billable rate of \$200.00 for services complete by a verified ABA Certificated Paralegal who meets the requirements of Business and Professions Code § 6450.

25. Moreover, it is anticipated that Class counsel will expend no less than an additional five hours of additional work between now and the conclusion of this matter, including my time spent preparing for and appearing at the final approval hearing, corresponding with the settlement administrator and opposing counsel throughout the settlement administration process, corresponding with our clients and class members, writing tax letters to our client, notifying the LWDA of the final approval order, and other typical and reasonably necessary tasks that arise post-final approval.

1 Costs Incurred

2 27. To date our firm has and expects to incur **\$15,818.46** in litigation costs in connection
3 with this case. An itemized list of costs is attached as **Exhibit A** hereto. All of these costs were and are
4 reasonably necessary for the successful prosecution of this action.

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

7 Executed on December 23, 2021 in Los Angeles, California.

8
9 

10 _____
Martin Sullivan, Esq.

Exhibit A

Exhibit A - Litigation Costs for Melmed Law Group P.C.

Date	Description	Cost
1/24/21	Certified Mail Receipt	\$14.00
2/28/20	Certified Mail Receipt	\$14.50
2/29/20	First Legal Invoice for Filing, Service and Complex Fee	\$1,605.50
3/23/20	Steve Rottman mediator invoice	\$9,000.00
7/8/20	First Legal Invoice for filing	\$49.00
8/8/20	First Legal Invoice for filing	\$27.00
8/21/20	Court call invoice	\$94.00
9/30/20	PAGA filing fee	\$75.00
10/13/20	Data Expert Analysis invoice	\$2,562.50
10/23/20	First Legal Invoice for filing	\$27.00
10/23/20	Data Expert Analysis supplemental invoice	\$1,790.00
11/8/20	First Legal Invoice for filing	\$234.25
12/23/20	First Legal Invoice for filing	\$27.00
1/8/21	Vcourt remote appearance invoice	\$96.35
5/23/21	First Legal Invoice for filing	\$30.75
6/18/21	Ace filing fee	\$75.26
7/10/21	Vcourt remote appearance invoice	\$96.35
		\$15,818.46