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16 Attorneys for Plaintiff William Hall, individually
17 and on behalf of all others similarly situated

18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **FOR THE COUNTY OF LOS ANGELES**

20 WILLIAM HALL, individually and on behalf
21 of all others similarly situated,

22 Plaintiff,

23 vs.

24 CULPEPPER & ASSOCIATES SECURITY
25 SERVICES, INC. a Georgia corporation;
26 DOES 1 through 25,

27 Defendants.

Case No.: 20STCV15317

*Assigned to Hon. Daniel J. Buckley
Dept. SSC-1*

**DECLARATION OF DANIEL
HOLZMAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: August 25, 2021

Time: 10:30 a.m.

Dept.: 1

Complaint Filed: April 21, 2020

1 I, Daniel M. Holzman, declare as follows:

2 1. I am admitted to practice law in the state of California. I have personal
3 knowledge of the matters set forth herein, and, if called as a witness, could competently
4 testify thereto.

5 2. I have been a member of the California Bar since 1995 and have specialized
6 in the practice of employment law and civil rights litigation since that time. I have extensive
7 experience handling employment law cases, including employment claims filed under the
8 California Government Code and California Labor Code. I have participated in many
9 mediations regarding employment law matters and wage and hour class actions. I have
10 participated in more than a dozen trials and several arbitrations, serving as lead counsel in
11 numerous cases.

12 3. I have been appointed as class counsel in the following wage and hour class
13 actions:

14 a. *Bromberg v. Fidelity National Information Services*, C.D. Cal. No. 2:15-CV-
15 7930

16 b. *Burciaga v. Superior Thread Rolling Company*, BC585143

17 c. *Cesar-Roden v Yoga Works, Inc.*, Los Angeles Superior Court Case No.
18 BC711991

19 d. *Claim Jumper Restaurants Wage and Hour Cases*, JCCP No. 4916

20 e. *Cypress Security Wage and Hour Cases*, Los Angeles Superior Court Case
21 No. BC672405 (JCCP NO. 4963)

22 f. *Dittmar v. Costco*, S.D. Cal. No. 3-14-CV-1156

23 g. *Franco v. Gentry Brothers, Inc.*, BC586571

24 h. *Gallegos v. EC Holdings Inc.*, BC616867

25 i. *Grieg v. Food on Time, Inc.*, at al., BC684566

26 j. *Gonzales v. Manrika, Inc.*, BC570534

27 k. *Grieg v. Food on Time, Inc.*, at al., Los Angeles Superior Court Case No.
28 BC684566

- 1 l. *Guillen v Grasshopper House, LLC*, Los Angeles Superior Court Case No.
2 BC685116
- 3 m. *Haskins v. Walmart, et al.*, San Diego Superior Court Case No. 37-2019-
4 00020149-CU-OE-NC
- 5 n. *Hamilton v. BlueMercury, Inc.*, BC625829
- 6 o. *Henriquez v. NGU Transport LLC*, Los Angeles County Superior Court No.
7 BC714165
- 8 p. *Hernandez v. The Bicycle Casino LP*, BC628414
- 9 q. *Jimenez v. PPG Industries, Inc.*, BC613324
- 10 r. *Kuenstle v. Childrens Hospital Los Angeles Medical Group, Inc.*, BC65385
- 11 s. *Maravilla v. Motion Picture Television Fund*, Los Angeles Superior Court
12 Case No. BC690494
- 13 t. *Medina v. Kaweah Pump, Inc.*, Tulare County Superior Court No. 265579
- 14 u. *Munoz v. Dependable Highway Express, Inc.*, BC535931
- 15 v. *Ortiz v. Roberts Tool Co., Inc.*, BC626244
- 16 w. *Perez v. The Parsons Group, Inc.*, Santa Barbara County Superior Court Case
17 No. 19CV01203
- 18 x. *Saavedra v. Cliff View Terrace, Inc.*, Santa Barbara Superior Court Case No.
19 17CV02531
- 20 y. *Schneider v. Inner City Education Foundation*, BC617827
- 21 z. *Stadnik v. Leon's Transmission Service, Inc.*, Los Angeles Superior Court
22 Case No. 19STCV44253
- 23 aa. *Vatralleva v. Sears, Roebuck and Co.*, BC515650
- 24 bb. *Villalobos v. Pedego, Inc.*, Orange County Superior Court Case No. 30-2019-
25 01102461
- 26 cc. *Wysocki v. Color Spot Nurseries, Inc.*, San Luis Obispo County Superior
27 Court No. 14CVPO138
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1 dd. *Yoo v NGL Transportation LLC*, Los Angeles Superior Court Case No.
2 BC682160

3 ee. *Yoo v. South Coast Transportation & Distribution, Inc.*, BC682120

4 4. I am familiar with California law governing wages owed to employees,
5 including but not limited to California Labor Code Sections 1197, 226(a), 510, 226.7,
6 512(a), 2699, California Business and Profession Codes 17200 et seq., the Fair Labor
7 Standards Act, Federal and State sick pay requirements, and the Wage Orders of the
8 Industrial Welfare Commission.

9 5. There are no conflicts that would prevent me from serving as Class Counsel
10 in this matter.

