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Attorneys for Plaintiff Talia Ovando,
and all others similarly situated

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

TALIA OVANDO, on behalf of herself and
all others similarly situated

Plaintiff,

v.

PAOLINO LOGISTICS LLC, a California
Limited Liability Company; PAOLINO
TRANSPORT LLC, a California Limited
Liability Company; AMAZON LOGISTICS,
INC., a Delaware Corporation; and DOES 1
through 100, inclusive
Defendants.

Case No. CIVSB2216425

CLASS ACTION

Assigned to: Hon. Kevin C. Lee

**DECLARATION OF JASON HATCHER
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: May 22, 2026

Time: 8:30 a.m.

Dept.: S26

Complaint Filed: July 28, 2022

FAC Filed: April 24, 2023

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I, Jason Hatcher, declare as follows:

1. I am an attorney at The Myers Law Group, A.P.C. (“MLG”) counsel for the named
 f Talia Ovando (“Plaintiff”), on behalf of herself and all other similarly situated individuals,
 above-entitled action. I am a member in good standing of the bar of the State of California
 admitted to practice in this Court. I have personal knowledge of the matters set forth herein,
 called upon as a witness to testify thereto, I could and would competently do so.

2. I graduated from Southwestern Law School in 2012. I am an active member in standing with the State Bar of California and State Bar of Nevada. I was admitted to the State California on or about December 3, 2012. I was admitted to the State Bar of Nevada on or May 7, 2021. I am admitted to practice before the United States District Court – Northern, Southern, and Eastern Districts of California; United States Ninth Circuit Court of Appeals; and all of California State Courts. During law school, I externed for the Honorable Judge V. Wilson in the U.S. District Court in the Central District of California and for the Honorable Anthony J. Mohr in Los Angeles County Superior Court's Complex Civil Department. I have been an attorney with The Myers Law Group, A.P.C. since March 2015. Prior to that, I was an attorney at the Law Office of Joseph Antonelli from December 2012 to January 2015. I have achieved the honor of Southern California Rising Star by Super Lawyers for the years 2017, 2018, 2019, 2020, 2021, 2022, and 2023. I was selected as a Southern California Super Lawyer in 2023.

3. I have helped litigate numerous successful wage and hour class actions in California. I have also been successful in supporting efforts in obtaining favorable published decisions for employees in the state of California:

- a. *Vazquez v. SaniSure, Inc.*, 101 Cal.App.5th 139 (2024);
- b. *Vasserman v. Henry Mayo Newhall Memorial Hospital*, 65 F.Supp.3d 932 (Central District 2014); and
- c. *Falk v. Children's Hospital Los Angeles*, 237 Cal.App.4th 1454 (2015).

These cases were significant decisions related to wage and hour class actions, as in *z* the Court of Appeal held that an employer and employee can agree to arbitrate claims

related to their employment relationship, but the termination of that relationship revokes the arbitration agreement and when there is no evidence that the parties agreed to arbitrate claims arising from a subsequent employment relationship, any claims arising solely from that subsequent relationship are not subject to arbitration (*Vazquez*); in *Vasserman* the Court held that no federal preemption or federal question jurisdiction exists over claims that arise under state law, rather than Collective Bargaining Agreements that govern employment of putative class members, so long as the resolution of the state law claims will not substantially depend on interpretation of those agreements (*Vasserman*); to the application of the tolling doctrine as applied to subsequent class actions being filed when the previous action was disposed of without a ruling on certification (*Falk*).

4. I have previously supported, or am currently supporting, the litigation of multiple wage and hour class actions that resulted in approved settlements for the class members. The following is a sample of those cases:

Children's Hospital of Orange County

(A) Declarant supported and helped litigate the class action matter of *De La Pena v. Children's Hospital of Orange County*, Orange County Superior Court Case No: 30-201801014749-CU-OE-CXC. On or about June 10, 2025, the Honorable David A. Hoffer granted final approval of the class action and PAGA action settlement for the total amount of \$10,000,000.00 and confirmed The Myers Law Group, A.P.C. – David P. Myers, Jason Hatcher, and Andriana N. Bravo as co-class counsel.

