

1 A. John Godoy, Esq. SBN 254911
2 CLAYEO C. ARNOLD, PC
3 865 Howe Avenue
4 Sacramento, CA 95825
5 Telephone: (916) 777-7777
6 Facsimile: (916) 924-1829
7 E-mail: jgodoy@justice4you.com
8 *Attorneys for Plaintiff Brittney Rand*

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF SACRAMENTO**

11 BRITTNEY RAND, individually, and on
12 behalf of herself and others similarly
13 situated, and as Representatives of the
14 California Labor and Workforce
15 Development Agency,

16 Plaintiff,

17 v.

18 PRO'S CHOICE BEAUTY CARE, INC.; and
19 DOES 1 THROUGH 100, inclusive,
20 Defendants.

Case No.: 34-2021-00294988-CU-OE-GDS

**SUPPLEMENTAL DECLARATION OF
A. JOHN GODOY IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND
ASSOCIATED ORDERS**

Date: May 1, 2026

Time: 9:00 AM

Dept: 22

Judge: Hon. Lauri A. Damrell

Action filed: February 22, 2021

1 I, A. John Godoy, declare the following to be true:

- 2 1. I am an attorney licensed to practice law in the State of California. I practice law at
3 Clayeo C. Arnold, A Professional Corporation (doing business as Arnold Law Firm),
4 counsel of record for the Plaintiff Brittney Rand in this matter. I have personal knowledge
5 of the facts stated herein based on my work on this matter, my practice at the Arnold Law
6 Firm, my review of the firm's file, and discussions with the plaintiff, co-counsel at the
7 Arnold Law Firm, and counsel for the defendant. If called to testify, I could and would
8 testify under oath as stated herein.
- 9 2. This declaration is provided in support of preliminary approval of a class action and PAGA
10 settlement in this matter. I am writing this declaration to further clarify the estimation of
11 damages.
- 12 3. In the current motion, I had originally based our estimate on damages from the earliest
13 claims made to the date of filing of the lawsuit. The expert's extrapolation was based on a
14 class size of 323 members where the number of employees remained constant year to year.
- 15 4. Defense counsel later pointed out to me that a better measure of estimated damages should
16 run to the present since the class members ran to the present. I agreed that I had made an
17 error and asked our expert to extrapolate to the present.
- 18 5. In discussing the extrapolation, the expert asked if he should extrapolate based on a class
19 size of 323 and a constant number of employees year to year, which was what his original
20 extrapolation was based on. Instead, Defendants provided updated information including
21 the number of employees year to year, which showed that the number of employees had
22 steadily decreased each year.
- 23 6. Based on these clarifications, the estimate was recalculated to extrapolate the damages to
24 present but also take into account the decline in workforce since the original sample was
25 taken. The new report is attached to this declaration as Exhibit A.
- 26 7. The previous estimated amount in the original estimate was \$2,074,460. The new estimate
27 is \$2,387,827.

8. The comparison of original estimated amounts is as follows:

	Original	Revised
Meal Period Premiums	\$358,942	\$489,264
Unpaid Drive Time	\$340,241	\$463,773
In-Store Minimum Wage	\$6,063	\$8,250
Interest on Meal Periods	\$186,929	\$254,798
Interest on Unpaid Drives	\$164,502	\$224,228
Interest on In-Store Wage	\$3,105	\$4,232
Waiting Time Penalty	\$879,187	\$758,584
Inaccurate Wage Statements	\$64,194	\$87,501
PAGA Labor Violations	\$71,307	\$97,197
PAGA Wage Statement	\$71,307	\$97,197
PAGA Waiting Time	\$1,621	\$2,209

9. My analysis of the risk factors remains the same. The adjusted estimates are as follows:

	Risk Adjusted Total	Risk Adjustment %
Meal Period Premiums	\$342,484.80	30%
Unpaid Drive Time	\$347,829.75	25%
In-Store Minimum Wage	\$8,250	No Adjustment
Interest on Meal Periods	\$178,358.60	30%
Interest on Unpaid Drives	\$168,171	25%
Interest on In-Store Wage	\$4,232	No Adjustment
Waiting Time Penalty	\$189,646	75%
Inaccurate Wage Statements	\$21,875.25	75%
PAGA Labor Violations	\$68,037.90	30%
PAGA Wage Statement	\$24,299.25	75%
PAGA Waiting Time	\$552.25	75%

1 10. The total risk adjusted exposure using the revised numbers is \$1,353,736.80, of which
2 \$1,260,847.40 is class claim damages and \$92,889.40 is PAGA penalties.

3 11. The proposed settlement is \$465,000, which is 34.35% of the total risk adjusted exposure.
4 Even with the revision in estimated damages, this percentage is an excellent result taking
5 into account the current status of the case, the potential risk factors, the need for extensive
6 discovery should the case go forward, and the general uncertainty of litigation.

