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Attorneys for Plaintiff Ernesto Rivera

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

ERNESTO RIVERA, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

FIBER CARE BATHS, INC., a California
corporation; and DOES 1 through 100,
inclusive;

Defendants.

Case No.: CIVSB2114174
[Consolidated With Case No.: CIVSB2114736]

Assigned For All Purposes to:
Honorable David Cohn
Department S26

CLASS ACTION

**DECLARATION OF DOUGLAS HAN IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Date: January 23, 2023
Hearing Time: 10:00 a.m.
Hearing Place: Department S26

Complaint Filed: May 18, 2021
Trial Date: None Set

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DECLARATION OF DOUGLAS HAN

1 County Superior Court, Case No. RG13687151; *Esters et al v. HDB LTD. Limited Partnership* Kern
2 County Superior Court, Case No. S-1500-CV-279879 DRL; *Bridgette Guzman, et al. v.*
3 *International City Mortgage, Inc.*, San Bernardino County Superior Court, Case No.
4 CIVDS1502516; *Davidson et al. v. Lentz Construction General Engineering Contractor*, Kern
5 County Superior Court, Case No. S-1500-CV-279853 LHB; *Betancourt v. Hugo Boss USA, Inc.*,
6 Los Angeles County Superior Court, Case No. BC506988; *Porras et al. v. DBI Beverage, Inc. et al.*,
7 Santa Clara County Superior Court, Case No. 1-14-CV-266154; *Hartzell et al. v. Truitt Oilfield*
8 *Maintenance Corporation*, Kern County Superior Court, Case No. S-1500-CV-283011; *Navarro-*
9 *Salas et al. v. Markstein Beverage Co. et al.*, Sacramento County Superior Court, Case No. 34-2015-
10 00174957-CU-OE-GDS; *David White, et al. v. Pilot Travel Centers, LLC*, San Joaquin County
11 Superior Court, Case No. STK-CV-UOE-2013-0009098; *McKinnon, et al. v. Renovate America,*
12 *Inc., et al.*, San Diego County Superior Court, Case No. 37-2015-00038150-CU-OE-CTL; *Evelyn*
13 *Antoine, et al. v. Riverstone Residential CA, Inc., et al.*, Sacramento County Superior Court, Case
14 No. 34-2013-00155974; *Pina v. Zim Industries, Inc.*, Kern County Superior Court, Case No. S-1500-
15 CV-284498 SPC; *Amaya v. Certified Payment Processing et al.*, Sacramento County Superior Court,
16 Case No. 34-2015-00186623-CU-OE-GDS; *Burke v. Petrol Production Supply, Inc.*, Kern County
17 Superior Court, Case No. BCV-15-101092; *Ceron et al v. Hydro Resources-West, Inc.*, Kern County
18 Superior Court, Case No. BCV-15-101461; *Chavana v. Golden Empire Equipment, Inc.*, Kern
19 County Superior Court, Case No. BCV-16-102796; *De La Torre et al. v. Acuity Brands Lighting,*
20 *Inc.*, San Bernardino County Superior Court, Case No. CIVDS1601800; *Dobbs v. Wood Group PSN,*
21 *Inc.*, Case No. BCV-16-101078 Kern County Superior Court, Case No. BCV-16-101078-DRL;
22 *Gonzalez et al v. Matagrano, Inc.*, San Francisco County Superior Court, Case No. CGC-16-550494;
23 *Harbabikian et al. v. Williston Financial Group, LLC*, Ventura County Superior Court, Case No.
24 56-2016-004485186-CU-OE-VTA; *Prince v. Ponder Environmental Services, Inc.*, Kern County
25 Superior Court, Case No. BCV-16-100784; *Ramirez v. Crestwood Operations, LLC*, Kern County
26 Superior Court, Case No. BCV-17-100503; *Reyes v. Halliburton Energy Services, Inc.*, Kern County
27 Superior Court, Case No. S-1500-CV-280215; *Rodriguez v. B&L Casing Serve, LLC et al.*, Kern
28 County Superior Court, Case No. S-1500-CV-282709; *Marketstar Wage and Hour Cases*, Alameda

DECLARATION OF DOUGLAS HAN

1 County Superior Court, Case No. JCCP004820; *Rodriguez et al. v. Delta Sierra Beverage, LLC*,
2 Sacramento County Superior Court, Case No. 34-2017-00206727; *Stuck v. Jerry Melton & Sons*
3 *Construction, Inc.*, Kern County Superior Court, Case No. BCV-16-101516; *Blevins v. California*
4 *Commercial Solar, Inc.*, Kern County Superior Case, No. BCV-17-100571; *Cisneros et al v. Wilbur-*
5 *Ellis Company, LLC*, Kern County Superior Court, Case No. BCV-17-102836; and *Castro et al. v.*
6 *General Production Service of California, Inc.*, Kern County Superior Court, Case No. BCV-15-
7 101164. Shunt was also certified as class counsel in *Fulmer et al. v. Golden State Drilling, Inc.*, Kern
8 County Superior, Court Case No. S-1500-CV-279707; *Manas et al. v. Kenai Drilling Limited*, Los
9 Angeles County Superior, Court Case No. BC546330; and *Nuncio et al. v. MMI Services, Inc.*, Kern
10 County Superior Court, Case No. S-1500-CV-282534, cases that were certified after a contested
11 class certification. Shunt is handling several class actions pending in California.

12 7. This case involves all current and former hourly-paid or non-exempt
13 employees who are or were employed by Defendant Fiber Care Baths, Inc. (“Defendant”) in
14 California at any time during the period from November 19, 2016, through October 21, 2022
15 (“Class,” “Class Members,” and “Class Period”).

16 8. On May 18, 2021, Plaintiff Rivera, a former employee of Defendant
17 represented by Justice Law Corporation, filed a wage-and-hour class action lawsuit against
18 Defendant in the Superior Court of California, County of San Bernardino, alleging eight (8) causes
19 of action (Case No. CIVSB2114174) (“Rivera Action”).

20 9. On May 20, 2021, Plaintiff Manuel Villegas (“Plaintiff Villegas”), another
21 former employee of Defendant represented by Jackson Law, APC, filed a wage-and-hour class
22 action lawsuit against Defendant in the Superior Court of California, County of San Bernardino,
23 alleging ten (10) causes of action (Case No. CIVSB2114736) (“Villegas Action”). Plaintiff Villegas
24 later filed a First Amended Complaint on July 6, 2022 adding an additional cause of action.

25 10. After filing their lawsuits, Plaintiff Rivera and Plaintiff Villegas (collectively,
26 known as “Plaintiffs”) decided to work together to litigate their cases against Defendant for efficacy
27 purposes due to the similarities in their allegations. Eventually, the Parties remotely attend mediation
28 on June 2, 2022 and July 21, 2022. Under the guidance of the mediator Lynn S. Frank, the Parties

1 reached a global settlement for both lawsuits.

2 11. In line with the settlement, Justice Law Corporation and Jackson Law, APC
3 entered a Joint Prosecution Agreement on July 21, 2022. Attached hereto as **Exhibit 2** is a true and
4 correct copy of the fully executed Joint Prosecution Agreement. Next, the Parties memorialized the
5 terms of the settlement in the Joint Stipulation of Settlement and Settlement Agreement (“Settlement
6 Agreement,” “Settlement,” or “Agreement”). Pursuant to the term of the Settlement Agreement, the
7 Parties stipulated to consolidate the Rivera Action and Villegas Action.

