

James R. Hawkins (SBN 192925)
Gregory Mauro (SBN 222239)
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Attorneys for Plaintiff Deanna Lynette Davis

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

LORENA BELLAMY, individually, and
on behalf of other members of the general
public similarly situated; and ORISHIA
BLACKSHER and HAROLD BRISSETT,
individually, and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiffs,

vs.

LIFELONG MEDICAL CARE, a
California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No.: HG19024178
[Consolidated with Case No.: 21CV004212
&
22CV012004]

**DECLARATION OF JAMES HAWKINS
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL**

HEARING INFO

Date: March 24, 2025
Time: 1:30 p.m.
Dept. 21

1 Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
2 Matthew Richard Soto (SBN 353499)
3 **LAWYERS for JUSTICE, PC**
410 West Arden Avenue, Suite 203
4 Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021
5 *Attorneys for Plaintiffs Lorena Bellamy, Orishia Blacksher, and Harold Brissett*
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1 **DECLARATION OF JAMES R. HAWKINS**

2 I, JAMES R. HAWKINS, declare as follows:

3 1. I am one of the attorneys of record for Plaintiff Deanna Lynette Davis, who
4 together with Plaintiffs Lorena Bellamy, Orishia Blacksher, and Harold Brissett (hereinafter
5 referred to as “Plaintiffs” or “Class Representatives”), commenced this class and PAGA action
6 on behalf of the Class Members and Aggrieved Employees. I submit this declaration in support
7 of Plaintiffs’ Motion for Final Approval of Class Action Settlement, which Plaintiffs filed
8 concurrently herewith, along with the supporting Memorandum of Points and Authorities. I have
9 personal knowledge of the facts set forth below, and if called to testify regarding them, I could
10 and would do so competently.

11 **EDUCATION AND CLASS ACTION EXPERIENCE**

12 2. In 1993, I graduated from the University of California, Los Angeles with a
13 Bachelor of Arts Degree. Following graduation, I attended Whittier Law School. In 1996, while
14 a full-time law student, I was also a full-time Judicial Extern for the Honorable Consuelo B.
15 Marshall, United States District Court, Central District. After approximately five months of
16 service for Judge Marshall, I became a full-time extern for the United States Attorney’s Office,
17 Central District of California. My externship lasted for approximately five months. Thereafter, in
18 1997, I graduated from Whittier Law School. The same year, I was admitted to practice law in
19 the State of California.

20 3. From 1997 to 2007, I was a named partner at Hawkins & Sofonio, a law firm
21 based out of Irvine, California. At Hawkins & Sofonio, I pioneered the employment department
22 litigating plaintiff related employment issues such as: Wrongful Termination, Age
23 Discrimination, Disability, Wage and Hour and Sexual Harassment claims. Through the success
24 and experience I obtained litigating employment related matters, I commenced litigating Wage
25 and Hour Class Actions in 2002. Since then, I have spent the vast majority of my practice
26 litigating Wage and Hour Class Actions.

27 4. In 2007, I incorporated my wage and hour class action practice as James
28 Hawkins, APLC. Since its inception, this law firm has been exclusively involved in class action

1 and complex litigation. In 2009, I opened an additional office in Miami, Florida, prosecuting
2 wage and hour class actions. Since 2002, I have been lead or co-lead counsel in all of the cases
3 listed in below.

4 5. I am qualified to act as Class Counsel. I have a great deal of experience in wage
5 and hour class action litigation and consumer class action litigation. I have been certified and
6 approved as class counsel in many other class actions, and I am currently litigating numerous
7 others before this Court and others. Although not an all-inclusive list, over the years I have
8 prosecuted the following class action matters as lead and/or co-lead counsel, all of which
9 implicated similar law and facts to those associated with this Action:

