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Attorneys for Plaintiff, ELMER ESTRADA GONZALEZ  
and on behalf of all others similarly situated,

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES, STANLEY MOSK COURTHOUSE**

ELMER ESTRADA GONZALEZ, individually,  
and on behalf of all others similarly situated,

Plaintiff,

v.

HITEX DYEING & FINISHING, INC., a  
California Corporation, and DOES 1 through 20,  
inclusive,

Defendants.

Case No.: 21STCV39332 [consolidated with Case  
No. 22STCV00158]

*Assigned to the Hon. David Cunningham, Dept. 11*

**DECLARATION OF JONATHAN LACOUR,  
ESQ. IN SUPPORT OF MOTION FOR FINAL  
SETTLEMENT APPROVAL**

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1. I am counsel of record for Plaintiff Elmer Estrada Gonzalez, as well as the putative class matter since this matter was filed. I am admitted to practice before all the courts of this state. I make this declaration based on my own personal knowledge except as to those matters stated on information and belief. If called as a witness to testify in this matter I could and would so testify.

2. The motion for which this declaration is offered in support seeks final approval of a class action settlement negotiated and entered into at arm's length by the parties herein.

- Up to 35% of the Gross Settlement Amount (\$157,500.00) to Plaintiffs' counsel for attorneys' fees;
- Up to \$30,000.00 to Plaintiffs' counsel for litigation costs and expenses;
- Class Representative Service Payments to the Class Representatives of not more than \$20,000;
- Up to \$24,000.00 for PAGA Penalties, allocated 75% to the LWDA PAGA Payment and 25% in Individual PAGA Payments to the Aggrieved Employees based on their PAGA Period Pay Periods; and
- \$7,500.00 to Phoenix Settlement Administrators for settlement administration costs

**Experience and Views of Counsel**

4. In addition to the actions of myself and my firm in litigating Plaintiff's case thus far, my firm is well qualified because of our experience, knowledge, and resources to act as counsel and represent Plaintiff and the putative class in this action. My practice is exclusively focused on employment matters, with a substantial percentage devoted to litigating wage, hour, and working-conditions violations. Furthermore, several of these wage and hour / working-conditions matters include PAGA claims and are thus litigated to encompass violations against groups of Aggrieved Employees comparable in size to approved classes in class actions.

5. I am the President and Managing Attorney of Employees First Labor Law P.C., a law firm dedicated to protecting the rights of employees in the workplace. I received my Juris Doctorate from Loyola Law School in Los Angeles, California in 2011. I have been admitted to the State Bar of California since 2012. I am a member of the Consumer Attorney's Association of Los Angeles and the California Employment Lawyers Association and Top 40 Under 40, National Advocates. I have been honored as the President of the Top 40 Under 40 for National Advocates in 2022, a Super Lawyers Rising Star Finalist, and Super Lawyers Rising Star from 2018 to Present.

6. I have been practicing law since 2012. Since that time I have focused almost exclusively on representing employees, including in wage-and-hour class actions. During my career I have represented employees in many wage-and-hour class action and/or PAGA lawsuits as lead or co-lead counsel, and I have obtained a high number of six and seven figure settlements against a range of defendants, including Fortune 500 companies. These cases have involved the gamut of wage-and-hour claims, including claims for failure to pay minimum wages, unpaid wages and overtime, failure to provide meal and rest breaks, failure to reimburse necessary business expenses, inaccurate pay statements, failure to pay timely wages—similar to claims at issue in the present matter. I am aware that the common and acceptable rate for contingency representation in wage-and-hour class action litigation is normally 40% before trial, with the range being from 33.3% up to 50%.

7. I am one of very few counsels to have tried a PAGA case to verdict, as referenced below. In addition, Attorney Lisa Noveck and myself were recently certified as class counsel in the matter entitled

1 *Rolando Viramontes v. Prestige Design Center, Inc.*, Orange County Case No. 30-2021-01179611-CU-  
2 OE-CJC.

3 8. I am thus experienced in prosecuting wage and hour employment matters on a  
4 representative basis whereby the scope of the case extends to investigations into allegations of *Labor Code*  
5 violations committed against large numbers of employees within the same matter.