8 12. Prior to mediation, the Parties conducted significant investigation and
9 discovery of the facts and law both before and after Plaintiffs filed their lawsuits. Specifically,
10 Defendant produced several documents relating to its policies, practices, and procedures regarding
11 reimbursement of business expenses, paying non-exempt employees for all hours worked, meal and
12 rest break policies, and payroll and operational policies. As part of Defendant’s production, Class
13 Counsel also reviewed time records, pay records, and information relating to the size and scope of
14 the Class, as well as data permitting Class Counsel to understand the number of workweeks in the
15 Class Period. Class Counsel also interviewed several putative class members.

16 13. The Parties agree the above-described investigation and evaluation, as well as
17 the information exchanged during the settlement negotiations, are more than sufficient to assess the
18 merits of the respective Parties’ positions and to compromise the issues on a fair and equitable basis.

19 14. Based on the information gathered and interviews Class Counsel conducted
20 with putative class members, Plaintiffs contend – Defendant denies – Defendant engaged in wage-
21 and-hour violations including, *inter alia*: (a) failing to provide compliant meal and rest breaks and
22 pay corresponding premium wages; (b) failing to compensate employees for all hours worked (*i.e.*,
23 minimum wages, overtime wages); (c) failing to properly calculate and pay overtime wages and sick
24 leave; (d) failing to reimburse business expenses; (e) failing to timely pay employees timely wages
25 during and after employment; and (f) failing to provide employees compliant wage statements.

26 15. The Parties remotely attended two (2) mediations. During mediation and
27 negotiations, the Parties discussed and considered the risks of continued litigation, certification, and
28 merits of the claims versus the benefits of a settlement. With the assistance of the mediator Lynn S.

1 Frank, the Parties eventually reached a settlement, and the terms were memorialized in the
2 Settlement Agreement, which the Parties now seek preliminary approval of.

3 16. The Settlement Agreement was reached because of arm's-length negotiations.
4 Though cordial and professional, the settlement negotiations have always been adversarial and non-
5 collusive in nature. At the mediation, both Parties' counsel conducted extensive arm's-length
6 settlement negotiations until an agreement was ultimately reached.

7 17. Plaintiffs and Class Counsel recognize the expense and length of continued
8 proceedings necessary to continue the litigation against Defendant through trial and through any
9 possible appeals. Plaintiffs and Class Counsel also considered the uncertainty and risk of further
10 litigation, potential outcome, and difficulties and delays inherent in such litigation. Based on the
11 foregoing, while Plaintiffs and Class Counsel believe in the merits of the case, they also believe the
12 Settlement is a fair, adequate, and reasonable settlement, and is in the best interests of the Class.

13 18. The Parties investigated and evaluated the factual strengths and weaknesses
14 of the Parties' claims and defenses before reaching the Settlement and engaged in investigation,
15 research, and discovery to support the Settlement. The Settlement was possible following significant
16 investigation and evaluation of Defendant's relevant policies and procedures, as well as the data
17 produced for the Class, permitting Class Counsel to engage in a comprehensive analysis of liability
18 and potential damages. This case has reached the stage where "the Parties certainly have a clear view
19 of the strengths and weaknesses of their cases" sufficient to support the Settlement's reasonableness,
20 adequacy, and fairness. (*Boyd v. Bechtel Corp.* (N.D.Cal. 1979) 485 F.Supp. 610, 617.)

21 19. The Settlement Agreement is the product of serious, informed, non-collusive
22 negotiations, has no obvious defects, does not improperly grant preferential treatment to Plaintiffs,
23 or segments of the Class, and falls within the range of fair and reasonable settlements. I believe this
24 non-reversionary settlement is in the best interests of the Class as fair, reasonable, and adequate.

25 20. The Agreement calls for the payment of the attorneys' fees of \$1,246,542.
26 This request is fair, reasonable, and adequate to compensate Class Counsel for the substantial work
27 they put into this case and the risk they assumed. I have practiced law in Southern California since
28 December of 2004, with most of my time focused solely on the prosecution of employment and

1 wage-and-hour class action litigation. I am aware the common and acceptable rate for contingency
2 representation in wage-and-hour class action litigation is normally forty percent (40%) before trial,
3 with the range being from thirty-three and one-third percent (33.3%) up to fifty percent (50%).

4 21. The attorneys' fees are intended to reimburse Class Counsel for all
5 uncompensated work they have done and for all the work they will continue to do in carrying out
6 and overseeing notification of the Class, communication with the Class regarding the Settlement,
7 and the settlement administration if the Settlement Agreement is preliminarily approved.

8 22. Class Counsel took this case on a contingent fee basis against a business
9 represented by a reputable defense firm. Accordingly, when taking these cases, we anticipate we
10 shall, if successful, receive a fee that exceeds our normal hourly rate, otherwise the risk is too great
11 to bear. Therefore, when we take on one matter, we are unable to take on other matters. When Class
12 Counsel became involved in this case, we realized the time commitment it would entail, and we were
13 forced to turn down matters. We were forced to do so because of the thorough factual investigation
14 and development this case required. Collectively, this case claimed a significant portion of Class
15 Counsel's time and attention throughout its pendency.

16 23. The contemplated attorneys' fees are reasonable for the services provided to
17 Class Members and for the benefits they will receive.

18 I declare under penalty of perjury under the laws of the California the foregoing is true and
19 correct. Executed on this 28th of September 2022, at Pasadena, California.

