

1 **THE LAW OFFICE OF NICK ROSENTHAL, APC**

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3 Los Angeles, CA 90017

4 Tel: 213-542-0439

5 Attorneys for Plaintiff,
JOVAN NEWLAND, individually,
and on behalf of all others
6 similarly situated

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

10
11 JOVAN NEWLAND, individually and on
behalf of all others similarly situated,

12 Plaintiff,

13
14 v.

15 WJD RESTAURANT GROUP, LLC, a
California Limited Liability Company; and
DOES 1through 50, inclusive,

16 Defendants.
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Case No.: 24STCV10446

[Unlimited Jurisdiction]

*Assigned to the Honorable Laura A.
Seigle, Dept. 17*

**DECLARATION OF NICK ROSENTHAL
IN SUPPORT OF MOTION FOR FINAL
APPROVAL**

Date: August 24, 2026

Time: 9:00 a.m.

Complaint Filed: April 25, 2024

Trial Date: Not set.

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7. There were no objections to the amount of attorneys' fees or litigation costs that Class Counsel seek in this case and for which Plaintiff asks the Court for final approval.

1 8. I am one of the primary attorneys on this matter. My qualifications are as
2 follows: I received my *Juris Doctorate* degree from USC Gould Law School in 2009. Upon
3 graduation, I was employed as an associate for approximately 4 years at Seyfarth Shaw LLP, a
4 national employment defense law firm. While at Seyfarth my practice was exclusively labor &
5 employment defense and I represented numerous corporations in large employment class
6 actions. Since 2014 I have been practicing plaintiff-side employment law.

7 9. I have been named as Class Counsel in a number of class actions that have been
8 granted certification or preliminary or final approval by the Superior Courts of Los Angeles
9 County, Orange County, Alameda County, Monterey County, Ventura County, San Bernardino
10 County, Solano County, Sacramento County, Santa Clara County, Santa Cruz County, Contra
11 Costa County, San Joaquin County, the United States District Court for the Central District of
12 California, and the United States District Court for the Northern District of California. These
13 cases include, but are not limited to: *Diller v. Under Armour Retail, Inc.*, Santa Clara County
14 Superior Court Case No. 114-CV-265729, *Lopez v. Imperial Body Shop, Inc.*, Orange County
15 Superior Court Case No. Case No. 30-2015-00816193-CU-OE-CXC, *Hughes v. Lincare, Inc., et*
16 *al.*, Monterey County Superior Court Case No. M124764, *Pittman v. Martinez Steel Corporation*,
17 San Bernardino County Superior Court Case No. CIVDS1823132, *Della Maggiora v.*
18 *Watsonville Community Hospital*, Santa Cruz County Superior Court Case No. 18CV00191,
19 *Randolph v. Pacific Racing Association*, Alameda County Superior Court Case No.
20 RG18908139, *Morones v. Bimbo Bakeries USA, Inc.*, Sacramento County Superior Court Case
21 No. 34-2018-00245481-CU-OE-GDS *Foaad Hanna v. Equinix, LLC*, Santa Clara County
22 Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County
23 Superior Court Case No. BC720144; *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior
24 Court Case No. 19CV341582; *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-
25 005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San Bernardino Superior Court Case
26 No. CIVDS1828867, *Pascual v. Satellite Healthcare, Inc.*, Santa Clara County Superior Court
27 Case No. 19CV345211; *Carrillo v. New Balance Athletics, Inc.*, Santa Clara County Superior
28 Court Case No. 19CV352469; *Vogel v. Veolia North America, LLC*, Monterey County Superior
Court Case No. 19CV001443; *Holman v. American Sugar Refining, Inc.*, Contra Costa County

1 Superior Court Case No. MSC18-00415; *Chavez v. Converse, Inc.*, United States District Court
2 – Northern District of California Case No. 15-cv-03746-NC; *Rodriguez v. Nike Retail Services,*
3 *Inc.*, United States District Court – Northern District of California Case No. 5:14-CV-1508
4 BLF; *Gutierrez v. Spa Havens, LP*, San Diego Superior Court Case No. 37-2019-00057065-CU-
5 OE-NC; *Cruzado v. Ontario T, Inc.*, San Bernardino Superior Court Case No. CIVSB2027249;
6 *Diaz v. Acuity Brands Lighting, Inc.*, San Bernardino Superior Court Case No. CIVDS2015583;
7 *Dunn v. Universal Plant Services, Inc.*, Solano County Superior Court Case No. FCS056134;
8 *Martinez v. COGIR Management USA, Inc.*, San Joaquin County Superior Court Case No. STK-
9 CV-UOE-2020-0001215; *O'Connor v. Schwan's Consumer Brands, Inc.*, Sacramento County
10 Superior Court Case No. 34-2019-00250574; *Ray v. C&W Facility Services, Inc.*, San
11 Bernardino Superior Court Case No. CIVSB2101321; *Alexander v. KBR Technical Services,*
12 *Inc.*, San Bernardino County Superior Court Case No. CIVSB2133085; *Cook v. Apple, Inc.*,
13 Sacramento County Superior Court Case No. 34-2021-0311177; *Wise v. Le Petite Academy,*
14 *Inc.*, San Joaquin County Superior Court Case No. STK-CV-UOE-2021-0010461; *Romano v.*
15 *SSA Terminals, LLC*, Los Angeles County Superior Court Case No. 20STCV29048; *Tobin v.*
16 *Ryder Truck Rental, Inc.*, United States District Court – Central District of California Case No.
17 5:20-cv-01569-JGB-SHK; *Delgado v. Kloeckner Metals Corporation*, Los Angeles County
18 Superior Court Case No. 20STCV22503; *Rodriguez v. US Bank National Association*, Los
19 Angeles County Superior Court Case No. BC617356; and *Heggins v. Enterprise Rent-A-Car*
20 *Company of Los Angeles, LLC*, Los Angeles County Superior Court Case No. 24STCV12156.

