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*Attorneys for Plaintiffs, the Putative Collective,
the Putative Class, Aggrieved Employees,
and on behalf of the State of California*

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF ALAMEDA**

ANDREA SALONGA and DANIELA
MELGOZA, individually and on behalf of all
others similarly situated and the State of
California,

Plaintiffs,

v.

AEGIS SENIOR COMMUNITIES, LLC,
d/b/a AEGIS LIVING; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 22CV007450

**DECLARATION OF FAWN F. BEKAM IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENT**

Date: January 25, 2023
Time: 3:00 p.m.
Dept: 514
Judge: Hon. Noël Wise
Res. ID: 106613794847

1 I, Fawn F. Bekam, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all of the courts of the State of
3 California. I am a senior associate with Aegis Law Firm, PC (“Aegis”), counsel for Plaintiff Andrea
4 Salonga. in this matter. I am thoroughly familiar with and have personal knowledge of all of the facts
5 set forth herein.

6 2. I submit this declaration in support of Plaintiffs’ Motion for Preliminary Approval of
7 Class Action Settlement. If called as a witness, I could and would competently testify thereto.

8 3. Aegis prosecutes wage and hour cases, including class actions on behalf of employees
9 and others who have had their rights violated. Aegis, either on its own, or with co-counsel is currently
10 serving as plaintiffs’ counsel of record in dozens of wage and hour and employment class action cases
11 pending in both state and federal court.

12 4. The attorneys working on this case have been appointed class counsel in many cases,
13 through both contested motions and settlement approval motions.

14 5. Aegis has litigated and successfully resolved many wage and hour class action cases
15 involving failure to pay wages and derivative Labor Code claims and penalties *See, e.g., Flores v.*
16 *Element Materials Technology Huntington Beach, LLC*, Los Angeles Superior Court, Case No.
17 18STCV10074 (class certification granted on December 16, 2021 for all current and former non-exempt
18 employees on issues of payment of daily overtime); *Bonello v. Laboratory Express, Inc.*, San Bernardino
19 Superior Court, Case No. CIVDS1714584 (class certification granted on May 14, 2021 for all current
20 and former couriers misclassified as independent contractors on issues of inaccurate wage statements,
21 failure to reimburse business expenses, and unfair competition); *Roman, et al. v. TRM Manufacturing,*
22 *Inc.*, Riverside Superior Court, Case No. RIC1706458 (class certification granted on December 17, 2020
23 for all current and former non-exempt workers’ on issues of rounding, meal period, and rest period
24 claims); *Gamboa v. Kamran, et al.*, San Bernardino Superior Court, Case No. CIVDS1605273 (class
25 certification granted on September 16, 2019, for factory workers on issues of rounding, automatic
26 deduction of first meal period, and second meal period); *Romo, et. al, v. GMRI, Inc. d/b/a/ Olive Garden,*
27 United States District Court Central District of California, Case No. EDCV-12-0715-JLQ (class
28 certification granted for restaurant workers’ rest period claims); *Sawyer v. Retail Data, LLC*, Orange

1 County Superior Court, Case No. 30-2014-00753767-CU-OE-CXC (unpaid wage and rest break claims
2 for piece rate workers); *Gonzalez v. SFFI Company, Inc., et. al*, San Bernardino County Superior Court,
3 Case No. CIV DS1504287 (unpaid wages, meal period and rest break claims for non-exempt
4 employees); *Antoine v. Riverstone Residential California, Inc., et. al*, Sacramento County Superior
5 Court, Case No. 34-2013-00155974 (rate of pay, on-call time, unpaid wage, meal period, rest break, and
6 expense reimbursement claims for non-exempt employees); *Nguyen v. Pharmerica*, Orange County
7 Superior Court, Case No. 30-2014-00716072-CU-OE-CXC (unpaid wages and unreimbursed expenses
8 for pharmacists); *Orellana v. Westlake*, Los Angeles County Superior Court, Case No. BC539614
9 (unpaid overtime, meal period and rest break claims for call center employees); *Kent v. Mountain View*
10 *Child Care, Inc.*, Los Angeles County Superior Court, Case No. BC539633 (minimum wage, overtime,
11 meal period, and rest break claims for hospital workers); *Durroh v. East West Bank*, Los Angeles County
12 Superior Court, Case No. BC528860 (overtime claims for failure to include bonuses in regular rate of
13 pay for bank workers); *O'Brien et al. v. Pizza Hut of Southeast Kansas, Inc. et al.*, Riverside County
14 Superior Court, Case No MCC 1301030 (meal period and expense reimbursement claims for delivery
15 drivers); *Bell v. Prime Healthcare*, Orange County Superior Court, Case No. 30-2011-00475240-CU-
16 OE-CXC (overtime claims for failure to include shift premiums in regular rate of pay and failure to
17 provide meal and rest periods to hospital workers), *Grana v. Toys R US-Delaware, Inc.*, Central District
18 of California, Case No. 2:13-cv-01302-DSF-JCG (bag check claims for unpaid wages and failure to
19 provide meal periods and rest breaks to retail employees); *Mendez v. H.J. Heinz Company, L.P., et. al*,
20 Orange County Superior Court, Case No. 30-2013-00644915-CU-OE-CXC (failure to pay all wages to
21 factory workers due to rounding practice); *Fresh & Easy Wage and Hour Cases*, Los Angeles Superior
22 Court, Cas No. JCCP 4705 (failure to provide meal and rest periods to supermarket workers); *Lunsford*
23 *v Stater Bros.*, Riverside Superior Court, Case No. RIC 1104475 (failure to provide meal and rest periods
24 to supermarket workers); *Gregg v. Belo*, Riverside Superior Court, Case No. RIC 523697 (unpaid wages
25 and missed meal and rest periods due to misclassification of newspaper delivery employees); *Brown v.*
26 *Experian Information Solutions, Inc., et. al.*, Orange County Superior Court, Case No. 30-2012-
27 00375163 (misclassification of engineers and similar positions); *Tereth v. Shakey's USA, Inc.*, Los
28 Angeles Superior Court, Case No. BC441359 (failure to provide meal and rest periods to restaurant