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EXHIBIT 1

Cases	Court	Case Number	Judge
Jamie Contreras v. Stueves's Milk Transport, Inc.	San Bernardino County Superior Court	CIVDS1304440	David Cohn
Art Kelly et al. v. Barker Management, Inc.	Los Angeles County Superior Court	BC506120	Kenneth Freeman
Patrick Arrellano v. Tolt, LLC; Tolt Service Group, Inc.	Los Angeles County Superior Court	BC512644	Amy Hogue
Derya Keles et al. v. The Art of Shaving-FL, LLC	Alameda County Superior Court	RG13687151	Wynne Carville
Marc Newman v. Hyder & Company	San Diego County Superior Court	37-2013-00051617-CU-OE-CTL	John Meyer
Abigail Stahl v. Fred Leeds Properties, Inc.	Los Angeles County Superior Court	BC509716	John Wiley, Jr.
Johnny Esters et al. v. HBD LTD, Limited Partnership	Kern County Superior Court	S-1500-CV-279879 DRL	David Lampe
Brian Davidson et al. v. Lentz Construction General Engineering Contractor, Inc.	Kern County Superior Court	S-1500-CV-279842-LHB	Lorna Brumfield
Lindsay Griffiths v. Paper Source, Inc.	Los Angeles County Superior Court	BC506121	William Highberger
Gabriel Betancourt v. Hugo Boss USA	Los Angeles County Superior Court	BC506988	Kenneth Freeman
Stephen McDougale et al. v. Ensign Drilling Company (California), Inc.	Kern County Superior Court	S-1500-CV-279842-LHB	Lorna Brumfield
Cody Pierce v. Progress Rail Services Corporation	Kern County Superior Court	S-1500-CV-282596	David Lampe
Michael Weston et al. v. Helmerich & Payne International Drilling Co.	Kern County Superior Court	1500 CV279549	David Lampe
Rod Rodriguez v. B&L Casing Service, LLC	Kern County Superior Court	S-1500-CV-282709-DRL	David Lampe
Jose Duval et al. v. DBI Beverage, Inc.	Santa Clara County Superior Court	1-14-CV-266154	Peter Kirwan
Pamela Van Goey v. Pro's Choice Beauty Care, Inc.	Los Angeles County Superior Court	BC545400	John Wiley, Jr.
Michael Peterson v. T-J Roofing Co., Inc (Baker Roofing)	San Joaquin County Superior Court	39-2014-00316043-CU-OE-STK	Barbara Kronlund
Ilya Zaydenburg et al. v. Crocs Retail, Inc.	Los Angeles County Superior Court	BC554214	John Wiley, Jr.
Jeff Hartzell et al. v. Truitt Oil Field Maintenance Corporation	Kern County Superior Court	S-1500-CV-283011-DRL	David Lampe
Nickolus Blevins v. Watkins Construction Co., Inc.	Kern County Superior Court	S-1500-CV-283079-LHB	Lorna Brumfield
Jennifer Ailey et al. v. Restoration Hardware, Inc.	Los Angeles County Superior Court	JCCP4794	William Highberger
Mario Navarro-Sales et al. v. Markstein Beverage Co.	Sacramento County Superior Court	34-2015-00174957	Alan Perkins
Jason Novak v. Midlands Management Corporation; Midlands Claim Administrators	Los Angeles County Superior Court	BC56702	Ann Jones
Oscar Pina v. Zim Industries, Inc. dba Bakersfield Well & Pump	Kern County Superior Court	S-1500-CV-284498-SPC	Sidney Chapin
David W. White et al. v. Pilot Travel Centers LLC	San Joaquin County Superior Court	39-2013-00301569-CU-OE-STK	Linda Lofthus
Kristin Hollinger et al. v. Safety Management Systems, LLC	Kern County Superior Court	S-1500-CV-284499-DRL	David Lampe
Michelle Ross et al. v. Southern State Insurance (Alsmadi)	Los Angeles County Superior Court	BC507217	Kenneth Freeman
Simone Blattler et al. v. Kate Spade & Company	Los Angeles County Superior Court	BC521256	Kenneth Freeman
Melba Hynick v. AmeriFirst Financial, Inc.	Los Angeles County Superior Court	BC573246	Lisa Hart Cole
Evelyn Antoine v. Rivertone Residential CA, Inc. dba Riverstone Residential Group	Sacramento County Superior Court	34-2013-00155974	Alan Perkins
Lesly Chavez et al. v. East West Bank	San Francisco County Superior Court	CJC-13-004839	Curtis Karnow
John Kim v. Hanmi Bank	Los Angeles County Superior Court	BC534578	Elihu Berle
Nickolous Blevins v. Republic Refrigeration, Inc.	Los Angeles County Superior Court	BC579924	Elihu Berle
Melba Hynick et al. v. International City Mortgage, Inc.	San Bernardino County Superior Court	CIVDS1502516	Keith Davis
Jose Contreas v. Towne Center Property Management, Inc.	Los Angeles County Superior Court	BC513621	Ann Jones
Cody Pierce et al. v. Robert Heely Construction, LP	Kern County Superior Court	S-1500-CV-282474-LHB	Lorna Brumfield
Terry Tauchman v. Outerwall, Inc. aka Coinstar, Inc.	Sacramento County Superior Court	34-2013-00154815	Alan Perkins

Sherrie Ward et al. v. Amazon Processing, LLC dba Appstar Financial	San Diego County Superior Court	37-2015-00012522-CU-OE-CTL	Timothy Taylor
Karen McKinnon et al. v. Renovate America, Inc.	San Diego County Superior Court	37-2015-00038150-CU-OE-CTL	John Meyer
Mark Aceves et al. v. Cambro Manufacturing Company	Orange County Superior Court	30-2015-00810013-CU-OE-CXC	Glenda Sanders
Kevin Marking v. Randy's Trucking, Inc.	Kern County Superior Court	BCV-15-100180-TSC	Thomas Clark
Daniel Saiyasit et al. v. Saccani Distributing Company	Sacramento County Superior Court	34-2015-00187440	Raymond Cadei
Michael Emerson et al. v. Ganahl Lumber Company	Orange County Superior Court	30-2014-00747750-CU-OE-CXC	Kim Dunning
Jose Salas v. Clean Harbor Environmental Services, Inc.	Kern County Superior Court	BCV-15-100187DRL	David Lampe
Edwin Murillo v. W.A. Thompson, Inc	Kern County Superior Court	BCV-16-101994	Sidney Chapin
Tyrone Windham et al. v. T.F. Louderback, Inc. dba Bay Area Beverage Company	Contra Costa County Superior Court	CIVMSC16-00861	Barry Goode
Derrick Lankford v. Roseburg Forest Products Co.	Los Angeles County Superior Court	BC603618	Ann Jones
Alejandro Hernandez v. Crest Beverage, LLC	San Diego County Superior Court	37-2015-00039163-CU-OE-CTL	Katherine Bacal
Martin Gonzalez v. Matagrano Inc.	San Francisco County Superior Court	CGC-16-550494	Curtis Karnow
Malachi Smith et al. v. Marketstar Corporation	Alameda County Superior Court	JCCP004820	George Hernandez
Justin Dougherty v. Redbox Automated Retail, LLC	Los Angeles County Superior Court	BC544841	Maren Nelson
Edgardo Madrigal et al. v. Couch Distributing Company, Inc.	Santa Cruz County Superior Court	15-CV-00439	Paul Burdick
Rodney Hoffman v. Blattner Energy Inc.	United States District Court of Central California	ED CV 14-2195-DMG (DTBx)	Dolly Gee
Ruben Amaya v. Apex Merchant Group, LLC dba Express Processing	Sacramento County Superior Court	34-2015-00186623-CU-OE-GDS	Steven Rodda
Eduardo De La Torre et al. v. Acuity Brands Lighting, Inc.	San Bernardino County Superior Court	CIVDS1601800	Donna Gunnell Garza
Carlos Ramirez v. Mashburn Transportation Services, Inc.	Kern County Superior Court	BCV-15-100591-SPC	Stephen Schuett
Dennis Carr et al. v. American Security Products Company	San Bernardino County Superior Court	CIVDS1606769	Wilfred Schneider, Jr.
Shane Burke v. Petrol Production Supply, Inc.	Kern County Superior Court	BCV-15-101092-SPC	Stephen Schuett
Sam John et al. v. Rival Well Services Incorporated	Kern County Superior Court	BCV-15-100504-SPC	Stephen Schuett
Tanya Orosco v. Visionary Home Builders of California	Sacramento County Superior Court	34-2017-00210368-CU-OE-GDS	Christopher Krueger
Eric Savage et al. v. Regus Management Group, LLC	Los Angeles County Superior Court	BC498401	Elihu Berle
Adalberto Chavana v. Golden Empire Equipment, Inc.	Kern County Superior Court	BCV-16-102796-DRL	David Lampe
Jeff Prince v. Ponder Environmental Services, Inc.	Kern County Superior Court	BCV-16-100784-DRL	David Lampe
Fernando Mondragon et al. v. Oldenkamp Trucking, Inc.	Kern County Superior Court	BCV-16-102399	Stephen Schuett
John Steele et al. v. Delta Sierra Beverage, LLC	Sacramento County Superior Court	34-2017-00206727	Alan Perkins
Nabor Navarro v. Trans-West Intermodal, Inc.	San Bernardino County Superior Court	CIVDS1700850	Brian McCarville
David Dobbs v. Wood Group PSN, Inc.	Kern County Superior Court	BCV-16-101078-DRL	David Lampe
Keith Lacy v. Azuma Foods International, Inc., USA	Alameda County Superior Court	RG16827402	Winifred Smith
Julio Ceron et al. v. Hyrdo Resources-West, Inc.	Kern County Superior Court	BCV-15-101461	Stephen Schuett
Antonio Calderon v. BKB Construction, LP	Kern County Superior Court	BCV-17-102154-DRL	David Lampe
Silvia Harbabikian et al. v. Williston Financial Group, LLC	Ventura County Superior Court	56-2016-00485186-CU-OE-VTA	Kent Kellegrew
Alex Vega et al. v. Advance Beverage Co., Inc.	Kern County Superior Court	BCV-16-100848-DRL	David Lampe
Emmanuel Villarin v. BHFC Operating LLC dba Bottega Louie	Los Angeles County Superior Court	BC616136	Carolyn Kuhl
Milton Krisher et al. v. General Production Service of California, Inc.	Kern County Superior Court	BCV-15-100795	David Lampe
Steve Stuck v. Jerry Melton & Sons Construction, Inc.	Kern County Superior Court	BCV-16-101516-DRL	David Lampe
Caryn Rafferty et al. v. Academy Mortgage Corporation	Sacramento County Superior Court	34-2016-00191285-CU-OE-GDS	David Brown