US Bank

(B) Declarant supported and helped litigate the class action matter of *Rodriguez v. U.S. Bank National Association*, Los Angeles Superior Court Case No: BC617356. On or about October 11, 2022, the Honorable Lawrence P. Riff granted final approval of the class action settlement for the total amount of \$10,750,000.00 and confirmed The Myers Law Group, A.P.C. – David P. Myers, Robert M. Kitson, and Jason Hatcher as co-class counsel.

City of Oxnard

(C) Declarant supported and helped litigate the certified class and collective action of

1 *Alvarez, et al. v. City of Oxnard. See Alvarez v. City of Oxnard* (C.D. Cal. Dec. 17, 2020, No. CV
2 19-8044 PSG (JCx)) 2020 U.S.Dist.LEXIS 250524 (granting preliminary collective FLSA
3 certification); *Alvarez v. City of Oxnard* (C.D. Cal. Dec. 17, 2020, No. CV 19-8044 PSG (JCx))
4 2020 U.S.Dist.LEXIS 250522 (granting class certification). On or about March 20, 2023, the
5 Honorable Philip S. Gutierrez granted final approval of the class action settlement for the total
6 amount of \$3,500,000.00. *See* US Central District Case No. 19-cv-08044 at Dkt. 100.

7 **Cox Communications Cal., LLC, et al.**

8 (D) Declarant supported and helped litigate the certified class action matter of *Feltzs v.*
9 *Cox Communications Cal., LLC, et al.* The U.S. District Court Central District of California
10 partially certified a class action on June 1, 2021. *Feltzs v. Cox Communs. Cal., LLC* (C.D. Cal.
11 June 1, 2021, No. SACV 19-2002 JVS (JDEx)) 2021 U.S.Dist.LEXIS 146447. On or about August
12 1, 2022, the Honorable James V. Selna granted final approval of the class action settlement for the
13 total amount of \$1,850,000.00. *See* Central District Case No. 18-cv-02136 at Dkt. 126.

14 **HCA Healthcare**

15 (E) Declarant helped litigate the certified class action matter of *Rum v. HCA*
16 *Healthcare, Inc.*, Central District of California US District Court Case No: 23-cv-5142-JFW
17 (BFMx). On or about February 1, 2024, the Honorable John F. Walter granted certification of class
18 action and appointed The Myers Law Group, A.P.C. – David P. Myers, Jason Hatcher, and
19 Andriana Bravo as class counsel. *Rum v. HCA Healthcare, Inc.* (C.D.Cal. Feb. 1, 2024, No. CV
20 23-5142-JFW(BFMx)) 2024 U.S.Dist.LEXIS 53269.

21 **Air Methods Corporation**

22 (F) Declarant supported and helped litigate the class action matter of *Sanchez v. Air*
23 *Methods Corporation, et al.*, San Bernardino Superior Court Case No: CIVSB2208677. On or
24 about April 7, 2025, the Honorable Christian Towns granted final approval of the class action
25 settlement for the total amount of \$550,000.00 and confirmed The Myers Law Group, A.P.C. –
26 Jason Hatcher and Andriana N. Bravo as class counsel.

27 **Seasons Hospice & Palliative Care**

28 (G) Declarant supported and helped litigate the class action matter of *Dunn v. Seasons*

1 *Hospice & Palliative Care of California, Inc., et al.*, San Bernardino Superior Court Case No:
2 CIVDS1824275. On or about July 21, 2022, the Honorable David S. Cohn granted final approval
3 of the class action settlement for the total amount of \$800,000.00 and confirmed The Myers Law
4 Group, A.P.C. – David P. Myers, Jason Hatcher, and Cassandra A. Castro as class counsel.

5 **Penn Ridge Transportation, Inc.**

6 (H) Declarant supported and helped litigate the class action matter of *Castellon v. Penn-*
7 *Ridge Transp., Inc.*, Central District Court Case No: ED CV 18-02136. On July 19, 2019, the
8 Court certified The Myers Law Group, APC—David P. Myers, Robert M. Kitson, and Jason
9 Hatcher—as adequate class counsel for settlement. *Castellon v. Penn-Ridge Transp.* (C.D. Cal.
10 July 19, 2019, No. EDCV 18-02136 AG (KKx)) 2019 U.S. Dist. LEXIS 237071. On November 3,
11 2020, the Honorable John A. Kronstadt granted final approval of the class action settlement for
12 the total amount of \$1,962,157.27 *Castellon v. Penn-Ridge Transp., Inc.* (C.D. Cal. Nov. 3, 2020,
13 No. ED CV18-02136 JAK (KKx)) 2020 U.S. Dist. LEXIS 245742.