6 9. In addition to the present case, I and my firm, Employees First Labor Law, have served as  
7 counsel for many other representative wage-and-hour lawsuits pending in various jurisdictions throughout  
8 California, including class-actions, PAGA cases, and cases involving both of these types of representative  
9 claims. Some examples of the recently tried or settled class and PAGA cases where I have served as  
10 counsel and prosecuted are the following: *Amy Piana v. LoanDepot.com, LLC*, Orange County Case No. 30-  
11 2017-00913164-CU-OE-CXC; *Robert Hernandez Lopez Jr. v. Karhay, LLC*, Riverside County Case No.  
12 CVRI2102600; *Jamie Sarinana v. Opticolor, Inc.*, Orange County Case No. 30-2018-01010815-CU-OE-  
13 CJC, *Abraham Duran v. Second Street Promenade, LLC et al.*, Los Angeles County Case No.  
14 19STCV43696, *Victor DeGuzman v. First Direct Lending, LLC*, Orange County Case No. 30-2018-  
15 00988428-CU-OE-CJC, *Brandon Chia v. RTI Systems PS*, Los Angeles County Case No. 20STCV16336,  
16 *Brian Bejarano v. Boulevard Nightlife Group, LLC et al.*, Los Angeles County Case No. 19STCV08303,  
17 *Claudio Fernandez et al. v. OC Auto Exchange, Inc.*, Los Angeles County Case No. BC664860, *Alice*  
18 *Sadoyan et al. v. Platinum Black, Inc. et al.*, Los Angeles County Case No. 19STCV43793, *Albert Connie*  
19 *et al. v. Jerome Moss et al.*, Los Angeles County Case No. 20STCV26107, *Emilio Leon et al. v. Bedabox,*  
20 *LLC et al.*, Central District of California Case No. 5:20-cv-02291 SP, *Marcus Schubert v. Blizzard*  
21 *Entertainment, Inc.*, Orange County Case No. 30-2020-01172466-CU-OE-CXC, *Marni Martin v.*  
22 *CalCare Hospice, Inc. et al.*, San Bernardino County Case No. CIVDS2011617, *Alex Holdridge v.*  
23 *Complete Solar, Inc. et al.*, Los Angeles County Case No. 20STCV22344, *Brian Nelson v. Great Western*  
24 *Sales, Inc.*, Orange County Case No. 30-2021-01196131-CU-OE-CXC, *Karla Munoz v. Elite*  
25 *Chiropractic & Wellness Center et al.*, Los Angeles County Case No. 19STCV44328, *Monica Munoz v.*  
26 *Ross Aviation Operations, LLC*, Riverside County Case No. PSC2003508, *Nicholas Marin v. Bendpak,*  
27 *Inc.*, Ventura County Case No. 56-2019-00528355-CU-OE-VTA, *Sungmin Kim v. Veyo, LLC*, County of  
28

San Diego Case No. 37-2020-00033184-CU-OE-CTL; and *Julia Lim et al. v. Looking Toward the Future, Inc. et al.*, Los Angeles County Case No. 19STCV37114.

10. Of particular note is the *Lim v. Looking Toward the Future, Inc.* case, where I tried and prevailed upon a statewide PAGA claim on the merits. The PAGA claim in that case arose largely out of the same wage and hour violations involved in this case, including meal and rest period violations, minimum wage and overtime violations, and waiting time penalties. I am therefore familiar with the extent of discovery and methods of presentation at trial necessary to prove violations across a representative class of employees against whom wage and hour violations have been committed.

11. My extensive experience in litigating employment wage and hour matters has been integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and generally negotiating fair and reasonable class action settlements. Practice in the narrow field of wage and hour litigation requires skill and knowledge concerning the constantly evolving substantive law (state and federal) as well as the procedural knowledge of how to litigate not only the claims of my clients but also absent Aggrieved Employees or Class members. In this action, I am fully equipped to use the skills and knowledge I have developed through more than a decade of litigating wage and hour lawsuits to fairly and adequately represent the interests of the Class. Therefore, on the account of my resources, experience, and knowledge, I am well qualified to act as class counsel and represent the Plaintiffs and the putative class members in this action.

12. Lisa Noveck graduated from Loyola Law School, Los Angeles in the Top 5% of her graduating class in 2017. Attorney Noveck holds memberships in the Consumer Attorneys Association of Los Angeles, Women Lawyers Association of Los Angeles, as well as the American Bar Association. In the past seven years working as an associate, senior associate, and assistant managing attorney for Employees First Labor Law P.C., Attorney Noveck has worked on hundreds of Plaintiff's side employment matters, including many of the PAGA and wage and hour class action cases litigated by my firm. Attorney Noveck has served in multiple capacities on these cases, including directly assisting myself and other trial counsel with trial documents and trial preparation as well as being the lead drafter of motions and briefs for such cases.