Carrie Baker v. Central Coast Home Health	San Luis Obispo County Superior Court	17CV-0219	Tana Coates
Jamar Farmer v. Cooks Collision, Inc.	Napa County Superior Court	17CV000969	Diane Price
Alvin Hayes et al. v. Advanced Drainage Systems, Inc.	Kern County Superior Court	BCV-17-101019	Stephen Schuett
Carlos Ramirez v. Crestwood Operations LLC	Kern County Superior Court	BCV-17-100503	David Lampe
Belen Torrez v. Freedom Mortgage Corporation	San Bernardino County Superior Court	CIVDS1709351	David Cohn
Nickolous Blevins v. California Commercial Solar, Inc.	Kern County Superior Court	BCV-17-199571	Stephen Schuett
Ricardo Ortega et al. v. Nestle Waters North America, Inc.	Los Angeles County Superior Court	BC623610	Carolyn Kuhl
Marco Reyes v. Halliburton Energy Services, Inc.	Kern County Superior Court	S-1500-CV-280215-SDS	Stephen Schuett
Dennis Carr v. So-Cal Structural Steel Fabrication, Inc.	San Bernardino County Superior Court	CIVDS1605828	Thomas Garza
Dois Sides et al. v. S.A. Camp Pump Company	Kern County Superior Court	BCV-16-100219-DRL	David Lampe
Javier Cisneros et al. v. Wilbur-Ellis Company LLC	Kern County Superior Court	BCV-17-102836-DRL	David Lampe
Landon Fulmer, Jr. et al. v. Golden State Drilling, Inc.	Kern County Superior Court	S-1500-CV0279707-SDS	Stephen Schuett
Alejandro Hernandez v. NUCO2 Management, LLC	Kern County Superior Court	BCV-17-102571-SDS	Stephen Schuett
Carlos McCollum et al. v. Delta Tech Service, Inc.	Solano County Superior Court	FCS049504	Scott Daniels
Juan Garcia et al. v. Straub Distributing Company, LTD	Kern County Superior Court	BCV-18-100377-DRL	David Lampe
Hal Weinshank et al. v. Freedom Mortgage Corporation	Sacramento County Superior Court	34-2018-00229068	David Brown
Carl Morel et al. v. Aseptic Solutions USA Ventures, LLC	Riverside County Superior Court	RIC1711383	Craig Riemer
Bridgette Guzman v. CrossCountry Mortgage, Inc.	San Diego County Superior Court	37-2017-00050474-CU-OE-CTL	Richard Whitney
Jose Castillo v. Gabriel I. Cruz dba GIC Transport Inc.	Kern County Superior Court	BCV-17-101807-DRL	Thomas Clark
Maximo Garcia et al. v. Glide Rite	Los Angeles County Superior Court	BC665485	William Highberger
Marie Hernandez v. Starbucks Corporation dba Teavana	Ventura County Superior Court	56-2017-00497449-CU-OE-VTA	Matthew Guasco
Talia Turner et al. v. Alliance Residential, LLC	Sacramento County Superior Court	34-2016-00199504-CU-OE-GDS	Alan Perkins
Genio Chuen v. 911 Mobile Mechanic, LLC	Orange County Superior Court	30-2017-00943421-CU-OE-CXC	Glenda Sanders
Elbern Gentry v. Eugene Burger Management Corporation	Sacramento County Superior Court	34-2015-00182515-CU-OE-GDS	David Brown
Daniel Lee v. Westside Habitats, LLC	Los Angeles County Superior Court	BC702296	Elihu Berle
Victor Felix v. Remedial Transportation Services, Inc.	Kern County Superior Court	BCV-18-102595	David R. Lampe
Amy Lustig v. Skyline Financial Corporation	Los Angeles County Superior Court	JCCP4929	Daniel Buckley
Maurice Bunche et al. v. Mettler-Toledo Rainin, LLC	Alameda County Superior Court	RG18899279	Winifred Smith
Richard Valencia v. Hill Phoenix, Inc.	San Bernardino County Superior Court	CIVDS1715125	David Cohn
Annie Ayala v. Cherry Creek Mortgage Co., Inc.	San Bernardino County Superior Court	CIVDS1813616	David Cohn
Melissa Paez v. C&R Restaurant Group, LP	Kern County Superior Court	BCV-18-103171	Stephen Schuett
Johnie Honeycutt et al. v. California Sierra Express, Inc.	Sarremonto County Superior Court	34-2017-00210723	David Brown
Jimmy Alexander v. Republic Services, Inc.	Kern County Superior Court	BCV-18-102520-DRL	David Lampe
Jose Garcia v. Hronis, Inc	Kern County Superior Court	BCV-18-101510	David Lampe
Carlos Koreisz et al. v. On Q Financial, Inc	Ventura County Superior Court	56-2018-00511 126-CU-OE-VTA	Mark Borrell
Jason Manas et al. v. Kenai Drilling Limited	Los Angeles County Superior Court	BC546330	Daniel Buckley
Michelle Xiong et al. v. Hilltop Ranch, Inc.	Merced County Superior Court	18CV-01340	Brian McCabe
David Bibb v. Gazelle Transportation, LLC	Kern County Superior Court	BCV-18-103172-DRL	David Lampe
Israel Balderama v. Steeler, Inc.	Kern County Superior Court	BCV-18-102314-DRL	David Lampe
Donna Chavez v. Munchkin, Inc.	San Bernardino County Superior Court	CIVDS1829987	John Tomberlin
Julio Rodriguez v. Square-H Brands, Inc	Los Angeles County Superior Court	BC719423	Elihu Berle
Jose Godinez et al. v. Lazer Spot, Inc.	Kern County Superior Court	BCV-17-102721	Thomas Clark
Ratcliffe v. Gold Star Mortgage Financial Group	Orange County Superior Court	30-2017-00918768-CU-OE-CXC	Peter Wilson

