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8 Attorneys for WENDY SGONTZ, VICKY WRIGHT  
and NICOLE GREGORY  
9

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **COUNTY OF ORANGE**  
12

13 WENDY SGONTZ, as an individual and  
on behalf of all others similarly  
14 aggrieved employees,

15 Plaintiffs,

16 vs.  
17

18 CROSSMARK, INC., a Delaware  
19 corporation; and DOES 1 to 50,  
20 inclusive,

21 Defendants.  
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Case No.: 30-2021-01204377-CU-OE-CXC

Assigned for All Purposes to:  
Hon. Randall J. Sherman  
Dept. CX105

**DECLARATION OF GLENN A. DANAS**

Date: August 9, 2024  
Time: 10:00 a.m.  
Dept.: CX-105

Reservation No.: 74284280

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I, Glenn A. Danas, declare as follows:

1. I am an attorney licensed to practice before all courts of the State of California. I am a partner at Clarkson Law Firm, P.C., and was appellate counsel for Plaintiff and Respondent Wendy Sgontz. Unless stated otherwise, I have personal knowledge of the facts recited in this declaration.

2. I received my undergraduate degree from Cornell University's School of Industrial and Labor Relations in 1998, my law degree from Emory University School of Law in 2001, and was admitted to the California Bar in June 2010. I have more than 20 years of litigation and appellate experience.

3. I have been a partner at Clarkson Law Firm, P.C. heading the firm's appellate department since June 2022. At Clarkson, my team has handled all of the appellate matters that arise within the firm, as well as engagements from new clients or other firms. From the end of 2022 through 2023, I had seven appellate partial or full reversals in a row and obtained review in the California Supreme Court in *Fuentes v. Empire Nissan*, which will be my fifth merits case in the California Supreme Court.

4. Prior to Clarkson Law Firm, I was a partner at Robins Kaplan (from 2018 to 2022), where I also devoted a substantial amount of my practice to appellate matters. Prior to Robins Kaplan, I was an associate (from 2009 through 2015) and then a partner (from 2015 through 2018) at Capstone Law APC, one of the largest wage and hour boutique firms in California. I began my career serving as a law clerk to then-Chief Judge U.W. Clemon of the U.S. District Court for the Northern District of Alabama.

5. I have argued 50 appeals in state and federal appellate courts throughout the country, including multiple unanimous wins in the California Supreme Court. I have submitted amicus briefs in the United States Supreme Court (on behalf of Senator Booker’s office) in *National Pork Producers Council v. Ross* and on behalf of a group of retired national security advisors in *Twitter v. Taamneh*, and in the Ninth Circuit in *Keebaugh v. Warner Brothers Entertainment*, on behalf of three leading academics on the use of “dark patterns” in manipulating assent to online arbitration forms.

6. I have earned numerous recognitions, including twice receiving the Daily Journal's award for "Top Appellate Reversal" of the year; being named among the "Top 100 Attorneys in California" by the Daily Journal; and earning a California Lawyer Attorney of the Year ("CLAY") award for my win in the California Supreme Court's landmark decision, *Iskanian v. CLS Transportation Los Angeles, LLC*. I

1 was also named one of the “Top Labor and Employment Attorneys in California” by the Daily Journal  
2 five years in a row, from 2015 to 2019, and one of the “Top 20 Attorneys in California under 40” in  
3 2013.

4 7. I also frequently speak on appellate topics, including on a panel with Ninth Circuit Judge  
5 John Owens in 2023 and 2024 (at the Class Action Law Forum in San Diego), and in Park City, Utah, on  
6 a panel regarding “Keeping the Win on Appeal” with Paul Clement, Ashley Keller, and federal circuit  
7 judges Amul Thapar (CA6) and Andrew Oldham (CA5). I have helped Academy member Leah Spero by  
8 mooted attorneys for California Supreme Court arguments, and have guest lectured students at the  
9 University of Oregon and Loyola of Los Angeles Law schools, on topics dealing with the overlap of  
10 appellate and employment law.