- 10 ○ ***Mojica v. Compass Group, Inc., et al.*** USDC Central District, Case No. 8:13-cv-
11 01754.
- 12 ○ ***Dao v. 3M Company, et al.*** USDC, CENTRAL DISTRICT, Case No. CV-08-04554.
- 13 ○ ***Ortiz v. Kmart***, USDC, CENTRAL DISTRICT, Case No. SACV 06-638 ODW.
- 14 ○ ***Morgan v. Aramark Campus, LLC***, USDC, CENTRAL DISTRICT, Case No.
15 SACV08-00412.
- 16 ○ ***West v Iron Mountain Information Management, Inc, et al.***; Los Angeles County
17 Superior Court, Case No. BC393709.
- 18 ○ ***Gonzalez v. Superior Industries International, Inc., et al.***, Los Angeles County
19 Superior Court, Case No. BC 357912.
- 20 ○ ***Acosta v. Fleetwood Travel Trailers of California, Inc., et al.***, Riverside County
21 Superior Court, Case No. RIC 440630.
- 22 ○ ***Walker v. Sharkeez, et al.***, Orange County Superior Court, Case No. 05CC00293.
- 23 ○ ***Padron v. Universal Protection Service, et al***, Orange County Superior Court, Case
24 No. 05CC00013.
- 25 ○ ***Martinez v. Securitas Security Services USA, et al.***, Santa Clara Superior Court,
26 Case No. 105-CV047499, et al. J.C.C.P. No. 4460.
- 27 ○ ***Velasquez-Lopez v. Hotel Cleaning Services, Inc. et al.***, Riverside Superior Court,
28 Case No. RIC 420909.

- ***Ruiz, et al. v. Unisourse Worldwide, Inc., et al.***, USDC, CENTRAL DISTRICT, Case No. CV09-05848.
- ***Herrador v. Culligan International Company, et al.***, USDC, CENTRAL DISTRICT, Case No. SACV 08-680.
- ***Defries v. Domain Restaurants, et al.***, Orange County Superior Court, Case No. 05CC00128.
- ***Denton v. BLB Enterprises, Inc., et al.***, Orange County Superior Court, Case No. 07CC01292.
- ***Rios v. Sandberg Furniture Manufacturing Co., Inc, et al.***, Los Angeles Superior Court, Case No. BC411477.
- ***McMurray v. Dave and Busters, Inc., et al.***, Orange County Superior Court, Case No. 06CC00099.
- ***Osuna v. DFG Restaurants, Inc., et al.***, Los Angeles Superior Court, Case No. BC 330145.
- ***Burns v. Gymboree Operations, Inc., et al.***, San Francisco Superior Court, Case No. CGC-07-461612.
- ***Willems v. Diedrich Coffee, Inc., et al.***, Orange County Superior Court, Case No. 07CC00015.
- ***Davila, et al. v. Beckman Coulter, Inc., et al.***, Orange County Superior Court, Case No. 07CC01347.
- ***Perez v. Naked Juice Company of Glendora, Inc.***, Los Angeles Superior Court, Case No. BC387088.
- ***Coordination Proceeding Special Title [Rule 1550(b)] Wackenhut Wage and Hour Cases***, Los Angeles Superior Court, Case No. JCCP 4545.
- ***Placencia v. Amcor Packaging Distribution, Inc.***, Orange County Superior Court, Case No. 30-2013-00694012-CU-OE-CXC.
- ***Trani v. Lisi Aerospace, et al.***, Los Angeles Superior Court, Case No. BC495527.

- ***Galvan v. Goodwin Co.***, Orange County Superior Court, Case No. 30-2013-00637062-CU-OE-CXC.
- ***Reyes v. Bristol Fiberlite***, Orange County Superior Court, Case No. 30-2013-00653425-CU-OE-CXC.
- ***Gutierrez v. HMT Tank, USDC Central Dist.***, Case No. CV14-1967-CAS(MAN)
- ***Williams v. Il Fornaio America Corp.***, Sacramento County, Case No. 34-2011-0009616.
- ***Aguilar v. 7-Eleven, Inc.***, Orange County, Case No. 30-2009-002687141-CU-OE-CXC.
- ***Madrigal v. Huntington Beach Market Broiler, Inc.***, Orange County, Case No. 30-2012-00611260.
- ***Vang v. Jazz Semiconductor, Inc.***, Orange County, Case no. 30-2011-00460278.
- ***Vigueras v. Red Robin International, Inc.***, USDC Central Dist. Case No. SACV 17-1422 JVS (DFMx);
- ***Smith v. Space Exploration Technologies Corp.***, Los Angeles Superior Court, Case No. BC55429;
- ***Cano v. Financial Statement Services, Inc.***, Orange County Superior Court, Case No. 30-2013-00653349-CU-OE-CXC;
- ***Mendez v. Liberty Glass Fabricators, Inc.***, Riverside County Superior Court Case No. RIC1800119;
- ***Attia v. Neiman Marcus Group, Inc.***, United States District Court for the Central District of California Case No. 8:16-cv-001504-DOC-FFM;
- ***O'Brien, et al. v. Cerida Investment Corp.***, Santa Clara Superior Court Case No. 21CV384527;
- ***Gonzalez v. Quality Aluminum Forge, LLC***, Orange County Superior Court Case No. 30-2015-00817941;
- ***Shay v. Apple, Inc.***, United States District Court for the Southern District of California Case No. 3:20-cv-1629-JO-BLM;