7 12. The estimated risk adjusted PAGA penalties are 6.86% of the total risk adjusted exposure.
8 The proposed PAGA settlement allocation is \$15,000, which is 3.23% of the total settlement
9 before costs. These percentages are very close, and considering that the overall resolution
10 serves as a deterrent and provides compensation, a smaller PAGA award is still adequate.

11 The foregoing is true and correct under penalty of perjury pursuant to the laws of the State of
12 California. Executed in Sacramento, California as dated below.

13
14 Dated: April 27, 2026

Signed: _____
A. John Godoy

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit A

Allman & Petersen Economics, LLC

7677 Oakport Street, Suite 610
Oakland, CA 94621
(510) 382-1550
www.allmaneconomics.com

Phillip H. Allman, Ph.D.
Jeffrey S. Petersen, Ph.D.
Max D. Allman, M.A., C.F.A

April 27, 2026

John Godoy
Arnold Law Firm
865 Howe Avenue
Sacramento, CA 95825

Re: Wages, interest and penalties due the class members in *Brittney Rand, et al. v. Pro's Choice Beauty Care, Inc. et al.*

Dear Mr. Godoy,

Per your request, I computed the wages, interest and penalties due the class members in the matter of *Brittney Rand, et al. v. Pro's Choice Beauty Care, Inc. et al.*, hereafter "this matter." The categories of wages due are: (1) meal period premium wages, (2) unpaid drive time, and (3) in-store minimum wage differential. The categories of penalties are: (1) waiting time penalties, (2) inaccurate wage statement penalties, and (3) PAGA penalties. The time punch data I reviewed was for the period of January 30, 2017 to April 26, 2020 for 198 class members. Based on this data, the total amount due in unpaid wages and penalties is below.

The total amount due in wages is as follows:

Meal period premium wages	\$ 199,337
Unpaid drive time	\$ 188,951
In-store minimum wage differential	<u>\$ 3,361</u>
Total wages due	\$ 391,649

The interest due on the unpaid wages is as follows:

Meal period premium wages	\$ 103,810
Unpaid drive time	\$ 91,355
In-store minimum wage differential	<u>\$ 1,724</u>
Total interest due	\$ 196,890

The total penalties due are as follows:

Waiting time	\$ 488,252
Inaccurate wage statements	\$ 35,650
PAGA - Unpaid meal & drive time, wage diff.	\$ 39,600

PAGA - Inaccurate Wage Stmt.	\$ 39,600
PAGA - Waiting Time	<u>\$ 900</u>
Total penalties due	\$ 604,002

The total amount due in wages, interest and penalties is based on the time punch data from January 30, 2017 to April 26, 2020 is **\$1,192,541**.

It is my understanding that there are a total of 323 class members. It is also my understanding that defense counsel in this matter supplied the number of class members per year as shown below:

<u>Year</u>	<u>Class Members</u>
2017	113
2018	113
2019	101
2020	100
2021	97
2022	92
2023	81
2024	81
2025	68
2026	48

I projected the total amount due the 323 class members from January 30, 2017 to the present based on: (1) the time punch data for January 30, 2017 to April 26, 2020 and (2) the yearly totals of class members from 2017 to 2026.¹ This projection assumes the time punch data and time periods are statistically representative of the remainder of the class period. The total amount due the entire class of 323 for the time period January 30, 2017 to the present in unpaid wages, interest and penalties is **\$2,387,827**. See the attached Table B for the total amounts per category.

DOCUMENTS REVIEWED

The computations for unpaid wages and penalties were derived from a review of the following documents:

- The Complaint;
- Daily and weekly payroll spreadsheets (February 2017 – March 2025);
- Time punch records (Movista: February 2017 – April 2020); and
- The California Merchandisers Payroll Detail spreadsheet (February 2017 – April 2020).

¹ The computations also account for the fractions of years in 2017 and 2026.

The analysis involved 91,451 daily punch records for 198 employees. Findings from this group were then extrapolated to the entire class of 323 employees.

Out of the 23,468 total potential workweeks identified by counsel, physical punch data was available for 11,620 work weeks. Within that specific subset of analyzed data (11,620 work weeks), 9,520 workweeks (approximately 82%) contained at least one violation.

A description of how each category of wages and penalties were computed is as follows.

MEAL PERIOD PREMIUM WAGES

Meal period premium wages were computed in the absence of recorded meal period punches for any shift exceeding 5 hours. A second meal period violation was computed if the shift was greater than 10 hours. This analysis assumes no compliant 30 minute off-duty meal period was provided or waived for these shifts. The amount of the meal period premium wage is the regular hourly rate of pay.

