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*Attorneys for Plaintiffs and on behalf of
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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

DAVID RAMIREZ and MARION
 LEMONS, on behalf of themselves and all
 others similarly situated,

Plaintiffs,

vs.

RITE AID CORPORATION, THRIFTY
 PAYLESS, INC., and DOES 1-10,
 inclusive.

Defendants.

Case No. 2:20-cv-03531-GW-SKx
 (Consolidated with Case No. 2:20-cv-07617-GW-SKx)

**DECLARATION OF HALLIE VON
 ROCK IN SUPPORT OF
 PLAINTIFFS' MOTION FOR
 PRELIMINARY APPROVAL OF
 CLASS ACTION SETTLEMENT**

Declaration of Hallie Von Rock in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement

I, Hallie Von Rock, declare as follows:

1. I am an attorney at law licensed to practice in the State of California and before this Court. I am a partner in the law firm Aiman-Smith & Marcy ("ASM"), which law firm is co-counsel for Plaintiffs David Ramirez and Marion Lemons, on behalf of the Settlement Class Members, LWDA, and Aggrieved Employees, in the captioned class action. The facts stated herein are true of my own personal knowledge. This declaration is provided in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement.

Investigation, Mediation, and Settlement

2. Prior to filing the *Lemons* complaint, our office thoroughly investigated the facts and legal issues in this case. We had multiple conferences and communications with Plaintiff Marion Lemons, who provided valuable information about her experience and that of other employees.

3. Plaintiff David Ramirez filed this putative class action on April 16, 2020, on behalf of all non-exempt retail associates in California. Ramirez filed a First Amended Complaint on July 17, 2020. Plaintiff Marion Lemons filed a putative class action on May 6, 2020, on behalf of all non-exempt retail associates in California. Plaintiff Lemons subsequently filed a First Amended Complaint adding a cause of action for penalties under the PAGA on July 31, 2020.

4. Plaintiff Lemons served written discovery, including Requests for Production of Documents and Special Interrogatories to all Defendants on October 27, 2020.

5. Plaintiffs Ramirez and Lemons filed a consolidated complaint on December 30, 2020, in the Central District of California. The consolidated complaint

1 asserts claims for failure to pay for all hours worked, failure to pay minimum wages,
2 failure to pay overtime wages, failure to provide meal periods, failure to provide
3 accurate itemized wage statements, waiting time penalties, failure to pay all wages due
4 on regularly-scheduled paydays, violation of California Business and Professions
5 Code Section 17200, and penalties under PAGA against Defendants based on time
6 that associates spent waiting for and undergoing bag checks while off the clock.

7 6. The parties, in their separate actions and then in the consolidated action,
8 served and responded to multiple formal discovery requests. Extensive meet and
9 confer efforts were engaged in by the parties for additional documents to be produced.

10 7. Plaintiffs took the deposition of Defendants' 30(b)(6) witness.
11 Defendants took the depositions of Plaintiffs Ramirez and Lemons.

12 8. The parties agreed to mediation with well-respected mediator Jeffrey A.
13 Ross, Esq. As a condition of the mediation, Plaintiffs required additional data and
14 information to be produced by Defendants, which included a lengthy set of requests of
15 discovery needed that included policies, videos, timekeeping records, and payroll data.

16 9. Defendants provided the requested documents and data prior to
17 mediation. This information, along with the independent investigation conducted by
18 Plaintiffs' counsel, was sufficient for Plaintiffs to assess the strengths and weaknesses
19 of the case and to perform a thorough damages analysis.

20 10. During the course of litigation, mediation, and settlement negotiations,
21 the Parties exchanged information and documents that allowed all sides to analyze the
22 risks and benefits of litigation and potential damages exposure, which included but
23 was not limited to, the following:

- 24 • interviewing Plaintiffs at length on repeated occasions;
- 25 • interviewing witnesses;
- 26 • obtaining discovery from witnesses;
- 27 • researching applicable laws;

- preparing and responding to discovery requests;
- ongoing meet and confer efforts with defense counsel;
- depositions of Defendants' 30(b)(6) witness and Plaintiffs;
- drafting and amending pleadings;
- reviewing employment policies, timekeeping records, payroll documents, and other data;
- preparing a detailed mediation brief;
- attending a full-day mediation;
- continued settlement negotiations with the mediator;
- preparing and negotiating about the terms of the Settlement Agreement; and
- preparing Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and supporting documents.

