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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

DANIELA GARIBAY, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

vs.

PACIFIC STEEL GROUP, a California
corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. CIVDS2011129

**DECLARATION OF EDWARD W.
CHOI IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

[Assigned to the Honorable Christian
Towns in Dept. S26]

Date: April 22, 2025
Time: 8:30 a.m.
Location: S26

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Attorneys for Plaintiffs Brandon Gay and Israel Berber

1 I, Edward W. Choi, declare as follows:

2 1. I am an individual over the age of 18. I am one of the attorneys of record for
3 Plaintiff Darren Morris (hereinafter referred to as "Plaintiff"). I have personal knowledge of the
4 facts set forth below and if called to testify I could and would do so competently.

5 2. Although Plaintiffs and their counsel are confident that litigation of the claims
6 would result in a representative judgment against Defendant, they recognize the inherent risks in
7 litigation, including the specific risks that class certification could be denied, liability could not
8 be established at trial, or the applicable law could change.

9 3. After taking into account sharply disputed factual and legal issues involved in
10 this litigation, the risks attending further prosecution, and the substantial benefits to be received
11 pursuant to the compromise and settlement of the litigation, I believe that settlement on the
12 terms hereinafter set forth is appropriate and in the best interests of the Parties and that this
13 settlement is fair and reasonable.

14 **ATTORNEY QUALIFICATIONS, FEES AND COSTS**

15 4. I am one of the primary attorneys on this matter. My qualifications are as
16 follows: I received my *Juris Doctorate* degree from UCLA Law School in 2000. Upon
17 graduation, I joined the law firm of Lee & Associates in Los Angeles, California as an associate.
18 I started my own practice in October 2004.

19 5. During the course of my practice, I have primarily represented consumers and
20 obtained millions of dollars in recovery for my clients. I have handled numerous wage and hour
21 cases during my career. Since 2009, I have been certified as class counsel and granted final
22 approval in numerous wage and hour cases including, but not limited to, *Choi, et al. v. Midway*
23 *International Inc.*, et al. LASC Case No. BC394495; *Garcia, et al. v. RGIS, LLC, et al.* LASC
24 Case No. BC 425624; *Cabrera v. Frazee, et al.* LASC Case No. BC 440309; *Vo, et al. v. The*
25 *Party Staff, et al.* OCSC Case No. 30-2011-00444836-CU-OE-CXC; *Oh, et al. v. Best Coach*
26 *Technologies, Inc., et al.* LASC Case No. BC 462848; *Rawley v. Freedom Mortgage, Inc.*
27 Orange County Superior Court Case No. 30-2014-00724164-CU-OE-CXC; *Castro v.*
28 *Continental Airlines*, USDC Central District Case No. 2:14-CV-00169-SVW-AGR; *Barreras v.*

1 *Michaels Stores, Inc.* USDC – Northern District Case No. C12-04474 PJH, *Dynabursky v.*
2 *AlliedBarton Security Services, LP, et al.*, SACV 12-02210 JST (RNBx), *Brown v. CVS*
3 *Caremark, et al.* United States District Court, Central District, Case No.: 2:15-cv-07631-JFW-
4 PJW; *Castillo v. Sheraton Operating Corporation*, USDC, Central District of California Case
5 No. 2:17-cv-07091-FMO-AS; *Zepeda v. Ulta Salon, Cosmetics & Fragrance, Inc.* USDC,
6 Eastern District of CA, Case No. 1:18-cv-00750-DAD; *Audycki v. Stanford Health Care, Inc.*
7 Santa Clara Superior Court, Case No. 19CV347173 and *Medina v. United Airlines, Inc.* Los
8 Angeles Superior Court, Case No. BC 624742.

9 6. My current billing rate is \$900.00 per hour, which is typical of attorneys in the
10 Los Angeles community that have been practicing for 24 years. In fact, I have personal
11 knowledge, many of my colleagues from UCLA Law School and opposing counsel are currently
12 billing at rates much higher than \$900.00 per hour. Since 2024, I have been previously
13 approved at \$900.00 per hour in *Bolding v. Cardinal Financial Company*, San Bernardino
14 County Case No. CIVSB2206543; *Harris v. American Freight Management Company, LLC*,
15 Sacramento Superior Court Case No. 34-2022-00329805; *Marin v. Sea World, LLC*, San Diego
16 Superior Court Case No. 37-2021-00047859-CU-OE-CTL; *Krishna v. Cepheid*, Santa Clara
17 Superior Court Case No. 22CV397316; and *Ismail v. American Airlines, Inc.* USDC Central
18 District of California, Case No. 2:22-cv-01111-KK-JPR.

19 7. To date, I have billed approximately 129.70 hours in connection with this
20 litigation including drafting correspondences, emails, pleadings and discovery along with
21 meeting and conferring with opposing counsel, and attending three mediations. I also anticipate
22 approximately 10 more hours to prepare for and attend the final approval hearing, and
23 coordinating the disbursement of the settlement funds. Thus, my total lodestar is \$125,730.00.
24 Attached hereto as Exhibit A is my time and task chart.

25 8. I am seeking reimbursement of \$2,041.79 for filing fees, attorney service fees,
26 and anticipate costs to finalize this matter. Attached hereto as Exhibit B is my firm's cost sheet.

27 9. My firm and I do not have any interests or involvement within the governance or
28 work of the Justice Gap Fund maintained by The State Bar of California.

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2 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
3 March 19, 2025, at Los Angeles, California.