1           13.     Jameson Evans graduated from Loyola Law School, Los Angeles in the Top 25% of his  
2 graduating class in 2021. Attorney Evans was a Note and Comment Editor for the Loyola of Los Angeles  
3 Entertainment Law Review and a member of the Scott Moot Court Honors Board. Over the approximately  
4 three years Attorney Evans has worked for Employees First Labor Law P.C. as an associate, Attorney  
5 Evans has served a worked on hundreds of Plaintiff's side employment matters, including many of the  
6 PAGA cases litigated by my firm. In particular, while Attorney Evans also works in trial preparation and  
7 drafts motions and briefs, Attorney Evans has worked extensively in PAGA and representative discovery  
8 which has helped secure favorable settlements and trial results in my firm's cases involving representative  
9 claims.

10           14.     Amanda Thompson graduated from Loyola Law School, Los Angeles in the Top 15% of  
11 her graduating class in 2022. Attorney Thompson was the Production Editor for the Loyola of Los Angeles  
12 International and Comparative Law Review, as well as a member of the St. Thomas Moore Law Honor  
13 Society. Attorney Thompson was also a member of the Loyola Law School Center for Juvenile Law and  
14 Policy. Attorney Thompson was specifically recruited as a trial attorney, and has appeared at oral  
15 argument on multiple dispositive motions within her first few months of practice and examined and cross-  
16 examined key witnesses at multiple trials. In her time working as an associate for Employees First Labor  
17 Law P.C., Attorney Thompson has also served as a law and motion drafter and key brief writer, including  
18 mediation briefs for matters EFLL has settled in the high six figures, and has participated in the  
19 questioning of witnesses and preparation of trial documents including jury instructions, special verdict  
20 forms, and motions *in limine* in multiple trials.

21           15.     In accordance with the above, the attorneys working on this case at my firm bill at the  
22 following hourly rates: Jonathan LaCour at \$850/hour, Lisa Noveck at \$750/hr, Jameson Evans at  
23 \$650/hour, and Amanda Thompson at \$600/hour.

24           16.     In the past several years, I and the attorneys at my firm have been awarded fees in multiple  
25 labor and employment cases at rates that support the 2025 requested rate in this case in light of inflation  
26 and rising costs.

1           17.     In April 2024, Arbitrator Honorable Franz E. Miller, (Ret.) approved me at an attorney's  
2 fees rate of \$850.00 per hour, Ms. Noveck at \$725.00 per hour, Mr. Evans and Ms. Thompson at \$600.00,  
3 per hour in a wage and hour case.

4           18.     In 2023, I requested and was awarded attorney's fees at the reduced rate of \$700 per hour  
5 in 2023 in the *Kern County Superior Court case Hutchison, et al. v. Lewis Towing 2, Inc., et al.*, Case No.:  
6 BCV-21-100772. I specifically asked for a lower than usual rate to account for the reduced local market  
7 in Kern County, and to account for the trial resolving in the first half of 2023. Also requesting reduced  
8 2023 rates to account for the reduced cost Kern County market EFLL paralegals were awarded at  
9 \$250/hour. All of our requested hours were awarded, with the only reduction to account for prior discovery  
10 motion fee awards.

11           19.     In November 2023, Employees First Labor Law was awarded attorneys' fees in an  
12 arbitration before Stephen M. Benardo in a FEHA case. The arbitrator approved reasonable rates for me  
13 at \$800 per hour, Lisa Noveck at \$600 per hour, and at Amanda Thompson \$400.

14           20.     In March 2023, in an arbitration before the Honorable Richard A. Stone (Ret.) on a FEHA  
15 case, the arbitrator highlighted the exceptional caliber of my work product before approving Employees  
16 First Labor Law's attorneys' by setting a reasonable "blended rate" of \$700/hour for myself, Ms. Noveck,  
17 Mr. Evans, and Ms. Thompson.

18           21.     In 2022, I was awarded fees at the reasonable rate of \$700 per hour by a Los Angeles  
19 Superior Court judge for work performed from 2019-2022. In the same action Ms. Noveck was also  
20 awarded attorney's fees at an hourly rate of \$500.00.

21           22.     I am aware that (1) Bernard Alexander of Alexander Morrison + Fehr LLP charges over  
22 \$1000.00 per hour, (2) Carney Shegerian of the Law Offices of Carney Shegerian charges over \$1300.00  
23 per hour, (3) Anthony Nguyen, an attorney working for Carney Shegerian charges over \$1000.00 per hour,  
24 (4) A. Jacob Nalbanyan of Levin Nalbanyan LLP charges \$1000.00 per hour, (5) Daniel Kramer of Kramer  
25 Trial Lawyers charges \$1000.00 per hour.