- **Milligan v. CWI, Inc.**, San Bernardino Superior Court Case No. CIVDS 2013999;
- **Aguilar v. LDI Mechanical, Inc.**, Riverside County Case No. RIC1610019;
- **Abron v. University Healthcare Alliance**, Alameda County Superior Court Case No. RG20066438;
- **Benson v. F21 Opco, LLC**, San Diego Superior Court Case No. 37-2021,00024619-CU-OE-CTL;
- **Allen v. Creative Stone Mfg., Inc.**, San Bernardino County Superior Court Case No. CIVSB2201498;
- **Santamaria v. Bright Horizons Children's Center**, San Bernardino County Superior Court Case No. CIVSB2210140;
- **Yniguez v. Airgas USA, LLC**, Los Angeles County Superior Court Case No. 20STCV18190;
- **Cervantez v. Genuine Parts Company**, Los Angeles County Superior Court Case No. 22STCV00981;
- **Robles v. Jetro Holdings, LLC**, San Diego Superior Court Case No. 37-2021-00015414-CU-OE-CTL;
- **Hernandez v. Euromarket Designs, Inc.**, Santa Clara County Superior Court Case No. 20CV3770922;
- **Ayala v. Veg-Land, et al.**, Orange County Superior Court Case No. 30-2014-00738775-CU-OE-CXC;
- **Puente v. Sully-Miller Contracting Co.**, Orange County Superior Court Case No. 30-2015-00792088-CU-OE-CXC;
- **Garcia v. Revolution Foods, Inc.**, Los Angeles Superior Court Case No. BC579142;
- **Attaway, et al. v. Alliance Residential, LLC**, Santa Clara County Superior Court Case No. 20CV365134;
- **Bowman v. Delta Dental of California**, Alameda County Superior Court Case No. RG21108230;

- **Hernandez v. Burrtec Waste & Recycling Services, LLC**, United States District Court for the Central District of California Case No. 5:21-CV-001490-JWH-SP;
- **Grant v. T-Mobile USA, Inc.**, United States District Court for the Central District of California Case No. 2:21-CV-02268;
- **Dawson v. Wonderful Pistachios and Almonds, LLC**, Kern County Superior Court Case No. BCV-17-100848;
- **Hamilton, et al. v. Michael Kors Stores (California), Inc.**, Los Angeles County Superior Court Case NO. 19STCV37061;
- **Ross v. Stater Bros.**, San Bernardino Superior Court Case No. CIVDS1902518;
- **Walker v. Barrett Business Services, Inc., et al.**, Los Angeles County Superior Court Case No. 20STCV39172;
- **Benitez, et al. v. Medtronic, Inc., et al.**, Orange County Superior Court Case No. 30-2019-01069185-CU-OE-CXC;
- **Montgomery v. Copart, Inc.**, Sacramento County Superior Court Case No. 34-2020-00280733-CU-OE-GDS;
- **Vizcarra-McNamee v. Nordstrom, Inc.**, Orange County Superior Court Case No. 30-2020-01141916-CU-OE-CXC;
- **Ayers v. Cherry Hill Programs, Inc.**, Fresno County Superior Court Case No. 20CECG00821;
- **Sleeper v. Boot Barn, Inc.**, Sacramento County Superior Court Case No. 34-2019-00272000-CU-OE-GDS;
- **Pulido-Dias v. Dirt Cheap, Inc.**, San Bernardino County Superior Court Case No. CIVDS1719694;
- **Villanueva v. Nordstrom, Inc.**, San Bernardino County Superior Court Case No. CIVDS1918706;
- **Bryson v. Madame Tussauds, et al.**, Los Angeles County Superior Court Case No. 19STCV33514

