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ELECTRONICALLY
FILED

Superior Court of California,
County of San Francisco

12/09/2021
Clerk of the Court
BY: SANDRA SCHIRO
Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

GUY BLAZ HANLEY, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

SAMSARA NETWORKS, INC., a
Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CGC-20-584034

[Assigned to the Hon. Anne-Christine Massullo,
Dept. 304]

**DECLARATION OF JONATHAN M. LEBE
IN SUPPORT OF PLAINTIFF'S MOTION
TO APPROVE SETTLEMENT
AGREEMENT PURSUANT TO THE
PRIVATE ATTORNEYS GENERAL ACT**

Date: January 4, 2022

Time: 10:00 a.m.

Dept.: 304

Complaint Filed: April 3, 2020

Trial Date: None Set

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I, Jonathan M. Lebe, declare as follows:

1. I am an attorney duly licensed to practice law before all courts in the State of California. I am the Managing Attorney of Lebe Law, A Professional Law Corporation and I represent Guy Blaz Hanley (“Plaintiff”) in this action. I have personal knowledge of the facts set forth herein and, if called and sworn in as a witness, could and would testify competently thereto.

2. I submit this declaration in support of Plaintiff's Unopposed Motion to Approve Settlement Pursuant to the Private Attorneys General Act.

3. I received Bachelor of Arts degrees in Political Science and International Studies from Northwestern University in 2008. I received my Juris Doctorate from Santa Clara University School of Law in 2012. During law school, I was a legal extern to the Honorable Nandor J. Vadas of the U.S. District Court, Northern District of California. I also had legal internships during law school with the Civil Division of the U.S. Attorney's Office and the Complex Litigation Division of the San Francisco City Attorney's Office.

4. I was admitted to the California State Bar in the fall of 2012. I am admitted to practice in all state courts in California and in all United States District Courts in California.

5. Upon admission to the bar, I became a Deputy County Counsel in the Litigation Section of the Santa Clara County Counsel's office. The Santa Clara County Counsel's office is one of the largest and most sophisticated offices of government lawyers in the county. The County Counsel's office engages in significant impact litigation and, of course, is responsible for the legal representation of the County. In my capacity as Deputy County Counsel, I litigated cases ranging from employment disputes to constitutional challenges to County jail policies.

6. Before starting my own firm, I also worked as an associate attorney with Lawyers for Justice, P.C., a class action law firm in California. In that capacity, I was responsible for the day-to-day management of numerous wage and hour class actions at a given time. In this position, I engaged in all possible types of motion practice including preparing motions for class certification.

1 7. I started my own law firm in early 2016. In 2018, 2019, and 2020 I was selected
2 as a Super Lawyer Rising Star based on nominations from my peers, a distinction only received
3 by 2.5% of attorneys. The vast majority of my practice consists of litigating wage and hour class
4 actions filed in California. Some of our firm's representative matters include:

5 a. *Midwest Motor Supply Co. v. Superior Court* (2020) 56 Cal.App.5th 702: In its
6 published opinion, the Court of Appeal affirmed the trial court's denial of Defendant's
7 motion to dismiss or stay action for forum non conveniens because Defendant's
8 purported forum selection clause was unenforceable under Labor Code section 925.

9 b. *Zakaryan v. The Men's Wearhouse, Inc.* (2019) 33 Cal.App.5th 659: In its
10 published opinion, Court of Appeal affirmed a trial court's denial of Defendant's
11 motion to compel arbitration (disapproved on another ground in *ZB, N.A. v. Superior*
12 *Court* (2019) 8 Cal.5th 175).

13 c. *Ortega v. Carson Wild Wings, LLC* (Los Angeles Superior Court, Case No.
14 BC677388): In this matter, our firm obtained a unanimous jury verdict holding our
15 client's former employer responsible for wrongful termination and retaliation. In its
16 verdict, the jury awarded our client \$300,000 in lost earnings, emotional distress
17 damages, punitive damages and penalties. The Court also awarded \$291,948 in
18 attorneys' fees. This matter is currently on appeal.

