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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

BREANN HOWARD, an individual, on behalf
of herself, and on behalf of all persons similarly
situated,

Plaintiff,

vs.

KOULAX ENTERPRISES, a California
Corporation; and DOES 1 through 50, Inclusive;

Defendants.

Case No. 21GDCV01154

**DECLARATION OF NICHOLAS J. DE
BLOUW IN SUPPORT OF MOTION
FOR AWARD OF ATTORNEYS' FEES
AND COSTS**

Date: January 14, 2026
Time: 8:30 a.m.

Reservation ID: 465957180582
Judge: Lauren A. R. Lofton
Dept.: X

1 I, NICHOLAS J. DE BLOUW, declare as follows:

2 1. I am a partner of the law firm of Blumenthal Nordrehaug Bhowmik De Blouw LLP
3 (“BNBD”), co-counsel of record for Plaintiff Breann Howard (“Plaintiff”) in this matter. As such,
4 I am fully familiar with the facts, pleadings and history of the matter. I am submitting this
5 declaration in support of Plaintiff’s Motion for an award of attorneys’ fees and litigation expenses
6 in connection with services rendered in the above-entitled action. The following facts are within
7 my own personal knowledge, and if called as a witness, I could and would testify competently to
8 the matters stated herein.

9 2. Blumenthal Nordrehaug Bhowmik De Blouw LLP have been approved as class
10 counsel and PAGA counsel in numerous other wage and hour and PAGA actions that have been
11 granted approval.

12 3. To date, BNBD has incurred approximately 40.75 hours on this case. Thus, I
13 anticipate the total amount of BNBD’s fees incurred in this case to be approximately \$24,306.00.
14 To date, BNBD has incurred litigation costs in the amount of \$751.78.

15 4. BNBD has represented hundreds of thousands of employees in hundreds of legal
16 matters, including PAGA lawsuits and hundreds of class actions and complex litigation cases.
17 BNBD’s practice is devoted almost entirely to the prosecution of wage and hour class actions and
18 PAGA action matters. The attorneys at BNBD have been appointed lead counsel in numerous
19 motions for class certification including many consolidated wage and hour matters.

20 5. Over the course of this litigation a number of attorneys have worked on this matter.
21 Their credentials are reflected in the Blumenthal Nordrehaug Bhowmik De Blouw LLP firm
22 resume, a true and correct copy of which is attached hereto. Some of the major cases our firm has
23 undertaken are also set forth in the firm resume. The bulk of the attorneys involved in this matter
24 have had extensive class litigation experience, much of it in the area of employment class actions,
25 unfair business practices and other complex litigation. The attorneys at my firm have extensive
26 experience in cases involving labor code violations and overtime claims. Class Counsel has
27 litigated similar wage and hour class action cases against other employers on behalf of employees,
28 including cases against Panda Express, Solarcity, Space Exploration, Union Bank, Verizon, Apple,

1 Wells Fargo, Kaiser, Universal Protection Services, and California State Automobile Association.
2 It is this level of experience which enabled the firms to undertake the instant matter and to
3 successfully combat the resources of the Defendant and their capable and experienced counsel. On
4 account of the concerted and dedicated effort this case required in order to properly handle and
5 prosecute, PAGA Counsel were precluded from taking other cases, and in fact, had to turn away
6 other potential fee generating cases.

7 6. The hourly rates for staff at BNBD are as follows: Partner Attorneys \$695 to \$850,
8 Associate Attorneys from \$475 to \$675, paralegals \$250 to \$325. The rates charged by BNBD are
9 in line with the prevailing rates of attorneys in the local legal community for similar work and, if
10 this were a commercial matter, these are charges that would be made and presented to the client.
11 These hourly rates have been approved by Courts throughout California. Finally, the
12 reasonableness of BNBD's hourly rates is further confirmed by comparing such rates with the rates
13 of comparable counsel practicing complex and class litigation as detailed in the National Law
14 Journal Billing Survey. See e.g. *Zest IP Holdings, LLC v. Implant Direct MFG., LLC*, 2014 U.S.
15 Dist. LEXIS 167563 (S.D. Cal. 2014) (finding that "Mayer Brown's \$775 average billing rate for
16 partners" and "Mayer Brown's \$543 average associate billing rate" are reasonable rates when
17 compared within 21 other firms practicing in the Southern District of California.) This survey is
18 useful to show that BNBD's rates are in line with the comparable rates of defense counsel that
19 opposes these types of class and PAGA claims, such as Mayer Brown noted above.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct. Executed this 7th day of November 2025, at La Jolla, California.

22 By: NICHOLAS DE BLOUW
23 NICHOLAS DE BLOUW (Nov 7, 2025 10:05:05 PST)

24 Nicholas J. De Blouw
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