UNPAID DRIVE TIME

Unpaid drive time was calculated exclusively from employee time punches. To remain consistent with the client's own reporting practices, three legs of drive time were recognized where recorded: drive time to the first store, drive time between stores, and drive time home. Drive time was not uniformly captured across all records; when it did appear in the time punch reports (Movista reports), it was assumed to be compensable and paid at the employee's base hourly rate.

To maintain a conservative estimate, a cumulative daily cap of three hours was applied across all three legs of drive time combined; any drive time exceeding this threshold was excluded from the analysis. Unpaid drive time was then multiplied by the employee's applicable hourly wage to calculate the resulting underpayment.

IN-STORE MINIMUM WAGE DIFFERENTIAL

To calculate base wage underpayments, each daily punch record was mapped to its corresponding work location. Where the applicable local minimum wage rate exceeded the employee's hourly rate, the difference was multiplied by all hours worked in that jurisdiction on the given day (e.g., Los Angeles, Santa Monica, Emeryville). City minimum wage rates were sourced from the California Department of Industrial Relations and the UC Berkeley Labor Center.

WAITING TIME PENALTIES

Waiting time penalties were computed for each class member that ended their employment and had unpaid wages due. To determine termination dates, the last pay date for each employee was identified using the daily payroll spreadsheet. Employees with a last pay date on or before December 31, 2024, were classified as no longer employed. The formula for the waiting time penalty is:

$$\text{HOURLY RATE OF PAY} \times 8 \text{ HOURS PER DAY} \times 30 \text{ DAYS}$$

INACCURATE WAGE STATEMENT PENALTIES

Inaccurate wage statement penalties were computed for each pay period with unpaid wages. The first penalty was assessed at \$50 and subsequent penalties were \$100 up to a maximum of \$4,000 per class member.

PAGA PENALTIES

PAGA penalties were computed at \$100 per pay period for each period containing unpaid wages. These penalties were restricted to the PAGA statutory window of February 22, 2020, to present.

It is my understanding that, in accordance with California law, multiple violations within a single work week are consolidated into one actionable penalty per pay period. While our analysis identified 1,212 individual violations (e.g., missed meals, unpaid drive time, and wage rate differentials) within the PAGA window, the primary penalty is legally restricted to one \$100 assessment per impacted pay period (\$39,600).

For each of the 396 pay periods with a primary underpayment, a secondary \$100 penalty was assessed for an inaccurate itemized wage statement (*Labor Code § 226*) (\$39,600). An additional \$100 'Waiting Time' penalty was applied only to the 9 instances where a primary violation occurred during an employee's final pay period, rendering the final wages untimely at the point of separation (\$900).

The attached Exhibit A shows the itemized computations described above. Table 1 shows the computations based on the time punch data for 198 class members. Table 2 shows the projected computations for all 323 class members.

PROFESSIONAL QUALIFICATIONS

My resume, fee schedule and list of trial and deposition testimonies in the last four years are attached as Exhibit B. I have worked on 192 wage and hour class action, or PAGA, cases and the retentions in these cases are 86 percent for plaintiffs and 14 percent for defendants. I have testified at trial for both plaintiffs and defendants in class action cases (total trial testimonies is

nine). I have testified at trial four times in class action wage and hour cases where I conducted a survey on behalf of plaintiffs. I have co-authored two peer-reviewed articles on wage and hour methods in surveys and class wide statistical inference from sample data. In addition to working as an expert witness on wage and hour matters, I am currently an adjunct associate professor of economics at Saint Mary's College and the former President of the American Academy of Economic and Financial Experts.

Please contact me with any questions.

Sincerely,

A handwritten signature in dark red ink that reads "Jeffrey S. Petersen". The signature is written in a cursive, flowing style.

Jeffrey S. Petersen, Ph.D.

EXHIBIT A

TABLE A

RAND V. PRO CHOICE BEAUTY CARE, INC
SUMMARY OF WAGES DUE, INTEREST DUE & PENALTIES
(BASED ON 198 CLASS MEMBERS WITH TIME PUNCH DATA)
(TIME PERIOD: JANUARY 30, 2017 TO APRIL 26, 2020)

UNPAID & UNDERPAID WAGES		
Meal Period Premiums	\$	199,337
Unpaid Drive Time	\$	188,951
In-Store Minimum Wage Differential (City Ordinances)	\$	3,361

TOTAL UNPAID & UNDERPAID WAGES	\$	391,649
INTEREST ON WAGES DUE		
Interest on Meal Period Premiums	\$	103,810
Interest on Unpaid Drive Time	\$	91,355
Interest on In-Store Minimum Wage Differential (City Ordinances)	\$	1,724

