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Attorneys for Proposed Plaintiff Juan Partida

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

JUAN PARTIDA, on behalf of himself
and all others similarly situated,

Plaintiffs,

v.

FLEETPRIDE, INC., an Alabama
corporation; and DOES 1 to 100,
inclusive,

Defendants.

) **CLASS ACTION**

) Case No.: 20STCV15187

) **DECLARATION OF RAPHAEL A. KATRI**
) **IN SUPPORT OF PLAINTIFFS' MOTION**
) **FOR FINAL APPROVAL OF CLASS**
) **ACTION SETTLEMENT**

) Date: January 5, 2022

) Time: 9:00 a.m.

) Department: 10C

) Honorable Jayne Lee

) Department 10C

) Action filed: April 20, 2020

) Trial Date: None Set

DECLARATION OF RAPHAEL A. KATRI

I, Raphael A. Katri, declare:

1. I am an attorney duly licensed to practice law in the State of California and am the principal attorney at The Law Offices of Raphael A. Katri, Co-Counsel of record for Plaintiff

1 Juan Partida. I have personal knowledge of the matters set forth herein, and would and could
2 testify thereto if called as a witness herein. I make this declaration in support of the adequacy of
3 my representation as Co-Counsel in this matter, and in support of final approval of class action
4 settlement.

5
6 2. I graduated from the University of California at Los Angeles in 1999 with a
7 degree in Sociology. I graduated from Loyola Law School of Los Angeles in 2002. I am
8 currently the principal attorney in The Law Offices of Raphael A. Katri in Los Angeles. I am an
9 attorney duly licensed to practice law in the States of California, Texas and New York, and am a
10 member in good standing with the Bar of this Court.

11
12 3. The majority of my legal experience since becoming a member of the California
13 Bar in 2002 has been devoted to the practice of California and federal employment law. Indeed,
14 my current law practice is devoted almost exclusively to employment law; namely representing
15 plaintiffs in wage and hour and representative claims and actions with the same or similar causes
16 of actions brought forth in the matter pending before this Court.

17
18 4. I have actively participated in the prosecution and successful settlement of
19 multiple wage and hour class action lawsuits and representative actions, helping to recover
20 millions of dollars on behalf of the respective class members and/or aggrieved employees in
21 those cases, Hernandez, et al v. Tyco International (US), Inc., et al. (Case No. BC315749),
22 Enterprise Wage and Overtime Cases, (Consolidated Case No. JCCP 4417), Tejeda, et al. v. La-
23 Z-Boy Inc. (Case No. CIVDS1311851), Pandey v. Sheridan Assisted Living, Inc. (Case No.
24 BC519461), Lukasik v. Design Within Reach, Inc. (Case No. BC528661), Montalvo v. Swift
25 Transportation Corp. (Case No. 37-2011-00094313-CU-OE-CTL), Terrazas v. Avanti Agency
26 Corp. (Case No. RIC1409978), Thomas v. Universal Home Care, Inc. (Case No. BC600623),
27 Vaquero v. Stoneledge Furniture LLC (Case No. BC522676), Sforza v. Go Wireless, Inc. (Case
28 No. BC636573), Jesus Lopez v. InTouch Mobile (Case No. BC619823), Garcia v. General

Coatings Corporation (Case No. 37-2016-00041617-CU-OE-CTL), Jose Balbastro v. Premier Insurance Services, Inc. (Case No. 37-2018-00023269-CU-OE-CTL), Loughrie v. Target Corporation (Case No. CIVDS1804580), Bennett v. Alorica, Inc. (Case No. 30-2018-00997257-CU-OE-CXC), Chacon v. Exel, Inc. (Case No. CIVDS1721284), Gonzalez v. CVS Pharmacy, Inc. (Case No. 30-2017-00951164-CU-OE-CXC), Bell v. CEVA Logistics U.S., Inc. (Case No. Case No.: 5:19-cv-00352-SVW (KK)), Salgado v. T-Mobile USA, Inc. (Case No.: 1:17-cv-00339-JLT), Suazo v. Leslie's Poolmart, Inc. (Case No. RIC185126), Woods v. Fresno Valves & Castings, Inc. (Case No.: 16CECG01134), Cahilig v. Ikea U.S. Retail, LLC (Case No.: 2:19-cv-01182), Elayda v. Physassist Scribe, Inc. (Case No.: CIVDS 2002023), Mier v. Mainfreight, Inc. (Case No.: 19STCV04465), McLucas v. Michael's Store Procurement Company, Inc. (Case No.: BC720953).