11. On March 12, 2021, the Parties participated in a formal, full-day mediation conducted by Jeffrey A. Ross, Esq., a well-regarded mediator experienced in mediating complex labor and employment matters. After a full day of negotiations, the parties agreed to continue negotiations with Mr. Ross.

12. Following further settlement negotiations, a mediator's proposal was accepted on June 3, 2021, for a non-reversionary settlement in the amount of nine million dollars (\$9,000,000.00).

13. Thereafter, counsel for the parties engaged in lengthy negotiations to finalize a long form settlement agreement.

14. Plaintiffs will serve a copy of the Settlement Agreement and Plaintiff's Motion for Approval of Settlement on the LWDA, concurrently with the court filing, on September 9, 2021.

15. The Settlement was reached only after arm's length and good faith negotiations. The mediator, Jeffrey A. Ross, Esq., is highly regarded and has specialized exclusively in the mediation of complex disputes. Both parties provided

1 detailed mediation briefs and Plaintiffs prepared an extensive analysis of the potential
2 exposure. The parties engaged in a significant exchange of data and had sufficient
3 information to evaluate the strengths and weaknesses of the claims and defenses,
4 whether to pursue litigation or settle, and the appropriate settlement value of the
5 claims. Despite zealous advocacy from both sides, the risks of continued litigation
6 had to be considered and a compromise of the claims was settled upon.

7 16. As Plaintiffs' counsel, I believe that this settlement is fair, reasonable,
8 and adequate and in the best interest of the Class Members, LWDA, and Aggrieved
9 Employees.

10 **Class Action / PAGA Representative Incentive Award**

11 17. Ms Lemons spent a significant amount of time helping me, and my firm,
12 with the prosecution of this action and performing the following tasks: (1)
13 communicating with her attorneys on numerous occasions; (2) detailing her
14 experiences and producing copies of documents; (3) assisting in preparing the
15 complaint; (4) responding to discovery requests; (5) having her deposition taken; (6)
16 reviewing the mediation documents prepared and being available throughout the
17 mediation; and (7) reviewing the terms of and signing the Settlement Agreement.

18 18. Ms Lemons also faced great risk in challenging Defendants'
19 employment policies and bringing suit against her former employer, not least because
20 Ms Lemons faced potential liability for Defendant's costs if Defendant prevailed.

21 19. Additionally, the notoriety of being a class action or PAGA
22 representative is even more significant today given the accessibility of court
23 documents on-line and PAGA/class action blogs. Further, employers frequently
24 perform background checks of applicants and the fact that an individual has sued a
25 former employer in a representative action will likely be viewed negatively. Thus, the
26
27

incentive award is necessary to award Ms Lemons for the notoriety and risk taken in her role as a class action and PAGA representative.

Adequacy of Counsel and Attorney's Fees and Costs

20. Aiman-Smith & Marcy is an experienced law firm focusing on complex civil litigation and representative actions. My firm substantially concentrates its practice in the prosecution of representative actions and we have successfully served as class counsel and PAGA counsel in prosecuting dozens of complex actions against major corporations, including taking cases to judgment and to appeal. We have recovered tens of millions of dollars in benefits for individuals across the country. Our two most recent class action appellate opinions are *Bradley v. Networkers International LLC* (2012) 211 Cal.App.4th 1129, and *Benton v. Telecom Network Specialists, Inc.* (2013) 220 Cal.App.4th 701, which have been cited in case law more than one hundred times. A true and correct copy of the firm résumé of Aiman-Smith & Marcy is attached hereto as **Exhibit A**.

21. Plaintiffs' counsel has kept contemporaneous time records, which support the request for attorney's fees under the terms of the settlement to be sought at final approval.

22. Further, Plaintiffs' counsel has kept detailed records of costs expended in this matter, which support the request for litigation costs under the terms of the settlement to be sought at final approval.

I certify under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Executed on September 9, 2021, at Oakland, California.