TOTAL INTEREST ON WAGES DUE	\$	196,890
PENALTIES		
Waiting Time Penalty	\$	488,252
Inaccurate Wage Statement Penalties	\$	35,650
PAGA - Primary Labor Violations (Meal Premium/Unpaid Drive/Wage Diff)	\$	39,600
PAGA Penalties - Inaccurate Wage Stmt	\$	39,600
PAGA Penalties - Waiting Time	\$	900

TOTAL PENALTIES	\$	604,002
TOTAL UNPAID WAGES, INTEREST ON WAGES DUE & PENALTIES	\$	1,192,541
OTHER INFORMATION		
<u>Interest</u>		
Class Period Start Date		2/22/2017
PAGA Period Start Date		2/22/2020
Interest Calculation Date		4/1/2026
Interest Rate - Wages Due		10%
Interest Rate - Rest & Meal Break Premiums		7%
Total Class Size		285
Employees Included in Analysis		198
Terminated Employees in Analysis		177
Total Meal Period Violations		15,706
Adjusted Unpaid Drive Time		14,563
Average Base Rate of Pay	\$	12.36
Total Work Weeks in Class Period		23,468
Work Weeks Analyzed		11,620
Work Weeks w/Violation		9,520

TABLE B

RAND V. PRO CHOICE BEAUTY CARE, INC
SUMMARY OF WAGES DUE, INTEREST DUE & PENALTIES
(PROJECTED TO 323 CLASS MEMBERS FROM 198 CLASS MEMBERS WITH DATA)
(TIME PERIOD: JANUARY 30, 2017 TO APRIL 27, 2026)

UNPAID & UNDERPAID WAGES

Meal Period Premiums	\$ 489,264
Unpaid Drive Time	\$ 463,773
In-Store Minimum Wage Differential (City Ordinances)	\$ 8,250

TOTAL UNPAID & UNDERPAID WAGES	\$ 961,287
--------------------------------	------------

INTEREST ON WAGES DUE

Interest on Meal Period Premiums	\$ 254,798
Interest on Unpaid Drive Time	\$ 224,228
Interest on In-Store Minimum Wage Differential (City Ordinances)	\$ 4,232

TOTAL INTEREST ON WAGES DUE	\$ 483,258
-----------------------------	------------

PENALTIES

Waiting Time Penalty	\$ 758,584
Inaccurate Wage Statement Penalties	\$ 87,501
PAGA - Primary Labor Violations (Meal Premium/Unpaid Drive/Wage Diff)	\$ 97,197
PAGA Penalties - Inaccurate Wage Stmt	\$ 97,197
PAGA Penalties - Waiting Time	\$ 2,209

TOTAL PENALTIES	\$ 943,282
-----------------	------------

TOTAL UNPAID WAGES, INTEREST ON WAGES DUE & PENALTIES	\$ 2,387,827
---	--------------

OTHER INFORMATION**Interest**

Class Period Start Date	2/22/2017
PAGA Period Start Date	2/22/2020
Interest Calculation Date	4/1/2026
Interest Rate - Wages Due	10%
Interest Rate - Rest & Meal Break Premiums	7%
Total Class Size	285
Employees Included in Analysis	198
Terminated Employees in Analysis	177
Total Meal Period Violations	15,706
Adjusted Unpaid Drive Time	14,563
Average Base Rate of Pay	\$ 12.36
Total Work Weeks in Class Period	23,468
Work Weeks Analyzed	11,620
Work Weeks w/Violation	9,520

EXHIBIT B

JEFFREY S. PETERSEN

Allman & Petersen Economics, LLC
7677 Oakport Street, Suite 610
Oakland, CA 94621

Phone: (510) 382-1550
FAX: (510) 382-1472
E-mail: jeff@allmaneconomics.com

EMPLOYMENT HISTORY

2003 – present	<i>Partner</i> Allman & Petersen Economics, LLC Oakland, California
2014 – present 1999 – 2001	<i>Adjunct Associate Professor of Economics</i> St. Mary's College Moraga, CA
1998 – 2003	<i>Senior Economist</i> U.S. Government Accountability Office (formerly the General Accounting Office) San Francisco, California
1999 – 2001	<i>Economics Instructor</i> Golden Gate University San Francisco, California
1995 – 1998	<i>Postdoctoral Fellow</i> University of California, Berkeley
1990 – 1995	<i>Research and Teaching Assistant</i> University of Utah Salt Lake City, Utah

EDUCATION

1996	Postdoctoral Training Program in Health Economics University of California, Berkeley
1995	Ph.D. in Economics, University of Utah
1989	B.A. in Economics, San Jose State University

PUBLICATIONS

Peer-Reviewed Book

“Carve-outs” in Workers’ Compensation: An Analysis of the Experience in the California Construction Industry, W.E. Upjohn Institute for Employment Research, Kalamazoo, MI 2003 (co-authored with David Levine, Frank Neuhauser, Richard Reuben, and Christian Etcheverria).

