

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Nicholas Rosenthal (State Bar No. 268297)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
(831) 531-4214
(831) 634-0333 facsimile
Attorneys for Plaintiffs and the Putative Class

[Additional party and counsel on next page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA**

JOSE VALENCIA, an individual,
BRANDON JEROUE, an individual, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

SENTINEL TRANSPORTION, LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 22CV00951

[Assigned for all purposes to the Hon. James F.
Rigali, Department SM Dept 2]

**DECLARATION OF NICHOLAS
ROSENTHAL IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL
OF CLASS AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: February 27, 2024

Time: 8:30 a.m.

Dept.: SM Dept. 2

Complaint Filed: April 29, 2022

Trial Date: None

1 I, Nicholas Rosenthal, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and am with the law firm Diversity Law Group, P.C., counsel of record for Plaintiffs
4 Jose Valencia and Brandon Jeroue (“Class Representatives” or “Plaintiffs”). I have personal
5 knowledge of the facts set forth below and if called to testify I could and would do so competently.

6 2. I am one of the primary attorneys on this matter. Based on my own independent
7 investigation and evaluation, I am of the opinion that settlement for the consideration and on the
8 terms set forth in the Joint Stipulation of Class and Representative Action Settlement (“Settlement
9 Agreement” or “Agreement”) is fair, reasonable, and adequate and is in the best interests of the
10 Class, in light of all known facts and circumstances and the expenses and risks inherent in litigation.

11 3. The funds represented by uncashed settlement checks will be paid out pursuant to
12 California Code of Civil Procedure section 384 to Legal Aid at Work, the designated *cy pres*
13 recipient. Neither Plaintiffs nor Class Counsel maintains an interest in and/or relationship with
14 Legal Aid at Work.

15 4. My qualifications are as follows: I received my JD from University of Southern
16 California Gould School of Law in 2009. Upon graduation, I practiced law as an associate at
17 Seyfarth Shaw LLP, representing corporate clients in both single-plaintiff and wage hour class
18 actions. In 2014, I began as an associate at Diversity Law Group.

19 5. I have handled a number of wage and hour matters including class actions and
20 multiple-plaintiff actions. I have been named as Class Counsel in a number of class actions that
21 have been granted certification or preliminary or final approval by the Superior Courts of Los
22 Angeles County, Orange County, Alameda County, and Monterey County, the United States
23 District Court for the Central District of California, and the United States District Court for the
24 Northern District of California. These cases include, but are not limited to: *Diller v. Under Armour*
25 *Retail, Inc.*, Santa Clara County Superior Court Case No. 114-CV-265729, *Dall v. Post Alarm*
26 *Systems*, Los Angeles County Superior Court Case No. BC598528, *Lopez v. Imperial Body Shop,*
27 *Inc.*, Orange County Superior Court Case No. Case No. 30-2015-00816193-CU-OE-CXC, *Hughes v.*
28 *Lincare, Inc., et al.*, Monterey County Superior Court Case No. M124764, *Pittman v. Martinez Steel*

1 *Corporation*, San Bernardino County Superior Court Case No. CIVDS1823132, *Della Maggiora v.*
2 *Watsonville Community Hospital*, Santa Cruz County Superior Court Case No. 18CV00191,
3 *Randolph v. Pacific Racing Association*, Alameda County Superior Court Case No. RG18908139,
4 *Morones v. Bimbo Bakeries USA, Inc.*, Sacramento County Superior Court Case No. 34-2018-
5 00245481-CU-OE-GDS, *Chavez v. Converse, Inc.*, United States District Court – Northern District
6 of California Case No. 15-cv-03746-NC, and *Rodriguez v. Nike Retail Services, Inc.*, United States
7 District Court – Northern District of California Case No. 5:14-CV-1508 BLF.

8 6. My co-counsel and I will adequately represent the Class Members in this action.
9 Plaintiff's Counsel have and will zealously represent Plaintiff and the Class and pursue this lawsuit
10 to its conclusion. I have no conflicts with the Class and will adequately represent the Class.

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

13 Executed on this 1st day of February 2024, at Los Angeles, California.

14 

15 _____
Nicholas Rosenthal