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Attorneys for Plaintiff and the Class

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

LISA LEFANTY, individually, and on behalf of
all others similarly situated,

Plaintiff,

vs.

KAISER FOUNDATION HOSPITALS; DOES
1 to 20, inclusive,

Defendants.

Case No. CV-21-004330

CLASS ACTION

**DECLARATION OF TIMOTHY B. DEL
CASTILLO IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: August 12, 2025

Time: 8:30 AM

Dept.: Dept 23

Action Filed: March 8, 2023

Trial Date: Not Set

1 I, Timothy B. Del Castillo, declare:

2 1. I am an attorney at law duly admitted to practice before all the courts of the State of
3 California and an attorney of record for Plaintiff Lisa Lefanty (“Plaintiff”) in this matter. I have
4 personal knowledge of the facts set forth in this declaration, and if called as a witness, could and
5 would testify as to their accuracy.

6 2. I am making this declaration on behalf of my client, the named Plaintiff, the
7 putative class members, and in support of Plaintiff’s Motion for Final Approval of Class Action
8 Settlement (“Motion”). A true and correct copy of the parties’ Joint Stipulation of Class Action
9 PAGA Settlement and Release is being filed with the Motion as **Exhibit A** to the Motion.

10 3. I am a seasoned litigation and trial attorney who has litigated numerous wage-and-
11 hour class action cases, both for Defendants and for Plaintiffs. Ever since I began practicing law,
12 I have practiced virtually exclusively California employment law, including individual and
13 representative actions on behalf of both employers and employees. I have worked on numerous
14 class action cases in California, in both Federal and Superior courts, since 2011.

15 4. I graduated with a Bachelor of Arts degree from Franciscan University of Steubenville in
16 2001, summa cum laude, with a double major in philosophy and theology. I received my Juris
17 Doctor degree from Pepperdine University School of Law in 2010, magna cum laude and
18 graduated in the top 3% of my class. During law school, I was a Lead Articles Editor for the
19 Pepperdine Law Review, served as a teaching assistant, and externed for Chief Judge Alex
20 Kozinski of the United States Court of Appeals for the Ninth Circuit.

21 5. I started my legal career as a judicial law clerk to Williams H. Pryor Jr. of the United
22 States Court of Appeals for the Eleventh Circuit, immediately after which I practiced employment
23 law for several years with two of the largest and highly-regarded international law firms: Akin
24 Gump Strauss Hauer & Feld LLP in Los Angeles and Orrick Herrington & Sutcliffe LLP. As a
25 Senior Associate in the employment litigation group at Orrick, Herrington & Sutcliffe LLP in its
26 Sacramento, California office, my hourly rate exceeded \$700.00 per hour, and I worked on
27 numerous complex wage-and-hour class actions. I have represented numerous Fortune 500
28 companies in high-stakes employment cases involving discrimination, harassment, retaliation,
misclassification, claims for unpaid wages, violations of the California Labor Code, wrongful

1 termination, and many other employment-related claims. For example, I have defended wage-
2 and-hour class and PAGA cases for employers such as Sears, Starbucks, and Morgan Stanley to
3 name a few.

4 6. In 2017, I started my own independent law practice, Castle Law: California Employment
5 Counsel. I now represent individuals in employment law matters, with a particular emphasis on
6 wage-and-hour issues.

7 7. I have served on the Executive Committee for the Labor and Employment Section of the
8 Sacramento County Bar Association, and on the Board for the Solo and Small Firm Division of
9 the Sacramento County Bar Association.

10 8. In 2018 and 2021, I was selected by a vote of my peers to be included in Sacramento
11 Magazine's list of 2018 Top Lawyers in Sacramento. In 2020–2021, I was recognized as a Super
12 Lawyer Rising Star for employment law, which recognizes no more than 2.5 percent of attorneys
13 in each state. In 2022–2025, I was selected as a Super Lawyer which recognizes no more than 5%
14 of attorneys in each state.