Peer-Reviewed Journal Articles

- “The Margin of Error on Damages Calculations Based on Sample Survey Data in Class Action Wage and Hour Cases,” *Journal of Legal Economics*, Volume 25, No. 1-2, September 2019 (co-authored with Phillip Allman).
- “The Effect of the Intent to Retire at Age 70 or Older on Work Life Expectancy,” *Journal of Legal Economics*, Volume 23, No. 2, April 2017 (co-authored with Phillip Allman).
- “Surveys in Class Action Wage and Hour Cases and the Use of Anonymous Respondents,” *Journal of Legal Economics*, Volume 22, No. 1, October 2015 (co-authored with Phillip Allman and William Lee).
- “Carve-Outs from the Workers Compensation System,” *Journal of Policy Analysis and Management*, 2002, Volume 21, No. 3, (co-authored with David Levine and Frank Neuhauser).
- “Health Care and Pension Benefits for Construction Workers: The Role of Prevailing Wage Laws,” *Industrial Relations*, 2000, Volume 39, No. 2.
- “A Comparison of Health Outcomes Among Older Construction and Blue-Collar Employees in the United States,” *American Journal of Industrial Medicine*, 1998, Volume 34, No. 3, (co-authored with Craig Zwerling).

Other Publications

- “The Margin of Error on Damages Calculations Based on Sample Survey Data in Class Action Wage and Hour Cases,” proceedings of the 2019 Allied Social Sciences Association, National Association of Forensic Economics Section (co-authored with Phillip Allman).
- “International Responses to an Aging Labor Force,” *Work Options for Mature Americans*. Teresa Ghilarducci and John Turner eds., Notre Dame, Indiana: University of Notre Dame Press, 2005. (co-authored with Charles Jeszeck, Anthony Defrank, Katherine Leavitt, Janice Peterson, Yunsian Tai, and Howard Wial).
- “Benefits vs. Wages: How Prevailing Wage Laws Affect the Mix and Magnitude of Compensation to Construction Workers,” in *The Economics of Prevailing Wage Laws*, Peter Philips and Hamid Azari eds., Ashgate Publishing, 2005. (co-authored with Erin Godtland).
- “Private and Public Sector Employment Policies to Extend the Labor Force Participation of Older Workers,” *Proceedings of the 55th Annual Industrial Relations Research Association Annual Conference*, 2003.
- “Return to Economic Productivity Following Acute Traumatic Injury: The Influence of Financial, Physical, and Psychosocial Factors,” *Proceedings of the American Association for the Surgery of Trauma Fifty-Ninth Annual Meeting*, 1999, (co-authored with Lara Papadakis, Diane Morabito, Herb Ochitill, Alicia Bocellari, and Robert Mackersie).

Portable Pensions for Casual Labor Markets: Lessons from the Operating Engineers Central Pension Fund, Quorum Books, Westport, CT, 1996 (co-authored with Teresa Ghilarducci, Garth Mangum, and Peter Philips).

Selected General Accounting Office Reports

“Older Workers: Policies of Other Nations to Increase Labor Force Participation,”
GAO-03-307, Feb. 2003

“Older Workers: Demographic Changes Pose Challenges for Employers and Workers,”
GAO-01-85, Nov. 2001

“Characteristics of Persons in Labor Force Without Pension Coverage,”
GAO/HEHS-00-131, Aug. 2000

“Social Security Reform: Implications of Raising the Retirement Age,”
GAO/HEHS-99-112, Aug. 1999

REVIEWER FOR PEER-REVIEWED JOURNALS AND BOOKS

Industrial Relations (University of California, Berkeley)

Perspectives (peer-reviewed section of the Social Security Bulletin)

Journal of Legal Economics

Journal of Forensic Economics

Palgrave Macmillan, Economics & Business Publications

The Earnings Analyst

PRESENTATIONS

“No Data, No Problem: How to Obtain an Unbiased Representative Sample in a Wage and Hour Case When No Employer Records Exist,” Western Economic Association Annual Conference, San Francisco, CA, June 2025.

“Profiles in Survey Research: The Intersection of Public Opinion and the Law,” Panelist, Pacific Chapter of the American Association of Public Opinion Research, November 2023.

“The Reference Guide on Survey Research,” Western Economic Association Annual Conference, San Diego, CA, July 2023.

Chair for Session “The Reference Manual on Scientific Evidence,” Western Economic Association Annual Conference, San Diego, CA, July 2023.

“Statistical Evidence in Wage and Hour Class Actions,” Webinar hosted by Strafford Publications, June 2023.

