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Attorneys for DAISY SOLANO,
on behalf of herself, all others similarly situated,
and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

DAISY SOLANO, on behalf of herself and
all others similarly situated, and on behalf of
the general public,

Plaintiff,

v.

GOODWILL SERVING THE PEOPLE OF
SOUTHERN LOS ANGELES COUNTY,
and DOES 1 through 100, inclusive,

Defendant.

Case No.: 21STCV19280

**DECLARATION OF MOHAMED
ELDESSOUKY IN SUPPORT OF
ATTORNEY FEES**

Date: June 7, 2022

Time: 8:30 a.m.

Dept: 73

Judge: Hon. Ann I. Jones

Action Filed: May 25, 2021

Trial Date: None Set

1 I, MOHAMED ELDESSOUKY, declare as follows:

- 2 1. I am counsel of record for Plaintiff Daisy Solano in the above-captioned matter. I am duly
3 admitted to practice before all the courts of the state of California. The following facts are within
4 my personal knowledge and, if called to testify, I could and would competently testify thereto.

5
6 **PROFESSIONAL AND LEGAL EXPERIENCE**

- 7 2. I obtained my bachelor's degree at the University of California Irvine. During my time there I
8 was heavily involved in my community and campus. In my fourth year, I was an instructor to
9 first-year students on courses pertaining to professional development and time management.
10 During my time as an instructor, I was tasked with creating a syllabus, course materials and
11 exams all while actively engaging students during lectures. During my last year at UCI, I served
12 as Student Body President for roughly twenty-five thousand students. During my tenure as
13 President, I introduced various spending measures for the campus, lobbied for statewide
14 legislation, supported teachers' pay, and served as the conduit between the U.C. Regents and
15 students across the state of California. Beyond my involvement in student government I was
16 also founder of several on-campus organizations and mentor to local high school students in
17 Santa Ana. Soon after graduating college I would intern for the American Leadership Academy
18 where I would again lecture to college students on the importance of time management, general
19 college curriculum, and host breakout session with various industry leading executives.

- 20 3. I attended McGeorge School of Law at the University of Pacific. I graduated in 2012 while on
21 dean's list. During law school I studied and worked abroad. During my first summer of law
22 school I interned with the University of Parma, Italy where I co-wrote a paper for the World
23 Bank on the topic of expert testimony. Also, while at the university of Parma I co-instructed
24 courses on intro to U.S. Law to Italian lawyers. That same summer, I attended courses at the
25 University of Salzburg, Austria where I studied constitutional law at the direction of Supreme
26 Court Justice Anthony Kennedy. As a lecturer, Justice Kennedy often engaged our class in live
27 debate on the most controversial constitutional issues pertaining to the U.S. During law school
28 I was also a Summer Associate for Baker & McKenzie. As a summer associate I was able to

1 further my knowledge of contract and corporate law. With both my academic and practical
2 training during law school, I feel I provide a unique skill set that allows me to best serve all my
3 clients. Because of my familiarity with corporate structures I find it easier to better understand
4 commonality amongst corporate defendants with respect to structure and implantation of
5 policies.

6 4. Since becoming a licensed attorney, I have focused my efforts on litigation and representing
7 Plaintiffs in California. Thus far, I have attended a total of three trial academies: California
8 Employment Law Association Trial Academy (Focused on just employment law); Consumer
9 Attorneys Association of Los Angeles Trial Academy (CAALA PTA); and the Orange County
10 Bar Trail Academy. There I was trained by some of the nation's top litigators on all aspect of
11 trial. Between all three programs the time spent spans to nearly 1 year of training. I know that
12 graduating from these academies has brought tremendous value to my litigation skills and
13 consequently the level of service to all my clients. Beyond the trial academies, each of the
14 above-mentioned organizations offer seminars to its members to provide guidance on the
15 changes in law and best practices which I regularly attend.

16 5. I am heavily involved in the legal community as I am an active member of Los Angeles Trial
17 Lawyers Charities (LATLC); Consumer Attorneys Association of Los Angeles (CAALA);
18 California Employment Law Association (CELA); Orange County Trial Lawyers Association
19 (OCTLA); Consumer Attorneys of California (CAOC); and the National Employment Lawyers
20 Association (NELA).

21 6. Just recently I was awarded 2021 Top Gun / Trial Lawyer of the Year for OCTLA. This award
22 is the most notable award for OCTLA and the result of significant vetting and competition. The
23 decision makers behind this are amongst the best trial lawyers in the state. My award marks the
24 first time in a decade that an employment attorney was given the award.