- **Hightower v. Levy Premium, et al.**, Santa Clara County Superior Court Case No. 19CV359262;
- **Marquez v. Maxim Crane Works, L.P., et al**, Los Angeles County Superior Court Case No. 19STCV39548;
- **Rovira v. Silverado Senior Living Management, Inc.**, Orange County Superior Court Case No. 30-2020-01136565-CU-OE-CXC;
- **Hallum, et al. v. FCA US, LLC**, San Bernardino County Case No. CIVDS1936782;
- **Martinez v. Placer Title Co., et al.**, Kern County Case No. BCV-19-103486;
- **Torres v. Van Law Food Products, Inc.**, Orange County Case No. 37-2017-00946312-CU-OE-CXC;
- **Holmes v. Pet Food Express, LLC**, Alameda County Case No. 22CV014140;
- **Ventura v. Conduent Commercial Solutions, LLC**, Kern County Case No. BCV-22-102043;
- **Ramirez v. CSI Electrical Contractors, Inc.**, Fresno County Superior Court Case No. 18CECG04150;
- **Magana v. Eibach Springs, Inc.**, Riverside County Superior Court Case No. RIC1708917;
- **Knox v. Express Messenger Systems, Inc.**, San Bernardino County Superior Court Case No. CIVDS1932323;
- **Corona, et al. v. G&M Oil Company, Inc.**, Los Angeles County Superior Court Case No. BC640876
- **Aguilar v. Peach Home Services, Inc., et al.**, Riverside County Superior Court Case No. RIC1823057;
- **Wilson v. M.C. LLC**, Orange County Superior Court Case No. 30-2019-01103382-CU-OE-CXC.
- **Nunez v. Nevell Group, Inc.**, Orange County Superior Court Case No. 30-2015-00783269.

- ***Bendorf, et al. v. Sea World LLC, et al.***, San Diego Superior Court Case No. 37-2021-00034922-CU-OE-CTL;
- ***DeMartini, et al. v. Safelite Fulfillment, Inc.***, Marin County Case No. CIV20002076;
- ***Ayala, et al., v. Macy's West Stores, Inc.***, Los Angeles County Case No. 20STCV34182;
- ***Wallen, et al. v. United Rentals (North America), Inc., et al.***, Stanislaus County Case No. CV-22-000399;
- ***Granados v. Hyatt Corporation***, United States District Court for the Southern District of California Case No. 3:23-cv-01001-H-VET;
- ***Vigil v. Hyatt Corporation***, United States District Court for the Northern District of California Case No. 4:22-cv-00693;
- ***Garcia v. U.S. Best Ingredients, Inc.***, Los Angeles Superior Court Case No. 21TRCV00813.

6. In sum, my firm has been the lead or co-lead counsel in hundreds of wage and hour cases since its inception. These cases have confronted many of the same issues presented in the above-entitled action. We have been certified as class counsel on numerous occasions (both through settlement and via motion). We have successfully recovered hundreds of millions of dollars for employees in the State of California and millions for the State as well through PAGA.

7. Indeed, our firm has served as class counsel in a number of significant wage and hour settlements. Of particular note, in 2019, our firm was co-lead counsel in securing the largest wage and hour class action settlement in California history at \$130,000,000. During this case, plaintiffs appealed a decertification order. This case involved several appeals. The appellate record amassed an extensive appellate record comprising a 23-volume joint appendix, a three-volume reporters' transcript, five briefs, four letter briefs, two motions for judicial notice, a motion to augment the record, and several additional letters informing the appellate court of new legal authority issued after *Dukes*. The matter was argued to and submitted by the Court of Appeal on September 15, 2016, and on November 21, 2016, the decertification order was

1 reversed, and the case was remanded for further proceedings. (*Lubin v. The Wackenhut*
2 *Corporation* (“Lubin”), 5 Cal. App. 5th 960 (2016)). Wackenhut filed a petition for review of the
3 Court of Appeal decision to the California Supreme Court. The Supreme Court denied
4 Wackenhut’s petition for review of Lubin. The Court of Appeal issued remittitur on April 10,
5 2017. Eventually through additional litigation, the parties were able to secure the \$130 million
6 settlement that was approved on October 21, 2019, by Judge Highberger in the Los Angeles
7 Superior Court.