15 9. I have given presentations to numerous business groups on topics related to employment
16 law in California, including but not limited to the following:

- 17 a. Strategies for a Successful Mediation in Wage and Hour Class and PAGA Actions,
18 California Lawyers Association, 13th Annual Advanced Wage and Hour
19 Conference.
- 20 b. Putting in Work: Running a High-Level Employment Law Practice, Above the
21 Law: The Legal Tech Non-Event with Jared Correia
- 22 c. Arbitration Agreements and PAGA Claims: Good News for Employers, Workplace
23 Wake-Up with Jennifer Shaw
- 24 d. Employment Litigation: Perspectives from the “Other Side”, Workplace Wake-Up
25 with Jennifer Shaw
- 26 e. Calculating Damages, Exposure & PAGA Penalties for Mediation/Settlement in
27 Wage and Hour Class and Representative Actions, Bridgeport Continuing
28 Education

- f. Advanced Strategies in Calculating Damages, Exposure & PAGA Penalties for Mediation/Settlement in Wage and Hour Class and Representative Actions, Bridgeport Legal Education
- g. The Mini MBA for Attorneys: Labor and Employment Law Essentials, National Business Institute
- h. How to Become a Pivotal Part of Any Wage and Hour Practice Group, Sacramento County Bar, Labor and Employment Section
- i. Alternative Dispute Resolution in Employment, National Business Institute
- j. Easy as ABC?: What Business Owners Need to Know About Worker Classification, SCORE Association
- k. Negotiations, Settlement, and Mediation, Federal Bar Association: Sacramento Chapter

10. I have experience representing clients' interests in trials, appeals, arbitrations, and mediations. I have tried three employment law cases in Sacramento Superior Court, including defending a certified class and Private Attorney General Act ("PAGA") action that went to trial in February 2019 before Honorable Steven M. Gevercer. (*Baker v. Advanced Disability Management, Inc.*, Case No. 34-2014-00160711).

11. I have represented numerous individuals in class and PAGA representative actions, including other matters in which class and PAGA action settlements have been approved with me as counsel for Plaintiffs. Courts have routinely awarded my firm common fund fee percentages in class and PAGA cases ranging from 33% to 40%. These cases include, but are not limited to, the following:

- a. *Rooney v. Save Mart Supermarkets*, Sacramento Superior Court Case No. 34-2020-00274973-CU-OE-GDS (class and PAGA action final approval granted for settlement for \$7,480,000 with 35% attorney fee award);
- b. *Marie Hogan v. Aecom Technical Services, Inc.*, Los Angeles County Superior Court Case No. 19STCV40072 (counsel for Plaintiff, wage-and-hour class action settlement final approval granted; \$3,680,000 settlement with 33.33% attorney fee award);

- 1 c. *Aaron Carr v. Howroyd-Wright Employment Agency et al.*, Sacramento Superior
2 Court, Case No. 34-2018-00228290 (counsel for Plaintiff, wage-and-hour class and
3 PAGA action, final approval of settlement for \$1,195,000 with 35% attorney fee
4 award);
- 5 d. *Christian Sipin et al. v. Salesforce.com, Inc.*, San Joaquin County Superior Court,
6 Case No. STK-CV-UOE-2019-0004629 (counsel for Plaintiffs, wage-and-hour
7 class and PAGA action, final approval of settlement for \$1,500,000 with 35%
8 attorney fee award);
- 9 e. *Sean Lalor et al. v. Mendocino Farms*, Sacramento County Superior Court, Case.
10 No. 34-2020-00277871 (class and PAGA action, final approval granted for
11 \$1,500,000 with 33.33% attorney fee award);
- 12 f. *Deena Sakhel v. Cogir Management USA Inc.*, San Joaquin County Superior Court,
13 Case No. STK-CV-UOE-2020-0001215 (class and PAGA action, final approval
14 granted for settlement for \$1,300,000 with 35% attorney fee award);
- 15 g. *Melody Armstrong et al. v. Ruan Transport Corp.*, San Bernardino County
16 Superior Court, Case No. CIVDS1605897 (class and PAGA action, final approval
17 granted for \$1,480,000 with 33.33% attorney fee award);
- 18 h. *Anthony Evans et al v. Direct Delivery Service, Inc. et al.*, San Joaquin County
19 Superior Court Case No. STK-CV-UOE-2020-0003776 (class and PAGA action,
20 preliminary approval granted for settlement for \$900,000 with 35% attorney fee
21 award);
- 22 i. *Jerome Williams v. RC Willey Home Furnishings*, Sacramento Superior Court Case
23 No. 34-2019-00272003 (class and PAGA action, final approval granted for
24 settlement for \$750,000 with 35% attorney fee award);
- 25 j. *Anthony Trujillo v. Valet Living, LLC*, Sacramento Superior Court Case No. 34-
26 2020-00273711 (class and PAGA action, final approval granted for \$750,000 with
27 35% attorney fee award);
- 28