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EXHIBIT A

Morris, et al. v. Pacific Steel Group
San Bernardino Superior Court Case No. CIVDS2011129
Time and Task Chart for Edward W. Choi

Hours	Description of Work
1.5	Review file and client documents
2.5	Review/revise Class Action Complaint; Confer with co-counsel
1.2	Review/revise First Amended Complaint
0.5	Review emails to set up meet and confer with opposing counsel
0.7	Review/revise Stipulation to file FAC
3.5	Draft Special Interrogatories and Request for Production of Documents
2.8	Review/revise responses to Interrogatories, Request for Admissions and Request for Production of Documents; Confer with client
5.5	Review discovery responses, review and index document production, review/revise meet and confer letter
1.2	Review/revise response to Defendant's meet and confer letter regarding Plaintiff's discovery responses; confer with co-counsel
1.5	Review emails to and from opposing counsel regarding meet and confer on outstanding discovery
1.0	Review/revise CMC Statement
0.8	Prepare for and attend Status Conference
1.5	Confer with counsel on other matters regarding joint mediation
1.2	Review/revise Joint CMC Statement
3.5	Review data and document production for mediation
1.1	Emails to schedule call and engage in call with co-counsel on other cases
1.8	Review/revise Mediation Brief
1.5	Confer with co-counsel regarding additional data points for expert analysis and continue reviewing/revising mediation brief
7.0	Attend mediation with Robert O'Brien
1.0	Review/revise Joint CMC Statement
2.3	Confer with co-counsel on Joint Prosecution Agreement, review/revise agreement
1.2	Review and response to multiple emails to schedule a second mediation
2.3	Review further production of documents for second mediation
1.2	Review/revise Mediation Brief

2.5	Review mediation analysis documents and confer with co-counsel regarding mediation
6.5	Attend second mediation
1.2	Draft Joint Status Conference Statement; confer with opposing counsel
1.5	Continue meet and confer regarding outstanding discovery issues with new counsel for defendant
0.9	Review/revise Protective Order
0.8	Review/revise Belaire Notice; confer with co-counsel
1.2	Review/revise Stipulation to continue MSJ and CMC; confer with co-counsel and opposing counsel regarding the same
2.7	Review/respond to emails regarding scheduling a third mediation
1.3	Review/revise Stipulation to continue class certification motion deadline and case management conference
1.7	Review/revise Notice of PMK deposition; confer with co-counsel regarding the same; review/respond to emails from defense counsel
0.5	Conference call with counsel on other matters regarding mediation and case status
1.6	Review/revise stipulation regarding class list; confer with opposing counsel regarding revisions
1.2	Review and response to multiple emails to schedule a second mediation
2.3	Review further production of documents for second mediation
1.2	Review/revise Mediation Brief
2.5	Review mediation analysis documents and confer with co-counsel regarding mediation
8.0	Attend second mediation
1.8	Confer with all counsel regarding the mediator's proposal
2.5	Review/revise Amended Complaint to consolidate cases
12.5	Review/revise long-form settlement agreement; confer with opposing counsel regarding terms therein; review revisions and further revise; Draft supporting declaration
12.8	Draft motion for preliminary approval, proposed order, and supporting documents; further review and revise same.
1.2	Draft Supplemental Declaration
1.5	Review emails from class action administrator and draft notice forms
3.0	Confer with class members regarding the settlement

8.5	Review/revise motion for final approval, proposed order, and supporting documents; further review and revise same.
129.7	<u>TOTAL HOURS</u>

EXHIBIT B

Client Trust Liability: Morris v. Pacific Steel Group

Date	Payee	Memo	Amount
06/24/2020	One Legal	Complaint & Complex Fee	\$1,490.32
07/13/2020	One Legal	Service of Process	\$ 83.60
07/14/2020	One Legal	Proof of Service Filing	\$ 7.96
08/31/2020	One Legal	Stipulation to file FAC	\$ 34.22
04/06/2021	One Legal	FAC filing	\$ 9.88
04/08/2021	One Legal	CMC Statement	\$ 13.18
04/19/2021	Court Call	Status Conference	\$ 94.00
07/08/2021	One Legal	CMC Statement	\$ 13.18
02/18/2022	One Legal	Joint Status Report	\$ 13.18
05/26/2022	One Legal	Joint Status Report	\$ 14.41
10/07/2022	One Legal	P's CMC Statement	\$ 12.77
05/11/2023	One Legal	P's CMC Statement	\$ 13.14
10/28/2023	One Legal	CMC Statement	\$ 12.31
	San Diego Superior		
12/05/2023	Court	Minute Order	\$ 1.00
10/24/2024	One Legal	Status Report	\$ 17.77
10/30/2024	One Legal	Motion for Prelim Approval	\$ 80.75
11/07/2024	One Legal		\$ 12.35
11/08/2024	One Legal	Supp Decl	\$ 17.77
	Anticipated Costs to Finalize		\$ 100.00
	Total		\$2,041.79

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Attorneys for Plaintiffs Brandon Gay, Israil Berber, and Darren Morris

☐ **BY MAIL (ENCLOSED IN A SEALED ENVELOPE):** I deposited the envelope(s) for mailing in the ordinary course of business at Los Angeles, California. I am “readily familiar” with this firm’s practice of collection and processing correspondence for mailing. Under that practice, sealed envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

☒ **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

☐ **BY PERSONAL SERVICE:** I delivered the document, enclosed in a sealed envelope, by hand to the offices of the addressee(s) named herein.

☐ **BY ELECTRONIC SERVICE:** I caused the document(s) to be transmitted electronically via One Legal eService to the individuals listed above, as they exist on that database. This will constitute service of the document(s).

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

Executed this **March 28, 2025**, at Los Angeles, California.

Stacy Winberg
Type or Print Name

/s/ *Stacy Winberg*
Signature