8 8. Additionally, in early 2020, our firm served as lead counsel in a class action jury
9 trial in the Central District of California involving the class and PAGA representative claims of
10 over 23,000 employees which successfully resolved in the midst of trial for \$8,500,000.

11 9. Our firm has settled many high-stakes class and representative actions. Hawkins’
12 settlements have directly compensated hundreds of thousands of California workers and
13 consumers. Hawkins’ actions have also forced employers to modify their policies for the benefit
14 of employees including changing the compensation structure for certain employees and changing
15 practices to ensure that workers will be able to take timely rest and meal breaks. A leader in
16 prosecuting class and PAGA enforcement actions, Hawkins has secured millions of dollars for
17 workers and in civil penalties for the State of California.

18 10. Here, the Parties’ agreement to pay Class Counsel Fees of 35% of the Gross
19 Settlement Amount (i.e. \$612,500.00) is reasonable. Plaintiffs’ counsel have borne the entire
20 risk and cost of this litigation on a pure contingency fee basis. The legal issues raised drew
21 significantly upon my firm’s and co-counsel’s experience and the extensive review and analysis
22 of documents and information by me and others at my firm and our co-counsel’s. In a complex
23 action such as this, the proposed attorneys’ fees are, at the very least, on the low side of the
24 market rate for contingency fees.

25 11. My firm as Class Counsel, on behalf of Plaintiffs and the Settlement Class
26 Members, invested approximately **256.60** documented hours litigating this matter through the
27 date of this declaration for a total lodestar of **\$203,060.00** in fees, broken down as follows: my
28 rate of \$1,050 per hour x 85.30 hours = \$89,565.00; Gregory Mauro’s rate of \$850 per hour x

1 121.90 documented hours = \$103,615.00; and paralegal Melissa Whitson's rate of \$200 x 49.40
2 hours = \$9,880.00.

3 12. In addition to the requested attorneys' fees, our office has expended
4 approximately **\$12,083.78** in costs in prosecuting this action. These costs have been necessary
5 costs associated with prosecution of this important matter. Counsel for Plaintiff respectfully
6 requests the Court grant the request to have these costs repaid from the Settlement. Attached
7 hereto as **Exhibit 1** is a true and correct copy of my firm's Billing Detail.

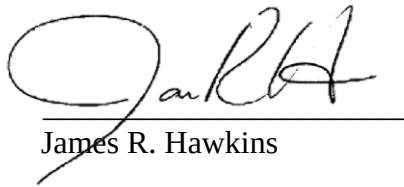
8 13. The Class Representatives have provided extensive supporting documents and
9 assisted Class Counsel in developing information necessary to litigate and settle this case.
10 Plaintiffs have also conducted record review and consultation with counsel in preparation for
11 discovery and eventual mediation, and to assist in evaluating and proving the claims. The
12 settlement provides for Class Representative Service Payments to be paid to the Class
13 Representatives in the amount of \$10,000.00 each. The Class Representative Service Payments
14 take into consideration the risks, time, effort and expenses incurred in coming forward to provide
15 invaluable information and negotiate and litigate this matter on behalf of all Settlement Class
16 Members who otherwise, would probably not file their own individual claims to recover what
17 may be relatively low damages. Further, the payment of \$10,000.00 each as a Service Payment
18 to the Class Representatives is very fair and justified based on the risks each Plaintiff has taken
19 and the benefits conferred upon the Settlement Class. Attached hereto as **Exhibit 2** is a true and
20 correct copy of the Declaration of Deanna Lynette Davis previously submitted in support of
21 Plaintiffs' Motion for Preliminary Approval.

22 14. Despite the complexity of the case, Class Counsel has, through the investment of
23 substantial effort and the resources of my law firm and co-counsels have been able to secure an
24 outstanding settlement on behalf of the Settlement Class. Plaintiffs would have faced substantial
25 legal and factual obstacles in demonstrating that class certification was appropriate. Plaintiffs
26 would also have been required to establish a significant amount of witness testimony, pattern and
27 practice evidence, statistical evidence, sampling evidence, expert testimony, and other evidence
28 in order to present their case both at the class certification stage and trial. Defendant has

1 vigorously contested liability, the amount of claimed damages, and the propriety of class
2 certification, and would have continued to do so through trial. Accordingly, I believe the
3 Settlement to be fair, reasonable, and adequate and in the best interests of the Settlement Class.
4 The fairness and adequacy of the Settlement is confirmed by all known facts and circumstances,
5 including the risk of significant delay and uncertainty associated with litigation, the various
6 defenses asserted by Defendant, and numerous potential appellate issues

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct. Executed on February 24, 2025 at Irvine, California.