- 1 k. *Susan Tanis v. Laser Eye Care of California, LLC et al.*, Sacramento County
2 Superior Court, Case No. 34-2021-00299140 (class and PAGA action, final
3 approval granted for \$720,000 with 35% attorney fee award);
- 4 l. *Blythe Ducheneaux v. Villa Sport, et al.*, Placer County Superior Court, Case No.
5 S-CV-0044826 (class and PAGA action, final approval granted for \$626,000 with
6 35% attorney fee award);
- 7 m. *Nicholas Simon v. Maita Enterprises, Inc.*, Sacramento Superior Court Case No.
8 34-2020-00276615 (PAGA-only action settlement approval for \$410,000 with 40%
9 attorney fee award);
- 10 n. *Robert Amador v. Jeff Thompson's Auto Group, Inc.*, El Dorado County Superior
11 Court, Case No. PC20190146 (PAGA-only settlement approved for \$260,000 with
12 40% attorney fee award);
- 13 o. *Virginia Gottlieb v. Agilent Tech.*, Sacramento Superior Case No. 34-2018-
14 0244298 (PAGA-only settlement approved for \$300,000 with 35% fee award);
- 15 p. *Bulos Saliba v. Amerigas Propane*, Sacramento Superior Case No. 34-2019-
16 00257327 (counsel for Plaintiff, final approval granted in wage-and-hour class and
17 PAGA action for \$195,000 with 40% attorney fee award);
- 18 q. *Ivan Guschin et al. v. Energy Star Lighting and Electric*, Sacramento County
19 Superior Court, Case. No. 2020-00281895-CU-OE (PAGA-only action settled for
20 \$110,000 with 40% attorney fee award);
- 21 r. *Kenneth Trone v. Sugar Bowl*, Placer County Superior Court, Case No. S-CV-
22 0045755 (PAGA-only settlement approved for \$142,500 with 40% attorney fee
23 award).
- 24 s. *Daniel McNamee et al. v. indiGO San Francisco, LLC*, Marin County Superior
25 Court Case No. 3:22-cv-04033-JSC (PAGA-only settlement approved for \$150,000
26 with 33% attorney fee award);
27
28

- 1 t. *Christine Hall, et al. v. USA Multifamily Management, Inc., et al.* Placer County
2 Superior Court Case No. S-CV-0045899 (class and PAGA action, final approval
3 granted for \$1,400,000 with 33.33% attorney fee award);
- 4 u. *Edmundo Holguin v. Hawthorne Machinery Company*, San Diego County Superior
5 Court Case No. 37-2021-00003107-CU-OE-CTL (PAGA-only settlement approved
6 for \$287,963 with 33.33% attorney fee award);
- 7 v. *Marjan Warmilee v. Lendbuzz Funding, LLC, et al.*, Sacramento County Superior
8 Court Case No. 34-2022-00328422 (class and PAGA action, final approval granted
9 for \$210,000 with 33.33% attorney fee award);
- 10 w. *Hailey Popovich v. Russell Cellular, Inc.*, Fresno County Superior Court, Case
11 No. 20CECG02552 (PAGA-only settlement approved for \$200,000 with
12 33.33% fee award);
- 13 x. *Kaitlin Brick, et al. v. Hooked on Solar, Inc.*, Placer County Superior Court,
14 Case No. S-CV-0048295 (class and PAGA action, final approval granted for
15 \$400,000 with 35% attorney fee award);
- 16 y. *Kali Bates, et al. v. MVP Event Productions, LLC et al.*, Sacramento County
17 Superior Court, Case No. 34-2022-00317653 (class and PAGA action, final
18 approval granted for \$175,000 with 35% attorney fee award);
- 19 z. *Guthrie Siegman v. JMR Concessions, LLC, et al.*, Alameda County Superior
20 Court, Case No. 23CV030280 (PAGA-only settlement, approved for \$235,000
21 with 33.33% attorney fee award);
- 22 aa. *Ellena Sornoso v. The Buckle, Inc.*, Butte County Superior Court, Case No.
23 23CV03464 (PAGA-only settlement, approved for \$147,500 with 33.33%
24 attorney fee award);
- 25 bb. *Zachariah Salsbury v. Hansen Bros. Enterprises*, Nevada County Superior
26 Court, Case No. CU0001116 (PAGA-only settlement, approved for \$216,425
27 with 35% attorney fee award);
28

