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Attorneys for Plaintiffs ALLONA FRAME, SARA
KHESRAWI, and ROXANA EDLYN GARCIA
NUNEZ, on behalf of themselves and all others
similarly situated and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN DIEGO

ALLONA FRAME, SARA
KHESRAWI, and ROXANA EDLYN
GARCIA NUNEZ, on behalf of
themselves and all others similarly
situated, and on behalf of the general
public,

Plaintiffs,

v.

LUXOTTICA OF AMERICA, INC.,
LUXOTTICA RETAIL NORTH
AMERICA, INC.; and DOES 1-100,

Defendants.

Case No. 37-2020-00026895-CU-OE-CTL

**DECLARATION OF SARAH E.
GALLAGHER, ESQ., IN SUPPORT OF
PLAINTIFFS' MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

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1. I am an individual over the age of 18 years of age and am competent to make this Declaration. I have personal knowledge of the facts stated in this Declaration. I am one of the counsel for Plaintiffs in this action. I am a member in good standing of the State Bar of California. I submit this Declaration in support of Plaintiffs' Motion for Preliminary Approval.

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1 7. I have represented and continue to represent Plaintiffs, in employment law actions,
2 filed and litigated in numerous court houses and venues across the state and federal courts of
3 California. I currently represent clients with claims under the Private Attorney General Act, with
4 active litigation in the San Diego Superior Court.

5 8. Our firm has made every effort to litigate this action in an efficient and cost-
6 effective manner. Following review of our case file and hours and discussions with counsel, our
7 firm has spent approximately 85.14 hours on this matter.

8 9. I devoted 76.04 hours to this case. The following is a summary of tasks and
9 activities performed in the litigation of this matter, which includes but is not limited to: conducted
10 intakes to obtain class participants, engaged in communication with current and potential class
11 participants to obtain information concerning workplace violations as well as all eligible class
12 participants', conducted legal review and analysis of prior PAGA cases brought forth against
13 Defendant to determine value and viability of class violations and class period, conducted legal
14 review of case law precedent on similar PAGA violations, compiled and analyzed data through
15 extensive discussions with class participants and co-counsel, documented data such as time period
16 and the frequency/type of workplace violations, drafted and reviewed PAGA letter and complaint,
17 compiled and analyzed informal discovery during course of litigation, drafted and reviewed
18 mediation, engaged in court appearances, negotiated and drafted the settlement agreement, and
19 collaborated with this matter's three (3) co-counsel members throughout the litigation of this
20 matter.

21 10. My hourly rate is \$550.00. Based on my hourly rate and the hours expended, 76.04,
22 my fee is \$41,822.00, which is reasonable and necessary to the successful litigation of this matter.

23 11. My staff member (Lead Law Clerk) Shannon Dart devoted 9.1 hours to this case,
24 at her rate of \$175 an hour, our fee for her time is \$1,592.50.

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12. My firm seeks reimbursement of litigation costs and expenses of \$2,236.76.

I hereby declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at West Palm Beach, Florida, on June 27, 2023.

Dated: June 27, 2023

GOLD COAST COUNSEL, APC



Sarah E. Gallagher, Esq.