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James R. Hawkins

EXHIBIT 1

Matter Billing Detail

Report Date: 2/14/2025
Report Time: 2:11PM
Page: 1 of 2
User ID: Gutierrez

JAMES HAWKINS APLC

Date Range: 01/01/1900 to 02/14/2025
Client: LIFELONG - DeAnna Lynette Davis
Matter: LIFELONG - Lifelong Medical Care- DeAnna Lynette Davis v. Lifelong- MASTERBRAND

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
12/15/2021	FST	First Legal Network - E-Filing, complaint; summons; civil case cover, complaint; civil case cover sheet; summons IN#30182125	\$1,650.45		Unbilled				
12/20/2021	FIL	Filing Fee - 12.15.2021 LWDA Filing Fee	\$75.00		Unbilled				
12/20/2021	POS	Postage - 12.15.2021 Ntc of LWDA Filing to Agent(s) via Certified Mail	\$7.96		Unbilled				
02/10/2022	CRT	Court Documents - 02.10.22 Pulled Order, Min Order, and Tentative off Docket	\$6.00		Unbilled				
02/10/2022	FST	First Legal Network - Process branch same day, Complaint, initial docs, ntc, order IN#30188503	\$285.83		Unbilled				
03/16/2022	FST	First Legal Network - E-Filing, proof of service by substituted ser, IN#30192286	\$40.45		Unbilled				
03/31/2022	FST	First Legal Network - E-Filing - Plaintiff's Request for Cont (3) IN# 30195930	\$172.45		Unbilled				
05/11/2022	CRT	Court Documents Stipulation to Amended Complaint	\$22.50		Unbilled				
05/23/2022	FST	First Legal Network- Filed plaintiff's request for continuance IN30199329	\$40.45		Unbilled				
05/31/2022	FST	First Legal Network- E-Filing: Complaint, Civil Case Cover Sheet, Summons IN#30202789	\$1,618.95		Unbilled				
08/09/2022	CRT	Court Documents - 06.07.22 Minute Order	\$1.00		Unbilled				
08/26/2022	CRT	Court Documents- 08.24.22 Minute Order & General Order	\$3.00		Unbilled				
09/13/2022	FST	First Legal Network - E-Filing: Plf's Req to Cont Initial (2) IN#30212421	\$139.95		Unbilled				
10/31/2022	FST	First Legal Network - E-Filing - Case Management Statement IN# 30216387	\$40.45		Unbilled				
11/17/2022	MED	Mediation Services- Mediation 93398 CK#10379	\$7,500.00		Unbilled				
11/28/2022	FST	First Legal Network - E-Filing - Case Management Statement IN# 30219274	\$40.45		Unbilled				
05/02/2023	CRT	Court Documents - 06.20.22 Order Re Consolidation	\$3.00		Unbilled				
05/08/2023	FST	First Legal Network - E-Filing - Case Management Statement IN# 30237327	\$42.70		Unbilled				

Matter Billing Detail

JAMES HAWKINS APLC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Total:	<u>\$11,690.59</u>	<u>\$0.00</u>					
		Balance:	<u>\$11,690.59</u>						
Total Fees Billed- - - - -		\$0.00							
Total Fees Unbilled : - - - - -		\$0.00							
Total Fees Received : - - - - -		\$0.00							
Total Soft Cost Billed : - - - - -		\$0.00							
Total Soft Cost Unbilled : - - - - -		\$0.00							
Total Soft Cost Received : - - - - -		\$0.00							
Total Hard Cost Billed : - - - - -		\$0.00							
Total Hard Cost Unbilled : - - - - -		\$11,690.59							
Total Hard Cost Received : - - - - -		\$0.00							
Total Taxes Billed : - - - - -		\$0.00							
Total Taxes Unbilled : - - - - -		\$0.00							
Total Taxes Received : - - - - -		\$0.00							
Total Late Charges Billed : - - - - -		\$0.00							
Total Late Charges Unbilled: - - - - -		\$0.00							
Total Late Charges Received : - - - - -		\$0.00							
Trust Balance: - - - - -		\$0.00							