- “Gold Standard Validation of Survey Responses in a Wage and Hour Class Action: The Case of Aldapa vs. Fowler Packing,” Fall Forensic Economics Workshop, South Lake Tahoe, CA, October 2022.
- “Supreme Court Decisions in Class Action Wage and Hour Cases,” Western Economic Association Annual Conference, July 2022.
- “Wage and Hour Surveys: Assisting with the Liability Determination and Assessing Nonresponse Bias,” 32nd Annual Meeting of the American Academy of Economic and Financial Experts, April 2021.
- “Statistical Evidence in Wage and Hour Class Actions Since Tyson Foods: Impact on Certification and Trial,” Webinar hosted by Strafford Publications, June 2020
- “The Implications of Recent Legal Decisions for Survey Methodology in Class Action Wage and Hour Cases,” Annual Conference of the Pacific Chapter of the American Association for Public Opinion Research, San Francisco, CA, December 2019.
- “Duran Duran: The Important Issues in the Two Duran Decisions for Surveys and Statistical Analysis,” Western Economic Association Annual Conference, San Francisco, CA, June 2019.
- “The Margin of Error on Damages Calculations in Class Action Wage and Hour Cases,” Allied Social Science Associations Annual Conference, National Association of Forensic Economics, Atlanta, GA, January 2019.
- “Survey Design and Analysis in Class Action Wage and Hour Cases,” Annual Conference of the Pacific Chapter of the American Association for Public Opinion Research, San Francisco, CA, December 2018.
- “Surveys in Class Action Wage and Hour Cases,” CLE Seminar, San Francisco, CA, October 2018.
- “Using Surveys to Assess Damages in Class Action Wage and Hour Cases,” 30th Annual Meeting of the American Academy of Economic and Financial Experts, Las Vegas, NV, April 2018.
- “Working to Age 70 or Older – How Much Does Intention Matter? Evidence from the Health and Retirement Study,” 28th Annual Meeting of the American Academy of Economic and Financial Experts, Las Vegas, NV, March 2016.
- “Policies to Extend the Labor Force Participation of Older Workers” – Industrial Relations Research Association Section of the Allied Social Sciences Association Annual Meeting, Washington, DC, Jan. 2003.
- Discussant for the panel “The Population Age 50-70 -- Past Trends and Future Projections” at the National Academy of Social Insurance conference on the Implications of an Aging Workforce for Income Security and Employee Benefits, Washington, D.C., Nov. 2001
- “Raising the Eligibility Ages for Social Security Benefits: Work and Health Issues Associated with this Policy Change” - School of Public Policy, University of California, Los Angeles, Jan. 2001
- “The Labor Market for Older Workers” - Bay Area Labor Economists Fall Workshop, Public Policy Institute of California, San Francisco, CA, Nov. 2000

"Raising the Eligibility Ages for Social Security Benefits: An Analysis of the Policy Implications"
- Association for Public Policy Analysis and Management Annual Research Conference, New York, NY, Oct. 1998.

"Carving Out Construction Employees from the Workers Compensation System in California: Putting Theory into Practice"
- Industrial Relations Research Association Section of the Allied Social Sciences Association Annual Meeting, Chicago, IL, Jan. 1998
- National Occupational Injury Research Symposium, National Institute of Occupational Safety and Health, Morgantown, WV, Oct. 1997

"Return to Work Following Acute Traumatic Injury"
- American Association for the Surgery of Trauma Annual Meeting, Boston, MA Sept. 1999
- National Occupational Injury Research Symposium, National Institute of Occupational Safety and Health, Morgantown, WV, Oct. 1997

"Health Care and Pension Benefits for Construction Workers: The Role of Prevailing Wage Laws"
- Health Economics Research Organization Section of the Allied Social Sciences Association Annual Meetings, New Orleans, LA, Jan. 1997

"Retirement from the Construction Industry" – University of California, Berkeley, Department of Demography, May 1995.

HONORS

President, American Academy of Economic and Financial Experts	2024-2026
Vice President, American Academy of Economic and Financial Experts	2022-2024
Member of the Board of Directors, American Academy of Economic and Financial Experts	2017-2020
National Research Service Award, Public Health Postdoctoral Fellowship, U.S. Department of Health and Human Services	1995-1997
Outstanding Scholar Athlete Honor Roll, San Jose State University	1988-1989
NCAA Division I Tennis Team, San Jose State University	1987-1989

PROFESSIONAL ORGANIZATIONS

American Economic Association

National Association of Forensic Economics

American Academy of Economic and Financial Experts

American Association for Public Opinion Research

Western Economic Association International

ALLMAN & PETERSEN ECONOMICS, LLC

Phillip H. Allman, Ph.D.
Jeffrey S. Petersen, Ph.D.
Max Allman, MA, CFA

7677 Oakport Street, Suite 610 • Oakland, CA 94621
TEL (510) 382-1550

FEE SCHEDULE (6/25/24)

