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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MADERA**

JASON NASR, JACK SAMONTE, GIL
MICHAELI, and MYESHA WILLIAMS, as
individuals and on behalf of all others similarly
situated, and as private attorneys general,

Plaintiffs,

vs.

SAN JOAQUIN VALLEY REHABILITATION
HOSPITAL, a Delaware limited liability company;
and DOES 1 through 50, inclusive,

Defendants.

Case No. MCV084862

Hon. Michael J. Jurkovich
Dept. 44

**DECLARATION OF ORI EDELSTEIN IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: May 28, 2026
Time: 8:30 a.m.
Dept.: Temporary Remote Dept.

Complaint Filed: March 16, 2021
FAC Filed: May 6, 2021
SAC Filed: May 22, 2025

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I, Ori Edelstein, hereby declare as follows:

1. I am an attorney duly licensed and in good standing to practice law in the courts of California. I am a member in good standing of the State Bar of California, I am admitted to the United States District Courts for the Northern, Eastern, Central, and Southern Districts of California. I am admitted to the United States Court of Appeals for the Ninth, Sixth, Fourth and Third Circuits.

2. I am a partner at the law firm of Schneider Wallace Cottrell Kim LLP (“SWCK”). SWCK specializes in class and collective litigation in state and federal court.

3. I am counsel of record for Plaintiff Myesha Williams, on behalf of the State of California and Aggrieved Employees in the above-captioned case. I submit this declaration in support of Plaintiffs’ Motion for Preliminary Approval of Class Action and PAGA Settlement (“Motion”). I am familiar with the file, the documents, and the history related to this case. The following statements are based on my personal knowledge and review of the files. If called to do so, I could and would testify competently thereto.

4. SWCK has extensive experience in wage-and-hour class actions, including significant experience in California. SWCK is regarded as one of the leading private plaintiff's firms in wage and hour class actions and employment class actions. In November 2012, the Recorder listed the firm as one of the "top 10 go-to plaintiffs' employment firms in Northern California." The partners and attorneys have litigated major wage and hour class actions, have won several prestigious awards, and sit on important boards and committees in the legal community. SWCK was founded by Todd Schneider in 1993, and I have been a member of the firm since 1995.

5. SWCK has acted or is acting as class counsel in numerous cases. A partial list of cases which have been certified and/or settled as Class and/or PAGA actions includes: *Macias, et al. v. First Technology Federal Credit Union* (Case No. 21CV375222) (Santa Clara Superior Court, March 12, 2026) (class certification of California classes for wage and hour claims); *Zermeno v. Marriott Int’l, Inc.* (Case No. RG20069869) (Alameda Superior Court, January 6, 2026) (approval of PAGA representative action settlement); *Chavez v. Teasdale Foods, Inc.* (Case No. 21CV-03035) (Merced Superior Court, January 8, 2026) (final approval of California class and subclasses of previously obtained certified wage and hour

claims); *Magana v. Goya Foods of California, Inc., et al.* (Case No. 20STCV43233) (Los Angeles Superior Court, December 4, 2025) (final approval of California class and PAGA action settlement of previously certified California rounding, meal, and wage statement claims); *Ramirez v. Prospect Int'l Airport Servs. Corp., et al.* (Case No. 21-CIV-03393) (San Mateo Superior Court, September 4, 2025); *McElroy, et al. v. Georgia-Pacific Corrugated LLC* (Case No. 23CV034158) (Alameda Superior Court, November 25, 2025) (final approval of California class and PAGA representative action settlement); *Kingsley v. IKEA US Retail LLC, et al.* (Case No. 24CV089765) (Alameda Superior Court, October 23, 2025) (final approval of California class and PAGA representative action settlement); *Hamilton v. Wayfair, LLC* (Case No. RG19006990) (Alameda County Superior Court, September 16, 2025) (final approval of settlement of previously certified California subclasses); *Roberts v. Turning Point Cmty. Programs*, (Case No. 23cv001916) (Sacramento Superior Court, July 7, 2025) (final approval of class and PAGA settlement); *Weaver v. Amentum Servs., Inc.* (Case No. 37-2021-00049868-CU-OE-CTL) (San Diego Superior Court, July 11, 2025) (final approval of California class and PAGA representative action settlement); *Morel v. HNTB Corp., et al.* (Case No. 3:2022-cv-00408) (United States District Court, Southern District of California, July 7, 2025) (final approval of California class and PAGA representative action settlement); *Tovar v. GC Servs. Ltd. P'ship*, (Case No 37-2021-00038640-CU-OE-CTL) (San Diego Superior Court, July 3, 2025) (final approval of Class and PAGA settlement); *Morales, et al. v. Porto's Bakery, Inc., et al.* (Case No. 20STCV34675) (Los Angeles Superior Court, June 25, 2025) (class certification of California class in consolidated matter); *Fleming v. Am. Retail Servs., et al.* (Case No. 37-2021-00007716-CU-OE-NC) (San Diego Superior Court, May 15, 2025) (final approval of class and PAGA representative action); *Bryant v. Renaissance Villages, Inc.* (Case No. RIC2002756) (Riverside Superior Court, May 13, 2025) (final approval of California class and PAGA representative action); *Cohen v. Peloton Interactive, Inc., et al.* (Case No. 2:22-cv-01425-MWF-E) (United States District Court, Central District of California, February 12, 2025) (final approval of FLSA collective, California class, and PAGA representative action); *Corley v. Invitation Homes Realty California, Inc.* (Case No. CIVSB2213022) (San Bernardino Superior Court, January 9, 2025) (final approval of California class, and PAGA representative action); *Salonga, et al. v. Aegis Senior Communities, LLC, et al.* (Case No. 22CV007450) (Alameda Superior Court, August 30, 2024) (final approval of FLSA collective, California