1 cc. *Kody Walker v. Enovix Corporation*, Alameda County Superior Court, Case
2 No. 23CV028923 (PAGA-only settlement, approved for \$180,000 with 30.00%
3 attorney fee award);
4 dd. *Dina Serrieh v. Jill Acquisition LLC*, Placer County Superior Court, Case No.
5 S-CV-0049697 (class and PAGA action, final approval granted for \$600,000
6 with 33% attorney fee award);
7 ee. *Carmen Garcia v. Caliber Holdings of California, LLC et al.*, Placer County
8 Superior Court, Case No. S-CV-0050365 (PAGA-only settlement, approved for
9 \$4,090,000 with 33.33% attorney fee award);
10 ff. *Nicole Prahm v. Hot Topic, Inc.*, Placer County Superior Court, Case No. S-
11 CV-0049489 (PAGA-only settlement, approved for \$1,180,000 with 33.33%
12 attorney fee award);
13 gg. *Sean Doyle, et al. v. UAUTO Roseville, LLC*, Placer County Superior Court,
14 Case No. S-CV-0052660 (PAGA-only settlement, approved for \$50,000 with
15 33.33% attorney fee award);
16 hh. *Blake Ahlers v. Rideout Memorial Hospital*, Yuba County Superior Court, Case
17 No. CVC22-00115 (PAGA-only settlement, approved for \$920,000 with
18 33.33% attorney fee award);
19 ii. *Eric Vasconcellos v. JS Sacramento, Inc. et al.*, Sacramento County Superior
20 Court, Case no. 23CV012199 (PAGA-only settlement, approved for \$170,010
21 with 33.33% attorney fee award);
22 jj. *Fredi Jaimez v. HPS Mechanical, Inc., et al.*, Kern County Superior Court,
23 Case No. B-CV-21-101987 (class and PAGA action, final approval granted for
24 \$400,000 with 35% attorney fee award);
25 kk. *Alicia Wilson v. Ohgane, Inc. et al.*, Sacramento County Superior Court, Case
26 No. 34-2023-00333601 (class and PAGA action, final approval granted for
27 \$477,260.37 with 33.33% attorney fee award); and,
28

1 *Mike Brazil, et al. v. BACO Realty Corporation*, Sacramento County Superior Court, Case
2 No. 23CV010056 (PAGA-only settlement, approved for \$260,000.00 with 33.4% attorney fee
3 award).

4 12. Additionally, our firm is counsel for Plaintiffs in numerous other currently pending class
5 and PAGA representative actions throughout the state, which are at various stages of litigation but
6 have not yet gone to judgment or had settlements approved, including but not limited to:

- 7 a. *Moala Alipate v. CHME, Inc.*, San Mateo County Superior Court, Case No. 20-
8 CIV-00733 (putative class and PAGA action pending);
- 9 b. *Isabella Fulli v. Carter's Retail, Inc.*, Placer County Superior Court, Case No.
10 S-CV-0052518 (class action pending);
- 11 c. *Nathan Christensen v. Carter Retail, Inc.*, Central District of California, Case
12 No. 8:20-cv-00776 JLS (KESx) (class certification denied, PAGA action
13 pending);
- 14 d. *Eduardo Enriquez v. Solari Enterprises, Inc.*, Los Angeles Superior Court, Case
15 No. 20STCV11129 (PAGA action pending);
- 16 e. *Alejandro Rodriguez v. Worldwind Services, LLC*, Kern County Superior
17 Court, Case No. BCV-19-103236 (class and PAGA action pending);
- 18 f. *Adrian Hernandez v. Santa Fe Mercados, Inc.*, Monterey County Superior
19 Court, Case No. 21CV000222 (class and PAGA action pending);
- 20 g. *Rana Musharbash v. JPMorgan Chase Bank*, Eastern District of California,
21 Case No. 2:22-cv-02320-DAD-KJN (PAGA action pending);
- 22 h. *Jordan Burkhardt v. Extra Space Management, Inc.*, El Dorado County
23 Superior Court, Case No. 25CV013 (putative class and PAGA action pending);
- 24 i. *Ruth Oyeniyi Abe, et al. v. United Cerebral Palsy of Greater Sacramento, Inc.*,
25 Sacramento County Superior Court, Case No. 23CV008763 (putative class and
26 PAGA action pending);
- 27 j. *Harry Edward v. SVC Manufacturing, Inc., et al.*, Alameda County Superior
28 Court, Case No. 23CV027173 (putative class and PAGA action pending);