11 8. Attached hereto as Exhibit A is a true and correct copy of the tasks performed and time  
12 expended by myself and associate Katelyn Leeviraphan on the appeal in this matter. Based on my  
13 qualifications and experience, I respectfully submit a rate of \$1,100/hour is reasonable for my time. Based  
14 on her qualifications and experience as set forth in her declaration, I submit a rate of \$425/hour is  
15 reasonable for Ms. Leeviraphan. Accordingly, my firm’s total lodestar for handling the appeal in this  
16 matter is \$41,362.50, based on 54.6 total attorney hours.

17 I declare under penalty of perjury that this declaration is true and correct. Executed at Los  
18 Angeles, California, this 17th day of April, 2024.

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21   
Glenn A. Danas

**EXHIBIT**

**A**

Wendy Sgontz v. Crossmark, Inc.  
Orange County Superior Court Case No. 30-2021-01204377-CU-OE-CXC

**SUMMARY OF ATTORNEY TIME / LODESTAR FEES**

| FIRM/ATTORNEYS           | YEAR ADMITTED | HOURS       | HOURLY RATE | TOTAL              |
|--------------------------|---------------|-------------|-------------|--------------------|
| <b>CLARKSON LAW FIRM</b> |               |             |             |                    |
| Glenn Danas              | <b>2010</b>   | <b>26.9</b> | \$1,100     | \$29,590           |
| Katelyn Leeviraphan      | <b>2022</b>   | <b>27.7</b> | \$425       | \$11,772.50        |
| <b>TOTAL</b>             | <b>--</b>     | <b>54.6</b> | <b>--</b>   | <b>\$41,362.50</b> |

**Wendy Sgontz v. Crossmark, Inc.**  
**Orange County Superior Court Case No. 30-2021-01204377-CU-OE-CXC**

**Clarkson Legal Time Report Detailed**  
**Glenn Danas**

| <b>Attorney</b> | <b>Hourly Rate</b> | <b>Time Spent</b> | <b>Fee</b>      | <b>Description of Work Performed</b>                       |
|-----------------|--------------------|-------------------|-----------------|------------------------------------------------------------|
| Glenn Danas     | \$1,100            | 25                | \$27,500        | Draft and revise Respondent's brief.                       |
| Glenn Danas     | \$1,100            | 0.5               | \$550.00        | Telephone conference with co-counsel regarding strategy.   |
| Glenn Danas     | \$1,100            | 1.4               | \$1,540.00      | Stipulation to stay appeal pending settlement discussions. |
| <b>TOTAL:</b>   | --                 | <b>26.9</b>       | <b>\$29,590</b> | --                                                         |

**Wendy Sgontz v. Crossmark, Inc.**  
**Orange County Superior Court Case No. 30-2021-01204377-CU-OE-CXC**

**Clarkson Legal Time Report Detailed**  
**Katelyn Leeviraphan**

| <b>Attorney</b>     | <b>Hourly Rate</b> | <b>Time Spent</b> | <b>Fee</b>         | <b>Description of Work Performed</b>                                        |
|---------------------|--------------------|-------------------|--------------------|-----------------------------------------------------------------------------|
| Katelyn Leeviraphan | 425.00             | 1.5               | \$637.50           | Review Appellate's Opening Brief and trial briefing                         |
| Katelyn Leeviraphan | 425.00             | 0.2               | \$85.00            | Review emails; document management                                          |
| Katelyn Leeviraphan | 425.00             | 22.4              | \$9,520.00         | Drafting, reviewing, and finalizing Respondent's brief.                     |
| Katelyn Leeviraphan | 425.00             | 0.2               | \$85.00            | Telephone conference regarding Respondent's brief                           |
| Katelyn Leeviraphan | 425.00             | 1.2               | \$510.00           | Research modification clauses and rewriting contracts for responding brief. |
| Katelyn Leeviraphan | 425.00             | 1.1               | \$467.50           | Research unenforceable modification clauses for responding brief.           |
| Katelyn Leeviraphan | 425.00             | 0.8               | \$340.00           | Research and draft joint status report regarding settlement negotiations.   |
| Katelyn Leeviraphan | 425.00             | 0.3               | \$127.50           | Revise joint status report and circulate to co-counsel.                     |
| <b>TOTAL:</b>       | --                 | <b>27.7</b>       | <b>\$11,772.50</b> | --                                                                          |