class, and PAGA representative action); *Walker v. Nursefinders, LLC, et al.* (Case No. 3:22-CV-04084-AGT) (Northern District of California, August 27, 2024) (final approval of California class and PAGA representative action settlement); *Bonner v. Providence Health System-Southern California* (Case No. 21STCV09585) (Los Angeles Superior Court, July 16, 2024) (class certification of a California rounding subclass and derivative subclasses); *Miles v. Kirkland* (Case No. 5:18-cv-01559-JWH) (Central District of California, June 7, 2024) (class certification of a California rest break subclass); *Clavel v. San Diego Sunrise Mgmt. Co.* (Case No. 37-2020-00028205-CU-OE-CTL) (San Diego Superior Court, May 29, 2024) (final approval of California class action settlement); *Randall, et al. v. Integrated Commc'n Serv. Inc., et al.* (Case No. 3:20-cv-05438-DGE) (Western District of Washington, March 29, 2024) (final approval of three-state class and FLSA collective action settlement); *Lopez v. Eurofins Scientific, Inc., et al.* (Case No. 3:21-cv-08652-LB) (Northern District of California, February 15, 2024) (final approval of California class and PAGA representative action settlement); *Rodriguez, et al. v. Tri-Wire Eng'g Sols., Inc., et al.* (Case No. 1:21-cv-10752-PBS) (District of Massachusetts, December 5, 2023) (final approval of five-state class and FLSA collective action settlement); *Beissel v. Western Flyer Express, LLC* (Case No. 5:21-cv-00903-R) (Western District of Oklahoma, November 3, 2023) (final approval of Oklahoma class and FLSA collective action settlement for deceptive trade practices, unlawful sale of business opportunities, and wage and hour claims on behalf of independent contractor truck drivers); *Sishi, et al. v. Eskaton Props. Inc., et al.* (Case No. RG21100764) (Alameda County Superior Court, August 4, 2023) (final approval of California class and PAGA representative action settlement); *Wright, et al. v. Frontier Mgmt. LLC, et al.* (Case No. 2:19-cv-01767-JAM-CKD) (Eastern District of California, March 13, 2023) (final approval of California, Illinois, Oregon, and Washington class and FLSA collective action settlement); *Campos v. Extra Express (Cerritos) Inc.* (Case No. BC715057) (Los Angeles Superior Court, January 18, 2023) (final approval of California law wage and hour class action settlement alleging misclassification of short haul delivery drivers); *Huddleston v. John Christner Trucking, LLC* (Case No. 4:17-cv-00549-GKF-CDL) (Northern District of Oklahoma, October 31, 2022) (final approval of California and Oklahoma class and FLSA collective action settlement where Plaintiff obtained class certification on behalf of allegedly misclassified truck drivers); *Tinaco v. Quik Stop Markets, Inc.* (Case No. RG20061119) (Alameda County Superior Court, June 23, 2022) (final approval of a class action