- 1 *k. Atya Tarkington v. Logical Innovations, Inc., et al.*, Los Angeles County
2 Superior Court, Case No. 22AVCV00752 (putative class and PAGA action
3 pending);
- 4 *l. Stanley Deo v. PVS Distributing*, Sacramento Superior Court, Case No.
5 25CV007159 (putative class and PAGA action pending);
- 6 *m. Janise Cohen v. Regal Cinemas, Inc.*, U.S. District Court Eastern District of
7 California, Case No. 2:25-cv-00770-DJC-CKD (PAGA action pending);
- 8 *n. Gabriella Arellano, et al v. Hero Adams, Inc., et al.*, Santa Clara County
9 Superior Court, Case No. 21CV386893 (putative class and PAGA action
10 pending);
- 11 *o. Brendan Alvarado v. Akkodis, Inc., et al.*, Sacramento County Superior Court,
12 Case No. 23CV009433 (PAGA action pending);
- 13 *p. Richard Archibeque v. Collins Electrical Company, Inc.*, San Joaquin County
14 Superior Court, Case No. STK-CV-UOE-2021-0003864 (putative class and
15 PAGA action pending);
- 16 *q. Dustin Graham v. Allied Waste Systems, Inc.*, Contra Costa County Superior
17 Court, Case No. C22-01284 (putative class and PAGA action pending);
- 18 *r. Cheryl Jones v. Provident Savings Bank, FSB*, Placer County Superior Court,
19 Case No. S-CV-0050482 (PAGA action pending);
- 20 *s. John Liashenko v. Berendsen, Inc.*, Sacramento County Superior Court, Case
21 No. 25CV010153 (PAGA action pending);
- 22 *t. Diana Mendoza v. Human Bees, Inc., et al.*, San Joaquin County Superior
23 Court, Case No. STK-UOE-2021-0002678 (putative class and PAGA action
24 pending);
- 25 *u. William Mustain v. Sierra Striping, Inc., et al.*, Placer County Superior Court,
26 Case No. S-CV-0052071 (putative class and PAGA action pending);
- 27 *v. Julie Nishimoto v. CP Capital Group, Inc.*, Yolo County Superior Court, Case
28 No. CV2024-1152 (PAGA action pending);

1 w. *Frank Ortegon-Ramirez v. Eclipse RTO, LLC, et al., San Joaquin County*
2 *Superior Court, Case No. STK-CV-UOE-2023-0002116* (PAGA action
3 pending);

4 x. *Darrell Phillips v. Garuda Labs, Inc. dba Instawork, et al., Placer County*
5 *Superior Court, Case No. S-CV-0054059* (putative class and PAGA action
6 pending);

7 y. *Anthony Ramacciotti v. Capitol Express Lines, Inc., Sacramento Superior*
8 *Court, Case No. 23CV006543* (PAGA action pending).

9 13. The lists above do not reflect several cases in which our firm has represented
10 employers in complex wage-and-hour class and PAGA cases.

11 14. This case was brought as a wage and hour class action based on Plaintiff's
12 allegations that Defendant misclassified Plaintiff and similarly situated Assistant Nurse Managers
13 as Exempt, when in fact they performed non-exempt work 50% or more of their working time.

14 15. Plaintiff is the only named representative in this matter and is contending was
15 misclassified as exempt and that she worked for Defendant as a non-exempt, hourly employee.
16 From Plaintiff's counsel's initial investigations of Plaintiff's claims and documents, we believed
17 these claims had merit and could be maintained as a class action. There is no date set for a motion
18 for certification in this matter and no trial date has been set.