Hallie Von Rock

Hallie Von Rock
Attorneys for Plaintiffs

Exhibit A



CURRICULUM VITAE OF AIMAN-SMITH & MARCY

FIRM BIOGRAPHY

Aiman-Smith & Marcy, PC, is a boutique plaintiffs' law firm that has successfully litigated individual and class action cases for plaintiffs across a broad variety of areas, including unpaid wages, unpaid overtime, missed meal and rest breaks, uniform reimbursement, consumer fraud, securities fraud, employment discrimination, civil rights, sex harassment, wrongful termination, whistleblower retaliation, and others. The firm represents exclusively plaintiffs, in all aspects of litigation, including trial and appeals. Aiman-Smith & Marcy began in 2005, although the principals have worked together since 1997.

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ATTORNEYS

RANDALL B. AIMAN-SMITH (SBN 124599)

Despite never graduating from high school or college, Randall Aiman-Smith was able to earn his Juris Doctor degree from Boalt Hall (University of California, Berkeley) School of Law in 1986. While at Boalt Hall, Mr. Aiman-Smith served as a member of the editorial board of the California Law Review and, additionally, on the Moot Court Board. Mr. Aiman-Smith was an adjunct faculty member at University of California, Hastings College of the Law for seven years and has been a frequent presenter at continuing educational seminars.

Mr. Aiman-Smith is admitted to practice in state and federal courts in California, including the Northern District, Central District, Ninth Circuit, and the Tenth Circuit Court of Appeals, and the California Supreme Court. Additionally, Mr. Aiman-Smith has been admitted *pro hac vice* in several other jurisdictions.

Over the 30 years that Mr. Aiman-Smith has been practicing law, he has worked exclusively as a litigator in the state and federal trial and appellate courts on behalf of plaintiffs seeking to vindicate their rights under the law. Mr. Aiman-Smith has tried numerous cases in the state and federal courts and has taken at least twenty-five cases to judgment or verdict, including an individual discrimination verdict in excess of \$1.6 million in *Williams v. Union Pacific Railroad* in 2009. Most recently, Mr. Aiman-Smith was lead trial counsel in *Aghmane v. Bank of America*, which was successfully tried to a \$1.6 million verdict on defamation and blacklisting in February 2018.

The firm and Mr. Aiman-Smith have taken approximately 25 matters to the state and federal courts of appeal on behalf of both appellants and respondents resulting in the creation of significant legal precedents favorable to plaintiffs. Published decisions where Mr. Aiman-Smith was counsel of record and had primary responsibility for writing briefs and making oral arguments include: *Bergemann v. United States*, 820 F.2d 1117 (10th Cir. 1987); *Eidsmore v. R.B.B., Inc.*, 25 Cal.App.4th 1989 (1994); *Rivero v. Superior Court (Smith)* (1997) 54 Cal.App.4th 1048; *Rivero v. City and County of San Francisco*, 316 F.3d 857 (9th Cir. 2002); *Bradley v. Networkers International LLC* (2012) 211 Cal.App.4th 1129; and *Benton v. Telecom Network Specialists, Inc.* (2013) 220 Cal.App.4th 701.

REED W. L. MARCY (SBN 191531)

Reed W. L. Marcy obtained his Bachelor's degree with High Honors in French Literature in 1983 and his Master's degree in French Literature in 1985, both from the University of California, Berkeley. After completing his Master's degree, Mr. Marcy worked at U.C. Berkeley's English Department for five years and at California College of Art (formerly known as CCAC) for three years prior to attending law school. Mr. Marcy graduated from University of California, Hastings College of Law, in 1997 and was admitted to practice in California in December 1997. Mr. Marcy was awarded numerous academic honors at Hastings, including the American Jurisprudence Award, the David Snodgrass Oral Advocacy Award, the California Computerized Legal Instruction Award, and awards for civil

rights and art law. Mr. Marcy was Associate Executive Editor for Comm/Ent, the journal of intellectual property law, and published a note on patent law. Mr. Marcy has been a frequent presenter of continuing legal education programs on employment law and legal research topics through National Business Institute.

Mr. Marcy is admitted to practice in state and federal courts in California, including the Northern District, Central District, Ninth Circuit, and Court of Appeals, along with the California Supreme Court, and has been admitted *pro hac vice* in Ohio and Oklahoma.

