

1 Janelle Carney, Esq. (Bar No. 201570)
JANELLE CARNEY – ATTORNEY AT LAW, APC
2 14758 Pipeline Ave., Suite E, 2nd Floor
Chino Hills, CA 91709-6025
3 Tel.: (909) 521-9609/ Fax: (909) 393-0471

4 Adam M. Rose (210880)
adam@frontierlawcenter.com
5 Manny M. Starr (319778)
manny@frontierlawcenter.com
6 FRONTIER LAW CENTER
23901 Calabasas Road, STE #2074
7 Calabasas, CA 91302
Telephone: (818) 914-3433/ Facsimile: (818) 914-3433

8 Attorneys for Plaintiff Keith Williams
9 *(Additional Plaintiff's counsel listed on next page)*

10
11 SUPERIOR COURT OF CALIFORNIA

12 COUNTY OF ORANGE

13 KEITH WILLIAMS, on behalf of himself and
all other similarly situated and aggrieved
14 employees,

15 Plaintiff,

16 v.

17 ST. JOSPEH HEALTH PERSONAL CARE
SERVICES, LLC., ST. JOSEPH PERSONAL
18 CARE SERVICES, LLC., and DOES 1 to 100,
inclusive,

19 Defendants.
20

21 MAYRA MIRANDA, ROBERT RASHAD,
CLAUDIA MORALES-ALVAREZ, DIANA
22 HOMER, DEBORAH MONTLE, individuals

23 Plaintiff,

24 v.

25 ST. JOSEPH HEALTH PERSONAL CARE
SERVICES, LLC., and DOES 1 to 100,
26

27 Defendants.
28

Case No. 30-2020-01134268-CU-OE-CXC
Assigned to: Hon. William Claster
Dept. CX104

**SUPPLEMENTAL DECLARATION OF
JANELLE CARNEY IN SUPPORT OF
MOTION FOR COURT APPROVAL OF
PAGA SETTLEMENT**

Date: July 28, 2023
Time: 9:00 a.m.
Dept.: CX104
Reservation No. 74050335

Complaint Filed: February 25, 2020
Trial Date: Vacated

RELATED CASE NO. 30-2022-01270521-
CU-OE-CXC
Hon. Randall Sherman
Dept. CX105
Action Filed: July 18, 2022
Trial Date: None set

1 Joseph Antonelli, Esq. (Bar No. 137039)
2 **LAW OFFICE OF JOSEPH ANTONELLI**
3 14758 Pipeline Ave., Suite E, 2nd Floor
4 Chino Hills, CA 91709-6025
5 Tel.: (909) 393-0223 / Fax: (909) 393-0471

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Attorney for Plaintiff Keith Williams

1 I, Janelle Carney, declare:

2 1. I am an attorney duly licensed to practice law before all courts in the State of
3 California. I am the managing partner at Janelle Carney – Attorney at Law, APC (JCAL). I am
4 counsel of record herein and I have personal knowledge of the facts herein. If called as a witness,
5 I could and would competently testify herein.

6 2. This declaration shall serve as a supplement to the Declaration of Janelle Carney
7 filed with Plaintiff's Motion for Court Approval of PAGA Settlement, filed on July 6, 2023, and to
8 correct the inadvertent error of assigning the wrong cost exhibit. (See Notice of Errata filed
9 concurrently herewith)

10 **COSTS REQUEST**

11 3. Declarant is correcting the costs incurred by the Law Office of Joseph Antonelli,
12 which currently has incurred approximately \$5,921.45. A true and correct copy of the Law Office
13 of Joseph Antonelli Expense Detail Report dated July 6, 2023, is attached to the Supplemental
14 Declaration of Joseph Antonelli, filed concurrently herewith, as **Exhibit 1**. The prior exhibit and
15 request were for a different case and was inadvertently included with Mr. Antonelli's declaration
16 for this action and request for costs. The Law Office of Joseph Antonelli is only seeking
17 \$5,921.45 in costs to date on this matter and not the \$9,593.34 amount that was inadvertently
18 included with Mr. Antonelli's July 6, 2023, declaration.

19 4. Due to the inadvertent error as to the Law Office of Joseph Antonelli's costs,
20 Plaintiff's Motion for Court Approval of PAGA Settlement and the supporting declarations filed
21 on July 6, 2023, inadvertently listed Plaintiff's counsel's cost as \$96,565.87. The correct amount
22 is \$92,893.98.

23
24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct.

26 Executed at Chino Hills, California on this 13th day of July, 2023.

27
28 
Janelle Carney

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

I am employed in the County of San Bernardino, State of California. I am over the age of eighteen (18) and not a party to the within action; my business address is 14758 Pipeline Avenue, Suite E, Second Floor, Chino Hills, CA 91709-6025.

On July 13, 2023, I served the foregoing document described as:

SUPPLEMENTAL DECLARATION OF JANELLE CARNEY IN SUPPORT OF MOTION FOR COURT APPROVAL OF PAGA SETTLEMENT

on INTERESTED PARTIES in this action as stated below:

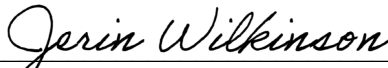
Derek Havel, Esq.
dhavel@smrh.com
Matthew Tobias, Esq.
mtobias@sheppardmullin.com
Tyler Johnson, Esq.
tjohnson@sheppardmullin.com
SHEPPARD, MULLIN, RICHTER &
HAMPTON, LLP
333 S. Hope Street, 43rd Fl.
Los Angeles, CA 90071-1422

Robert L. Starr, Esq.
robert@frontierlawcenter.com
Manny Starr, Esq.
manny@frontierlawcenter.com
Adam M. Rose, Esq.
adam@frontierlawcenter.com
FRONTIER LAW CENTER
23901 Calabasas Rd., #2074
Calabasas, CA 91302

XX BY E-MAIL: I electronically served the above-mentioned document to each of the recipients at their respective e-mail addresses. My e-mail address is:
Jerin@JanelleCarneyLaw.com.

Executed on July 13, 2023, at Chino Hills, California.

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



Jerin Wilkinson