

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com
Peter J. Carlson, Esq. [CSB No. 295611]
peter@lmlfirm.com
LAUBY, MANKIN & LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

JOE GUZMAN, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

DECKERS OUTDOOR CORPORATION, a
Delaware Corporation; and DOES 1 through
20, inclusive;

Defendants.

Case No.: CVRI2100707
*[Assigned to Hon. Craig Riemer for all
Purposes]*

**DECLARATION OF PETER J.
CARLSON IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

I, Peter J. Carlson, state and declare:

1. I am an attorney duly licensed to practice law in the State of California and am a senior associate at Lauby, Mankin & Lauby LLP, attorneys of record for Plaintiff Joe Guzman ("Plaintiff"). I am fully familiar with the facts of this case and submit this declaration in support of Plaintiff's Motion for Final Approval of this Class Action Settlement. The matters set forth herein are based upon my personal knowledge and, if called upon as a witness, I could and would give competent testimony with respect to the matters contained herein.

///

///

1 QUALIFICATION OF COUNSEL

2 2. I graduated from the University of Oregon School of Law in May 2013 and have
3 been a member, in good standing, of the State Bar of California since January 2014. I am
4 licensed to practice before all courts of the State of California and am admitted to practice in the
5 United States District Court for the Central District of California and have litigated cases in
6 various courts and counties throughout California, including successful briefing and argument in
7 the Court of Appeal.

8 3. I began working at Fernandez & Lauby LLP (the predecessor of Lauby, Mankin
9 & Lauby LLP) in March 2016 and, since that time, my practice has consisted solely of
10 representing employees. The vast majority of my cases have been litigated as class actions,
11 representative PAGA actions, or a combination of the two.

12 4. I have been the handling attorney on over 130 class action and/or representative
13 PAGA actions. And, on these cases, myself and/or my firm have been appointed Class Counsel
14 on over 50 cases, and have helped negotiate settlements totaling over \$72,500,000 for my clients,
15 the employees, and the State of California.

16 5. I was the handling attorney for the second largest PAGA-only settlement in
17 California's history – a \$12.5 million-dollar court approved settlement, which followed extensive
18 litigation, summary adjudication and writs to the CA Supreme Court against a Fortune 50
19 company (*Garcia v. Macy's*, San Bernardino Superior Court Case No. CIVDS1516007).

20 6. I have tried two major class and PAGA cases against Fortune 100 companies. In
21 2018, I was the handling attorney on a PAGA-only case in Orange County where my firm
22 succeeded on a motion for summary adjudication and litigated through trial to obtain a \$425,000
23 judgment for over 1,600 aggrieved employees. Also, in 2019, I was the handling attorney for my
24 firm on a class action against Walmart, where we obtained class certification on behalf of over
25 5,000 employees. After extensive litigation, the matter went to trial, and the jury returned a
26 verdict of approximately \$6.1 million on the meal period claims.

27 7. Additionally, I have handled approximately 6 cases for which we received class
28 certification orders following contested certification motions concerning similar claims.

13. My requested rate is also reasonable, consistent, and less than the rate found in the Laffey Matrix (www.laffeymatrix.com), which indicates that the benchmark rate for an attorney that graduated law school in 2013 is \$676 per hour.

14. My hourly rate has been approved by various courts in California, including the following non-exhaustive list of recent settlements for which I have been the handling attorney:

a. *Woods, et al. v. Just In Time Cargo, Inc.*, San Bernardino Superior Court, Case No. CIVDS200750 (June 8, 2022) (\$450,000 wage-and-hour class and PAGA settlement approved with lodestar cross-check of \$575 rate);

b. *Torres, et al. v. ePac Los Angeles, LLC, et al.*, San Bernardino Superior Court, Case No. CIVDS2017140 (April 19, 2022) (wage-and-hour class and PAGA settlement approved with lodestar cross-check of \$575 rate);

c. *Finger v. Professional Registry Holdings, LLC, et al.*, Riverside Superior Court, Case No. CVRI2101956 (June 28, 2022) (\$500,000 wage-and-hour class and PAGA settlement approved with lodestar cross-check of \$575 rate);

d. *Carrillo v. BluSky Restoration Contractors LLC*, San Bernardino Superior Court, Case No. CIVSB2105793 (June 29, 2022) (\$360,000 PAGA-only settlement approved with lodestar cross-check of \$575 rate).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 12, 2022, at Riverside, California.

By:


Peter J. Carlson