Mr. Marcy began working as a law clerk for Randall Aiman-Smith in 1995, while still a law student. After graduation and admission to the Bar in 1997, Mr. Marcy continued working as an attorney for Mr. Aiman-Smith, becoming a partner in Mr. Aiman-Smith's firm in 2002. In 2005, Mr. Marcy and Mr. Aiman-Smith formed Aiman-Smith & Marcy.

Mr. Marcy has abundant experience as a civil litigator, including extensive experience in all phases of employment law and class actions from initial client intake through trial and appeal. Mr. Marcy has been the lead attorney for dozens of employment and consumer class actions. Mr. Marcy has extensive experience in employment law appellate practice. Published decisions where Mr. Marcy had responsibility for writing briefs and making oral arguments include *Rivero v. City and County of San Francisco*, 316 F.3d 857 (9th Cir. 2002); *Bradley v. Networkers International LLC* (2012) 211 Cal.App.4th 1129; and *Benton v. Telecom Network Specialists, Inc.* (2013) 220 Cal.App.4th 701. Mr. Marcy's most recent decision was an unpublished memorandum opinion overturning summary judgment in a defamation and blacklisting action in the Ninth Circuit in *Aghmane v. Bank of America, N.A.* 696 Fed. Appx. 175 (9th Cir. May 17, 2017) Case Number 15-15482. The case was successfully tried to a \$1.6 million verdict for defamation and blacklisting in February 2018.

HALLIE VON ROCK (SBN 233152)

Ms Von Rock graduated with a Bachelor of Arts degree from University of California, Berkeley with Honors in 1999. Ms Von Rock graduated from the University of California, Hastings College of Law, in 2004 and was admitted to practice in California in December, 2004. Ms Von Rock was awarded numerous academic honors at Hastings, including the Witkin Award for Excellence for Trial Advocacy and CERCLA Outstanding Achievement Awards for Trial Advocacy

and for Moot Court. Ms Von Rock was an Editor for Hastings West Northwest Environmental Law Journal.

Ms Von Rock is admitted to practice in state and federal courts in California, including the Northern District, Central District, Southern District, and Court of Appeals, along with the California Supreme Court.

Ms Von Rock has worked with Randall Aiman-Smith and Reed Marcy since 1996, first doing administrative work while still an undergraduate at University of California, Berkeley. Ms Von Rock began working as a law clerk for Mr. Aiman-Smith and Mr. Marcy during her last year of law school in June 2003 and was hired as an Associate following admission to the California Bar in 2004. Ms Von Rock has been a partner at Aiman-Smith & Marcy since 2012.

During Ms Von Rock's significant litigation experience, she has worked on numerous employment and consumer cases and class action cases. Ms Von Rock has experience in all aspects of litigation and class action work, including trial and appeal. Published decisions where Ms Von Rock had responsibility for writing briefs include *Bradley v. Networkers International LLC* (2012) 211 Cal.App.4th 1129; and *Benton v. Telecom Network Specialists, Inc.* (2013) 220 Cal.App.4th 701, and the unpublished decision in *Aghmane v. Bank of America, N.A.*, 696 Fed. Appx. 175 (9th Cir. May 17, 2017) Case Number 15-15482. Most recently, Ms Von Rock was trial counsel in *Aghmane v. Bank of America*, which was successfully tried to a \$1.6 million verdict on defamation and blacklisting in February 2018.

BRENT A. ROBINSON (SBN 289373)

Mr. Robinson graduated with a Bachelor of Arts degree in English literature from University of California, Santa Barbara in 2008, having spent his junior year at University of Leeds, in England. Mr. Robinson graduated from the University of San Francisco School of Law, in 2012 and was admitted to practice in California in 2013. Mr. Robinson graduated in the top-twentieth percentile of his class, earned the CALI Award for Excellence in Legal Ethics, and received the California Academy of Appellate Lawyers Award for outstanding appellate advocacy.

Mr. Robinson is admitted to practice in state and federal courts in California and is a member of the Labor & Employment Section of the California Lawyers Association, as well as the California Employment Lawyers Association.

Mr. Robinson spent the first four years of his career fighting for employees' civil rights in the workplace, representing low-income workers from marginalized communities throughout the San Francisco Bay Area. Mr. Robinson has handled cases from intake through to settlement or judgment, including by prevailing at trial and in overcoming dispositive motions.