- (1) Economic research and analysis, report preparation, document review, office and client consultations, deposition preparation and trial preparation.¹

-- Ph.D. Economist	\$650 / hour
-- Senior Economist	\$475 / hour
-- Economist or CPA	\$325 / hour
-- Survey Administration	\$125 / hour

- (2) Deposition testimony²

-- Ph.D. Economist	\$850 / hour
-- Senior Economist	\$550 / hour

- (3) Arbitration and trial testimony³

-- Ph.D. Economist	\$850 / hour
-- Senior Economist	\$550 / hour

- (4) Travel time \$300 / hour

¹ Bills will be submitted periodically and are due upon presentation, not at the conclusion of the case.

² Payment for deposition testimony shall be paid in accordance with C.C.P. '2034 (i) (3) --i.e. payment of an expert's fees for the anticipated length of a deposition shall be paid at the commencement of his/her deposition, and any outstanding balance shall be paid within five days of receiving an itemized statement of the expert's services.

³ All invoices to date must be paid prior to trial testimony. In addition, an additional retainer must be paid prior to the trial testimony based upon the estimated invoice for the testimony.

Trial & Deposition List for Jeffrey S. Petersen (Last Four Years)

	Case	Case Number	Jurisdiction	Date
Trials & Arbitrations	Yumul et al. v. Indus Investments et al.	BC565881	Los Angeles	April, 2018
	Zarate v. Sungrow USA Corporation	01-18-0003-8025	American Arbitration Association	September, 2019
	Dezan v. Dignity	CIVDS1516658	San Bernardino	September, 2021
	Chavez, et al. v. California Collision	RG17865765	Alameda	August, 2022
	Vasquez v. Leprino Foods	1:17-cv-00796-AWI-BAM	Eastern District of California	March, 2023
	Carroll v. City and County of SF	CGC-17-562580	San Francisco	April, 2023
	Hamm v. Acadia Laplace Holdings	20-1515 Section "E"	Eastern District of Louisiana	February, 2024
Depositions	Zarate v. Sungrow USA Corporation	01-18-0003-8025	American Arbitration Association	June, 2019
	Dueker et al. v. CRST Expedited	2:18-cv-08751-FMO-FFM	Central District of California	September, 2019
	Nevarez et al. v. Costco Wholesale Corp.	2:19-cv-03454-SVW-SKx	Northern District of California	January, 2020
	Sephora Wage and Hour Cases	CGC-16-550894	San Francisco	June, 2020
	Dhawan v. Regents of the Univ. of CA	RG18911598	Alameda	October, 2020
	Van Bebber v. Dignity Health	1:19-cv-00264-DAD-EPG	Eastern District of California	October, 2020
	Ayala v. UPS Supply Chain Solutions	5:20-cv-00117-PSG-AFM	Central District of California	February, 2021
	Christensen v. Carter's Retail	8:20-cv-00776 JLS (KESx)	Central District of California	April, 2021
	Nucci v. Rite Aid	19-CV-01434-LHK	Northern District of California	June, 2021
	Crump v. Hyatt	4:20-cv-00295-HSG	Northern District of California	June, 2021
	Dezan v. Dignity	CIVDS1516658	San Bernardino	August, 2021
	Williams v. Saint Joseph's	30-2020-01134268-CU-OE-CXC	Orange	September, 2021
	Johnson v. Bakersfield Memorial	BCV-19-102016	Kern	October, 2021
	Powell v. Saint Joseph's	STK-CV-UOE2019-0011155	San Joaquin	October, 2021
	Castillo v. Western Range	3:16-cv-00237-RJC-VPC	District of Nevada	November, 2021
	Cruz v. Bruceville Terrace	34-2018-00245506	Sacramento	November, 2021
	Larson v. Mark Twain Medical Center	19CV44062	Calaveras	November, 2021
	Aldapa v. Fowler Packing	1:15-CV-00420-DAD-SAB	Eastern District of California	December, 2021
	Vasquez v. Leprino Foods	1:17-cv-00796-AWI-BAM	Eastern District of California	January, 2022
	Hinds v. Fedex Ground	3:18-cv-01431-JSW (EDL)	Northern District of California	March, 2022
	Rodriguez v. Walmart	2:20-cv-07045 AB(KKx)	Central District of California	May, 2022
	Sanchez v. Sam's West, Inc.	2:21-cv-05122-SVW-JC	Central District of California	May, 2022
	Cruz v. Talentscale	RIC1821842	Riverside	May, 2022
	Villanueva v. Select Employment Services	3:17-cv-06875-JCS	Northern District of California	September, 2022
	Perez v. Leprino Foods	1:17-cv-00686-AWI-BAM	Eastern District of California	October, 2022
	Stafford v. Bojangles Restaurants	3:20-cv-266-MOC	Western District of North Carolina	October, 2022
	Dieves v. Butte Sand Trucking	CVCS19-0001082	Sutter	November, 2022
	Adelman v. Starbucks	3:20cv-01178-JD	Northern District of California	February, 2023
	Carroll v. City and County of SF	CGC-17-562580	San Francisco	March, 2023
	Castro v. Gardner Trucking	4:20cv-05473-YGR	Northern District of California	April, 2023
	Villegas v. Duarte Nursery	2014212	Stanislaus	May, 2023
	Ames v. San Antonio Regional Hospital	CIVDS2018953	San Bernardino	May, 2023
	Porcayo v. So Cal Land Maintenance	30-2021-01236054-CU-OE-CXC	Orange	September, 2023
	Charles v. Varsity Tutors	19CV347249	Santa Clara	October, 2023
	Carbajal v. Imperial Maintenance Services	STK-CV-UOE-2016-0001100	San Joaquin	October, 2023
	Torres v. Johnston Nurseries	BCV-19-100830 TSC	Kern	December, 2023
	Cruz v. Talentscale	RIC1821842	Riverside	January, 2024
	Sanchez v. Sam's West, Inc.	2:21-cv-05122-SVW-JC	Central District of California	January, 2024
	Price v. Starlight Marine	C20-01311	Contra Costa	May, 2024
	Refuerzo v. Southwest Airlines	3:22-cv-00868-JSC	Northern District of California	June, 2024
	Vargas-Rios v. MCH Electric	RG21103287	Alameda	June, 2024
	Branco v. Walmart	19CV360648	Stanislaus	July, 2024
	O'Connor v. HRL Laboratories	37-2022-00048942-CU-OE-CTL	San Diego	October, 2024
	Mohammed v. American Airlines	19CV342788	Santa Clara	March, 2025
	Rush-Alfaro v. Chevron	21STCV29441	Los Angeles	April, 2025
	Felix v. Staples Contract & Commercial	5:24-cv-01968-KK-SP	Central District of California	June, 2025
	Navas v. Fresh Venture	17-cv-02222	Santa Barbara	June, 2025
	Cuevas v. Little Caesar Enterprises	3:cv-03166-RFL	Northern District of California	February, 2026
	Refuerzo v. Southwest Airlines	3:22-cv-00868-JSC	Northern District of California	February, 2026
	Garcia v. Columbia Riverside Inc.	CVRI2203402	Riverside	March, 2026

