

AEGIS LAW FIRM, PC

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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

MATTHEW LUCCHESI and JULIO
CHAVEZ, individuals, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

KONE, INC., a Corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No. CGC-20-588225

**DECLARATION OF JESSICA L. CAMPBELL
IN SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF CLASS SETTLEMENT**

Hearing Date: May 4, 2022

Hearing Time: 9:30 a.m.

Dept: 302

Judge: Hon. Richard B. Ulmer Jr.

1 I, Jessica L. Campbell, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all of the courts of the State of
3 California. I am a partner with Aegis Law Firm, PC (“Aegis”), counsel for Plaintiffs in this matter. I
4 am thoroughly familiar with and have personal knowledge of all of the facts set forth herein.

5 2. I submit this declaration in support of Plaintiffs’ Motion for Preliminary Approval of
6 Class Action Settlement. If called as a witness, I could and would competently testify thereto.

7 3. After the instant case was filed, my office filed a class action for David Chang in October
8 2021 in the Superior Court of California for the County of Orange; Case No. 30-2021-01226194-CU-OE-
9 CXC.

10 4. Shortly after the filing of the *Chang* action, all of the Parties participated in mediation and
11 reached a global settlement.

12 5. Aegis Law Firm prosecutes wage and hour cases, including class actions on behalf of
13 employees and others who have had their rights violated. Aegis, either on its own, or with co-counsel is
14 currently serving as plaintiffs’ counsel of record in dozens of wage and hour and employment class
15 action cases pending in both state and federal court.

16 6. The attorneys working on this case have been appointed class counsel in many cases,
17 through both contested motions and settlement approval motions.

18 7. Aegis has litigated and successfully resolved many wage and hour class action cases
19 involving failure to pay wages and derivative Labor Code claims and penalties. *See, e.g., Roman, et al.*
20 *v. TRM Manufacturing, Inc.*, Riverside Superior Court, Case No. RIC1706458 (class certification granted
21 on December 17, 2020 for all current and former non-exempt workers’ on issues of rounding, meal period,
22 and rest period claims); *Gamboa v. Kamran, et al.*, San Bernardino Superior Court, Case No.
23 CIVDS1605273 (class certification granted on September 16, 2019, for factory workers on issues of
24 rounding, automatic deduction of first meal period, and second meal period); *Romo, et. al, v. GMRI, Inc.*
25 *d/b/a/ Olive Garden*, United States District Court Central District of California, Case No. EDCV-12-
26 0715-JLQ (class certification granted for restaurant workers’ rest period claims); *Sawyer v. Retail Data,*
27 *LLC*, Orange County Superior Court, Case No. 30-2014-00753767-CU-OE-CXC (unpaid wage and rest
28 break claims for piece rate workers); *Gonzalez v. SFFI Company, Inc., et. al*, San Bernardino County

1 Superior Court, Case No. CIV DS1504287 (unpaid wages, meal period and rest break claims for non-
2 exempt employees); *Antoine v. Riverstone Residential California, Inc., et. al*, Sacramento County
3 Superior Court, Case No. 34-2013-00155974 (rate of pay, on-call time, unpaid wage, meal period, rest
4 break, and expense reimbursement claims for non-exempt employees); *Nguyen v. Pharmerica*, Orange
5 County Superior Court, Case No. 30-2014-00716072-CU-OE-CXC (unpaid wages and unreimbursed
6 expenses for pharmacists); *Orellana v. Westlake*, Los Angeles County Superior Court, Case No.
7 BC539614 (unpaid overtime, meal period and rest break claims for call center employees); *Kent v.*
8 *Mountain View Child Care, Inc.*, Los Angeles County Superior Court, Case No. BC539633 (minimum
9 wage, overtime, meal period, and rest break claims for hospital workers); *Durroh v. East West Bank*,
10 Los Angeles County Superior Court, Case No. BC528860 (overtime claims for failure to include
11 bonuses in regular rate of pay for bank workers); *O'Brien et al. v. Pizza Hut of Southeast Kansas, Inc.*
12 *et al.*, Riverside County Superior Court, Case No MCC 1301030 (meal period and expense
13 reimbursement claims for delivery drivers); *Bell v. Prime Healthcare*, Orange County Superior Court,
14 Case No. 30-2011-00475240-CU-OE-CXC (overtime claims for failure to include shift premiums in
15 regular rate of pay and failure to provide meal and rest periods to hospital workers), *Grana v. Toys R*
16 *US-Delaware, Inc.*, Central District of California, Case No. 2:13-cv-01302-DSF-JCG (bag check claims
17 for unpaid wages and failure to provide meal periods and rest breaks to retail employees); *Mendez v.*
18 *H.J. Heinz Company, L.P., et. al*, Orange County Superior Court, Case No. 30-2013-00644915-CU-OE-
19 CXC (failure to pay all wages to factory workers due to rounding practice); *Fresh & Easy Wage and*
20 *Hour Cases*, Los Angeles Superior Court, Cas No. JCCP 4705 (failure to provide meal and rest periods
21 to supermarket workers); *Lunsford v Stater Bros.*, Riverside Superior Court, Case No. RIC 1104475
22 (failure to provide meal and rest periods to supermarket workers); *Gregg v. Belo*, Riverside Superior
23 Court, Case No. RIC 523697 (unpaid wages and missed meal and rest periods due to misclassification
24 of newspaper delivery employees); *Brown v. Experian Information Solutions, Inc., et. al.*, Orange
25 County Superior Court, Case No. 30-2012-00375163 (misclassification of engineers and similar
26 positions); *Tereth v. Shakey's USA, Inc.*, Los Angeles Superior Court, Case No. BC441359 (failure to
27 provide meal and rest periods to restaurant employees); *Azurin v. Harbor Distributing LLC, et. al.*, Los
28 Angeles Superior Court, Case No. BC421392 (failure to pay overtime wages, provide meal and rest