Mr. Robinson continues to serve as lead attorney in prosecuting putative class claims for age discrimination in disability retirement benefits in *Carroll v. City and County of San Francisco et al.* (San Francisco Sup. Ct. Case No. CGC-17-526580; First Dist. Ct. of App. Case Nos. A154569 and A155208; Supreme Court Case No. S259558). *See, Carroll v. City and County of San Francisco* (2019) 41 Cal.App.5th 805.

JOSEPH CLAPP (SBN 99194) *Of Counsel

Mr. Clapp received his Bachelor of Arts degree in Economics from the University of California at Berkeley in 1978. While attending college, he organized the 1,500 workers in Yosemite National Park into a union. In 1981, Mr. Clapp received his J.D. degree from McGeorge School of Law, University of the Pacific, and while attending McGeorge he served as the Comments Editor for the Pacific Law Journal.

Mr. Clapp is admitted to practice in federal and state courts in California, including the U.S. District Court for the Northern District of California, the U.S. District Court for the Eastern District of California, the Ninth Circuit Court of Appeals, and the California Supreme Court.

Mr. Clapp began his career with the trial firm of Herron & Herron in 1982 and remained with that firm for 26 years. Thereafter, he spent a year with the firm of Kumin Sommers before opening his own practice. In 2012, he became "of counsel" to Aiman-Smith & Marcy.

Throughout his career, Mr. Clapp has always fought for those who work for a living. He has litigated all aspects of the employment relationship, and his cases have included wrongful or discriminatory discharges, the failure to pay wages due (e.g., overtime, prevailing wages), substandard working conditions (e.g., meal periods), and the failure to pay earned pensions (ERISA). He has tried numerous cases and has prosecuted numerous appeals in both in state and federal courts. He

was lead counsel for two published appellate victories: *George v. California Unemployment Insurance Appeals Board* (2009) 179 Cal.App.4th 1475 (public employee's retaliation lawsuit survives claim and issue preclusion defenses), and *Walker v. Berkeley Housing Authority*, 951 F.2d 182 (9th Cir. 1991) (biased decision-maker violates public employee's Due Process rights).

REPRESENTATIVE CASES FOR AIMAN-SMITH & MARCY

A representative list of significant class actions, representative actions, and jury trials in which the attorneys at Aiman-Smith & Marcy have served as lead counsel or co-class counsel includes:

Aghmane v. Bank of America NA, U.S. District Court, Northern District, Case No. No.: C 13-03698 DMR. (\$1.6 million jury verdict on defamation and blacklisting in February 2018) (Ninth Circuit Opinion reversing summary judgment on defamation and blacklisting claim appears at 696 Fed. Appx. 175 (9th Cir. 2017)).

Bean v. Hugo Boss Retail, Inc., U.S. District Court, Northern District, Case No. 3:13-cv-05921-RS (class action for uniform reimbursement, bag searches, and missed breaks)

Benton, et al. v. Telecom Network Specialists, Inc., Los Angeles County Superior Court, Case No. BC354230, published as (2013) 220 Cal.App.4th 701 (class action for overtime, meal and rest breaks; established important principles for class certification of wage and hour cases).

Booker, et al. v. Tanintco, Inc., Los Angeles County Superior Court, Case No. BC349267 (class action for overtime, meal and rest breaks)

Bradley, et al. v. Networkers International, LLC, San Diego County Superior Court, Case No. GIC 862417, published as (2012) 211 Cal.App.4th 1129 (class action for overtime, meal and rest breaks; established important principles for class certification of wage and hour cases).

Brawner v. Bank of America, United States District Court, Northern District of California, Case No. 3:2014cv02702 (class action for misclassification as exempt)

Brown v. Abercrombie & Fitch Co., 2014 U.S. Dist. LEXIS 19414, N.D. Cal., February 14, 2014, Case No.: 4:13-CV-05205 YGR (uniform reimbursement class action; 62,000 person class certified), consolidated with *Bojorquez v. Abercrombie*

& Fitch Co., Southern District of Ohio, Case No. 2:16-cv-00551-MHW (250,000 employees) (\$25 million settlement).

Cohen v. FedEx Office and Print Services, Inc., Alameda County Superior Court Case No. RG17810621 (consumer class action under Fair and Accurate Credit Transactions Act)

Cruz v. Goodman Networks, Inc., U.S. District Court, Northern District, Case No. 4:2010cv03820 (misclassification).