5. Although I am experienced in employment, class action matters and representative actions, I associated in as co-counsel on this case Law Offices of Kevin T. Barnes. This firm has a great deal of experience in wage and hour class action employment cases and representative actions, and together both of our firms have and will continue to aggressively and competently represent the named plaintiff and the other aggrieved individuals in this case. In light of the foregoing, I am qualified to act as co-Class Counsel in this matter.

6. My law office has incurred a total of 23.3 attorney hours as of today and I expect to spend approximately 10 hours to prepare for and/or attend the final settlement hearing, contact with aggrieved employees requesting case status updates over the next several months, and to ensure that proper claims administration and distribution occurs to all aggrieved employees. Though I normally work on a contingency basis, for purposes of calculating a lodestar, my standard hourly rate for class action litigation is \$700 per hour. Thus, my office's lodestar will be \$23,310 (see Itemization of Hours of the Law Offices of Raphael A. Katri attached as Exhibit 1). Plaintiff's counsel has not asked Plaintiff to pay counsel's hourly rate or any client of that matter.

7. My law office has current costs of \$589.20 and anticipates \$240 in additional costs relating to Case Anywhere service fees through case closure for a total of \$829.20 in costs (see Itemization of Costs of the Law Office of Raphael A. Katri attached as Exhibit 2). These costs were a result of investigation, research, litigation, travel to mediation in this matter, and other related matters to the prosecution of this case (e.g., Case Anywhere document service).

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

Executed this 6th day of December, 2021, at Los Angeles, California.

By: Raphael Katri
RAPHAEL A. KATRI
Declarant

EXHIBIT 1

ITEMIZATION OF HOURS OF LAW OFFICES OF RAPHAEL A. KATRI

**RAPHAEL A. KATRI, ESQ.
TIMESHEET**

DATE	DESCRIPTION	TIME SPENT
8/16/19	Initial phone intake from client; review of documents received via email; research regarding potential issues and relevant caselaw.	3.3
8/17/19	Research regarding employer and potential defendant incl. any past litigation and financial viability	1.3
8/19/19	Prepared detailed intake sheet with all facts, issues and exhibits from investigation and had call and email with co-counsel to refer case and discuss facts and issues for potential class action.	1.2
8/21/19	Call with co-counsel to discuss potential case and strategy; email with additional paystubs and documents to review	.6
8/21/19	Email to financial expert sending documents and setting parameters for requested financial analysis	.4
8/26/19	Received and reviewed financial analysis and damages analysis from financial expert; reviewed and discussed same with co-	.6

	counsel	
8/29/19	Teleconference with co-counsel and client to discuss possibility of retaining services and to further discuss facts regarding potential case	.7
8/29/19	Received and reviewed additional documents and records from client following call to be reviewed with co-counsel in anticipation of any potential case	.4
12/16/19	Call with client following separation of employment to discuss strategy for filing case	.4
12/17/19	Call with co-counsel following client separation from company to discuss strategy going forward and to analyze additional potential causes of action	.3
1/12/20	Travel to and attend formal in-person meeting with prospective client and co-counsel at co-counsel's office to discuss updates regarding facts, legal research, and potential steps moving forward	2.9
1/12/20	Received and reviewed additional schedule reports from client; review same with co-counsel	.4
1/14/20	Review of retainer documents with client including responding to questions about role as representative	.3
2/13/20	Assisted with revisions to LWDA / PAGA letter	.4

1	3/19/20	Discussions with co-counsel for purposes of	.3
2		finalizing Complaint; review of same	
3	5/27/20	Received and reviewed Answer by	.2
4		Defendant	
5	6/19/20	Discussions with co-counsel and opposing	.3
6		counsel regarding discovery issues and stay	
7	8/17/20	Meet and confer with opposing counsel and	.4
8		co-counsel regarding initial status	
9		conference	
10	8/18/20	Assist in completing initial status conference	.3
11		statement	
12	8/20/20	Email from file & serve regarding case	.1
13		management for this matter	
14	8/21/20	Finalize status conference statement	.2
15	8/24/20	Received and reviewed notice of related	.1
16		cases	
17	8/28/20	Research regarding related case; discussions	.4
18		with co-counsel regarding related case and	
19		strategy for moving forward in light of	
20		notice	
21	9/1/20	Discussions with co-counsel after	.4
22		identification of prior filed case and potential	
23		impact on current matter; review of past	
24		complaint to identify any overlap of claims,	
25		and formulate strategy	
26	9/2/20	Discussions with co-counsel following with	.2
27		call with counsel for prior filed case	
28		regarding coordination and split fee	
		discussions	