Jose Duval v. Pacific States Petroleum, Inc.	Sacramento County Superior Court	34-2018-00231934, 34-2018-243085	David Brown
Karen Morgan v. Childtime Childcare, Inc. (Federal)	United States District Court of Central California	8:17-cv-01641 AG (KESx)	Andrew Guilford
Alejandro Amador v. RMJV, LP dba Fresh Creative Foods	San Diego County Superior Court	37 -2018-00045893-CU-OE-NC	Jacqueline Stern
Georgeta Beldiman v. Universal Hospital Services, Inc.	Kern County Superior Court	BCV-18-102235-SDS	Stephen Schuett
Juan Sanchez v. Leon Krous Drilling, Inc.	Los Angeles County Superior Court	BC705069	William Highbarger
Araz Parseghian et al. v. Homestreet Bank	Sacramento County Superior Court	34-2018-00241855-CU-OE-GDS	David Brown
Jose Garcia v. Pacific Coast Supply, LLC	Sacramento County Superior Court	30-2019-00247748-CU-OE-GDS	David Brown
Carl Powell et al. v. West Coast Casing, LLC	Kern County Superior Court	BCV-15-100277-DRL	David R. Lampe
Daniel Flores v. Wilmar Oils & Fats (Stockton), LLC	San Joaquin County Superior Court	STK-CV-UOE-2018-0012758	Barbara Kronlund
Jordan Dahlberg et al. v. Fresno Beverage Company dba Valley Wide Beverage	Tulare County Superior Court	VCU279083	Bret Hillman
Kamada McDaniel v. Royal Cup, Inc.	Alameda County Superior Court	RG19001661	Brad Seligman
Steven Franklin v. Synergy One Lending, Inc.	Kern County Superior Court	BCV-20-100178-SDS	Stephen Schuett
Jorge Proctor v. Helena Agri Enterprises, LLC	San Diego County Superior Court	37-2018-00057894-CU-OE-CTL	Joel Wohlfel
Mariano Martinez v. Community Playgrounds, Inc.	Solano County Superior Court	FCS053879	Bradley Nelson
Fabian Mayorag v. Sturgeon Services International, Inc.	Los Angeles County Superior Court	BC509717	Ann I. Jones
Christine Arman v. Circor Aerospace, Inc.	Riverside County Superior Court	RIC1613578	Sunshine Sykes
Liam Meyers et al v. Power Machinery Center	Kern County Superior Court	BCV-19-100897-DRL	David R. Lampe
Imelda De Vega v. Baxter Healthcare Corporation	Merced County Superior Court	20CV-00782	Brian McCabe
Mario R. Guerrero et al. v. Plaza Home Mortgage, Inc.	Imperial County Superior Court	ECU001150	L. Brooks Anderholt
Marcel Harrington et al. v. Arlon Graphics, LLC	Orange County Superior Court	30-2018-00970444-CU-OE-CXC	Peter Wilson
Daishun Luckett v. King's Hawaiian Bakery West, Inc. et al.	Los Angeles County Superior Court	19TRCV00761	Gary Y. Tanaka
Harry Noriesta v. Konica Minolta Business Solutions U.S.A., Inc.	United States District Court of Central California	EDCV 19-620-JGB (KKx)	Jesus G. Bernal
Rance Lewis v. Environmental Waste Minimization, Inc.	Kern County Superior Court	BCV-19-102248-SDS	Stephen Schuett
Juan Olivas et al. v. VCI Construction, LLC	Kern County Superior Court	BCV-20-100512-SDS	Stephen Schuett
Jonathan McAllister et al. v. La Tortilla Factory, Inc.	Sonoma County Superior Court	SCV-263220	Gary Nadler
Luis Ross et al. v. Cardinal Financial Company L.P.	Orange County Superior Court	30-2018-00998757-CU-OE-CXC	William Claster
Mansour Nije v. Lucira Health, Inc. f/k/a Diassess, Inc.	Alameda County Superior Court	RG20055890	Julia A. Spain
Byron Woods et al. v. Johanson Dielectrics, Inc.	Los Angeles County Superior Court	19STC11487	Maren Nelson
Harry Noriesta v. Konica Minolta Business Solutions U.S.A., Inc.	Merced County Superior Court	20CV-01183	Brian McCabe
Guy Beaudoin et al. v. Weststar Transportation, Inc.	Kern County Superior Court	BCV-18-101045	David R. Lampe
Josh Spier et al. v. Gibbs International, Inc.	Kern County Superior Court	BCV-19-101774-DRL	David R. Lampe
Raynisha Buntun et al. v. 1st Class Staffing et al.	San Joaquin County Superior Court	STK-CV-UOE-2018-15239	Geoge J. Abdallah
Thomas Cuen v. Patriot Environmental Services, Inc.	Kern County Superior Court	BCV-18-102851	David R. Lampe
Sovann Touch v. Presidio Components	Kern County Superior Court	BCV-20-101005	David R. Lampe
Justin Janis et al. v. United Rentals (North America), Inc.	Kern County Superior Court	BCV-19-102692	David R. Lampe
Jeff Borghi v. Goldco Direct LLC dba Goldco Precious Metals	Ventura County Superior Court	56-2019-00533053-CU-OE-VTA	Jeffery G. Bennet
John Kula v. Markem-Imaje Corporation	San Bernardino County Superior Court	CIVDS1911687	Bryan F. Foster
Joseph Garza v. CIG Logistics (Continental Intermodal Group)	Kern County Superior Court	BCV-19-102776-SDS	Stephen Schuett
Robin Arnold v. Guranteed Rate, Inc.	Ventura County Superior Court	56-2019-00523081-CU-OE-VTA	Jeffery G. Bennet
Tyler Arciniega et al. v. Ony Glo, Inc. dba Mortgage Bankers	San Bernardino County Superior Court	CIVDS1901760	Brian S. McCarville
Erica Corona et al. v. Property West, Inc.	San Diego County Superior Court	37-2017-00028103-CU-OE-CTL	Ronald F. Frazier
AnnMarie Albanex v. Bank of Hope	Los Angeles County Superior Court	19STCV30577	Rafael A. Onkeko