Flournoy, et al. v. 3S Network, Inc., Contra Costa County Superior Court, Case No. C09-00113 (misclassification)

Green, et al. v. Presidio International, Inc. dba A|X Armani Exchange, San Francisco Superior Court, Case No. CGC 13-536365 (class action for uniform reimbursement, bag searches, and missed breaks)

Guess Outlet Stores Pricing Cases, Los Angeles County Superior Court Case No. JCCP 4883 (consumer retail pricing class actions)

Hernandez, et al. v. FocusMicro, Inc., U.S. District Court, Northern District, Case No. CV 11-05621 EDL (off-the-clock work and missed breaks)

Hurtado, et al. v. Lowe's HIW, U.S. District Court, Northern District, Case No. CV-11-1996 (consumer class action under Song-Beverly Credit Card Act)

Holmes, et al. v. Big Five Sporting Goods, Los Angeles County Superior Court, Case No. JCCP4667 (consumer class action under Song-Beverly Credit Card Act)
Jerominski v. Walgreen Co., consolidated as *In re Walgreen Co. Wage and Hour Class Action*, U.S. District Court, Central District of California, Case No. 11-cv-07664-PSG (FFMx) (40,000 employee class action for bag searches) (\$23 million settlement)

Jones v. Armanino LLP, Alameda County Superior Court, Case No. RG 13-68105 (consumer class action for accounting negligence)

Kulvicki, et al. v. Pick-N-Pull Auto Dismantlers, Alameda County Superior Court, Case No. RG11560441 (class action for misclassification)

Maldonado, et al. v. ME Cal, Inc., San Francisco County Superior Court, Case No. CGC-11-5109000 (class action for misclassification)

Mendes, et al. v. B-4 Partners, LLC, et al., Alameda County Superior Court, Case No. RG11603095, consolidated with *Noble v. Greenberg Traurig, LLP*, Alameda County Superior Court, Case No. RG11593201 (consumer class action for securities fraud, Ponzi scheme)

Milton v. Best Buy Stores, L.P., U. S. District Court, Central District of California, Case No. CV11-6913, consolidated as *Gass, et al. v. Best Buy Stores, L.P.*, U.S. District Court, Central District of California, Case No. CV 11-01507 SJO (JCGx) (consumer class action under the Song-Beverly Credit Card Act)

Nakooka v. Dollar Tree Stores, Inc., U.S. District Court, Northern District of California, Case No. 3:17-CV-03955-JD (employee class action for uniform reimbursement)

Ortiz v. CVS Caremark Corporation, et al., U.S. District Court, Northern District of California, Case No. CV 12-05859 EDL; related with *Murphy v. CVS Caremark Corp.*, Los Angeles County Superior Court No. BC464785 (30,000 employee class action for bag searches, off-the-clock work) (\$12.75 million settlement)

Price, et al. v. EXI Parsons Telecom, Los Angeles County Superior Court, Case No. BC351252 (class action for overtime, meal and rest breaks)

Rivera v. Uniqlo California, LLC, U.S. District Court for the Central District of California, Case No. 17-CV-02848-JAK (JPR) (uniform reimbursement class action)

Robinson, et al. v. Defender Security Company, Alameda County Superior Court, Case No. RG10505016 (class action for misclassification and off-the-clock work)

Saberi, et al. v. Bridgestone Firestone Retail & Commercial Operations, Alameda County Superior Court. Case No. RG08406555 (\$14 million settlement)

Smith, et al. v. S.Com, Inc., San Francisco County Superior Court, Case No. CGC-02-412968 (misclassification class action)

Westman, et al. v. Rogers Family Funeral Homes, Contra Costa County Superior Court, Case No. C 98-03165 (consumer class action for negligence)

Williams v. Bank of America, N.A., U.S. District Court, Central District of California, Case No. SACV 15-01597 AG (KESx) (misclassification class action)

Williams v. Union Pacific Railroad Co., Alameda County Superior Court Case No. RG 06251955 (race discrimination jury verdict of \$1.6 million)

Zimmelman Jewelry v. CrossCheck, Sonoma County Superior Court, Case No. SCV 229654 (consumer class action for unfair business practices)