14 **Compass Group USA, Inc.**

15 (I) Declarant supported and helped litigate the class action matter of *Gonzalo Romero,*
16 *et al. v. Compass Group USA, Inc. dba Canteen Vending Services*, San Bernardino Superior Court
17 Case No. CIVDS1512026 as an attorney at The Myers Law Group, APC. On or about October 3,
18 2017, the Honorable Thomas S. Garza granted final approval of the class action settlement in the
19 *Compass* matter for the amount of \$4,000,000.00 and confirmed David P. Myers, Robert M. Kitson
20 and Jason Hatcher as class counsel.

21 **Transtreme, LLC**

22 (J) Declarant supported and helped litigate the class action matter of *Jackie Solgan v.*
23 *Transtreme, LLC*. (“*Transtreme*”), San Bernardino Superior Court Case No. CIVDS1919244, as
24 an attorney at The Myers Law Group, APC. On or about October 5, 2020, the Honorable Janet M.
25 Frangie granted final approval of the class action settlement in the *Transtreme* matter for the
26 amount of \$1,000,000.00 and confirmed David P. Myers, Robert M. Kitson and Jason Hatcher of
27 the Myers Law Group, A.P.C. as Class Counsel.

28 **Professional Electrical Construction Services, Inc.**

1 (K) Declarant supported and helped litigate the class action matter of *Salvador Ayon v.*
2 *Professional Electrical Construction Services, Inc.* (“PECS”), San Bernardino Superior Court
3 Case No. CIVSB2203994, as an attorney at The Myers Law Group, APC. On or about September
4 12, 2023, the Honorable Jessica Morgan granted final approval of the class action settlement in
5 the PECS matter for the amount of \$770,000.00 and confirmed David P. Myers and Jason Hatcher
6 of The Myers Law Group, A.P.C. as Class and Collective Counsel.

7 **Image International Manufacturing, LLC**

8 (L) Declarant supported and helped litigate the class action matter of *Lynn Hodge v.*
9 *Image International Manufacturing, LLC, et al.* (“Image”), U.S. District Court Central District
10 Case No. EDCV 18-925 JGB (SHKx) as an attorney at The Myers Law Group, APC. On or about
11 October 7, 2019, the Honorable Jesus G. Bernal granted final approval of the class action
12 settlement in the *Image* matter where the Court had appointed The Myers Law Group, A.P.C.,
13 David P. Myers, Robert M. Kitson and Jason Hatcher as counsel on behalf of the Settlement Class
14 for purposes of settlement only.

15 **D&R Glass, Inc.**

16 (M) Declarant supported and helped litigate the class action matter of *Aaron Tellez-*
17 *Giron v. D&R Glass, Inc.* (“D&R Glass, Inc.”), San Bernardino Superior Court Case No.
18 CIVDS1821562, as an attorney at The Myers Law Group, APC. On or about February 2, 2021,
19 the Honorable David Cohn granted final approval of the class action settlement in the *D&R Glass,*
20 *Inc.* matter for the amount of \$675,000.00 and confirmed David P. Myers and Jason Hatcher of
21 The Myers Law Group, A.P.C. as Class Counsel.

22 **Investment Concepts, Inc.**

23 (N) Declarant supported and helped litigate the class action matter of *Lisa Miller v.*
24 *Investment Concepts, Inc.* (“ICI”), Santa Barbara Superior Court Case No. 19CV04672, as an
25 attorney at The Myers Law Group, APC. On or about October 26, 2022, the Honorable James F.
26 Rigali granted final approval of the class action settlement in the *ICI* matter for the amount of
27 \$546,677.68 and confirmed David P. Myers and Jason Hatcher of The Myers Law Group, A.P.C.
28 as Class Counsel.

