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Attorneys for Plaintiff
CARRELL (BILL) BILYEU

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF AMADOR

CARRELL BILL BILYEU, an individual,

Plaintiff,

v.

U.S. MINE CORP, a Nevada corporation;
and DOES 1-50 inclusive,

Defendants.

CASE NO. 20-CV-11946

DECLARATION OF SARAH K. STERLING,
ESQ. IN SUPPORT OF PLAINTIFF'S
APPLICATION FOR APPROVAL OF PAGA
SETTLEMENT

*[Assigned for all purposes to the Hon. J.S.
Hermanson/Dept. 03]*

Complaint Filed: December 23, 2020

DECLARATION OF SARAH K. STERLING, ESQ.

I, Sarah K. Sterling, declare the following:

1. I am an attorney duly licensed to practice law in the State of California. I am one of the attorneys representing Plaintiff Carrell Bill Bilyeu ("Plaintiff") in the above captioned action. I am an associate attorney at Frontier Law Center. Employment law has been my primary area of practice since August 2018. I have personal

1 knowledge of the facts in this declaration and if called on to testify about the facts I
2 could and would competently do so.

3 2. The parties attended mediation with experienced employment law mediator Hon.
4 David I. Brown (Ret.), JAMS – Sacramento. Through arm’s-length negotiations, and
5 after an extensive review of informal discovery and documentation, the parties
6 reached a resolution at mediation.

7 3. The case settled at mediation for \$30,180.00.

8 4. I believe this settlement is fair and reasonable given the facts of the case,
9 Defendants’ affirmative defenses, the risks that Plaintiffs faced in litigating this case
10 to trial, and based on my assessment as an experienced employment law attorney.

11 5. Plaintiff’s counsel has spent a significant amount of time litigating this case,
12 including time spent communicating with the client, evaluating and analyzing the
13 relevant legal theories, drafting and filing various PAGA letters, drafting and filing
14 the complaint, engaging in discovery, analyzing the time and payroll records, and
15 attending mediation. To date, I have logged 58 hours litigating this matter which, at
16 the reasonable rate of \$375/hour, totals approximately \$21,750 in fees.

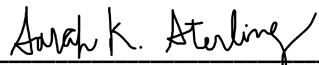
17 6. Plaintiff’s counsel expects to spend additional time on the settlement approval and
18 administration process as well.

19 7. The attorneys’ fees sought are therefore reasonable in light of the work put into this
20 case, the strong public policy furthered by litigating PAGA cases, and the general
21 complexity of litigating PAGA cases.

22 8. Based on the foregoing, the court should thus approve the PAGA settlement and
23 enter an order dismissing this action with prejudice.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct.

26 Date: January 4, 2022

27 
28 Sarah K. Sterling