Matter Billing Detail

Report Date: 2/14/2025
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Page: 1 of 2
User ID: Gutierrez

JAMES HAWKINS APLC

Date Range: 01/01/1900 to 02/14/2025
Client: LIFELONG - DeAnna Lynette Davis
Matter: LIFELONG004 - Lifelong Medical Care-PAGA-DeAnna Lynette Davis v. Lifelong

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
07/25/2022	CRT	Court Documents - 07.05.22 Minute Order	\$2.00		Unbilled				
07/25/2022	FST	First Legal Network - Process S&C, Initial Docs, Ntc, Order IN#30205948	\$270.54		Unbilled				
08/02/2022	FST	First Legal Network- E-Filing: POS by Substituted Ser IN#30209403	\$40.45		Unbilled				
09/22/2022	CRT	Court Documents - 09.21.22 Order Re Continuance	\$4.00		Unbilled				
02/17/2023	FST	First Legal - E-Filing - Case Management Statement IN# 30227367	\$42.70		Unbilled				
10/24/2024	LDS	Legal Document Server - E-Filing - Notice IN# 10640604	\$33.50		Unbilled				
		Total:	\$393.19	\$0.00					
		Balance:	\$393.19						

Matter Billing Detail

JAMES HAWKINS APLC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total Fees Billed-----			\$0.00						
Total Fees Unbilled : -----			\$0.00						
Total Fees Received : -----			\$0.00						
Total Soft Cost Billed : -----			\$0.00						
Total Soft Cost Unbilled : -----			\$0.00						
Total Soft Cost Received : -----			\$0.00						
Total Hard Cost Billed : -----			\$0.00						
Total Hard Cost Unbilled : -----			\$393.19						
Total Hard Cost Received : -----			\$0.00						
Total Taxes Billed : -----			\$0.00						
Total Taxes Unbilled : -----			\$0.00						
Total Taxes Received : -----			\$0.00						
Total Late Charges Billed : -----			\$0.00						
Total Late Charges Unbilled: -----			\$0.00						
Total Late Charges Received : -----			\$0.00						
Trust Balance: -----			\$0.00						

EXHIBIT 2

1 JAMES HAWKINS APLC
 2 James R. Hawkins, Esq. (#192925)
 3 Gregory Mauro, Esq. (#222239)
 4 Michael Calvo, Esq. (#314986)
 5 Lauren Falk, Esq. (#316893)
 6 Ava Issary, Esq. (#342252)
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 8 9880 Research Drive, Suite 200
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 10 Tel.: (949) 387-7200
 11 Fax: (949) 387-6676

12 Attorneys for Plaintiff Deanna Lynette Davis

13 ***Additional Counsel List on Next Page***

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 15 **FOR THE COUNTY OF ALAMEDA**

16 LORENA BELLAMY individually, and on
 17 behalf of other members of the general public
 18 similarly situated; and ORISHIA
 19 BLACKSHER and HAROLD BRISSETT,
 20 individually, and on behalf of other aggrieved
 21 employees pursuant to the California Private
 22 Attorneys General Act;

23 Plaintiffs,

24 vs.

25 LIFELONG MEDICAL CARE, a California
 26 corporation; and DOES 1 through 100,
 27 inclusive,

28 Defendants.

DEANNA LYNETTE DAVIS, individually
 and on behalf of all others similarly situated;

Plaintiff,

v.

LIFELONG MEDICAL CARE, a California
 Corporation; and DOES 1-50, inclusive,

Defendants

Case No. HG19024178

Consolidated with Case Nos. 21CV004212 and
 22CV012004

**DECLARATION OF DEANNA LYNETTE
 DAVIS**

Date:

Time:

Dept.: 21

Judge: Hon. Noël Wise

Complaint Filed: February 20, 2019

Trial Date: None Set

1 Arby Aiwazian (SBN 269827)
2 Joanna Ghosh (SBN 272479)
3 Matthew Richard Soto (SBN 353499)
4 **LAWYERS *for* JUSTICE, PC**
5 410 West Arden Avenue, Suite 203
6 Glendale, California 91203
7 Tel: (818) 265-1020 / Fax: (818) 265-1021

8 *Attorneys for* Plaintiffs Bellamy, Blacksher, and Brissett

DECLARATION OF DEANNA LYNETTE DAVIS

I, DEANNA LYNETTE DAVIS hereby declare as follows:

1. I am over the age of eighteen. The following is based upon my personal knowledge and if called as a witness, I could and would competently testify thereto.

