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Attorneys for Plaintiff and the Aggrieved Employees

(Additional Counsel on Next Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

AJ BOLDING, as an individual and on behalf
of all others similarly situated,

Plaintiff,

v.

CARDINAL FINANCIAL COMPANY, a
Pennsylvania limited partnership; and DOES
1 through 50, inclusive,

Defendants.

Case No. CIVSB2206543

[Assigned for all purposes to the Hon. Jessica
Morgan, Dept. S-26]

**DECLARATION OF EDWARD W. CHOI
IN SUPPORT OF MOTION TO APPROVE
THE PARTIES' SETTLEMENT
AGREEMENT PURSUANT TO THE
LABOR CODE PRIVATE ATTORNEYS
GENERAL ACT OF 2004**

Date: July 1, 2023
Time: 8:30 a.m.
Dept.: S-26

ADDITIONAL COUNSEL

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Attorneys for Plaintiff and the Aggrieved Employees

1 I, Edward W. Choi, declare as follows:

2 1. I am an individual over the age of 18. I am one of the attorneys of record for
3 Plaintiff A.J. BOLDING (hereinafter referred to as "Plaintiff"). I have personal knowledge of
4 the facts set forth below and if called to testify I could and would do so competently.

5 2. Although Plaintiff and his counsel are confident that litigation of the claims
6 would result in a representative judgment against Defendant, they recognize the inherent risks in
7 litigation, including the specific risks that class certification could be denied, liability could not
8 be established at trial, or the applicable law could change.

9 3. After taking into account sharply disputed factual and legal issues involved in
10 this litigation, the risks attending further prosecution, and the substantial benefits to be received
11 pursuant to the compromise and settlement of the litigation, Plaintiff and her counsel have
12 concluded that settlement on the terms hereinafter set forth is appropriate and in the best
13 interests of the Parties and that this settlement is fair and reasonable.

14 **ATTORNEY EXPERIENCE**

15 4. I am one of the primary attorneys on this matter. My qualifications are as
16 follows: I received my *Juris Doctorate* degree from UCLA Law School in 2000. Upon
17 graduation, I joined the law firm of Lee & Associates in Los Angeles, California as an associate.
18 I started my own practice in October 2004.

19 5. During the course of my practice, I have primarily represented consumers and
20 obtained millions of dollars in recovery for my clients. I have handled numerous wage and hour
21 cases during my career. Since 2009, I have been certified as class counsel and granted final
22 approval in numerous wage and hour cases including, but not limited to, *Choi, et al. v. Midway*
23 *International Inc.*, et al. LASC Case No. BC394495; *Garcia, et al. v. RGIS, LLC, et al.* LASC
24 Case No. BC 425624; *Cabrera v. Frazee, et al.* LASC Case No. BC 440309; *Vo, et al. v. The*
25 *Party Staff, et al.* OCSC Case No. 30-2011-00444836-CU-OE-CXC; *Oh, et al. v. Best Coach*
26 *Technologies, Inc., et al.* LASC Case No. BC 462848; *Rawley v. Freedom Mortgage, Inc.*
27 Orange County Superior Court Case No. 30-2014-00724164-CU-OE-CXC; *Castro v.*
28

1 *Continental Airlines*, USDC Central District Case No. 2:14-CV-00169-SVW-AGR; *Barreras v.*
2 *Michaels Stores, Inc.* USDC – Northern District Case No. C12-04474 PJH, *Dynabursky v.*
3 *AlliedBarton Security Services, LP, et al.*, SACV 12-02210 JST (RNBx), *Brown v. CVS*
4 *Caremark, et al.* United States District Court, Central District, Case No.: 2:15-cv-07631-JFW-
5 PJW; *Castillo v. Sheraton Operating Corporation*, USDC, Central District of California Case
6 No. 2:17-cv-07091-FMO-AS; *Zepeda v. Ulta Salon, Cosmetics & Fragrance, Inc.* USDC,
7 Eastern District of CA, Case No. 1:18-cv-00750-DAD; *Audycki v. Stanford Health Care, Inc.*
8 Santa Clara Superior Court, Case No. 19CV347173 and *Medina v. United Airlines, Inc.* Los
9 Angeles Superior Court, Case No. BC 624742.

10 6. My current billing rate is \$900.00 per hour, which is typical of attorneys in the
11 Los Angeles community that have been practicing for 23+ years. In fact, I have personal
12 knowledge, many of my colleagues from UCLA Law School and opposing counsel are currently
13 billing at rates much higher than \$900.00 per hour. Further, since early 2023, I have been
14 previously approved at \$850.00 per hour by several courts, including *Lakey v. Poshmark, Inc.*,
15 Santa Clara Superior Court, Case No. 22CV395084; *Audycki v. Stanford Health Care, Inc.*
16 Santa Clara Superior Court, Case No. 19CV347173 and *Medina v. United Airlines, Inc.* Los
17 Angeles Superior Court, Case No. BC 624742.

18 7. To date, I have billed approximately 17.2 hours in connection with this litigation
19 including drafting correspondences, emails, pleadings and informal discovery along with
20 meeting and conferring with opposing counsel, and attending mediation. I also anticipate
21 approximately 5 more hours to prepare for and attend the settlement approval hearing, and
22 coordinating the disbursement of the settlement funds. Thus, my total lodestar is \$19,980.00.
23 Attached hereto as **Exhibit A** is my time and task chart.

24 8. I am seeking reimbursement of \$ 5,540.40 for attorney service fees, CourtCall,
25 mediation fees and anticipate costs to finalize this matter. Attached hereto as **Exhibit B** is my
26 firm's cost sheet.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on
2 April 22, 2024, at Los Angeles, California.

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EXHIBIT A

Bolding v. Cardinal Financial Company
San Bernardino Superior Court - Case No. CIVSB2206543
Time and Task Chart – Edward W. Choi

Hours	Description of Work
1.7	Revise complaint and research causes of action in preparation for same
1.0	Review/revise Complaint
1.5	Review/revise special interrogatories and request for production of documents set one
5.5	Attend mediation
1.0	Review/revise MOU
3.0	Review/revise long form Settlement Agreement, Class Notice
3.5	Review/revise Motion for Approval; Draft Declaration in Support of PAGA Settlement Approval
17.2	TOTAL HOURS

EXHIBIT B

Client Trust Liability: Bolding v. Cardinal Financial

Date	Payee	Memo	Amount
09/06/2022	Turner's Attorney Service Ace Executive	8/30/22 - FAC	\$ 85.00
09/12/2022	Services		\$ 82.44
05/10/2023	Court Call		\$ 72.00
07/05/2023	Turner's Attorney Service Fuchsman Mediation	4/6/23 - Notice of Ruling	\$ 85.00
09/07/2023	LLC		\$ 5,000.00
10/26/2023	One Legal		\$ 15.96
	Anticipated Costs to Finalize		\$ 200.00
	Total		\$ 5,540.40