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MESRIANI LAW GROUP

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Attorneys for Plaintiff Luis Lopez,
individually and on behalf of all others similarly-situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

LUIS LOPEZ, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

GE UNITED TECHNOLOGIES, LLC, a
Delaware Limited Liability Company d/b/a
GRASSDOOR, and DOES 1 through 10,
Inclusive,

Defendants.

Case No. 20STCV34691

ASSIGNED FOR ALL PURPOSES TO:
The Honorable William F. Highberger
Department SS10

CLASS ACTION

**DECLARATION OF RODNEY MESRIANI IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND ENTERING
JUDGMENT**

Date: October 24, 2022

Time: 11:30 a.m.

Dept.: 10

Judge: William F. Highberger

Complaint filed: September 11, 2020

Trial date: Not set

DECLARATION OF RODNEY MESRIANI

I, Rodney Mesriani, declare as follows:

1. I am an attorney duly licensed to practice law before all courts in the State of California. I am the Managing Attorney of Mesriani Law Group, A Professional Law Corporation and I represent Luis Lopez in this action. I have personal knowledge of the facts set forth herein and, if called and sworn in as a witness, could and would testify competently thereto.

2. I received a Bachelor of Science degree in Accounting from California State University at Northridge in 1993. I received a law degree from Southwestern School of Law in 1996. In law school, I was a law clerk for Judge William J. Rea of the United States District Court, Central Branch and also for the Department of Corporations.

3. I was admitted to the California State Bar in the fall of 1996. I am admitted to practice in all state courts in California, the Central District Court of California, and the Ninth Circuit.

4. I started Mesriani Law Group in 1997. My firm represents plaintiffs in individual employment disputes as well as complex and class action litigation, including wage and hour, labor and employment, consumer protection, and other public interest class actions. I have handled thousands of labor and employment cases over the last two decades. For years, I have been rated AV Preeminent by Martindale-Hubbell and have been a member of the prestigious Multi-Million Dollar Advocates Forum. I have been appointed Class Counsel in over a dozen wage and hour class actions.

5. I have been appointed as Class Counsel in the following proceedings: *Tasawar Abbas, et al. v. A-1 Security Screens, Inc.*, Los Angeles County Superior Court Case No. BC716439; *Michael Angelos, et al. v. City of Santa Monica*, Los Angeles County Superior Court Case No. BC627227; *Antonio Soto Jr., et al. v. H.T.L. Automotive, Inc., et al.* Los Angeles County Superior Court Case No. BC636374; *Laura Rubi, et al. v. Bergen Shippers Corp.*, Los Angeles County Superior Court Case No. BC715077; *Patricia Martinez v. Whaler LLC*, Los Angeles County Superior Court Case No. BC621047; *David Karayan, et al. v. Excel*

1 *Studios, LLC*, Los Angeles County Superior Court Case No. BC666586; *Joseph Jun Caballero,*
2 *et al. v. MLT, Inc.*, Los Angeles County Superior Court Case No. BC659936; *Ashley Singer, et*
3 *al. v. M.A.C. Cosmetics, Inc.*, San Diego County Superior Court Case No. 37-2019-00033695-
4 CU-OE-CTL; *Brandon Centino, et al. v. Arrowhead Products Corporation,* Orange County
5 Superior Court Case No. 30-2018-00988493; *Navid Bordbar, et al. v. Enterprise Rent-A-Car*
6 *Co. of San Francisco, LLC, et al.*, Orange County Superior Court Case No. 30-2017-00960085-
7 CU-OE-CXC; *Kevin T. Klein, et al. v. Loomis Armored US, LLC*, San Bernardino County
8 Superior Court Case No. CIVDS1704547, among others.

9 6. I continue to actively seek to develop my knowledge of California wage and
10 hour law and have taken many Continuing Legal Education classes related to wage and hour
11 law and class action law. I have been an active member of the Consumer Attorneys Association
12 of Los Angeles and the American Association for Justice, formerly the Association of Trial
13 Lawyers of America, and regularly consult with their members regarding cutting edge
14 developments in California wage and hour law.

15 7. I consider myself experienced and qualified to evaluate the Class claims and
16 viability of the defenses. Based on the history of the above-captioned case, and given my
17 experience and analysis, it is my view that the settlement is fair, reasonable, and adequate, and
18 in the best interest of the class members. Had the litigation not reached the proposed settlement
19 set forth in the Settlement Agreement, I, along with my co-counsel, would have continued to
20 prosecute the class' claims through certification, trial and beyond.