25 7. I was a top finalist for CAALA's Rising Star Award in 2019 and was again just nominated for
26 this award in 2021. There are only five attorneys who made this list from all of CAALA.

27 8. Both nominations are prestigious awards reserved for those dedicated to their craft and to the
28 representation of deserving clients. I am honored to be recipient of these nominations and will

1 continue to dedicate my practice to serving people in my community.

2 9. In the past years, I attended Justice Day in Sacramento as a member of CAOC and held various
3 meetings with assemblymen/assemblywomen and Senators to discuss various bills affecting
4 millions of employees here in California. During that same trip myself and various colleagues
5 engaged Governor Newsom on the importance of such things such as AB5 and continued
6 funding for our courts and their staff. After successful lobbying, Gov. Newsom officially signed
7 AB5 into law. I also plan on attending this year's CAOC conference in San Francisco to further
8 contribute to organization and obtain further education on developing law.

9 10. With respect to CAALA I've served as a member of the Diversity Committee as well as New
10 Lawyers Ambassador. Currently I am Vice Chair of the Diversity and Inclusion committee.
11 Here I am tasked with discussing innovative ways to make sure attorneys of all backgrounds
12 are properly represented. Most recently I have engaged various local high school to work with
13 CAALA so we may get in front of young students to encourage their inclusion into our field.
14 "You can't be what you don't see". As a New Lawyer Ambassador, I set time aside to counsel
15 and mentor young attorneys to the organization and aid those seeking to better under the
16 resources available to them.

17 11. In May of 2021 I spoke in front of roughly 200 high seniors about the importance of diversity
18 in the field of law and the general functions of being an attorney. Currently I am working with
19 judges and the L.A. Superior court to schedule Power Lunches and sponsored events for Teen
20 Court to extend our outreach in the local community.

21 12. With regards to CELA, I currently sit on the Mentorship Committee which is tasked with
22 connecting new employment attorneys with experienced attorneys. Through the committee's
23 work, we continue to increase quality lawyering and diversity within the legal profession as a
24 whole, and more specifically within the plaintiffs' employment bar.

25 13. In 2019 I had the honor of speaking at the CELA conference in San Jose, California. CELA is
26 a statewide organization of approximately 1,200 attorneys who devote the majority of their
27 practices to representing employees in individual and class actions, including cases involving
28 unpaid wages, discrimination, harassment, retaliation and whistleblowing.

1 14. For last year I have served as an Executive Committee member to LACBA's Small Firm
2 committee.

3 15. I have been lead counsel in hundreds of actions involving violations of California's wage and
4 hour laws as well FEHA causes of action. Most matters I handle are related to disability
5 discrimination, harassment, and wrongful termination. I have made it a point to be as
6 knowledgeable as possible on this subject matter and pride myself on often providing skilled
7 counsel to not just clients but also attorneys in my field. I have represented hundreds of
8 employees with a large majority of them receiving considerable compensation for their losses.
9 I was lead trial attorney on 4 cases which went to verdict in the last 24 months. Two that reached
10 an award in arbitration in the last 16 months.

11 16. In June of 2019, I was court approved for \$550/hour by Honorable Michael M. Markman in
12 the class actions matter of *Manuel Cabral vs. Numark Transportation, Inc* Case No.
13 RG1785230. Over the last three years my hourly rate has now become \$650.00/hour. From my
14 dealings with attorneys both in Los Angeles and Orange County with similar experience I
15 understand this rate to be reasonable and commonly approved by courts. This is also the rate I
16 commonly charge clients who need counsel on matters which do not necessarily require
17 litigation. This rate is competitive given the rates of other competing offices in both Los Angeles
18 and Orange County.

19 17. In May of 2019, I was lead trial counsel on the matter of *Scricca v. U.C. Regents* Case No. 30-
20 2017-00899789-CU-WT-CJC. The case was primarily a Disability Discrimination, Reasonable
21 Accommodation, and Interactive Process matter where the Plaintiff Ms. Scricca who was deaf
22 in one ear was accused of nursing incompetence shortly after budgetary changes at U.C.I.
23 Medical center. Nearly every witness who took the stand had provided some form of a statement
24 made against the Plaintiff with supporting documentation. Because of this, impeachment of
25 witnesses required extensive review of the statement, supporting documents, as well as those
26 statements of others to draw contradictions and inconsistencies. Ultimately it was through these
27 efforts that Plaintiff was in fact able to bring into question many of the allegations made against
28 her. The case was also particularly difficult, because Defendant was a sympathetic public entity

1 – The Regents of The University of California, and, during the voir dire, a few jurors expressed
2 reluctance to award money damages against The Regents. Defendant was represented at trial
3 by two very able and experienced trial attorneys, one a partner at the firm, and the other a
4 shareholder and name partner as well as a trial attorney since 1979. After a 3-week trial and
5 award of attorney fees my office obtained a judgment for over \$1.5M.