1 **Children’s Hospital Los Angeles**

2 (O) Declarant supported and helped litigate the class action matter of *Denise Mays v.*
3 *Children’s Hospital Los Angeles* (“*CHLA*”), Los Angeles Superior Court Case No. BC477830
4 during the time Declarant was an associate attorney at the Law Office of Joseph Antonelli. In or
5 about September 2016, the Honorable Ann I. Jones granted final approval of the class action
6 settlement in the *CHLA* matter for the amount of \$27,000,000.00.

7 **Micro World Corp. dba Barska**

8 (P) Declarant supported and helped litigate the class action matter of *Angelo Fabela*
9 *and Jesse Ortiz v. Micro World Corp. dba Barska* (“*Barska*”), Los Angeles Superior Court Case
10 No. BC509643 during the time Declarant was an associate attorney at the Law Office of Joseph
11 Antonelli. In or about May 2014, the Honorable Elihu M. Berle granted final approval of the class
12 action settlement in the *Barska* matter for the amount of \$1,050,000.00 and “appoint[ed], for
13 settlement purposes only, Joseph Antonelli, Janelle Carney, and Jason Hatcher [Declarant] . . . as
14 class counsel.”

15 **UniFirst Corporation**

16 (Q) Declarant supported and helped litigate the class action matter of *Evelia Mosqueda*
17 *v. UniFirst Corporation* (“*UniFirst*”), United States District Court Central District of California
18 Case No. CV 14-05324-AB (VBKx), during the time Declarant was an associate attorney at the
19 Law Office of Joseph Antonelli. In or about December 2015, the Honorable Andre Birotte, Jr.
20 granted final approval of the class action settlement in the *UniFirst* matter for the amount of
21 \$2,600,000.00.

22 **Iron Mountain**

23 (R) Declarant supported and helped litigate the class action matter of *Marc Casanova,*
24 *et al. v. Iron Mountain Information Management Services, Inc., et al.* (“*Iron Mountain*”), Los
25 Angeles Superior Court Case No. BC543256 during the time Declarant was an associate attorney
26 at the Law Office of Joseph Antonelli. In or about January 2016, the Honorable Kenneth Freeman
27 granted final approval of the class action settlement in the *Iron Mountain* matter for the amount of
28 \$2,800,000.00.

1 **Classic Residence Management, LP dba Vi at La Jolla**

2 (S) Declarant supported and helped litigate the class action matter of *Shiela Victoriano*
3 *v. Classic Residence Management, LP dba Vi at La Jolla* (“Vi”), San Diego Superior Court Case
4 No. 37-2014-00028031-CU-OE-CTL during the time Declarant was an associate attorney at the
5 Law Office of Joseph Antonelli. In or about May 2016, the Honorable Richard E.L. Strauss granted
6 final approval of the class action settlement in the *Vi* matter for the amount of \$3,000,000.00.

7 **Parkview Community Hospital Medical Center**

8 (T) Declarant supported and helped litigate the class action matter of *Amber Bart v.*
9 *Parkview Community Hospital Medical Center* (“Parkview”), Riverside Superior Court Case No.
10 RIC1406044 during the time Declarant was an associate attorney at the Law Office of Joseph
11 Antonelli. In or about September 2016, the Honorable Sharon J. Waters granted final approval of
12 the class action settlement in the *Parkview* matter for the amount of \$2,550,000.00.