19 16. From the beginning, Defendants have contested the merits of this case and the
20 suitability of the case for class action treatment, and, notwithstanding their agreement to settle this
21 matter; they believe they have complied with all state and federal employment laws with respect
22 to Plaintiffs and the putative class. Defendants also have contended that this matter is not
23 appropriate for class certification outside of this proposed class settlement. Although I am of the
24 opinion that a class can be certified, I also believe in the fairness of the settlement that is based on
25 factoring in the uncertainty and risks to Plaintiff involved in not prevailing on one or more of the
26 causes of action or theories alleged, the possibility of non-certification and potential for appeals.

27 17. Based on our extensive factual and legal investigation and research, careful
28 evaluation of the respective parties' strengths and weaknesses the uncertainty in the law with
 regard to certification, and the negotiations that have taken place, I am convinced that the

1 proposed settlement is reasonable and fair and in the best interest of the class. The length and
2 risks of trial and other normal perils of litigation that impact the value of the claims were also
3 considered and weighed in reaching the proposed settlement. In addition, I carefully considered
4 the prospect of potential class certification issues as well as the uncertainty of class certification,
5 the difficulties of complex litigation, and the lengthy process of establishing specific damages and
6 various possible delays and appeals in agreeing to the proposed settlement. I further considered
7 the fact that penalties under the PAGA could be substantially cut at the discretion of the Court
8 even if Plaintiff was successful in proving those claims. Overall, I believe it is more beneficial to
9 secure a guaranteed benefit to the class now rather than to proceed with litigation and potentially
10 obtain zero funds to the class due to legal or factual issues with the case.

11 18. I and my co-counsel, along with Plaintiff's assistance, thoroughly investigated the
12 merits of the class claims and potential damages for such claims. The parties engaged in
13 substantial informal and formal discovery and exchange of documents. Defendants provided
14 relevant wage and hour policies, as well as Plaintiff's time records, pay records, and personnel
15 file, as well as data regarding wages earned by other class members. Numerous class members
16 were contacted as part of our investigation. The Parties engaged in mediation with experienced
17 wage and hour mediator Jeff Ross, on August 7, 2024, and were able to reach a settlement.
18 Additionally, Plaintiff assisted in all aspects of this litigation including providing factual
19 information relating to theirs and similarly situated employees' employment conditions, and
20 answered questions regarding Defendant's factual contentions in this matter. This was important
21 because it directly related to our ability to maintain this case as a class action and our ability to
22 obtain a favorable settlement for the class. Throughout this litigation, I and my co-counsel
23 communicated with Defendant's counsel, including via telephone and email, discussing our
24 respective positions and it was only after litigation and extensive, arm's length negotiations that
25 the parties were able to reach a settlement. The negotiations were at all times contentious and
26 adversarial, though still professional in nature.

27 19. On April 29, 2021, Plaintiff filed her PAGA Notice with the Department of
28 Industrial relations ("DIR") via its website, detailing various alleged violations of the Labor Code
committed by Defendant, for the purpose of complying with California Labor Code § 2699.3's

1 notice requirement. At that time, our firm submitted the \$75.00 filing fee on behalf of Plaintiff.
2 The PAGA Notice was sent to Defendant via certified mail. The LWDA did not provide any
3 response to Plaintiff's notice correspondence and Defendant did not cure any other alleged
4 violations and, therefore, Plaintiff was authorized to file her lawsuit in superior court. On January
5 11, 2022, Plaintiff filed her Amended PAGA Notice.

6 20. Plaintiff initiated this action by filing her Class Action and PAGA Complaint in
7 Stanislaus County Superior Court on August 13, 2021.

8 21. On January 16, 2024, Plaintiff's counsel uploaded a copy of the filed complaint on
9 the LWDA website. On January 17, 2025, Plaintiff's counsel uploaded a copy of the Settlement
10 Agreement to the LWDA website.