19 8. I have been appointed certified Class Counsel in the following proceedings in
20 connection with approvals of wage and hour class action and Private Attorney General Act
21 settlements: *Amie Pfiefer v. Zesty Inc.*, San Francisco Superior Court, CGC-19-574570; *Anthony*
22 *Dirico, et al. v. Seek Capital, LLC*, Los Angeles Superior Court Case No. BC698076; *Brandon*
23 *Centino v. Arrowhead Products, Orange County Superior Court*, Case No. 30-2018-00988493;
24 *Donna Burris v. Resort Vacations, Inc.*, Orange County Superior Court, Case No. 2018-00997260;
25 *Elizabeth Merritt v. Houzz Inc.*, Santa Clara Superior Court, Case No. 19CV341181; *Janet*
26 *Manteon v. M.A.C. Cosmetics, Inc.*, Los Angeles County Superior Court, Case No. BC702940;
27 *Jamal Holcomb v. Weiser Security Services, Inc.*, Los Angeles Superior Court, Case No.
28 19STCV03843; *Jerome Hughes, et al. v. Surveillance Security, Inc.*, Judicial Coordination

Proceeding Case No. 4969; *Jihwan Kim v. Demandforce, Inc.*, San Francisco Superior Court, Case No. CGC-18-570997; *Jordan Olson v. Medtronic, Inc., et al.*, San Francisco Superior Court, Case No. CGC-19-576875; *Joseph Jun Caballero v. MLTD, Inc.*, Los Angeles Superior Court Case No. BC659936; *Kendall Klette v. Balboa Capital Corporation*, Orange County Superior Court, Case No. 30-2018-00970552; *Kevin Klein v. Loomis Armored, US LLC*, San Bernardino Superior Court Case No. CIVDS1704547; *Leslie Walling v. National Funding Inc.*, San Diego Superior Court, Case No. 201800061889; *Lorena Sanchez v. Valley Presbyterian Hospital*, Los Angeles Superior Court Case No. BC678638; *Lucas Cardena v. Strata Capital Corporation*, Orange County Superior Court, Case No. 30-2018-01041233-CU-OE-CXC; *Michael Schmitz, et al. v. HealthIQ Re Inc.*, Santa Clara Superior Court, Case No. 18CV337951; *Patricia Martinez v. Whaler LLC*, Los Angeles Superior Court Case No. BC621047; *Rhett Hubbard v. Caliber Home Loans, Inc.*, Orange County Superior Court, 30-2018-01017838; *Shameka Watson v. Aegis Security & Investigations Inc.*, Los Angeles Superior Court Case No. BC695411; *Shayna Amster v. Starbucks Corporation*, San Bernardino Superior Court, Case No. CIVDS1922016; *Suzana Mederos v. Consolidated Disposal Service, L.L.C.*, Los Angeles Superior Court, Case No. BC677379; *Tyler Jones, et al. v. Citiguard, Inc.*, Los Angeles County Superior Court Case Number BC664890.

9. The chart below shows the hours spent by each of Lebe Law APLC's attorneys on categories of work on this case.

Task and Related Communications or Meetings	Jonathan M. Lebe	Zachary T. Gershman
Pleadings and Notice to LWDA	6.4	3.3
Client Communications	7.3	1.4
Investigations and Discovery	15.3	11.1
Arbitration Motion	5.8	2.7
Mediation Preparation and Attendance	24.9	17.3
Settlement and Related Filings	16.7	9.9
Other Court Filings	6.3	5.5
Total Hours	82.7	51.2
Fees	\$49,425	\$15,445.00

1 10. I worked 82.7 hours on this matter. My billable rate was \$550 for work performed
2 in 2019 and 2020 and was raised to \$650 in January of 2021. My lodestar attorney's fees, before
3 any multiplier, amount to \$49,425. My firm also incurred \$103.20 in costs on this case. A list of
4 my firm's expenses in this matter are attached as **Exhibit A**.

5 11. Zachary Gershman is an associate attorney of Lebe Law, APLC in good standing
6 of the State Bar of California and admitted to practice in all state courts in California, and in the
7 Central, Eastern, and Northern United States District Courts in California.

8 12. Mr. Gershman began working for Lebe Law, APLC in August of 2019 as a law
9 clerk after graduating from the USC Gould School of Law in May of 2019, where he was an
10 Executive Senior Editor of the Southern California Law Review. He received his Bachelor of Arts
11 degree in Political Science from the University of Connecticut in 2015. He was admitted to the
12 California State Bar on December 2, 2019.

13 13. Mr. Gershman has expended a total of 49.3 hours in the prosecution of this matter.
14 None of his time duplicated the time expended by others. At his requested rate of \$250 per hour
15 for work performed in 2020, and \$350 per hour for work perform in 2021, his fees calculate out to
16 \$15,445.00.

17 I declare under penalty of perjury under the laws of the State of California and the United
18 States of America that the foregoing is true and correct. Executed on December 8, 2021 in the
19 City of Los Angeles in the State of California.

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JONATHAN M. LEBE

EXHIBIT A

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Other PAGA Notice cost	BILLABLE	3/27/2020	\$75.00	\$75.00	1	JL
Postage Cost of serving PAGA Notice	BILLABLE	3/27/2020	\$14.30	\$14.30	1	JL
Postage Personnel Records Request on Defendant	BILLABLE	10/19/2019	\$13.90	\$13.90	1	ZG