21 10. To date, I have incurred approximately 59.8 hours in connection with the
22 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have
23 incurred to date.

24 11. The total lodestar for my hours will be approximately \$47,840 based on an
25 hourly rate of \$800.00 per hour, which is my new rate as of January 1, 2026. I have been
26 approved at this rate in *Dodson v. Automobile Club of Southern California*, Tulare Superior
27 Court Case No. VCU308283. Previously, my hourly rate was \$750.00 per hour as of April 1,
28 2025. I was approved at that rate in *Segura v. Community Commerce Bank*, Los Angeles
Superior Court Case No. 24STCV21054 and in *Heggins v. Enterprise Rent-A-Car Company of*

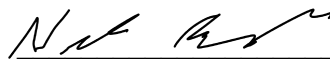
1 *Los Angeles, LLC*, Los Angeles Superior Court Case No. 24STCV12156. Previously, my hourly
2 rate as of January 1, 2022 was \$700.00. I have been approved at the \$700.00 rate in *Gutierrez v.*
3 *Spa Havens, LP*, San Diego Superior Court Case No. 37-2019-00057065-CU-OE-NC; *Cruzado*
4 *v. Ontario T, Inc.*, San Bernardino Superior Court Case No. CIVSB2027249; *Ray v. C&W*
5 *Facility Services, Inc.*, San Bernardino Superior Court Case No. CIVSB2101321; *Alvarez v.*
6 *Forterra Building Products*, San Diego Superior Court Case No. 37-2020-00018179-CU-OE-
7 CTL; *Dunn v. Universal Plant Services of California, Inc.*, Solano County Superior Court Case
8 No. FCS056134, *Pulido v. Georgia-Pacific Corrugated III LLC*, Fresno Superior Court Case
9 No. 18CECG00265; *In re: FPI Management Wage and Hour Cases*, Los Angeles Superior
10 Court Case No. JCCP5050; *Rodriguez v. U.S. Bank, N.A.*, Los Angeles Superior Court Case No.
11 BC617356; *Goodarzi v. Belmont Village L.P.*, Los Angeles Superior Court Case No.
12 20STCV15572; *Vernon v. McClane/Suneast, Inc.*, San Bernardino Superior Court Case No.
13 CIVSB2123367; *Clark v. Now Optics, LLC*, San Diego Superior Court Case No. 37-2020-
14 00044817-CU-OE-CTL; *Diaz v. Acuity Brands Lighting, Inc.*, San Bernardino Superior Court
15 Case No. CIVDS2015583; *Idian v. VHSD ES, Inc.*, San Diego Superior Court Case No. 37-
16 2019-00018927-CU-OE-CTL; *Romano v. SSA Terminals, LLC*, Los Angeles Superior Court
17 Case No. 20STCV29048; and *Alexander v. KBR Technical Services, Inc.*, San Bernardino
18 Superior Court Case No. CIVSB2133085. Prior to January 1, 2022, I was approved at a rate of
19 \$650.00 by various courts, including: *Pittman v. Martinez Steel Corporation*, San Bernardino
20 County Superior Court Case No. CIVDS1823132, *Della Maggiora v. Watsonville Community*
21 *Hospital*, Santa Cruz County Superior Court Case No. 18CV00191, *Randolph v. Pacific Racing*
22 *Association*, Alameda County Superior Court Case No. RG18908139, *Morones v. Bimbo*
23 *Bakeries USA, Inc.*, Sacramento County Superior Court Case No. 34-2018-00245481-CU-OE-
24 GDS *Foaad Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No.
25 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No.
26 BC720144; *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court Case No.
27 19CV341582; *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-
28 CU-OE-VTA; *Carter v. Kline Services, Inc.*, San Bernardino Superior Court Case No.
CIVDS1828867; *Pascual v. Satellite Healthcare, Inc.*, Santa Clara County Superior Court Case

1 No. 19CV345211; *Carrillo v. New Balance Athletics, Inc.*, Santa Clara County Superior Court
2 Case No. 19CV352469; *Vogel v. Veolia North America, LLC*, Monterey County Superior Court
3 Case No. 19CV001443; *Holman v. American Sugar Refining, Inc.*, Contra Costa County
4 Superior Court Case No. MSC18-00415; and *Chavez v. Converse, Inc.*, United States District
5 Court, Northern District of California Case No. 15-cv-03746-NC.

6 12. Class Counsel communicated with Plaintiff on well over a dozen occasions and
7 Plaintiff showed a remarkable interest in the proceedings of this case and litigation strategy.
8 Indeed, Class Counsel discussed numerous case-related documents in extensive detail, and
9 Plaintiff consistently demonstrated a concern for the Class as a whole.

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

12 Executed on July 28, 2026 at Los Angeles, California.

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EXHIBIT A

Newland v. WJD Restaurant Group, LLC
Nick Rosenthal Time and Task Chart

Hours	Description of Work
5.6	Intake meetings with client and review of client documents.
1.0	Draft and edit LWDA letter.
6.2	Draft and edit Complaint.
1.2	Draft and edit First Amended Complaint.
1.1	Communications with Defendant re: mediation.
2.7	Coordination of mediation.
1.6	Prepare data request.
2.1	Review Defendant's data and document production and perform damages analysis.
6.9	Draft mediation brief.
8.3	Attend mediation.
3.4	Review and edit MOU; communicate with defense counsel.
4.5	Review and edit Settlement Agreement; communications with defense counsel.
8.5	Draft Motion for Preliminary Approval and supporting papers.
6.7	Draft Motion for Final Approval and supporting papers.
59.8	TOTAL HOURS