2. I was employed by Defendant Lifelong Medical Care, ("Defendant" or "Lifelong") in approximately August 2020 as a Non-Exempt Employee working as a Referral Specialist. I worked for Defendant until my separation from Defendant's employ in approximately August 2021. While working for Lifelong, I don't think I was paid for all of my work time, such as time spent working off-the-clock. I also don't think I got all of my meal and rest breaks like I was supposed to. I had to use my own personal equipment such as my cell phone for work as well but never got any reimbursement.

3. I decided to bring this lawsuit because I did not feel that I was treated fairly as an employee of Defendant, especially with regard to not being paid properly for all the hours I worked, and not getting all of my proper lunches and rest breaks. As a result, I believe the other class members and myself are owed additional compensation for all of the work we did that was not paid for by Lifelong.

4. It is my understanding this lawsuit could not have been prosecuted or settled unless I or some other employee decided to serve as a named plaintiff and pursue the case. In deciding to serve as a named plaintiff, I understood that my name would be publicly attached to this lawsuit and that my work experiences to some extent would be set forth in a public court file. I recognized that I would need to devote a certain amount of time that I could have spent otherwise. I also recognized that my bringing the lawsuit carried some degree of risk. Despite this, I decided to serve as the named plaintiff without any promise of recovery or compensation.

5. I am familiar with the work involved in prosecuting this case. I have participated in numerous meetings and communications with my lawyers regarding this case. I am familiar with the allegations and defenses of the claims in this case. I am familiar with the major events in this case, including the investigation performed by my lawyers, the mediation with Defendant that resulted in this settlement, and the preparation of settlement papers and the need to obtain

1
2 court approval of the proposed settlement. I also prepared for my deposition, although it was
3 never taken as a result of the settlement, and I participated in all stages of the litigation and
4 provided my lawyers with information and documents regarding my employment with
5 Defendant.

6 6. I believe that the proposed settlement obtained on behalf of the other aggrieved
7 employees is excellent in view of the issues and risks involved with the case.

8 7. I believe I have fulfilled my duties as a named plaintiff and class representative,
9 which required a significant amount of time and effort during the course of this case. These
10 efforts required dedicating numerous hours to lawsuit activities including, but not limited to:
11 (a) communicating with my attorneys to stay informed of ongoing developments in the case and
12 to discuss the proposed settlement ultimately negotiated; (b) searching for and providing
13 documents and other materials relating to my work experience; (c) responding to requests for
14 information relating to my work experience; (d) preparing for my deposition although it was
15 never taken as result of the settlement, and (e) reviewing filings and key documents including
16 drafts of the complaint and the settlement agreement. These tasks required my dedication of at
17 least 35-40 or more hours of my time, which time I honestly could have spent on family,
18 personal time, school time, or work. My understanding is that future tasks may require several
19 more hours of my time. I believe I have been diligent and that I have acted above and beyond
20 that of which is expected of a named plaintiff to date and will continue to do so.

21 8. It is my opinion that \$10,000.00 is a fair and adequate award for my service as a
22 named plaintiff and class representative, and in consideration for my general release of all
23 claims against Lifelong. I believe that amount is fair and reasonable in view of the work I have
24 and will continue to perform on behalf of the State and the aggrieved employees. I believe that
25 my role in this lawsuit has resulted in a valuable benefit to the State of California and other
26 aggrieved employees, and I accepted the potential risk of being liable for the opposing parties'
27 costs if we were unsuccessful in this lawsuit. I believed in this case, so I was willing to be the
28 named plaintiff to risk this and pursue this class action litigation. I also accepted the risk that

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2 news of this lawsuit could also potentially impact my ability to secure other work. At all times I
3 believe I have acted in the best interests of the entire class.

4 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and
5 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

6 I declare under penalty of perjury under the laws of the United States that the foregoing
7 is true and correct. Executed on 5/29/2024, at Antioch, California.

8 DocuSigned by:
9 DEANNA L DAVIS
0720037E31DF470...
10 DEANNA LYNETTE DAVIS
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