1 settlement for failure to pay for all hours worked, failure to pay minimum and overtime wages, failure to
2 provide meal and rest breaks, waiting time penalties, and failure to provide itemized wage statements,
3 under California law); *Ramirez, et al. v. Rite Aid Corp., et al.* (Case No. CV 20-3531-GW-SKx) (Central
4 District of California, May 19, 2022) (final approval of California class action and PAGA representative
5 action settlement); *Madrigal v. Mission Lakes Country Club, Inc.* (Case No. RIC2003428) (Riverside
6 County Superior Court, May 18, 2022) (final approval of California class action and PAGA representative
7 action); *Hazel v. Himage Sols., Inc.* (Case No. RG20068159) (Alameda County Superior Court,
8 November 2, 2021) (final approval of a California class action settlement for failure to pay for all hours
9 worked, failure to pay minimum and overtime wages, failure to provide meal and rest breaks, failure to
10 reimburse necessary business expenditures, waiting time penalties, and failure to provide itemized wage
11 statements); *Pine Manor Investors, LLC v. FPI Mgmt., Inc.* (Case No. 34-2018-00237315) (Sacramento
12 County Superior Court, October 20, 2021) (final approval of a California class action settlement in action
13 that alleged improper billing for workers compensation charges by an apartment complex management
14 company); *Etcheverry v. Franciscan Health Sys.* (Case No. 3:19-cv-05261-RJB-MAT) (Western District
15 of Washington, October 19, 2021) (final approval of hybrid Fair Labor Standards Act and Washington
16 class action); *Jean-Pierre v. J&L Cable TV Servs., Inc.* (Case No. 1:18-cv-11499-MLW) (District of
17 Massachusetts, August 31, 2021) (final approval of hybrid Fair Labor Standards Act and Massachusetts,
18 New Hampshire, Maine, and Pennsylvania class action); *Amaraut v. Sprint/United Mgmt. Co.* (Case No.
19 3:19-cv-00411-WQH-AHG) (Southern District of California, August 5, 2021) (final approval of hybrid
20 Fair Labor Standards Act and Arizona, Colorado, New York, Ohio, and Washington Rule 23 action); *Diaz*
21 *v. TAK Commc'ns CA, Inc.* (Case No. RG20064706) (Alameda County Superior Court, July 27, 2021)
22 (final approval of hybrid Fair Labor Standards Act and California class action); *Villafan v. BROADSPECTRUM*
23 *Downstream Servs., Inc.* (Case No. 3:18-cv-06741-LB) (Northern District of California, April 9, 2021)
24 (final approval of class and collective action settlement for failure to pay minimum wages and overtime
25 rates, failure to provide meal and rest breaks, failure to reimburse business expenses, and failure to
26 provide itemized wage statements); *Jones, et al. v. CertifiedSafety, Inc., et al.* (Case No. 3:17-cv-02229-
27 EMC) (Northern District of California, June 1, 2020) (final approval of hybrid Fair Labor Standards Act
28 and California, Washington, Illinois, Minnesota, Alaska, and Ohio class action settlement for failure to

1 pay for all hours worked, failure to provide meal and rest breaks, unreimbursed business expenses,
2 waiting time penalties, and failure to provide itemized wage statements); *El Pollo Loco Wage and Hour*
3 *Cases* (Case No. JCCP 4957) (Orange County Superior Court, January 31, 2020) (final approval of a
4 class action settlement for failure to pay for all hours worked, failure to provide meal and rest breaks,
5 unreimbursed business expenses, waiting time penalties, and failure to provide itemized wage statements,
6 under California law); *Soto, et al. v. O.C. Commc'ns, Inc., et al.* (Case No. 3:17-cv-00251-VC) (Northern
7 District of California, Oct. 23, 2019) (final approval of a hybrid Fair Labor Standards Act and California
8 and Washington law Rule 23 action with joint employer allegations); *Manni v. Eugene N. Gordon, Inc.*
9 *d/b/a La-Z-Boy Furniture Galleries* (Case No. 34-2017-00223592) (Sacramento Superior Court) (final
10 approval of a class action settlement for failure to pay for all hours worked, failure to pay minimum and
11 overtime wages, failure to provide meal and rest breaks, waiting time penalties, and failure to provide
12 itemized wage statements, under California law); *Van Liew v. North Star Emergency Servs., Inc., et al.*
13 (Case No. RG17876878) (Alameda County Superior Court) (final approval of a class action settlement
14 for failure to pay for all hours worked, failure to pay minimum and overtime wages, failure to provide
15 meal and rest breaks, failure to reimburse for necessary business expenditures, waiting time penalties,
16 and failure to provide itemized wage statements, under federal law); *Asalati v. Intel Corp.* (Case No.
17 16cv302615) (Santa Clara Superior Court) (final approval of a class and collective action settlement for
18 failure to pay for all hours worked, failure to pay overtime, failure to provide meal and rest breaks, failure
19 to reimburse for necessary business expenditures, failure to adhere to California record keeping
20 requirements, waiting time penalties, and failure to provide itemized wage statements, under federal and
21 California law); *Harmon, et al. v. Diamond Wireless, LLC*, (Case No. 34-2012-00118898) (Sacramento
22 Superior Court) (final approval of a class action settlement for failure to pay wages free and clear, failure
23 to pay overtime and minimum wages, failure to provide meal and rest breaks, failure to pay full wages
24 when due, failure to adhere to California record keeping requirements, and failure to provide adequate
25 seating, under California law); *Aguilar v. Hall AG Enters., Inc., et al.*, (Case No. BCV-16-10994-DRL)
26 (Kern County Superior Court) (final approval of a class action settlement for failure to provide meal and
27 rest periods, failure to compensate for all hours worked, failure to pay minimum and overtime wages,
28 waiting time penalties, failure to provide itemized wage statements, and failure to pay undiscounted

