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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN JOAQUIN

JOSHUA D. HODGES, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

CALIFORNIA TRUCK CENTERS, LLC, a
California Limited Liability Company;
DELTA TRUCK CENTER, a California
Company; and DOES 1-50, inclusive,

Defendants.

CASE NO. STK-CV-UOE-2022-0000168

*[Case assigned for all purposes to the Hon.
George J. Abdallah, Dept. 10A]*

**DECLARATION OF JOSHUA
FALAKASSA IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND CLASS
REPRESENTATIVE ENHANCEMENT
AWARDS**

Date: October 13, 2025
Time: 9:00 AM
Dept.: 10A

Action Filed: January 10, 2022
Trial Date: None Set

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1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California, and I am the principal of Falakassa Law, P.C, and serve as attorney of record, along with The Bokhour Law Group, P.C., Otrkupman Law Firm, and The Haines Law Group, P.C., for Plaintiffs and the Settlement Class.

3. I am a 2013 graduate from the University of California, Berkeley, School of Law, (“Berkeley Law”) where I successfully completed courses in Labor Law, Employment Discrimination and Labor/Employment Arbitrations. During law school, I served as a summer associate at Sanford, Wittels and Heisler LLP, a boutique plaintiffs’ side employment law firm focusing on FMLA wage and hour class action litigation, and other public interest lawsuits. As a second-year law student, I served as a summer associate at the San Francisco office of Littler Mendelson, P.C., I aided employers in defending wage and hour class action lawsuits filed under California and federal law.

5. Thereafter, as principal of Falakassa Law, P.C., I have handled over 100 employee vs. employer litigation matters, including more than 40 class action wage/hour and PAGA cases. Over the last few years, my practice has almost entirely consisted of representing employees, the majority of which has included class action and representative action wage and hour matters. In total, I have handled upwards of 90 class action and representative action wage/hour cases.

6. I was selected as a “Super Lawyer Rising Star” in Employment Litigation during the years 2017-2025, a distinction that is reserved for the top 2.5 % of lawyers in the practice

1 area. I have also been recognized by Topverdicts.com for achieving Top 20 and Top 50 wage
2 and hour class and PAGA actions settlements in California in 2021-2024.

3 7. My firm has the experience, resources, and means necessary to allow us to
4 provide adequate representation to all Settlement Class Members in this Action. Currently, my
5 firm is acting as counsel in at least thirty-five wage-and-hour class actions.

6 8. Class Counsel are experienced California litigators with established track records
7 prosecuting complex class actions to successful resolution. After investigating the claims,
8 analyzing Defendant's defenses, and preparing to litigate through certification and trial, both
9 Plaintiff and Class Counsel unequivocally support the proposed Settlement as the best outcome
10 for the Settlement Class under the circumstances described herein.

11 9. In my judgment, the per-capita recovery is well within—and in many instances
12 exceeds—the reasonable range for cases of this type. The Settlement delivers prompt, certain
13 compensation and avoids the substantial risks, expense, and delay of continued litigation and
14 potential appeals. The Class's reaction confirms this assessment: no objections were filed and
15 no requests for exclusion were submitted. This uniformly positive response strongly supports
16 final approval.

17 10. All Rule 23(e)/California approval factors favor the Settlement. The agreement
18 was negotiated at arm's length with the assistance of an experienced, respected mediator; Class
19 Counsel conducted extensive investigation and analysis of the claims; and, based on our
20 experience, the Settlement provides an excellent result for the Class. Given the robust process,
21 the informed evaluation of risks, and the Class's unanimous support, the Settlement is fair,
22 adequate, and well within the range of reasonableness, and should be finally approved.

23 11. Class Counsel's application for an award of Attorneys' Fees in an amount of
24 approximately 33.33% of the Settlement Amount on behalf of the Settlement Class is reasonable
25 and fair. The requested fee falls on the lower end of the Ninth Circuit's historical benchmark
26 for attorneys' fees of 20% to 40% of a common fund. It is fair compensation for undertaking
27 complex, risky, expensive, and time-consuming litigation on a contingent basis.

28 12. For Class Counsel, the fees here were wholly contingent in nature, and the case

presented far more risk than the usual contingent fee case. There was the prospect of the enormous cost inherent in class action litigation and a long battle with a corporate Defendant. That prospect has become a reality in trial courts and the Court of Appeal in other wage and hour class litigations. Class Counsel risked not only a great deal of time but also a great deal of expense to ensure the successful litigation of this action on behalf of all Settlement Class Members. Based upon the foregoing, Class Counsel respectfully requests that the Court award Attorneys' Fees as requested.

13. I have worked approximately 87.5 hours on this case since its inception, and my hourly rate for class action matter is \$700. Accordingly, this results in a total lodestar amount of \$61,250 for my legal work on this matter.

14. The ultimate result was far from certain. When this case was taken on a contingency fee basis, the firm agreed to assume responsibility for all litigation costs. In the course of this Action, Class Counsel paid all costs, including filing fees, court costs, research fees, and mediation costs. There was never a guarantee that we would recoup those expenditures.

15. It has been my experience that the benchmark for an attorney fee award in California state cases is one-third of a common settlement fund, a standard upheld by the California Supreme Court in the *Robert Half* case. Here, in accordance with the Settlement Agreement, Class Counsel is seeking a fee of one-third of the Settlement Amount.

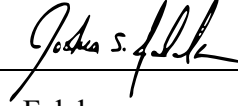
16. The fee is warranted because of the results achieved for the Settlement Class Members, both in terms of the immediate cash settlement and the fact that the Settlement Class Members resoundingly supported the Settlement. Defendant does not oppose this fee request.

17. Pursuant to California Rule of Court 3.769, Class Counsel hereby discloses the existence of a Joint Prosecution and Fee Splitting Agreement among the counsel representing plaintiffs in the consolidated litigation. Under this agreement, any attorneys' fees awarded by the Court will be allocated among counsel as follows:

- Bokhour Law Group, P.C. – 22%;
- Falakassa Law, P.C. – 22%;
- Haines Law Group – 44%; and

- Otkupman Law Firm – 12%

I declare under penalty of perjury under the laws of California that the foregoing is true and correct, this 17th day of September 2025, at Los Angeles, California.



Joshua Falakassa