11 **THE SETTLEMENT IS FAIR, JUST, AND REASONABLE**

12 22. Based on the expected testimony from Plaintiff and putative class members, a
13 review of Defendant's wage and hour policies, Plaintiff's testimony during two days of
14 depositions, as well as pay data of putative class members, and other documents relating to the
15 alleged claims for Plaintiff and the putative class, the scope of the potential damages to Plaintiff
16 and putative class members in light of the claims alleged, the uncertainty in the law with regard to
17 certification, and the negotiations that have taken place, I am convinced that the proposed
18 settlement is reasonable and fair and in the best interest of the class. The length and risks of trial
19 and other normal perils of litigation that impact the value of the claims were also considered and
20 weighed in reaching the proposed settlement. In addition, I carefully considered the prospect of
21 potential class certification issues as well as the uncertainty of class certification, the difficulties of
22 complex litigation, and the lengthy process of establishing specific damages and various possible
23 delays and appeals in agreeing to the proposed settlement. I further considered the fact that
24 penalties under the PAGA could be substantially cut at the discretion of the Court even if
25 Plaintiffs were successful on proving those claims. Overall, I believe it is more beneficial to
26 secure a guaranteed benefit to the class now rather than to proceed with litigation and potentially
27 obtain zero funds to the class due to legal or factual issues with the case.

28 23. I and my co-counsel, along with Plaintiff's assistance, thoroughly investigated the
merits of the claims and potential damages for such claims. The parties engaged in substantial

1 informal and formal discovery and exchange of documents, and participated in a full-day
2 mediation session prior to reaching a settlement. Defendants provided relevant wage and hour
3 policies, as well as Plaintiff's time records, pay records, and personnel files, as well as
4 timekeeping and pay data on other class and PAGA members.

5 24. In agreeing to represent Plaintiff and take on the case for all putative class
6 members, I and my firm agreed to take this case on a contingency basis, meaning that I would take
7 a percentage of any settlement or judgment should we recover a monetary amount. We took a risk
8 that we would not recover any money in this matter if we were unsuccessful at trial. We also took
9 on the risk that the case may not be certified as a class action and/or be subject to an unfavorable
10 summary judgment ruling. However, I believe it is important to make sure employees are able to
11 find affordable representation in order to ensure that employers are providing complete and
12 accurate representations to employees regarding all hard-earned wages. My firm, Castle Law:
13 California Employment Counsel, PC is a boutique law practice that focuses exclusively on
14 employment litigation. We do not have a large number of attorneys or cases and taking on class
15 actions to vindicate the rights of absent class members represents a substantial risk and burden as
16 class action litigation requires a substantial amount of time and financial resources to successfully
17 litigate. I believe the risk experienced by taking on class action litigation cases is much more
18 substantial than what typically larger law firms would face.

19 25. My co-counsel and I are requesting attorneys' fees and costs pursuant to the
20 common fund doctrine as we believe it to be applicable to the present case pursuant to *Serrano v.*
21 *Priest*, 20 Cal.3d 25, 34–35 (1977) and *Paul, Johnson, Alston & Hunt v. Gaulty*, 886 F.2d 268,
22 271 (9th Cir. 1989). Plaintiff and her counsel have been able to secure an identifiable benefit on
23 behalf of the class and equity counsels that the cost of the representation should be born equally
24 amongst all class members receiving these benefits. The settlement recovery provides an
25 excellent result and is the product of substantial time and effort in analyzing the facts and law
26 applicable to this case. We agreed to take this case on a contingency and as a class action with the
27 possibility that we would not receive any compensation for my time and efforts due to issues
28 regarding the merits and/or certification and have carried that risk over the more than two years. I
have reviewed fee arrangements and Court ordered fee awards in similar class cases and I believe

1 that the 33% fee request is within the accepted ranges. In my experience with contingency cases
2 in employment law cases, the typical percentage negotiated between parties ranges from thirty-
3 five to forty percent (35% to 40%) in individual litigation. In class action litigation, my
4 experience in my own firm and working with several other firms has been that the typical
5 percentage negotiated between parties and approved by a court range from thirty-five to forty
6 percent (35% to 40%). I believe our request of 33% of the gross settlement for attorneys' fees is
7 justified given the results obtained on behalf of the class. Moreover, at this time, my firm has
8 advanced costs for Plaintiff and putative PAGA members and has not received any compensation
9 whatsoever for our time expended in this case.

10 26. I am also seeking reimbursement of my out-of-pocket costs incurred to date, which
11 are currently \$12,225.40. These costs were reasonably incurred during the course of litigation, and
12 generally include filing fees and postage costs. Attached as **Exhibit A** is a true and correct
13 summary report of the costs incurred by my law firm in this matter.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct. Executed this 7th day of July, 2025, in Roseville, California.