1 A. John Godoy (SBN 254911)
2 **CLAYEO C. ARNOLD, PC**
3 865 Howe Avenue
4 Sacramento, CA 95825
5 Telephone: (916) 777-7777
6 Facsimile: (916) 924-1829
7 E-mail: jgodoy@justice4you.com
8 *Attorneys for Plaintiff Brittney Rand*

9 **SUPERIOR COURT OF CALIFORNIA**

10 **COUNTY OF SACRAMENTO**

11 BRITTNEY RAND, individually, and on
12 behalf of herself and others similarly
13 situated, and as Representatives of the
14 California Labor and Workforce
15 Development Agency,

16 Plaintiffs,

17 vs.

18 PRO'S CHOICE BEAUTY CARE, INC.; and
19 DOES 1 THROUGH 100, inclusive,

20 Defendants.

Case No.: 34-2021-00294988-CU-OE-GDS

PROOF OF SERVICE

Date: Friday, May 1, 2026

Time: 9:00 AM

Dept: 22

Judge: Hon. Lauri A. Damrell

Action filed: February 22, 2021

Re: ***Rand, Brittney v. Pro's Choice Beauty Care, Inc.***

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO, Case No.: 34-2021-00294988

Proof of Service

I, Pawanpreet Kaur, declare and state:

I am a citizen of the United States, over 18 years of age, employed in the county of Sacramento, and not a party to the within action. My business address is 865 Howe Avenue, Sacramento, CA 95825.

On the date below, I served the following documents:

- **SUPPLEMENTAL DECLARATION OF A. JOHN GODOY IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND ASSOCIATED ORDERS**

on the following parties in said action by the means indicated below:

[X] (BY TRANSMITTING VIA EMAIL OR ELECTRONIC TRANSMISSION) the document(s) listed above to the addressees listed on the attached service list at the email addresses listed thereon from pkaur@justice4you.com.

Keiko J. Kojima
Burke, Williams & Sorensen, LLP
444 South Flower Street, Suite
2400 Los Angeles, CA 90071-2953
E: KKojima@bwslaw.com

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on April 27, 2026, at Sacramento, California.

Pawanpreet Kaur

Pawanpreet Kaur