Ernesto Perez v. Tri-Star Deying and Finishing, Inc.	Los Angeles County Superior Court	BC649292	Carolyn Kuhl
Kelly Lomeland v. Consolidated Fire Protection	Orange County Superior Court	30-2019-01056877-CU-OE-CXC	Glenda Sanders
Edward Cardenas v. Point Mortgage Corporation	San Diego County Superior Court	37-2018-00036627-CU-OE-CTL	Ronald F. Frazier
Patricial Alcantar et al v. Bay Equity, LLC	Marin County Superior Court	CIV1903376	James Chou
Efrain Perez v. Freedom Medical, Inc.	San Bernardino County Superior Court	CIVDS1903517	Bryan F. Foster
Justin Tourchette v. Finelite, Inc.	Alameda County Superior Court	RG19022885	Frank Roesch
Nathan Priess v. Fiore Management, LLC	Kern County Superior Court	BCV-20-100930-DRL	David R. Lampe
Paul Svinth v. Wastequip Manufacturing Company, LLC	Kern County Superior Court	BCV-17-102143-DRL	David R. Lampe
Marisol Coronado v. Adventist Health Medical Center Tehachapi et al.	Kern County Superior Court	BCV-19-102644	David R. Lampe
Beverly Saolom v. Pulmonox Corporation	San Mateo County Superior Court	19-CIV-05070	Nancy Fineman
Rodney Bianco et al. v. Fujitsu America, Inc.	Los Angeles County Superior Court	18STCV00254	Daniel Buckley
Mark Barnes v. American Financial Network	Orange County Superior Court	30-2017-00921175-CU-OE-CXC	William Claster
Alejandro Pichardon v. American Financial Network	Orange County Superior Court	30-2016-00880472-CU-OE-CXC	William Claster
Edgar Sanchez v. Sunpower Corporation	Kern County Superior Court	BCV-18-102563-SDS	Stephen Schuett
Keith Lacy v. Agro Merchants Oakland, LLC	Alameda County Superior Court	RG18909127	Brad Seligman
Joseph B. Williams v. Good Health, Inc. et al.	Los Angeles County Superior Court	19STCV14944	Elihu M. Berle
Matthew Tucker v. BYD Coach & Bus, LLC	Los Angeles County Superior Court	BC698921	Amy Hogue
Jamie Garcia v. Argo Chemical, Inc.	Kern County Superior Court	BCV-18-102162	David R. Lampe
Cindy Johnson et al. v. Summit Funding, Inc.	Sacramento County Superior Court	34-2018-00237292	Shama H. Mesiwala
Paul Zavala v. Donaghy Sales, LLC	Kern County Superior Court	BCV-20-102005	David R. Lampe
Luis Pelayo v. Rancho Foods, Inc.	Los Angeles County Superior Court	20NWCV00359	Raul Sahagun
Joy Mathis v. Wintrust Mortgage a division of Barrington Bank & Trust Company N.A.	Los Angeles County Superior Court	18STCV01136	Amy Hogue
Antonesha Hoshaw v. Sutherland Healthcare Global Solutions	Los Angeles County Superior Court	19STCV33165	Carolyn Kuhl
Jose Duval v. Dawson Oil Company	Sacramento County Superior Court	34-2020-00276862-CU-OE-GDS	Shama H. Mesiwala
Robin Edwards et al. v. Heartland Payment Systems, Inc.	Los Angeles County Superior Court	BC606083	Daniel Buckley
Cesar Martinez v. Blue Dot Safes Corporation	Los Angeles County Superior Court	19PSCV00618	Gloria White-Brown
Sasha Ellis v. UDR LP et al.	Orange County Superior Court	30-2018-01022710-CU-OE-CXC	William Claster
Steven DeCorso v. Westland Technologies, Inc.	Stanislaus County Superior Court	CV-20-002807	John R. Mayne
Victor Duron et al. v. Super Care, Inc.	Los Angeles County Superior Court	19STCV1479	Kenneth Freeman
Jenay Clayton et al. v. Land Home Financial Services, Inc.	Sacramento County Superior Court	34-2019-00258005-CU-OE-GDS	Shama H. Mesiwala
Priscilla Ramirez v. Amphastar Pharmaceuticals, Inc.	San Bernardino County Superior Court	CIVDSZOI1327	David Cohn
Gina Davidson v. Augusta Financial, Inc.	Los Angeles County Superior Court	20CHCV00420	Melvin Sandvig
Bob Vilitchai v. Ametek Programmable Power, Inc. et al.	San Diego County Superior Court	37-2015-00025968-CU-OE-CTL	Gregory W. Pollack
Carleton Hargrove v. San Diego County Credit Union (PAGA)	San Diego County Superior Court	37-2019-00049944-CU-OE-CTL	Joel R. Wohlfeil
Diego Ayala et al. v. J.C. Ford Company	Kern County Superior Court	BCV-20-102948-DRL	David R. Lampe
Francisco Munoz v. Bon Suisse, Inc.	San Diego County Superior Court	37-2018-00031675-CU-OE-CTL	Kenneth J. Medel
Frank Fernandez v. Confluent Medical Technologies, Inc.	Alameda County Superior Court	RG19012821	Brad Seligman
Monique Gonzalez v. Murad, LLC	Los Angeles Count Superior Court	19STCV28937	Yvette M. Palazuelos
Elizabeth Stacy v. Branded Group, Inc.	Kern County Superior Court	BCV-21-100443-BCB	Bernard C. Barmann
Brittney Hart v. Zazzle, Inc.	San Mateo County Superior Court	20-CIV-01321	Nancy L. Fineman
Eric Williams v. Aetna, Inc. et al.	Alameda County Superior Court	RG19004083	Stephen Kaus