1	9/8/20	Received and reviewed ruling regarding	.1
2		related cases	
3	9/9/20	Received notice from Case Anywhere	.1
4		regarding assignment for purposes of case	
5		filing; set up.	
6	11/5/20	Assist in preparation and mediation brief	.6
7	11/10/20	Research and analysis of LC 213(d) for	1.1
8		purposes of arguing at the mediation	
9	11/17/20	Emails with mediator's office to set up	.2
10		confidentiality, etc.	
11	11/19/20	Review of documents produced by	.5
12		defendants ahead of mediation to evaluate	
13		existing claims and arguments and determine	
14		any additional claims	
15	11/19/20	Discussions with co-counsel throughout and	.6
16		following mediation regarding defenses	
17		discuss and regarding ultimate proposed	
18		settlement terms	
19	11/20/20	Assist with revisions to MOU following	.3
20		agreement to settle on salient terms	
21	12/29/20	Assist in finalizing MOU	.2
22	1/27/21	Review and discuss notice of settlement	.1
23	2/2/21	Review and comments regarding proposed	.4
24		settlement agreement	
25	3/25/21	Review and comments regarding proposed	.3
26		class notice	
27	4/27/21	Call with client to discuss status of	.4
28		settlement	
	5/17/21	Review and comments regarding proposed	.2

	FAC	
6/23/21	Assist in finalizing motion for preliminary approval, including preparation of declaration in support thereof	.8
8/9/21	Received and reviewed tentative ruling on preliminary approval; discussions with co-counsels regarding same	.1
8/23/21	Discussions with co-counsel and Phoenix settlement administrators regarding administration of class settlement	.3
10/18/21	Received and reviewed minute order from the court regarding approval	.1
10/1/21	Received and reviewed weekly report from settlement administrator regarding status of mailings, return, and responses by putative class members	.1
10/8/21	Received and reviewed weekly report from settlement administrator regarding status of mailings, return, and responses by putative class members	.1
10/15/21	Received and reviewed weekly report from settlement administrator regarding status of mailings, return, and responses by putative class members	.1
10/22/21	Received and reviewed weekly report from settlement administrator regarding status of mailings, return, and responses by putative class members	.1
10/29/21	Received and reviewed weekly report from	.1

	settlement administrator regarding status of mailings, return, and responses by putative class members	
11/5/21	Received and reviewed weekly report from settlement administrator regarding status of mailings, return, and responses by putative class members	.1
11/26/21	Received and reviewed weekly report from settlement administrator regarding status of mailings, return, and responses by putative class members	.1
12/3/21	Received and reviewed weekly report from settlement administrator regarding status of mailings, return, and responses by putative class members	.1
Estimated through Disbursement to Aggrieved Employees	prepare for and/or attend the final settlement hearing, contact with aggrieved employees, and to ensure that proper claims administration and distribution occurs to all aggrieved employees	10

TOTAL HOURS 33.3
TOTAL FEES \$23,310

EXHIBIT 2

ITEMIZATION OF COSTS OF LAW OFFICES OF RAPHAEL A. KATRI

PAYEE	DESCRIPTION	PAYMENT METHOD	PAYMENT DATE / INVOICE DATE	AMOUNT
Case Anywhere	Court-Ordered Document Filing Service	Bank autopay with account ending in 8402	12/3/20	\$109.20
Case Anywhere	Court-Ordered Document Filing Service	Bank autopay with account ending in 8402	3/4/21	\$120
Case Anywhere	Court-Ordered Document Filing Service	Bank autopay with account ending in 8402	6/4/21	\$120
Case Anywhere	Court-Ordered Document Filing Service	Bank autopay with account ending in 8402	9/8/21	\$120

Case Anywhere	Court-Ordered Document Filing Service	Bank autopay with account ending in 8402	12/5/21	\$120
Case Anywhere	Court-Ordered Document Filing Service	-----	Anticipated In 3/2022	\$120
Case Anywhere	Court-Ordered Document Filing Service	-----	Anticipated In 6/2022	\$120
				TOTAL: \$829.2