21 8. In this litigation, the Parties attended mediation with Todd A. Smith, a well-
22 regarded and experienced wage and hour class action mediator. Based on the history of this
23 case, and given our firm's extensive experience as class action employment and wage and hour
24 litigators, and having fully participated in the mediation facilitated by mediator Todd A. Smith,
25 it is our view that the proposed Settlement is fair, reasonable, and adequate and in the best
26 interest of the members of the Class. This experience has allowed co-counsel and my firm to
27 fully endorse the terms and conditions of the proposed settlement.

28 ///

1 9. I have devoted 57.0 hours to this action. My hourly rate is \$595.00 per hour.
2 Based on my own research and experience, this hourly rate is below the average/mean range of
3 the typical rates of a Los Angeles area law firm that practices complex litigation and is
4 consistent with, if not lower than, the prevailing rates for attorneys of similar experience, skill
5 and reputation. Attached as Exhibit A is a true and correct copy of my Time Records.

6 10. For example, several courts in this district have approved fee ranges into which
7 Class Counsel's rates easily fall. In 2011, *Hartless v. Clorox Co.*, 273 F.R.D. 630, 644 (S.D.
8 Cal. 20 2011), the Honorable Cathy Ann Bencivengo affirmed the rate of "\$675 for an
9 experienced partner's time." *Id* at 6442

10 11. Other California District Courts have approved even higher attorney fee rates.
11 For example, in *CLRB Hanson Indus., LLC v. Weiss & Assocs., PC*, 2012 WL20539 (N.D. Cal.
12 Jan. 5, 2012), the court found that the hourly rates of the two top billers to be reasonable at
13 \$1100 and \$850 per hour each. Case No. C0S-03649, Dkt. No. 342. Even though the
14 defendants appealed the attorneys' fee award, the Ninth Circuit affirmed the district court's
15 finding that the requested fees were justified. *CLRB Hanson Indus., LLC v. Weiss & Assocs.,*
16 *PC*, 2012 WL 20539, at *1.

17 12. My firm has incurred costs in the sum of \$801.60. Attached as Exhibit B is a
18 true and correct copy of my firm's Itemization of Costs.

19 I declare under the penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct and that this declaration is executed on
21 9/22/22, in Los Angeles, California.

22
23 

24 Rodney Mesriani

EXHIBIT A

MESRIANI LAW GROUP

a professional law corporation

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Rodney Mesriani, Esq.
Attorney for Luis Lopez

Billing Invoice:

Luis Lopez, et al. v. GE United Technologies, LLC, d/b/a Grassdoor

Case No.:
20STCV34691

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
7/2/2020 – 7/8/2020	Client Consultation and Fact Gathering	5.00	\$595.00	\$2,975.00
7/14/2020 – 7/18/2020	File Review and Legal Analysis	8.00	\$595.00	\$4,760.00
9/9/2020 – 3/17/2022	Multiple Conferences with Co-Counsel re: Strategy	2.00	\$595.00	\$1,190.00
9/9/2020 – 3/23/2022	Review various Pleadings, Motions, Discovery, Correspondence, and Provide Input	26.00	\$595.00	\$15,470.00
4/13/2021	Mediation Brief Review and Mediation Preparation	8.00	\$595.00	\$4,760.00
4/14/2021	Attended Mediation	8.00	\$595.00	\$4,760.00
	TOTAL:	57.0		\$33,915.00

EXHIBIT B

MESRIANI LAW GROUP

a professional law corporation

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Rodney Mesriani, Esq.
Attorney for Luis Lopez

Costs Invoice:

Luis Lopez, et al. v. GE United Technologies, LLC, d/b/a Grassdoor

Case No.:
20STCV34691

DATE	DESCRIPTION	INVOICE NO.	AMOUNT
1/8/2021	Case Anywhere – 20STCV34691	#208614	\$81.60
4/4/2021	Case Anywhere – 20STCV34691	#216838	\$120.00
7/2/2021	Case Anywhere – 20STCV34691	#225144	\$120.00
10/4/2021	Case Anywhere – 20STCV34691	#233513	\$120.00
1/5/2022	Case Anywhere – 20STCV34691	#241737	\$120.00
4/8/2022	Case Anywhere – 20STCV34691	#250047	\$120.00
7/7/2022	Case Anywhere – 20STCV34691	#258393	\$120.00
	TOTAL:		\$801.60