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13 Attorneys for Plaintiffs
14 ANGEL BRAVO and PABLO FLORES

15 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF SANT CLARA**

17 ANGEL BRAVO and PABLO FLORES

18 Plaintiffs,

19 V.

20 GALLAHER COMPANY AND ROBERT
21 JOHN GALLAHER AND DOES 1
22 THROUGH 50.

23 DEFENDANTS.

CASE NO.: 21CV381912

**DECLARATION OF XIAOMING LIU IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA
SETTLEMENT.**

Date: September 18, 2024

Time: 1:30 p.m.

Dept: 19

Judge: Hon. Theodore C. Zaner

1 I, Xiaoming Liu, declare as follows:

2
3 1. I am an attorney licensed to practice law in California and one of the attorneys for
4 Plaintiffs in this matter. I have personal knowledge of the facts set forth in this declaration, and,
5 if called as a witness, I could and would testify thereto.

6 2. I have been licensed to practice law in California since 2019. I have focused my
7 practice Employment law primarily representing low wage workers.

8 3. I attended law school at the Santa Clara University Law School and graduated in
9 2019. I was admitted to the California Bar in December of 2019. Prior to attending law school, I
10 received a Bachelor of Science Degree and a Master of Science Degree from Oklahoma State
11 University.

12 4. While in Law School, I took classes in Employment Law and volunteered in
13 workers' rights clinics at Katherine and George Alexandar Community Law Center.

14 5. After being admitted to the California Bar, I have been working as the Chinese
15 Mandarin speaking attorney at Santa Clara County Office of Labor Standards Enforcement's
16 legal advice line and as counsel of Step Forward Foundation on employment law related matters.

17 6. My legal practice focuses exclusively representing workers on wage and hour
18 matters. I was lead counsel in *McCuen v. Lupin Heights, Inc*, Santa Clara Superior Court Case
19 No. 21CV388754. I am also co-counsel in two other wage and hour cases in Santa Clara
20 Superior Court.

21 7. I have worked with non-profits organizations on wage and hour issues. I am a
22 volunteer attorney with Katherine and George Alexander Law Center (affiliated with Santa Clara
23 University Law School). I am an active participant in the Santa Clara County Wage Theft
24 Coalition where I am regularly outreaching to low income and non-English speaking
25 communities on workers' rights issues.

26 8. I keep track of my hours using Microsoft Excel spreadsheet. I enter my hours
27 worked on the case shortly after I've completed the tasks.
28

1 9. In total, I am billing 54 hours at \$475 per hour. Exhibit A is a true and correct
2 copy of the hours I logged for this matter as described above. I printed the data to PDF and
3 redacted information that is attorney client.
4

5 I declare under penalty of perjury pursuant to the laws of the United States that the
6 foregoing is true and correct, executed on August 19, 2024, in Santa Clara County, California.
7

8 Dated: August 22, 2024

/s/ Xiaoming Liu

Xiaoming Liu

EXHIBIT A

Gallaher

Client Name	Events	Date	Start	End	Hours	Hours Billed	Total Minutes	In increment of 10 minutes	Hours	Hours Billed
	Revise FAC	8/23/2021	9:35	9:58	0:23	0.33	23.00	20.00	0:23:00	0:23:00
	Revise FAC	8/23/2021	14:23	16:29	2:06	2.17	126.00	130.00	2:06:00	2:29:00
	Call with co-counsel	8/30/2021	1:30	1:37	0:07	0.17	7.00	10.00	0:07:00	2:36:00
	Research and draft memo on statute of limitations	9/8/2021	20:06	21:57	1:51	1.83	111.00	110.00	1:51:00	4:27:00
	Research and draft memo on statute of limitations	9/9/2021	9:01	13:00	3:59	4.00	239.00	240.00	3:59:00	8:26:00
	Draft memo on SOL	9/9/2021	14:00	15:27	1:27	1.50	87.00	90.00	1:27:00	9:53:00
	Draft memo on SOL	9/9/2021	16:20	17:06	0:46	0.83	46.00	50.00	0:46:00	10:39:00
	Research and Draft DFI	10/8/2021	10:45	11:50	1:05	1.17	65.00	70.00	1:05:00	11:44:00
	Draft DFI	10/8/2021	13:56	16:44	2:48	2.83	168.00	170.00	2:48:00	14:32:00
	Draft mediation Brief	7/18/2022	23:13	23:59	0:46	0.83	46.00	50.00	0:46:00	15:18:00
	Draft mediation Brief	7/19/2022	0:00	3:44	3:44	3.67	224.00	220.00	3:44:00	19:02:00
	Draft mediation Brief	7/19/2022	8:16	8:53	0:37	0.67	37.00	40.00	0:37:00	19:39:00
	Draft mediation Brief	7/19/2022	16:12	21:25	5:13	5.17	313.00	310.00	5:13:00	24:52:00
	Draft mediation Brief	7/20/2022	18:11	19:03	0:52	0.83	52.00	50.00	0:52:00	25:44:00
	Participate in mediation	7/27/2022	9:57	13:00	3:03	3.00	183.00	180.00	3:03:00	28:47:00
	Review Evidence	11/3/2022	19:19	22:12	2:53	2.83	173.00	170.00	2:53:00	31:40:00
	Review Evidence	11/8/2022	10:49	12:05	1:16	1.33	76.00	80.00	1:16:00	32:56:00
	Review Evidence and Calculate Damages	12/14/2022	17:08	21:22	4:14	4.17	254.00	250.00	4:14:00	37:10:00
	Talk to Tomas and Mediator	12/15/2022	9:30	10:50	1:20	1.33	80.00	80.00	1:20:00	38:30:00
	Review evidence and calculate damages	12/16/2022	6:37	8:28	1:51	1.83	111.00	110.00	1:51:00	40:21:00
	Review evidence	12/19/2022	15:00	15:30	0:30	0.50	30.00	30.00	0:30:00	40:51:00
	Prepare for meeting tomorrow	2/26/2023	20:04	21:05	1:01	1.00	61.00	60.00	1:01:00	41:52:00
	Meet opp counsel to go through mediation calculation and talk to co-counsel afterwards	2/27/2023	11:00	11:54	0:54	0.83	54.00	50.00	0:54:00	42:46:00
	Talk to co-counsel	2/27/2023	15:36	15:48	0:12	0.17	12.00	10.00	0:12:00	42:58:00
	Research and modify damage calculation and draft email to co-counsel	2/27/2023	20:12	23:02	2:50	2.83	170.00	170.00	2:50:00	45:48:00
	Review mediation materials	6/6/2023	16:07	16:21	0:14	0.17	14.00	10.00	0:14:00	46:02:00
	Participate in mediation	6/7/2023	9:40	16:20	6:40	6.67	400.00	400.00	6:40:00	52:42:00
	Review Settlement Agrrement	8/23/2023	9:45	11:27	1:42	1.67	102.00	100.00	1:42:00	54:24:00
					0:00	0.00	0.00	0.00	0:00:00	54:24:00
					0:00	0.00	0.00	0.00	0:00:00	54:24:00
					0:00	0.00	0.00	0.00	0:00:00	54:24:00
					0:00	0.00	0.00	0.00	0:00:00	54:24:00
					0:00	0.00	0.00	0.00	0:00:00	54:24:00