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19 Timothy B. Del Castillo
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EXHIBIT A

Activities Export

07/13/2025

3:36 PM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/04/2025	\$	Notice - Filing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$20.25	-	\$20.25
02/27/2025	\$	Remote Appearance at 03.04 PAM Hearing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Victoria Anyanwu	1.00	\$37.35	-	\$37.35
02/11/2025	\$	Remote Appearance 02.13.25 Hearing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Victoria Anyanwu	1.00	\$37.35	-	\$37.35
02/03/2025	\$	CMCS - Filing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$14.88	-	\$14.88
01/28/2025	\$	Amended Complaint - Filing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$20.25	-	\$20.25
09/26/2024	\$	CMCS - Filing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$16.99	-	\$16.99
05/02/2024	\$	Plaintiff's Half of Mediation Fees ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$6,250.00	-	\$6,250.00
04/22/2024	\$	CMCS - Filing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$19.10	-	\$19.10
03/06/2024	\$	Stip and Order - Filing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$39.84	-	\$39.84
							\$0.00 0.00h	\$12,225.40 0.00h

Activities Export

07/13/2025

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/03/2023	\$	CMCS - Filing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$17.04	-	\$17.04
08/08/2023	\$	STENO - Depo Transcript Fees ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$2,296.30	-	\$2,296.30
08/08/2023	\$	Mailing to STENO ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$0.63	-	\$0.63
08/01/2023	\$	Ntc of Complex Case Fees ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$1,122.16	-	\$1,122.16
06/12/2023	\$	First Filing of Notice of Complex Case - Filing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$17.19	-	\$17.19
06/12/2023	\$	Notice of Filing Complex Case Fees - Filing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$30.52	-	\$30.52
06/07/2023	\$	Notice of Remote Appearance - Filing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$17.04	-	\$17.04
06/07/2023	\$	CMC Remote Appearance Fee ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$30.35	-	\$30.35
05/26/2023	\$	CMC Statement - Filing ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$17.04	-	\$17.04
							\$0.00 0.00h	\$12,225.40 0.00h

Activities Export

07/13/2025

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/12/2022	\$	Court Call ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$96.35	-	\$96.35
11/23/2022	\$	CMC Statement ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$16.57	-	\$16.57
06/28/2022	\$	Demand For Jury Trial - E-Filing Fees ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$16.57	-	\$16.57
06/20/2022	\$	Demand For Jury Trial - One Legal Fees ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$12.87	-	\$12.87
06/03/2022	\$	CMC Statement ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$19.66	-	\$19.66
05/13/2022	\$	Simpluris - Shared w/Kent ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$1,249.00	-	\$1,249.00
12/13/2021	\$	VCourt Appearance-Initial CMC (Shared) ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Gade Hamilton	1.00	\$96.35	-	\$96.35
12/01/2021	\$	POS of CMC Statement ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$16.06	-	\$16.06
11/24/2021	\$	CMC Statement ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Ron Buchanan	1.00	\$0.73	-	\$0.73
							\$0.00 0.00h	\$12,225.40 0.00h

Activities Export

07/13/2025

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/24/2021	\$	One Legal Order # 16791675 Civil Case Cover Sheet, Notice of Case Management Conference, Summons, Complaint (Shared) ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Gade Hamilton	1.00	\$41.18	-	\$41.18
08/20/2021	\$	VCourt-Stanislaus County Case Management Conference ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Gade Hamilton	1.00	\$96.35	-	\$96.35
08/13/2021	\$	One Legal # 16756805 Notice of Case Management Conference,Civil Case Cover Sheet -Plaintiff(s), Summons, Complaint (Shared) ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Gade Hamilton	1.00	\$476.21	-	\$476.21
04/29/2021	\$	Postage LWDA ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Gade Hamilton	1.00	\$4.11	-	\$4.11
04/29/2021	\$	LWDA Case No. LWDA- CM-830741-21 (Kent Paid) ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Gade Hamilton	1.00	\$75.00	-	\$75.00
03/30/2021	\$	E108 Postage: Records Request ● Unbilled	Lefanty - Kaiser Permanente [00283] Kaiser Permanente	Gade Hamilton	1.00	\$4.11	-	\$4.11
							\$0.00 0.00h	\$12,225.40 0.00h