13 5. Andriana N. Bravo, Esq. was admitted to practice in California on May 9, 2023.
14 Ms. Bravo completed her undergraduate studies at the University of San Francisco with Bachelor
15 of Arts degrees in both Economics and International Studies, while also completing minors in
16 Legal Studies and African Studies. Ms. Bravo graduated from the University of the Pacific,
17 McGeorge School of Law, in May 2022. As a law student, Ms. Bravo was a law clerk with Legal
18 Services of Northern California and the California Attorney General’s Office, Employment
19 Administrative Mandate Section as well as a certified law student with McGeorge Community
20 Legal Services. Upon graduating from law school Ms. Bravo worked as a law clerk with
21 CalLawyer PLC, and upon becoming a member of the State Bar of California, Ms. Bravo joined
22 The Myers Law Group, A.P.C. as an attorney focusing primarily on wage and hour class action
23 litigation cases. Ms. Bravo supported and helped litigate the following proposed and/or approved
24 class action cases: *Madison v. ECMD, Inc.*, US District Court, Central District, Case No. 2:24-
25 cv07887-MWC-MAA; *Johnson v. North Coast Property Group, Inc.*, San Bernardino Superior
26 Court, Case No. CIVSB2400231; *Rum v. HCA Healthcare, Inc.*, US District Court, Central District
27 of California, Case No: 2:23-cv-05142-JFW-BFM; *De La Pena v. Children’s Hospital of Orange*
28 *County*, Orange County Superior Court, Case No. 30-2018-0104749-CUOE- CXC; *Sanchez v. Air*

1 *Methods Corporation*, San Bernardino Superior Court, Case No. CIVSB2208677. Ms. Bravo also
2 supported efforts in obtaining *Vazquez v. SaniSure, Inc.*, 101 Cal.App.5th 139 (2024), a favorable
3 published opinion for employees in the state of California.

4 6. As of April 29, 2026, based on the recorded time worked by MLG attorneys,
5 MLG's lodestar for this action is \$147,722.50. MLG attorneys' hourly rates are between \$475.00
6 and \$775.00 and are in line with rates typically approved in wage and hour class action litigation.
7 The hourly rate for myself is \$775.00. The hourly rate for Ms. Cassandra Castro is \$675.00. The
8 hourly rate for Ms. Bravo is \$475.00. These rates reflect the current value of hourly rates applied
9 to these attorneys for a lodestar cross-check and/or are consistent with market rates for a lodestar
10 cross-check based on the skill and experience of these attorneys and/or as previously approved.

11 7. MLG's attorney times are recorded using common law firm billing software
12 ("Merus"), in increments of 1/10th of an hour. The MLG billing entries are intended to convey the
13 substance of what time was spent on in working up this case, and by whom, without requiring
14 substantial redactions to conceal attorney-client privileged information in fee motions. Attorneys
15 are instructed to record their time at or near the time of the event being recorded. The spreadsheet
16 entries contain standard abbreviations such as "OC" for opposing counsel. Individuals are usually
17 referred to by initials. Far less reliable methods have been accepted to establish the amount of time
18 a law firm spent working on a given matter. (*See Mardirossian & Associates, Inc. v. Ersoff* 62
19 Cal.Rptr.3d 665 (2007) (finding after-the-fact declarations and testimony of counsel estimating
20 percentage of total work time spent on a given matter to be competent and sufficient to establish
21 entitlement to fees for the time claimed.).

22 8. The settlement allocates attorneys' fees at one-third of the \$474,466.72 common
23 fund gross settlement amount (based on the triggered escalator clause). Attorney's fees based on
24 one-third of a common fund is fair and reasonable. The California Supreme Court has approved
25 "the percentage method" in class action settlements based on one-third of the gross common fund
26 which represents the market rate in California. *See Laffitte v. Robert Half Internat., Inc.*, 1 Cal. 5th
27 480, 502-503 (2016); *Lealao v. Beneficial California, Inc.* (2000) 82 Cal.App.4th 19, 48 (the
28 percentage-of-the-benefit approach "is result-oriented rather than process-oriented, it better

approximates the workings of the marketplace” than the lodestar approach).

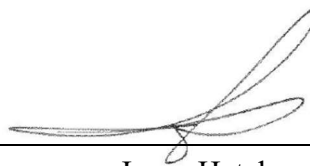
9. Class Counsel’s one-third fee request of the common fund is fair and reasonable given the time and labor required, the novelty and difficulty of the wage and hour claims at-issue in this matter; the skill required to properly litigate a wage and hour class action of this type; a one-third percentage of the common fund is the customary fee; the matter is under a contingency agreement; the significant recovery obtained based on the claims alleged; the experience, reputation and ability of the plaintiffs’ attorneys working on this case, and awards in similar cases.

10. I believe that the proposed Settlement is fair, reasonable, and adequate given the known facts and circumstances.

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

Dated: April 30, 2026

By: _____



Jason Hatcher