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SUPERIOR COURT OF CALIFORNIA

COUNTY OF SACRAMENTO

Coordination Proceeding
Special Title (Rule 3.550)

**SUNSHINE RETIREMENT WAGE AND
HOUR CASES**

) JCCP No. 5247
) Hon. Lauri A. Damrell
) Dept. 28
)
) **DECLARATION OF MANNY STARR IN**
) **SUPPORT OF PLAINTIFF'S MOTION**
) **FOR PRELIMINARY APPROVAL OF**
) **CLASS ACTION AND PAGA**
) **SETTLEMENT**
)
) Date: October 6, 2023
) Time: 9:00 a.m.
) Dept.: 28
)
) Action filed: September 22, 2021

**DECLARATION OF MANNY STARR IN SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

1 I, Manny Starr, declare:

2 1. I am an attorney duly licensed to practice law before all courts in the State of
3 California. I am President of Frontier Law Center. I am counsel of record herein and I have
4 personal knowledge of the facts herein. If called as a witness, I could and would competently
5 testify herein.

6 2. I have extensive experience in wage and hour class action litigation. This case seeks
7 to conditionally certify the matter for settlement purposes and obtain preliminary approval of a
8 non-reversionary settlement in the gross amount of \$940,000.00 on behalf of approximately 1,130
9 current and former non-exempt hourly individuals employed by Defendants at any time from
10 September 27, 2017, until the date of preliminary approval or sixty (60) days after the agreement is
11 signed, whichever is earlier, at any of the Defendant's California facilities.

12 3. Frontier Law Center focuses in the area of wage and hour issues. Since we first
13 started taking cases in 2016, our firm has almost worked exclusively on wage and hour cases,
14 particularly class and PAGA actions. I have litigated numerous successful wage and hour class
15 actions in California. From my first days practicing law I have worked for Frontier Law Center
16 litigating wage and hour matters. I have worked closely with Adam Rose and Theodore Tang from
17 our firm for the last six and a half years, and I know them to be competent and experienced
18 attorneys in their own right. Between the three of us, we have over 20 years of combined
19 experience in wage and hour class and PAGA cases.

20 4. **CLASS ACTION EXPERIENCE**

21 I have previously served as class counsel in a number of class action cases, including wage
22 and hour matters. The following is a sample of matters wherein Frontier Law Center (myself, Mr.
23 Rose, and/or Mr. Tang) have been approved as class counsel:

- 24 i. *Joshua Albright, et al. v. Loma Linda Shared Services*, Case No. CIVDS1818361:
25 Class action and PAGA case involving failure to pay wages, meal and rest break
26 violations, and failure to indemnify work related expenses; \$600,000.00 settlement;
27 final approval granted;
28 ii. *Tri Nguyen v First Alarm Security & Patrol, Inc.*, Case No. 18CV332369: class
action and PAGA case on behalf of security guards involving various wage and hour

- 1 issues; \$7,250,000 settlement; final approval granted;
- 2 iii. *Ronnie McNeal v. Platinum Security, Inc.*, Case No. 19STCV05709: PAGA action
- 3 on behalf of security guards involving meal and rest break violations and failure to
- 4 pay wages in a timely manner; \$300,000 settlement; PAGA settlement approved;
- 5 iv. *Adolph Cruz, et al v. Holder Construction Group, LLC*, Case No. 19CV341862:
- 6 PAGA action on behalf of construction workers involving off the clock work and
- 7 meal and rest break violations; \$500,000 settlement; PAGA settlement approved;
- 8 v. *Mervyn Cole v. Saucey, Inc.* Case No. BC707895: class action and PAGA case
- 9 involving misclassification of employees and other wage and hour issues; \$590,000
- 10 settlement; final approval granted;
- 11 vi. *Kevin Hernandez v. Contemporary Services Corporation*, Case No. BC684206:
- 12 PAGA action on behalf of security guards involving various wage and hour issues;
- 13 \$795,000 settlement; PAGA settlement approved;
- 14 vii. *Keosia Green v. American Guard Services, Inc.* Case No. BC688437: PAGA action
- 15 on behalf of security guards involving wage and hour issues; \$315,000 settlement;
- 16 PAGA settlement approved;
- 17 viii. *James Rushing v. Security Intelligence Specialist Corporation*, Case No. 18-civ-
- 18 1808, class action and PAGA case on behalf of security guards for breaks and wage
- 19 statement violations; \$480,000 settlement; final approval granted;
- 20 ix. *Veronica Espinoza v. Sharp HealthCare*, Case No. 37-2018-00034031-CU-OE-
- 21 CTL, class action and PAGA case on behalf of hospital employees relating to meal
- 22 and rest break violations, among other things; \$2,125,000 settlement; final approval
- 23 granted; and
- 24 x. *Anthony Gaines, et al. v. Triple Canopy, Inc.*,¹ Case No. 9CV345169, class action
- 25 and PAGA case on behalf of approximately 550 security guards relating to meal and
- 26 rest break violations and other wage and hour issues; \$2,300,000 settlement; final
- 27 approval granted;
- 28

6 Declarant will provide a supplemental detailed cost bill along with the Final Approval
7 Declaration to verify said costs incurred and requested. I have reviewed each cost incurred to date
8 and believe each cost to be reasonable and necessary in order to effectively prosecute the claims of
the class.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct.

11 Executed at Calabasas, California, on this 11th day of September, 2023.

EXHIBIT 1

Expenses

for Lupe Socorro Morales - Employment Claim - Sunshine Retirement Living llc dba: Creekside Oaks Retirement

Expense entries

Date	Activity	Description	Staff	Quantity	Price	Billable?	Write Off?	Status	Total
6/20/2023		One Legal CC Sale : 05073721	Yasmin Ruiz	1	\$72.07	True	No	-	\$72.07
4/13/2023		One Legal CC sale: 04905326	Mary Mars	1	\$72.07	True	No	-	\$72.07
3/14/2023		Econ One Inv. No. 23366	Kirsten Starr	1	\$1,415.45	True	No	-	\$1,415.45
2/28/2023		Verdict Resources Inv. No: 0000837	Mary Mars	1	\$300.00	True	No	-	\$300.00
2/20/2023		Econ One Inv. No. 23216	Kirsten Starr	1	\$662.39	True	No	-	\$662.39
11/15/2022		Signature Resolution Mediation Fee - Inv. No. 39711	Kirsten Starr	0.5	\$4,387.50	True	No	-	\$2,193.75
10/22/2021		Confirmation #25790492- Notice of Association of counsel; served to Def.	Manny Starr	1	\$69.50	True	No	-	\$69.50
9/21/2021		Confirmation #25659194- Physical filing	Manny Starr	1	\$67.50	True	No	-	\$67.50
9/21/2021		Costs to mail 2 Supplemental PAGA letters	Manny Starr	1	\$15.06	True	No	-	\$15.06
9/21/2021		Mailed PAGA Letter to Deponent	Manny Starr	1	\$14.66	True	No	-	\$14.66
9/21/2021		RR to Sunshine Retirement Living llc	Manny Starr	1	\$13.92	True	No	-	\$13.92
9/9/2021		PAGA Filing	Manny Starr	1	\$75.00	True	No	-	\$75.00
Total - Write offs									\$0.00
Total - Unbillable									\$0.00
Total - Billable									\$4,971.37
Total									\$4,971.37