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Attorneys for Plaintiff Monique Bravo

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

MONIQUE BRAVO, an individual, on behalf
of herself and all others similarly situated,

Plaintiff,

v.

OPTUMCARE MANAGEMENT, LLC, a
California Corporation,

Defendants,

Lead Case No. 22STCV12240 ("Bravo I")
(Consolidated with Case No. 23STCV17426
("Bravo II"))

ASSIGNED FOR ALL PURPOSES TO:
Honorable Brock T. Hammond, Dept. 407

**CONSOLIDATED REPRESENTATIVE
ACTIONS**

**DECLARATION OF PEGGY J. REALI IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA REPRESENTATIVE
SETTLEMENT**

Date: September 10, 2026

Time: 8:30 a.m.

Dept: 407

Reservation No.: 267317946638

Complaint filed: April 11, 2022

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I, Peggy J. Reali, declare:

1. I am an attorney at law, duly licensed to practice before all of the Courts of the State of California. Since June 2023 I have been a shareholder of United Employees Law Group, PC (“UELG”). UELG is co-counsel of record for Plaintiff Monique Bravo (“Plaintiff”) in this action.

2. I submit this declaration in support of Plaintiff's Motion for Approval of PAGA Representative Settlement.

3. I make this Declaration based on my personal knowledge except for those matters which are stated on information and belief, or after a detailed review of UELG business records, and if called to testify I could and would competently testify to the matters contained in this Declaration.

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4. I appeared at and participated in a full day mediation with my co-counsel, The Markham Law Firm and Cohelan Khoury & Singer. The mediator, Dan Turner, is a well-reputed and successful wage and hour class and PAGA action mediator. Settlement negotiations were at arm's length and, although conducted in a professional manner, were adversarial. My co-counsel and I went into the mediation session willing to explore the potential for a settlement of the dispute, but we were also prepared to litigate their position through trial.

5. I believe that the Settlement is fair, adequate, and reasonable. In my opinion, the Settlement provides substantial monetary benefits to the LWDA and aggrieved employees and is a product of diligent efforts to obtain the best possible result for the LWDA and aggrieved employees. This Settlement was reached following thorough legal and factual research and analysis, thorough review of data relative to the claims in the action, arduous settlement negotiations, and thorough investigation of the underlying facts by the respective parties and review of records. The settlement negotiations were, at all times, adversarial and non-collusive in nature. In sum, I am well-suited to act as counsel for Plaintiff and other aggrieved employees and will continue to vigorously represent the interests of the LWDA and the aggrieved employees.

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7. I am a graduate of the University of San Diego School of Law, and have practiced law since 1991. I have extensive experience in class action litigation, including wage and hour / PAGA litigation, and have been involved in litigating numerous mass torts in state and federal courts throughout the United States, to include, among others, against Big Tobacco culminating in the 1998 Big Tobacco Master Settlement, L-Tryptophan, Fen-Phen Litigation, Breast Implant Litigation, Vioxx Litigation, and the *2007 San Diego Wildfire Litigation*. I have conducted at least three trials, to include two jury trials and one bench trial, and have prepared for numerous trials which settled on the eve of trial.

9. I have served as class counsel in numerous wage-and-hour class and representative actions in both federal and state courts in California and other states since at least 2007, when I was employed as an attorney with the wage-and-hour class action firm then known as Cohelan & Khoury (now Cohelan, Khoury & Singer). In addition to extensive class action and PAGA litigation experience with that firm, I have continued this practice through Reali Law, APC (beginning in 2017), served as Of Counsel and as an independent contractor with other well-regarded wage-and-hour and class action firms in California and other jurisdictions, and in addition, since 2023, have continued to litigate class and representative matters through United Employees Law Group. Since 2007, I have been appointed as class counsel, and/or performed substantial litigation work in cases in which my law firm was appointed as class counsel, and/or otherwise contributed to wage and hour class / PAGA litigations with class co-counsel, including, but not limited to, the following:

- 1 a. *Yeager v. Atlas Technical Consultants (CA), Inc.*, Alameda Superior Court Case No.
2 23CV039836 (Reali appointed class counsel, final approval of \$500,000 Class / PAGA
3 settlement);
- 4 b. *Duffie v. Reliable Energy Management, Inc.*, Los Angeles Superior Court Case No.
5 23STCV28325 (Reali as counsel of record; participated in mediation; extensive
6 contribution to approval briefing; Class / PAGA of \$200,000);
- 7 c. *Fumera et al. v. LBC Mundial Corporation*, San Francisco Superior Court Case No. CGC-
8 23-60896 (Reali appointed class counsel, final approval of \$503,000 Class / PAGA
9 settlement);
- 10 d. *Villalobos v. Cornwall Security Services, Inc.*, Los Angeles Superior Court Case No.
11 22STCV28166 (Reali appointed class counsel, final approval of Class / PAGA \$230,000
12 settlement);
- 13 e. *Cebreros v. SmartCareMD Practice Management, LLC*, San Diego Superior Court Case
14 No. 37-2019-00022973-CU-OE-NC (Reali appointed class counsel, final approval of
15 \$596,653 Class / PAGA settlement);
- 16 f. *Montgomery v. CEC Entertainment*, San Diego Superior Court Case No. 37-2020-
17 00009952-CU-OE-CTL (Reali obtained class action settlement of \$325,000; then
18 defendant's Ch. 11 petition and subsequent settlement through bankruptcy court);
- 19 g. *Merino v. Wells Fargo and Company*, United States District Court, District of New Jersey
20 Case No. 2:16-cv-07840-ES-MAH (Reali appointed class counsel, final approval granted,
21 \$35 million settlement);
- 22 h. *Collins v. ITT Educational Service, Inc.*, United States District Court, Southern District of
23 California Case No. 12-cv-1395-DMS-BGS (firm appointed class counsel, final approval
24 granted, \$200,000 Class / PAGA settlement);
- 25 i. *Tenet Health Care Litigation* Los Angeles Superior Court JCCP 4377 (firm appointed
26 class counsel, final approval granted, \$85m settlement);
- 27 j. *Wells Fargo Wage and Hour Cases*, JCCP 004821, Alameda County Superior Court (firm
28 appointed class counsel, final approval granted, \$27.5 million Class / PAGA settlement);