26           23.     Between the attorneys listed above, Employee's First Labor Law's lodestar is \$98,345,  
27 based on 131.4 attorney hours spent litigating this case through the filing of this motion. We also anticipate  
28 spending further attorney time in the pendency of bringing this case to full resolution.

24. My firm's representation of Plaintiff Gonzalez in this matter represents a significant amount of time and resources. The representation has been on a full contingency basis, with no retainer fee or costs paid by Plaintiff Gonzalez at any time through the present, and Plaintiff Gonzalez has taken on significant out-of-pocket expenditures to prosecute this case. My firm has not been paid any fee or for any of its costs as of the present and has fronted all costs and infrastructure to work on this matter.

25. Under all relevant factors discussed herein as well as in other accompanying declarations and the points and authorities, I respectfully request the Court award class counsel the requested fees of \$157,500. Crosner Legal and Employees First Labor Law will split any fees awarded 40% to Crosner Legal and 60% to Employees First, and both clients have been informed of and consented to the proposed fee split.

26. In addition, my firm has incurred the following costs during the course of representation in this matter:

| Costs                                             | Amount Paid |
|---------------------------------------------------|-------------|
| Filing of Case                                    | \$1,481.72  |
| Filing of Notice of CMC                           | \$7.26      |
| Case Anywhere                                     | \$135.00    |
| Complex Fee                                       | \$1,000.00  |
| Class Certification Motion Filing                 | \$68.91     |
| Filing of Status Conference Statement (3.17.2023) | \$7.26      |
| Filing of Notice of Ruling FSC (3.24.2023)        | \$7.26      |
| Filing of Notice of Ruling FSC (5.18.2023)        | \$7.26      |
| Filing of Status Conference Statement (5.11.2023) | \$7.26      |
| Filing of Reply ISO Class Certification Motion    | \$7.26      |
| Filing of Joint Stipulation for Continuance       | \$28.71     |
| Filing of POS of Summons                          | \$7.26      |
| Deposition of Chad Kim (PMK)                      | \$2,570.85  |
| Filing of Notice of Change of Address             | \$7.26      |
| Class Certification Motion Re-Filing              | \$68.91     |
| Re-Filing of Proposed Trial Plan                  | \$7.26      |
| Service of Summons and Complaint                  | \$88.00     |
| Filing of Brief                                   | \$7.26      |
|                                                   | \$5,514.70  |

27. Throughout this case, Class Counsel conducted a thorough investigation of the subject wage-and-hour practices and engaged in non-collusive, arm's-length negotiations facilitated by a respected mediator in order to reach a settlement. Defendants have agreed to pay fair value to settle

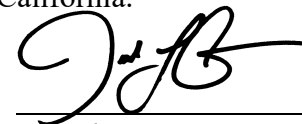


1 Plaintiffs' claims given the existence of the numerous legal hurdles and challenges that faced Plaintiffs.  
2 From Class Counsel's substantial experience with individual and representative wage-and-hour lawsuits,  
3 this case could not have settled on better terms under the circumstances. Class Counsel therefore request  
4 that the settlement be granted preliminary approval so that those persons whom it was intended to benefit  
5 shall be afforded the opportunity to determine its adequacy for themselves.

6         28. The parties heavily litigated this case from its inception. This included inspection and  
7 analysis of documents; in-depth analysis of potential class-wide damages; preparing for class certification;  
8 and extensive research of the applicable law with respect to the claims asserted in the actions and the  
9 potential defenses thereto. In addition, Class Counsel also took the deposition of Defendants' Person Most  
10 Knowledgeable in order to solidify Plaintiffs' understanding of the scale and type of violations underlying  
11 potential class-wide damages. Class Counsel has investigated and evaluated the strengths and weaknesses  
12 of their factual and legal arguments before reaching the proposed settlement, and engaged in sufficient  
13 investigation, research and discovery to support the settlement. Plaintiffs and Class Counsel put in  
14 significant time and resources and did everything at every stage of this case to try and obtain the best result  
15 for the proposed class.

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17         I declare under penalty of perjury pursuant to the laws of the state of California that the foregoing  
18 is true and correct.

19  
20                 Executed this 28th Day of July, 2025 in Pasadena, California.

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22 \_\_\_\_\_  
23 Jonathan LaCour