6 18. In 2021 I was again approved for \$650/hour following an arbitration award with AAA in the
7 matter of *Pavloff v. AmWest*.

8 19. Since obtaining this verdict and award I have regularly settled cases either by way of direct
9 negotiations or through mediation in excess of \$5M.

10 20. I am also heavily involved in legal community as I am an active member of Los Angeles Trial
11 Lawyers Charities (LATLC), Consumer Attorneys Association of Los Angeles (CAALA), and
12 Consumer Attorneys of California (CAOC). Just a few weeks ago I attended Justice Day in
13 Sacramento as a member of CAOC and held various meetings with assemblymen and Senators
14 to discuss various bills affects millions of employees here in California. I have been Plaintiff's
15 counsel in many actions involving violations of California's wage and hour laws. My
16 experience includes litigating through verdict. Besides those settled through mediation, I have
17 litigated several wage and hour matters. For example, I have been involved as lead counsel for
18 plaintiffs in the following actions involving wage and hour violations under California law:
19 *Contreras v. Felix Continental Cafe, et al. Case No. 30-2019-01067425-CU-OE-*
20 *NJC; Dominguez v. Chan Lee, an individual, et al. Case No. 30-2019-01058952-CU-WT-*
21 *CJC; Dunn v. California One Hospitality, Inc., et al. Case No. 30-2018-00967145-CU-WT-*
22 *CJC; Gallardo v. Lascari's and Sons, Inc. Case No. BC661442; Garcia v. Top Line MFG., Inc.*
23 *Case No. 19CMCV00057; Gonzalez v. Longhorn Construction Services, Inc. Case No. 30-2018-*
24 *00980561-CU-WT-CJC; Hughes v. Manufacturing Automation & Software Systems, Inc. Case*
25 *No. PC057274; Kilmaster v. Kai Hospitality, Inc., a California corporation, et al. Case No.*
26 *BC689045; Rosales v. CDS Lawyers a Professional Corporation, et al. Case No. 30-2018-*
27 *01029764-CU-WT-CJC; Rosales v. The Kroger Co., et al. Case No. 30-2019-01052276-CU-*
28 *WT-CJC; Torres v. Buena Park Automotive Case No. 30-2018-00967208-CU-WT-CJC; Zia v.*

2 **WORK PERFORMED AND RISK UNDERTAKEN IN THIS CASE**

3 21. As an employment attorney, all my cases are very fact intensive and dense with paperwork. All
4 the above-mentioned cases required thorough review and indexing of personnel files prior to
5 following up with the client. Often the information presented in an initial production will not
6 provide the full pictures and often requires further discovery motions. It is for this reason I
7 carefully review all produced documents with my clients to ensure full compliance.

8 22. Here, the Plaintiff Daisy Solano contacted my office shortly after being terminated. During my
9 initial consultation I spent extensive time getting to know the details of the Ms. Solano's
10 working conditions, job responsibilities, and overall process about going and coming from
11 work.

12 23. After Ms. Solano was retained, I began to conduct research on the applicable law, cases similar
13 to this particular defendant, and also the executive management team who sent various emails
14 to Ms. Solano. Shortly after this initial investigation my office was in receipt of her personnel
15 file where we further researched her employment and history with Defendant.

16 24. Through out this process several conversations were had with Ms. Solano and me to obtain
17 relevant information towards working up this case and providing updates along the way. This
18 includes emails, phone calls, and the collections of various documents.

19 25. On March 31, 2022, we attended a mediation in hopes of resolving this case. Before attending
20 I spent time reviewing the mediation brief and preparing for the mediation itself.

21 26. I have worked a total of 75 hours on this case and my hourly rate is \$650 with the result that
22 my lodestar value for fees on this case is \$48,450.00. My time spent on this case consisted of
23 (1) case analysis, legal theories, research and reaching out to attorneys in my community to
24 explore co-counseling options; (2) telephone calls, and emails with co-counsel to discuss
25 litigation strategy and details including the collection of various documents; (3) attend
26 mediation towards class settlement; and (4) review of and negotiation of settlement agreement
27
28

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

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4 DATED: May 13, 2022

ELDESSOUKY LAW, APC

6
7 By: 
8 Mohamed Eldessouky
9 Attorneys for Plaintiff
10 DAISY SOLANO
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