- 1 k. *Alvarez v. Farmers*, case number 3:14-cv-00574-WHO, (firm appointed class counsel,
2 final approval granted, \$4.9 million settlement);
- 3 l. *Saldana v. Amazon*, case number 3:14-cv-00290-DJH (W.D. Ky.) (firm appointed class
4 counsel, final approval granted, \$3.77 million settlement);
- 5 m. *Vangsoulatda v. Blue Shield*, San Francisco Superior Court Case No. CGC-14-543296
6 (firm appointed class counsel, final approval granted, \$3 million settlement);
- 7 n. *Wells Fargo Bank Wage and Hour Cases*, Los Angeles Superior Court JCCP 4702 (*Layog*
8 *v. Wells Fargo, et al.*) (firm appointed class counsel, final approval granted, \$13 million
9 settlement);
- 10 o. *Kogok v. T-Mobile USA, Inc.*, San Diego Superior Court Case No. 37-2012-00076945
11 (firm appointed class counsel, final approval granted, \$2.75 million settlement);
- 12 p. *Johnson v. Metlife Ins. Co.*, Case No. 13-cv-128-JLS-RNB (C.D. Cal. Mar. 19, 2015) (firm
13 appointed class counsel, final approval granted, \$1.97 million settlement);
- 14 q. *Loeza v. Chase Bank, NA*, United States District Court, Southern District of California
15 Case No. 3:13-cv-95-L-BGS (firm appointed class counsel, class certified and settled for
16 \$970,000);
- 17 r. *Campagna et al. v. Language Line Services, Inc.*, Orange County Superior Court Case No.
18 30-2012-00578934-CU-OE-CXC (firm appointed class counsel, final approval granted,
19 \$900,000 settlement);
- 20 s. *Santini v. Wells Fargo*, United States District Court, Northern District of California, Case
21 No. 4:16-cv-01992-YGR (RealI appointed class counsel, final approval granted, \$685,00
22 settlement).

23 My Curriculum Vitae will be produced upon request.

24 10. I personally performed at least **8.55 hours** of legal services on behalf of the aggrieved
25 employees through June 1, 2026, as follows: Prepare for mediation (review brief and discuss with co-
26 counsel) (.50 hours); appear at and participate in 1/26/2026 mediation (6.50 hours); de-brief UELG
27 team after mediation (.25 hours); and communications with UELG staff / Markham Law Firm re
28 declaration for approval of settlement; and draft RealI Decl. in support of approval of settlement (1.30

1 hours).

2 11. At my hourly rate of \$875 an hour, my **lodestar is \$7,481.25** (8.55 hours at \$875 /
3 hour).

4 12. In performing legal services, the undersigned has exercised billing discretion, and has
5 not billed for every phone call, email reviewed, and the like. Moreover, I have been mindful to not
6 log duplicative hours that were not reasonably necessary to the resolution of this case.

7 13. UELG sets its billing rates based on a review of the rates charged by other plaintiffs'
8 attorneys involved in complex litigation in the state of California. I have reviewed and been informed
9 of billing rates at several other class action / PAGA / representative firms in California, and my hourly
10 rate of \$875 is comparable to rates charged by other class action and employment firms in this market
11 for attorneys with similar levels of experience. My law firm requests the foregoing billable rates be
12 applied in this case.

13 14. My hourly rate of \$875 has remained unchanged throughout this litigation. The rate is
14 reasonable and consistent with prevailing market rates for senior attorneys litigating complex wage-
15 and-hour class and PAGA actions in Northern California and throughout California.

16 15. Courts have previously approved similar hourly rates for my work in comparable
17 wage-and-hour class and representative actions. In 2026, the Alameda Superior Court approved a rate
18 of \$850 in *Duffie v. Reliable Energy Management, Inc.*, Los Angeles Superior Court Case No.
19 23STCV28325, and also in 2026 a rate of \$750 was approved in *Yeager v. Atlas Technical*
20 *Consultants (CA), Inc.*, Alameda Superior Court Case No. 23CV039836. In 2024, the Los Angeles
21 Superior Court approved a rate of \$725 per hour in *Villalobos v. Cornwall Security Services, Inc.*,
22 Case No. 22STCV28166. In 2019, a federal court approved my \$650 hourly rate in *Merino v. Wells*
23 *Fargo & Company*, No. 2:16-cv-07840-ES-MAH (D.N.J.). Between 2016 and 2018, courts approved
24 my \$575 hourly rate in multiple coordinated Wells Fargo wage-and-hour proceedings, including
25 JCCP Nos. 4702 and 4821.

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1 16. In compliance with California Rules of Professional Conduct section 1.5.1, Plaintiff
2 entered into a Joint Prosecution Agreement with their counsel of record. The JPA governs the division
3 of responsibilities and attorneys' fees among counsel, and Plaintiff provided informed written consent
4 after full disclosure.

5 I declare under penalty of perjury of the laws of California and of the United States of America
6 that the foregoing is true and correct. Executed this 2nd day of June, 2026, at San Diego, California.

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10 Peggy J. Reali
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