11 6. Based upon my litigation experience, my billable hourly rate at Caskey &
12 Holzman is \$675. As set forth in the Declaration of Aaron C. Gundzik, my hourly rate of
13 \$675 is in the range of rates commonly charged in the Los Angeles community for
14 representing plaintiffs in wage and hour class actions.

15 7. I have reviewed the Declaration of Aaron C. Gundzik and can confirm the
16 accuracy of his statements regarding the case history, our assessment of the value of each of
17 the Plaintiff's claims, the mediation and the work we performed on the case.

18 8. Like Mr. Gundzik, I have analyzed and weighed the evidence discussed in his
19 declaration and have determined that the proposal to settle the case for \$325,568 represents a
20 fair and reasonable discount from the realistic recovery and is within the "ballpark" of a fair,
21 reasonable and adequate settlement of the wage and hour class action claims alleged in this
22 case for the classes comprised of approximately 70 individuals.

23 9. As of July 15 of this year, I expended 28.2 hours on the case, which equates
24 to attorneys' fees of \$18,900. During the class action, I spent the following amounts of time
25 on the following activities:
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<u>ATTORNEY ACTIVITY</u>	<u>TIME EXPENDED:</u>
initial client meetings and review of claims, communications with client, pre-filing investigation and ongoing communications, and communications with other class members	4.6 hours
strategy and analysis regarding claims	2.1 hours
settlement matters (including negotiation with opposing counsel after mediation, communications with co-counsel, preparing and reviewing the Memorandum of Understanding, settlement stipulation and the class notice, amended settlement stipulation and amended class notice, and communications with the settlement administrator)	6.5 hours
prepare for and attend mediation (includes working to prepare mediation strategy, drafting mediation brief, post-mediation settlement negotiations and analysis)	12.8 hours
drafting pleadings and Court documents (includes complaints, settlement agreement and class notices, motion for preliminary approval and supporting declarations, joint reports, stipulations, and motion for final approval and supporting declarations):	2.2 hours
<u>Total Hours:</u>	28.2 hours

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1 10. My firm also incurred costs in this case that we have paid. In total, as of July
2 of 2021, my firm incurred expenses in the amount of \$3,838.50. Of this amount, \$3,500 is
3 the cost of half of the mediator's fee. We will incur another \$300 for the cost of Case
4 Anywhere during the next two quarters, which would make our total costs equate to
5 \$4,138.50. An itemized list of our expenses is attached hereto in **Exhibit "A."**

6 I declare under penalty of perjury under the laws of the state of California that the
7 foregoing is true and correct and that this Declaration was executed on the date set forth
8 below in Calabasas, California.

9
10 Dated: July 27, 2021



Daniel M. Holzman

Exhibit A

Hall Expenses by Category

Photocopy Charges:	\$2.00
Postage:	\$0.50
Mediation:	\$3,500.00
Case Anywhere:	\$336.00

TOTAL COSTS:	\$3,838.50
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* **Future Case anywhere estimated costs: \$300**
(July - Sept \$150)
(Oct - Dec \$150)

Total Costs:	\$4,138.50
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 14011 Ventura Blvd., Suite 206E, Sherman Oaks, CA 91423.

On July 30, 2021, I served the following document described as

**- DECLARATION OF DANIEL HOLZMAN IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

on the interested parties in this action:

(X) by serving () the original (X) true copies thereof as follows:

Please see attached service list

() BY MAIL I caused such envelope to be deposited in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.	() BY FACSIMILE TRANSMISSION I caused said document(s) to be transmitted by facsimile transmission to the name(s) and facsimile telephone number(s) of the person(s) named on the attached service list. The facsimile machine telephone number of the sending facsimile machine was (818) 918-2316. A transmission report was issued by the sending facsimile machine confirming that the transmission was completed without error. A true and correct copy of said transmission report is attached hereto.
() BY OVERNIGHT DELIVERY Said document was placed in an envelope designated by the express service center and placed for collection in a box regularly maintained by said carrier with whom we have a direct billing account, to be delivered to the office of the addressee listed above on the next business day.	(XX) BY ELECTRONIC TRANSMISSION I caused the above-described document to be electronically served to the names and email addresses listed on the Service List attached hereto.

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

() FEDERAL I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

(X) EXECUTED on July 30, 2021, at Sherman Oaks, California.



Nicole Salazar

SERVICE LIST

Bethany Pelliconi, Esq. Elisabeth Watson, Esq. SEYFARTH SHAW LLP 2029 Century Park East, Suite 3500 Los Angeles, CA 90067 Telephone: (310) 201-9233 Facsimile: (310) 551-8328 Email: bpelliconi@seyfarth.com ewatson@seyfarth.com <i>Attorneys for Defendant Culpepper & Associates Security Services, Inc.</i>	Marshall A. Caskey, Esq. Daniel M. Holzman, Esq. N. Cory Barari, Esq. CASKEY & HOLZMAN 24025 Park Sorrento, Ste. 400 Calabasas, CA 91302 Telephone: (818) 657-1070 Facsimile: (818) 297-1775 Email: mcaskey@caskeyholzman.com dholzman@caskeyholzman.com nbarari@caskeyholzman.com <i>Attorneys for William Hall, individually and on behalf of all others similarly situated</i>
<i>Via Electronic Submission</i> PAGA Administrator 1515 Clay Street, Ste. 801 Oakland, CA 94612	