employees); *Azurin v. Harbor Distributing LLC, et. al.*, Los Angeles Superior Court, Case No. BC421392 (failure to pay overtime wages, provide meal and rest periods, reimburse business expenses to Account Managers); *Caffero v. ABC* (failure to provide meal periods and reimburse expenses of therapists). All cases cited above were successfully resolved for the plaintiff classes.

6. Samuel A. Wong is a graduate of University of Pennsylvania Law School, where he received his J.D. in 2001. Mr. Wong received a Bachelors of Arts in Sociology from the University of California at Berkeley in 1997.

7. After graduation from law school in 2001, the same year in which Mr. Wong took and successfully passed the California Bar Exam, Mr. Wong moved to back to Los Angeles, California where he was employed at Paul Hastings, Janofsky & Walker, LLP. While working in the employment department at Paul Hastings, he was involved in numerous wage and hour class action lawsuits and other employment related matters.

8. Mr. Wong became a founding partner of Aegis Law Firm, PC in 2003, and focused his practice on plaintiff's side employment work. Throughout his years of practice, Mr. Wong represented and obtained successful outcomes for his clients, including awards through arbitration and trial.

9. Mr. Wong is a member of the Orange County Bar Association, Orange County Trial Lawyers Association, and California Employment Lawyers Association.

10. Mr. Wong was chosen by Law and Politics Magazine as a Super Lawyer Rising Star, representing one of the top 2.5% of lawyers under 40 in Southern California in 2011, 2012, 2013, and 2014. He has been chosen by Law and Politics Magazine as a Super Lawyer every year since 2015. Mr. Wong was also chosen as a Top Attorney in the field of employment law by OC Metro in 2014, 2015, and 2018.

11. Kashif Haque received his J.D. in 2001 from Washington University School of Law. While in law school, Mr. Haque was a member of the Law Review Editorial Board, author of an article published in the Law Review, Executive Board Member of Moot Court, and a member of the Dean's List. He received a Bachelor's of Science in Business Administration from the University of Central Missouri in 1998, where he was a member of the Beta Alpha Psi honors fraternity.

1 12. Since 2004, Mr. Haque has exclusively focused his practice on plaintiff's employment
2 litigation with a specific focus on wage and hour claims. Since then, he has represented over 500,000
3 employees with their employment claims, many of which included wage and hour claims. He has been
4 appointed class counsel in approximately 100 cases and is currently litigating over 150 employment
5 wage and hour class action cases.

6 13. Mr. Haque authored a book on employment litigation strategies with West Publishing
7 and has been invited to speak on class action and wage and hour issues on numerous occasions. He has
8 spoken at seminars by the State Bar of California, California Employment Lawyer's Association
9 (CELA), Orange County Bar Association, and various other CLE providers. Mr. Haque is the former
10 Chair for the Labor and Employment Section of the Orange County Bar Association. He was selected
11 as one of the Top 50 Attorneys in Orange County by Super Lawyers for 2017 and 2019. He has been a
12 Super Lawyer for every year from 2009 to the present. OC Register/Metro has selected him as one of
13 the Top 5 Employment Lawyers in Orange County for every year the list was published, from 2012 to
14 2018.

15 14. Jessica L. Campbell is a partner at Aegis Law Firm. Ms. Campbell was admitted to the
16 California Bar in December of 2011, and received her J.D. from Santa Clara University School of Law
17 and her B.A. from the University of California, Berkeley. Ms. Campbell has dedicated her career to
18 plaintiffs' side class actions. Ms. Campbell's experience includes successful work on class action
19 appeals, class certification motions, and class settlements. She was chosen by Law and Politics
20 Magazine as a Super Lawyer Rising Star, representing one of the top 2.5% of lawyers under 40 in
21 Southern California in 2018-2021.

22 15. I am a senior associate at Aegis. I am a graduate of University of California, Irvine
23 School of Law, where I received my J.D. in 2015. I received my B.A. from University of California,
24 Los Angeles in 2012. While in law school, I was a recipient of numerous honors, including multiple
25 Dean's Awards, Dean's Merit Scholarship, and pro bono graduation honors. I have been chosen as Super
26 Lawyer – Rising Star since 2020, and Best Lawyers: Ones to Watch since 2021.

27 16. Aegis has performed significant work and expended litigation costs in prosecuting the
28 matter with no guarantee of any payment.

1 17. At final approval, Aegis will fully brief the merits of its request for the award of
2 attorneys' fees and litigation costs.

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

5 Executed on October 24, 2023 at Irvine, California.

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