Lavelle Marshall v. Impossible Foods, Inc.	Alameda County Superior Court	RG20052303	Brad Seligman
Alphonso Rivera, et al. v. Love Automotive Group, Inc.	Kern County Superior Court	BCV-18-102730	David R. Lampe
Ron Ferguson adv. Alpha Petroleum Transport, Inc et al.	Kern County Superior Court	BCV-18-101446-BCB	Bernard C. Barmann
Lisa Ramirez et al. v. CareFusion Resources, LCC et al.	San Diego County Superior Court	37-2018-0058078-CU-OE-CTL	Ronald F. Frazier
Kevin Lor v. Antech Diagnostics, Inc (PAGA)	Sacramento County Superior Court	34-2020-00282790	Shama H. Mesiwala
Ashley Simms v. John Stewart Company	Alameda County Superior Court	HG19028122	Paul D. Herbert
Nestor Bulle v. Killion Industries, Inc	San Diego County Superior Court	37-2020-00018510-CU-OE-CTL	Timothy B. Taylor
Vanessa Samaniego v. Sanmina Corporation	Kern County Superior Court	BCV-20-102817	Bernard C. Barmann
Daniel Sonico v. Ji Medical, Inc. adv. Ramat	Alameda County Superior Court	RG20062766	Evelio Grillo
Christina Signh v. Ryzen Solutions	Alameda County Superior Court	RG19039158	Frank Roesch
Joseph Fox v. Crunch, LLC	Sacramento County Superior Court	34-2020-00276101-CU-OE-GDS	Richard K. Sueyoshi
Alexander Hernandez v. Saint Gobain Performance Plastics Corporation	Orange County Superior Court	30-2020-01142388-CU-OE-CXC	Randall J. Sherman
Randall Cowen v. Everett Financial, Inc dba Supreme Lending	Sacramento County Superior Court	34-2018-00247289-CU-OE-GDS	Shama H. Mesiwala
Jerome Oswald v. L.A. Turbine	Los Angeles County Superior Court	20STCV33496	Carolyn B. Kuhl
Dyron Dorsey v. Kruger Foods, Inc.	San Joaquin County Superior Court	STK-CV-UOE-2020-0002099	Erin Guy Castillo
Garner adv. Inter-State Oil Company adv. Garner	AAA	1-21-0003-6413	Kenneth H. Yoon
Alyssa Webb-Bruner v. RA Medical Systems, Inc.	San Diego County Superior Court	37-2019-00066232-CU-OE-CTL	James A. Mangione
Janine Salinas v. Change Healthcare Technology Enabled Services, LLC	Ventura County Superior Court	56-2020-00539300	Mark Borrell
John Hernandez et al. v. Triangle Distributing Co.	Los Angeles County Superior Court	20STCV13172	Maren Nelson
Rason Williams v. National Construction Rentals, Inc	Alameda County Superior Court	RG20075904	Brad Seligman
Gina Massenzo v. Bachem Americas, Inc.	Los Angeles County Superior Court	20TRCV00591	Gary Y. Tanaka
Itxel Toribio v. ITT Aerospace Controls, LLC	Los Angeles County Superior Court	19STCV17469	Kenneth R. Freeman
Lanzell Smith Jr. v. American Campus Communities, Inc.	Sacramento County Superior Court	34-2020-00280934	Shama H. Mesiwala
Randy Munoz v. Osram Sylvania Inc., et al.	Sacramento County Superior Court	34-2020-00284677	Judith S. Craddick
Arlene Bandril et al. v. Plastikon Industries	Alameda County Superior Court	RG19038227	Brad Seligman
Kijana Wicker v. ASC Profiles LLC (PAGA)	Sacramento County Superior Court	34-2019-00270803-CU-OE-GDS	Judith S. Craddick
Janet Ugale et al. v. Allen Distribution, LP	San Joaquin County Superior Court	STK-CV-UOE-2020-0005807	Barbara Kronlund
Angela Burmayer v. Weck Analytical Environmental Services, Inc.	Los Angeles County Superior Court	20STCV30871	William F. Highberger
Rick Beltran v. Stremicks Heritage Foods, LLC	Orange County Superior Court	30-2019-01043445-CU-OE-CXC	Peter Wilson
Luis Searls v. Central Valley Eggs LLC	Kern County Superior Court	BCV-20-101910-JEB	J. Eric Bradshaw
Elisala Tela v. Metrocell Constrution, Inc. (PAGA)	San Bernardino County Superior Court	CIVDS1918537	David Cohn
Nina Brooks v. Action Property Management, Inc. (PAGA)	Los Angeles County Superior Court	BC562417	Daniel J. Buckley
Joshua Mendoza v. Savage Services Corporation	Los Angeles County Superior Court	18STCV04798	Daniel J. Buckley
Eddie Fulinara v. Genmark Diagnostics, Inc.	San Diego County Superior Court	37-2019-00000877-CU-OE-CTL	Ronald F. Frazier
Janine Salinas v. Jafra Cosmetics International, Inc.	Los Angeles County Superior Court	20STCV04284	Carolyn Kuhl
Joseph Hernandez v. Buttonwillow Warehouse Company, Inc.	Kern County Superior Court	BCV-19-100202-BCB	Bernard C. Barmann
Zulema Diaz v. Roxbury Surgery Center, LLC, et al.	Los Angeles County Superior Court	20STCV46531	Mel Red Recana
Daniel Rodriguez v. Means Engineering, Inc.	San Diego County Superior Court	37-2020-00024397-CU-OE-CTL	Katherine Bacal
Erika Martinez v. N.A.F.T.A Distributors	San Bernardino County Superior Court	CIVDS1938970	David Cohn
Juan Gomez v. IHI Power Services Corp.	Merced County Superior Court	20CV-02657	Brian McCabe

Jose Zuniga v. Central Valley Concrete, Inc.	Merced County Superior Court	20CV-00490	Brian McCabe
Brian Perez, et al. v. Merit Aluminum, Inc.	Riverside County Superior Court	RIC1904580	Sunshine S. Sykes
Jacob Schumacher, et al. v. Georgia Pacific Corrugated LLC	Central District Federal Court	CV 19-8632-DMG (AFMx)	Dolly M. Gee
Gerald Angeles, et al., v. iKrusher, Inc.	Contra Costa County Superior Court	MSC20-01312	Edward Weil
Robert Enriquez v. MCE Corporation	Contra Costa County Superior Court	MSC20-01744	Edward Weil
Buck Walsh, et al., v. Tandem Diabetes Care, Inc.	San Diego County Superior Court	A281153-48	Joan M. Lewis
Michane Greene v. Information Resources, Inc. d/b/a Scanscape	San Bernardino County Superior Court	CIVSB2024620	David Cohn
Francesca Burke, et al., v. Old Republic Home Protection Company, Inc., et al.	Contra Costa County Superior Court	MSC20-02203	Edward G. Weil
Shonie Shoemaker v. Broken Arrow Communications, Inc.	Merced County Superior Court	21CV-03517	Brian McCabe
David Pena v. San Joaquin Supply dba Ernest Packaging	Los Angeles County Superior Court	19STCV43500	Amy D. Hogue
Blain Smith, et al. v. KS Industries, L.P.	Kern County Superior Court	S-1500-CV-284188-BCB Consolidated with BCV-21-101300	Bernard C. Barmann
Daniel Ybanez v. Navy Federal Credit Union	San Diego County Superior Court	37-2019-00016815-CU-OE-CTL	Gregory W. Pollack
Amanda Cunningham v. Cottonwood H.C., Inc. dba Cottonwood Post-Acute Rehab	Yolo County Superior Court	CV2021-1375	Daniel M. Wolk
Devon Zabalza v. Customized Distribution Services, Inc.	San Bernardino County Superior Court	CIVDSI931371	David Cohn
Adedeji Adejobi v. Nulaid Foods, Inc. et al.	San Joaquin County Superior Court	STK-CV-UOE-2020-0008625	Barbara Kronlund
Robert Enriquez v. Global Modular, Inc.	Merced County Superior Court	20CV-03162	Brian McCabe
Nguyen Ngo, et al. v. Medimpact Healthcare Systems, Inc.	San Diego County Superior Court	37-2020-00015657-CU-OE-CTL	Keri Katz
Liduvina Jurado v. Gallo Cattle Company	Merced County Superior Court	18CV-01342	Brian McCabe
Aharon Spry, et al. v. Prime Lube, Inc. et al.	San Bernardino County Superior Court	CIVDS2018738	David Cohn
Gorge Monjaraz v. H & U, Inc. d/b/a Sun Noodle California, LLC	Los Angeles County Superior Court	20MCV00285	Thomas D. Long
Eileen Velasquez, et al. v. Hi-Temp Insulation, Inc.	Merced County Superior Court	21CV-02505	Brian McCabe
Steven Jefferson v. McCormack Baron Management, Inc.	San Francisco County Superior Court	CGC-20-588162	Richard B. Ulmer Jr.
Allen Morgan v. Wehah Farm, Inc dba Lundberg Family Farms	Butte County Superior Court	20CV02554	Stephen E. Benson
Sean Hammond, et al. v. Paul Durham Electric, Inc. fka Harold E. Nutter & Son, Inc.	Sacramento County Superior Court	34-2020-00291142-CU-OE-GDS	Christopher Krueger
Fateema Brown v. Fair Oaks Estates, Inc.	Sacramento County Superior Court	34-2020-00278787	Richard Sueyoshi
Charisma Coleman, et al. v. H&E Equipment Serives, Inc. et al.	Alameda County Superior Court	RG20069157	Brad Seligman
Theresa Romandia v. Mattson Technology, Inc.	Alameda County Superior Court	RG20053121	Brad Seligman
Daria Regester, et al. v. The Jackson Laboratory dba The Jackson Laboratory, West	Sacramento County Superior Court	34-2021-00310014-CU-OE-GDS	Christopher E. Kreugar
Earl Rhodes, et al. v. Cavotec Dabico US Inc., et al.	Orange County Superior Court	30-2021-01177305-CU-OE-CXC	Peter Wilson
Stacey Collins v. Mobile Medical Examination Services, LLC dba MEDXM, et al.	Orange County Superior Court	30-2020-01130693-CU-OE-CXC	Glenda Sanders
Mario Ceja v. Silvergate Bank	San Diego County Superior Court	37-2020-0016207-CU-OE-CTL	Ronald F. Frazier
Christopher Luque, et al. v. Glovis America, Inc.	Ventura County Superior Court	56-2021-00550720-CU-OE-VTA	Jeffrey G. Bennett
Alexandra Pelgrift v. The 21st Amendment Brewery Cafe	San Francisco County Superior Court	CGC-20-585227	Ethan P. Schulman
Kevin McNeil, et al. v. KIK International, LLC., et al.	San Bernardino County Superior Court	CIVDS1915438	Bryan F. Foster
Sterling Skinner v. MoreFlavor, Inc.	Alameda County Superior Court	RG20084231	Brad Seligman
Jose Lozano v. Peterson Brothers Consutruction, Inc.	Merced County Superior Court	22CV-00103	Brian McCabe
Tom Tesene v. Serrato- McDermott, Inc. dba Allied Auto Stores	Alameda County Superior Court	RG21090589	Brad Seligman

