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MATERN LAW GROUP, PC

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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

CHRIS FARLEY, IRENE IMSON, SHELBY
WARD, and DARLENE GRIFFITH,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiff,

vs.

SHARP MEMORIAL HOSPITAL, a
California corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No. 37-2021-00006007-CU-OE-CTL

[Consolidated with Case No. 37-2021-
00047190-CU-OE-CTL]

**DECLARATION OF LAUNA ADOLPH
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: December 1, 2023
Hearing Time: 8:30 a.m.

Judge: Hon. Robert Longstreth
Dept: 65

Action Filed: February 9, 2021
Trial Date: Not set

DECLARATION OF LAUNA ADOLPH

I, LAUNA ADOLPH, hereby declare as follows:

1. I am an attorney at law, licensed to practice in the State of California. I am a senior associate at Matern Law Group, PC (“MLG”), counsel of record for plaintiff Irene Imson (“Imson”) in the above-entitled action.

2. I make this declaration on the basis of personal firsthand knowledge unless another source of information or belief clearly appears from the context, and as to all such matters, I believe them to be true. If called as a witness, I could and would readily and competently testify to all matters stated herein.

3. I submit this declaration in support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement.

ADEQUACY OF REPRESENTATION AND QUALIFICATIONS OF CLASS COUNSEL

5. MLG is a 24-attorney law firm that is actively and continuously practicing in employment litigation, almost exclusively representing employees in both individual and class actions in both state and federal courts throughout California.

6. MLG is qualified to handle this litigation because the firm is experienced in litigating Labor Code violations in both individual and class action cases. MLG has handled, and is currently handling, numerous wage and hour class action lawsuits.

7. Matthew J. Matern received a B.A. with honors in 1986 from Tulane University. Mr. Matern received his J.D. from Southwestern University School of Law in 1991. Mr. Matern became an active member of the State Bar of California in September 1992, and has been an active member in good standing continuously since then. He has been practicing as a litigation attorney in Los Angeles since 1992, and has been concentrating on employment litigation since approximately 1997.

8. In 1992, Mr. Matern founded the general partnership which later became known as Rastegar & Matern, Attorneys at Law, A Professional Corporation. In 2012, he founded the Law Offices of Matthew J. Matern, which changed its name to Matern Law Group in January 2014, and then to Matern Law Group, PC in May 2016. Since 1992, Mr. Matern has been

1 heavily, successfully, and continuously involved in active litigation and trial work, including
2 extensive work in employment litigation and wage and hour class actions.

3 9. Over the course of his career, Mr. Matern has been involved in over 100 class
4 action settlements, with many of them settling in the seven figure range, including settlements in
5 the amount of \$140 million, \$50 million, \$26 million, \$18 million, \$8.5 million, \$7.0 million,
6 \$6.0 million, \$6.0 million, \$5.0 million, \$4.5 million, \$4.5 million, \$4.2 million, \$4.2 million,
7 \$3.75 million, \$3.75 million, \$3.6 million, \$3.3 million, \$3.1 million, and \$3.0 million. Mr.
8 Matern has represented clients in numerous wage and hour class action lawsuits that settled with
9 per-class-member recoveries in a range similar to the anticipated per-class-member recovery in
10 the instant case. He has also been appointed class counsel in over 20 certified wage and hour
11 class action cases which involved contested certification proceedings.

12 10. Mr. Matern has been counsel in a number of cases which resulted in published
13 appellate victories including *Zuniga v. Alexandria Care Center, LLC* (2021) 67 Cal.App.5th 871;
14 *Meeks v. AutoZone, Inc.* (2018) 24 Cal. App. 5th 855; *ABM Industries Overtime Cases* (2017) 19
15 Cal. App. 5th 277; *Julian v. Glenair, Inc.* (2017) 19 Cal. App. 5th 277; *Franco v. Athens Disposal*
16 *Company, Inc.* (2009) 171 Cal. App. 4th 1277; *Gutierrez v. California Commerce Club*, (2010)
17 187 Cal. App. 4th 969; *Pantoja v. Anton* (2011) 198 Cal. App. 4th 87; *Fuentes v. AutoZone, Inc.*,
18 (2011) 200 Cal. App. 4th 1221; *Ventura v. ABM Industries, Inc.* (2012) 212 Cal. App. 4th 258;
19 and *Franco v. Arakelian Enterprises, Inc.* (2012) 211 Cal. App. 4th 314; and other non-published
20 appellate victories.

21 11. Mr. Matern has personally tried approximately 25 cases, including approximately
22 20 jury trials.

23 12. Mr. Matern's work has led him to be recognized as a Southern California Super
24 Lawyer every year since 2009.

25 13. I am a senior associate at MLG. I graduated from the University of California,
26 Los Angeles in 2000 and received my J.D. from Loyola Law School in 2003. I have been an
27 active member of the California State Bar in good standing since December 2003. I am also
28 admitted to practice in Illinois. I have 20 years of experience handling wage-and-hour and

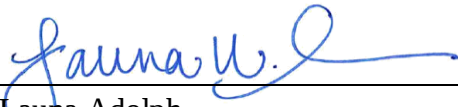
1 consumer class actions, and have been appointed class counsel in scores of cases in state and
2 federal courts in both California and New York. I have been appointed class counsel in over 10
3 wage and hour cases involving contested class certification proceedings. I was part of the trial
4 team in a certified wage and hour class action trial alleging claims for failure to pay overtime
5 wages, which settled post-trial for \$26 million. I am a Fellow in the Litigation Counsel of
6 America. My work has led me to be recognized as a Southern California Super Lawyer each year
7 since 2014 and as a Southern California Rising Star in 2013.

8 14. I am not aware of any conflicts of interest between MLG and the class members.

9 15. I do not have any interest in or connection to the cy pres recipient, San Diego
10 County Bar Foundation, and I do not have any actual or potential conflicts of interest with the cy
11 pres recipient. I also am not aware of any actual or potential conflict of interest between any
12 member of my firm and the cy pres recipient.

13 16. I do not have any interest in or connection to the settlement administrator, ILYM
14 Group, and I do not have any actual or potential conflicts of interest with the settlement
15 administrator. I also am not aware of any actual or potential conflict of interest between any
16 member of my firm and the settlement administrator.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct. Executed on November 3, 2023 at Manhattan Beach, California.

19
20 
21 Launa Adolph