wages, under California law); *Visceral and Krueger v. Mistras Grp., Inc.*, (Case No. 3:15-cv-02198-EMC) (Chen, J.) (Northern District of California) (final approval of a class and collective action settlement for failure to compensate for all hours worked, including overtime, under federal and California law); *Jeter-Polk, et al. v. Casual Male Store, LLC, et al.*, (Case No. 5:14-CV-00891) (Central District of California) (final approval of a class action settlement for failure to provide meal and rest periods, failure to compensate for all hours worked, failure to pay overtime wages, unpaid wages and waiting time penalties, and failure to provide itemized wage statements); *Meza, et al. v. S.S. Skikos, Inc., et al.*, (Case No. 15-cv-01889-TEH) (Northern District of California) (final approval of class and collective action settlement for failure to compensate for all hours worked, including overtime, under federal and California law, failure to provide meal and rest breaks, failure to reimburse for necessary business uniforms, failure to pay full wages upon termination to, and failure to provide accurate itemized wage statements); *Holmes, et al v. Xpress Global Sys., Inc.*, (Case No. 34-2015-00180822) (Sacramento Superior Court) (final approval of a class action settlement for failure to provide meal and rest breaks and failure to provide accurate itemized wage statements); among many others.

6. I have extensive experience in wage and hour litigation. Virtually all of my cases are wage and hour actions. I have litigated numerous legal issues in wage and hour class and representative cases in California, as well as Fair Labor Standards actions around the country. I also have extensive experience seeking certification of wage and hour class actions, and all the unique issues arising therefrom. I am the primary partner on this matter at SWCK.

7. Before I became the primary partner on this matter, Carolyn H. Cottrell, a partner at SWCK, was the primary partner on this matter at SWCK. Ms. Cottrell devoted nearly her entire legal career to advocating for the rights of individuals who have been subjected to illegal pay policies, discrimination, harassment and retaliation and representing employees in wage and hour and discrimination class actions. Ms. Cottrell has litigated hundreds of wage and hour, employment discrimination and civil-rights actions, and has managed many of SWCK's current cases in these areas. She is a member of the State Bar of California, and has had memberships with Public Justice, the National Employment Lawyers Association, the California Employment Lawyers Association, and the Consumer Attorneys of California. She served on the Board of Directors for the San Francisco Trial Lawyers

1 Association and co-chaired its Women's Caucus. She was named one of the "Top Women Litigators for
2 2010" by the Daily Journal, and in 2012, she was nominated for Woman Trial Lawyer of the Year by the
3 Consumer Attorneys of California. She has also been selected as a Super Lawyer every year since 2014.
4 Ms. Cottrell earned her bachelor's degree from the University of California and is a graduate of the
5 University of the Pacific, McGeorge School of Law.

6 **Attorneys' Fees and Costs**

7 8. Plaintiffs' counsel's efforts resulted in a total Settlement Amount of \$4,000,000.00. This
8 is a fair and reasonable settlement and an especially favorable result in light of the number of Covered
9 Employees and the challenges Plaintiffs may have faced at trial. This result was achieved by the work
10 and success of Plaintiffs' counsel, who negotiated the Settlement after extensive preparation.

11 9. SWCK has been representing Plaintiff Williams and the State in this matter on strictly
12 contingency-fee basis. SWCK exposed themselves to the risk of zero recovery after a substantial
13 investment of time, money, and resources, and have done so since the inception of the case without any
14 payment or compensation.

15 10. SWCK's lodestar in this Action to date is approximately 957.60 hours, corresponding to
16 \$624,956.50 in fees, and \$9,776 in expenses. A breakdown of SWCK's hours, rates, fees, and expenses
17 will be provided with the motion for final approval.

18 11. Reasonable litigation expenses are ordinarily included with an award of attorneys' fees
19 pursuant to California wage-and-hour law. Here, Plaintiff's counsel's expenses were reasonable,
20 necessary to the prosecution, and of the type customarily billed to fee-paying clients.

21
22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct.

24 Executed on this 5th day of May 2026 in Emeryville, California.

25
26 
27 Ori Edelstein
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