Joseph Jimenez v. Makita USA, Inc.	Los Angeles County Superior Court	20STCV21732	Lawrence P. Riff
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EXHIBIT 2

JOINT PROSECUTION AGREEMENT

The Law Firms of:

(1) JUSTICE LAW CORPORATION (“JUSTICE”), counsel for Plaintiff in the case of *Ernesto Rivera v. Fiber Care Baths, Inc.*, San Bernardino County Superior Court Case No. CIVSB2114174; **and**, (2) JACKSON APC (“JACKSON”), counsel for Plaintiff in the case of *Manuel Villegas v. Fiber Care Baths, Inc.*, San Bernardino County Superior Court Case No. CIVSB2114736, **as well as**, (collectively the, “Attorneys”), enter into this Joint Prosecution Agreement (“Agreement”) in connection with these cases (the “Actions”).

The purpose of this Joint Prosecution Agreement (“Agreement”) is to memorialize the rights and responsibilities with respect to (a) the conduct of the work necessary for the investigation, litigation and settlement negotiation of the Action, (b) the payment of costs and expenses, and (c) the recovery of costs and expenses and attorney’s fees.

1. Relationship of Attorneys

Attorneys will jointly litigate the Action and process any Settlement, with the understanding that they are Co-Lead Counsel. Together, the Attorneys shall be responsible for directing the course and conduct of the Action. The Attorneys agree to confer with each other on decision-making. The Attorneys agree to work cooperatively and to keep each other apprised of all developments in the Action, including communication with the clients, the Court, and opposing counsel. JUSTICE will take the lead in preparing for and handling mediation and negotiations for July 21, 2022 and will confer with JACKSON for settlement. If the case settles on July 21, 2022, JACKSON will be responsible for settlement approval procedures with the Court.

2. Professional Negligence

Attorneys assume no liability for each other’s professional negligence.

3. Payment of Costs and Expenses.

Attorneys shall pay their own internal costs related to word processing, transportation and hotels, postage and delivery, internal photocopying, computer research, telephone charges and similar internal expenses.

Attorneys shall be responsible for the payment of external costs and expenses of the Litigation incurred after the signing of this agreement, including but not limited to filing fees, reporter fees, service of process fees, consultant and expert witness fees, expert travel costs, document production and other discovery costs, and class notice costs, in accordance with the percentage fee shares described below in Section 4(b).

4. Recovery of Attorneys’ fees, Investigation, Litigation, Costs and Expenses.

a. Out-of-pocket costs and expenses as described in Section 2 above shall first be reimbursed to the party to the Agreement who paid them.

b. In the event there is a recovery in this case, either by settlement, judgment, arbitration award, or otherwise, and award of any type of damages or other monetary relief and/or an award of attorneys' fees, Attorneys shall recover fees after reimbursing such costs and expenses. Fees shall be allocated between Attorneys as follows:

- i. 65% to JUSTICE; and
- ii. 35% to JACKSON.

5. Scope of Agreement.

This Agreement applies to the investigation, negotiation or litigation of the Action. Should other claims or litigation ensue against the Company, a separate agreement regarding association of counsel would be required.

6. Dispute Resolution

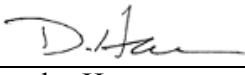
In the event of a dispute regarding this Agreement, the parties agree to mediate. If mediation is unsuccessful the parties agree to binding arbitration with either JAMS or Judicate West.

ACCEPTED and AGREED to:

I have read the foregoing and agree to abide by the terms of this Joint Prosecution Agreement. I am authorized to execute this Agreement on behalf of my firm or organization.

JUSTICE LAW CORPORATION

Date: July 21, 2022

By: 
Douglas Han

JACKSON APC

Date: July 20, 2022

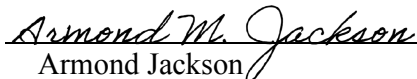
By: 
Armond Jackson

EXHIBIT A TO “JOINT PROSECUTION AGREEMENT”
Rules of Professional Conduct of the State Bar of California, Rule 1.5.1(a)(2)
Client Consent

I, Ernesto Rivera, state as follows:

1. I have been advised in writing that the attorneys identified above have entered into a proposed “Joint Prosecution Agreement.” I understand that the attorneys will divide any attorney’s fees awarded by the court as stated above.
2. My attorney has answered any and all questions that I have about the proposed fee division. I understand the proposed fee division fully.
3. I hereby consent to the proposed fee division.

07/20/2022

Dated: _____

Ernesto Rivera

Signature: Ernesto Rivera

EXHIBIT B TO “JOINT PROSECUTION AGREEMENT”
Rules of Professional Conduct of the State Bar of California, Rule 1.5.1(a)(2)
Client Consent

I, Manuel Villegas, state as follows:

1. I have been advised in writing that the attorneys identified above have entered into a proposed “Joint Prosecution Agreement.” I understand that the attorneys will divide any attorney’s fees awarded by the court as stated above.
2. My attorney has answered any and all questions that I have about the proposed fee division. I understand the proposed fee division fully.
3. I hereby consent to the proposed fee division.

Dated: July 20, 2022

Manuel Villegas
Signature: Manuel Villegas