1 periods, reimburse business expenses to Account Managers); *Caffero v. ABC* (failure to provide meal
2 periods and reimburse expenses of therapists).

3 8. Samuel A. Wong is a graduate of University of Pennsylvania Law School, where he
4 received his J.D. in 2001. Mr. Wong received a Bachelors of Arts in Sociology from the University of
5 California at Berkeley in 1997.

6 9. After graduation from law school in 2001, the same year in which Mr. Wong took and
7 successfully passed the California Bar Exam, Mr. Wong moved to back to Los Angeles, California
8 where he was employed at Paul Hastings, Janofsky & Walker, LLP. While working in the employment
9 department at Paul Hastings, he was involved in numerous wage and hour class action lawsuits and
10 other employment related matters.

11 10. Mr. Wong became a founding partner of Aegis Law Firm, PC in 2003, and focused his
12 practice on plaintiff's side employment work. Throughout his years of practice, Mr. Wong represented
13 and obtained successful outcomes for his clients, including awards through arbitration and trial.

14 11. Mr. Wong is a member of the Orange County Bar Association, Orange County Trial
15 Lawyers Association, and California Employment Lawyers Association.

16 12. Mr. Wong was chosen by Law and Politics Magazine as a Super Lawyer Rising Star,
17 representing one of the top 2.5% of lawyers under 40 in Southern California in 2011, 2012, 2013, and
18 2014. He was chosen by Law and Politics Magazine as a Super Lawyer in 2015, 2016, 2017, and 2018.
19 Mr. Wong was also chosen as a Top Attorney in the field of employment law by OC Metro in 2014,
20 2015, and 2018.

21 13. Kashif Haque received his J.D. in 2001 from Washington University School of Law.
22 While in law school, Mr. Haque was a member of the Law Review Editorial Board, author of an article
23 published in the Law Review, Executive Board Member of Moot Court, and a member of the Dean's
24 List. He received a Bachelor's of Science in Business Administration from the University of Central
25 Missouri in 1998, where he was a member of the Beta Alpha Psi honors fraternity.

26 14. Since 2004, Mr. Haque has exclusively focused his practice on plaintiff's employment
27 litigation with a specific focus on wage and hour claims. Since then, he has represented over 500,000
28 employees with their employment claims, many of which included wage and hour claims. He has been

1 appointed class counsel in approximately 100 cases and is currently litigating over 150 employment
2 wage and hour class action cases.

3 15. Mr. Haque authored a book on employment litigation strategies with West Publishing
4 and has been invited to speak on class action and wage and hour issues on numerous occasions. He has
5 spoken at seminars by the State Bar of California, California Employment Lawyer's Association
6 (CELA), Orange County Bar Association, and various other CLE providers. Mr. Haque is the former
7 Chair for the Labor and Employment Section of the Orange County Bar Association. He was selected
8 as one of the Top 50 Attorneys in Orange County by Super Lawyers for 2017 and 2019. He has been a
9 Super Lawyer for every year from 2009 to the present. OC Register/Metro has selected him as one of
10 the Top 5 Employment Lawyers in Orange County for every year the list was published, from 2012 to
11 2018.

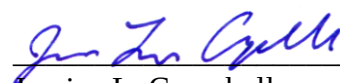
12 16. I am a partner at Aegis Law Firm. I was admitted to the California Bar in December of
13 2011, and received my J.D. from Santa Clara University School of Law and my B.A. from the University
14 of California, Berkeley. I have dedicated my career to plaintiffs' side class actions. My experience
15 includes successful work on class action appeals, class certification motions, and class settlements. I
16 was chosen by Law and Politics Magazine as a Super Lawyer Rising Star, representing one of the top
17 2.5% of lawyers under 40 in Southern California in 2018-2021.

18 17. Aegis Law Firm has performed significant work and expended litigation costs in
19 prosecuting the matter with no guarantee of any payment.

20 18. At final approval, Plaintiffs' Counsel will fully brief the merits of its request for the award
21 of attorneys' fees and litigation costs.

22
23 I declare under penalty of perjury under the laws of the State of California that the foregoing is
24 true and correct.

25 Executed on April 7, 2022 at Irvine, California.

26
27 
28 Jessica L. Campbell