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9 Attorneys for Plaintiff DIANA LOPEZ

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

DIANA LOPEZ, in her representative capacity,

Plaintiff,

vs.

WHITE MEMORIAL MEDICAL CENTER, a
business entity exact form unknown; and DOES
1 through 50, inclusive,

Defendants.

CASE NO.: 21STCV19484

[Assigned to Hon. Judge Curtis A. Kin, in
Department 72]

**DECLARATION OF NICOLE C.
BURGOS ROMERO, ESQ ISO
UNOPPOSED MOTION AND MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

Date: December 29, 2023

Time: 8:30 am

Dept: 72

Reservation ID: 253531346841

*[Filed Concurrently with the Notice of
Motion and Motion for Approval of
Settlement Order Approving Settlement of
Claims, [Proposed] Order Re Unopposed
Motion for Settlement Approval, and
Declaration of Michael Baltaxe, Esq.]*

Action Filed: May 24, 2021

Trial Date: None

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1. I am an individual resident of the County of Ventura, State of California, and am duly licensed to practice law in the State of California. I am an associate in the law firm of Sottile Baltaxe.

3. I graduated from Loyola Law School in 2021, with a concentration in Civil Advocacy. While in Law School, I was an extern at the Los Angeles Foundation for Legal Aid and Loyola's Center for Conflict Resolution. I also worked as a legal clerk for a Personal Injury and Civil Rights Firm.

5. I have been practicing plaintiff's employment law in California since February 2022.

7. As an associate at Sottile Baltaxe, I work on various aspects of litigation including, expounding and answering discovery, preparing clients for deposition, defending client positions, taking depositions, speaking to witnesses, conducting legal research, and motion practice.

- Defending Plaintiff's deposition;
- Analyzing the case and assessing the PAGA penalties;
- Meeting with Plaintiff to assess her claims;
- Handling Discovery and Drafting Meet and Confer Letter
- Drafting the damages portion on the mediation brief;
- Assisting in opposing the Motion for Summary Judgment, including but not limited to preparing the Separate Statement;
- Assisting in negotiations during the mediation session;

- Preparing and appearing for an Ex-parte Application to Continue Trial
- Preparing the Instant Motion;

9. I believe an appropriate and reasonable hourly rate for me in this matter would be three hundred dollars (\$300.00) per hour. I base this on my experience, my credentials, and my knowledge of the range of rates charged by other Plaintiff employment attorneys in this field.

10. I generally kept my time contemporaneously on spreadsheet.

11. A true and correct copy of the Time Sheet Compilation containing most of the time that I devoted to this matter through now, is attached hereto as **Exhibit 1.**

12. Accordingly, I have expended the following total hours, including anticipated hours on this matter:

My Total Attorney's Hours: 58.8

My Total Attorney's Fees at \$300.00 per hour spent: \$17,640.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct, and that this declaration was executed on October 18, 2023, at Agoura Hills, California.

/s/ Nicole C. Burgos Romero

Nicole C. Burgos Romero

EXHIBIT 1

Attorney:

Nicole Burgos Romero

DATE	ACTIVITY	HRS
12-24-2022	Defending Plaintiff's Deposition	5.00
01-20-2023	Analyzing the Case and Assessing PAGA Penalties	3.00
1-23-2022	Meeting with Plaintiff	1.0
01-23-2022	Assessing PAGA Penalties	3.5
01-24-2022	Calculating PAGA Penalties and Drafting the Damages Portion of the Mediation Brief	4.5
02-21-2023	Propounding Requests for Production of Documents, Set Two	.3
03-06-2022	Reviewing Defendant's Discovery Responses	4.0
03-08-2022	Drafting Meet and Confer Letter	1.5
04-12-2023	Drafting Meet and Confer Letter	2.0
01-26-2023	Assisting in negotiations during the mediation session	4.0
06-23-2023	Assisting in Opposing Defendant's Motion for Summary Judgment, including but not limited to preparing the Separate Statement	3.5
06-24-2023	Assisting in Opposing Defendant's Motion for Summary Judgment, including but not limited to preparing the Separate Statement	.5
06-27-2023	Assisting in Opposing Defendant's Motion for Summary Judgment, including but not limited to preparing the Separate Statement	4.0
06-30-2023	Preparing Ex-Parte to Continue Trial	2.0
07-05-2023	Assisting in Opposing Defendant's Motion for Summary Judgment, including but not limited to preparing the Separate Statement	8.5
07-06-2023	Appearing at Ex-Parte to Continue trial	.5
10-14-2024	Preparing Motion for Settlement Approval	5
10-18-2023	Finalizing Motion for Settlement Approval	6
		Total : 58.8

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 18 years of age and not a party to the within action. My business address is 28632 Roadside Drive, Suite 100, Agoura Hills, CA 91301.

On November 29 2023, I served, in the manner indicated below, the foregoing document described as **DECLARATION OF NICOLE C. BURGOS ROMERO, ESQ ISO UNOPPOSED MOTION AND MOTION FOR APPROVAL OF PAGA SETTLEMENT** on the interested parties in this action by placing true copies thereof enclosed in a sealed envelopes, at Agoura Hills, California, addressed as follows (or as stated on the attached Proof of Service Mailing List):

SEE ATTACHED SERVICE LIST

- ☐ **(BY MAIL)** I caused such envelopes with postage thereon fully prepaid to be placed in the United States mail at Agoura Hills, California. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter is more than one (1) day after date of deposit for mailing in affidavit (C.C.P. § 1013(a)).
- ☒ **(BY ELECTRONIC MAIL)** The document listed above was transmitted via electronic mail to the e-mail addresses set forth above, or as stated on the attached Proof of Service Mailing List. The transmission was reported as complete and without error (C.C.P. § 1010.6(a)(2)).
- ☐ **(BY OVERNIGHT COURIER):** I caused the above-referenced document to be delivered to FEDERAL EXPRESS for delivery to the addresses on the attached service list.
- ☐ **(BY PERSONAL SERVICE)** I caused such envelopes to be delivered by hand to the offices of the addressees (C.C.P. § 1011(a)(b)).

* * * * *

- ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the foregoing 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.

EXECUTED on November 29, 2023, at Agoura Hills, California.

/s/ Nicole C. Burgos Romero
Nicole C. Burgos Romero

SERVICE LIST

Sheryl L. Skibbe, Esq. Ashely D. Stein, Esq. VEDDER PRICE (CA) LLP 1925 Century Park East, Suite 1900 Los Angeles, California 99067 Telephone: (424) 204-7700 Facsimile: (424) 204-7702 sskibbe@vedderprice.com astein@vedderprice.com dpippo@vedderprice.com	Attorneys for Defendant WHITE MEMORIAL MEDICAL CENTER
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