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Attorneys for Plaintiff, JEREMIAH CLAIBORNE
on behalf of himself and all others similarly situated

[Additional Counsel Listed on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

JEREMIAH CLAIBORNE, PABLO CAMPOS
HERNANDEZ and MARCOS RODRIGUEZ
and VICTOR AVALOS on behalf of
themselves and all others similarly situated

Plaintiffs,

vs.

PERFORMANCE TRANSPORTATION, LLC,
a California limited liability company;
PERFORMANCE FOOD GROUP, INC., a
Colorado corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 22STCV31766

ASSIGNED FOR ALL PURPOSES TO:

JUDGE: Hon. David S. Cunningham III

DEPT: S11

**DECLARATION OF RUBEN
ESCOBEDO IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS AND PAGA SETTLEMENT**

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21 And VICTOR AVALOS
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I, RUBEN ESCOBEDO, declare as follows:

2. I have personal knowledge of the matters set forth herein and would and could testify thereto if called as a witness herein.

4. I attended law school at Chapman University School of Law (Fowler), and graduated cum laude in 2011. My law school training included time at Raytheon Space and Airborne Systems' legal department, where I assisted with unique transactional matters alongside former JAG attorneys. I participated in moot court and served as a teaching assistant. My paper, *Achieving the Goals of Sentencing Tax Evaders After United States v. Booker*, Vol. 2 Chapman Journal of Criminal Justice 275 (2011), was published in the Chapman Journal of Criminal Justice, where I was a member. I passed the California Bar Examination and obtained my law license in 2011.

6. From 2010-2013, during and after law school, I joined a small firm. My first formal law firm training was provided by Mohammed K. Ghods, who was previously a shareholder in the national law firm of Ross, Dixon & Bell, LLP before that firm's merger with

1 Troutman Sanders (now Troutman Pepper). I handled various business and employment matters
2 for the firm's clients.

3 7. From 2013-2020, I was a partner at the law firm of Lynberg & Watkins, where I
4 primarily defended private businesses in employment litigation and municipalities in
5 employment & personal injury litigation from 2013 to 2020. I have litigated across the state,
6 including Orange County, Riverside County, Los Angeles, San Diego County, San Bernardino
7 County, Santa Barbara County, Kern County, Merced County, Tulare County, San Luis Obispo
8 County, Contra Costa County, Alameda County, Placer County, Santa Clara County, San
9 Francisco, Sacramento County, and San Joaquin County. I have tried cases successfully to
10 verdict, both as lead counsel and second chair. I have represented both employees and
11 employers at various times during my career.

12 8. I have successfully litigated employment cases in many industries, including
13 Agriculture, Construction & Maintenance, Food Service, Education, Healthcare, Hotel &
14 Hospitality, Janitorial, Manufacturing, Public Safety, Professional Occupations, Retail,
15 Technology / IT, and Transportation & Distribution. In 2020, I transitioned to a solo practice
16 where I continue my work primarily in private sector employment litigation on behalf of
17 employees.

18 9. I am licensed to practice before the U.S. Court of Appeals for the Ninth Circuit
19 and the U.S. District Courts for the Central, Eastern, Southern, and Northern Districts of
20 California.

21 10. I am a member of the American Society of Legal Writers, National Order of
22 Scribes, Northern Santa Barbara County Bar Association, and San Luis Obispo County Bar
23 Association. I have also been awarded the Rutan & Tucker, LLP Golden Quill Legal Writing
24 Award. I have spoken at conferences and MCLE events on various topics, including
25 employment law and anti-SLAPP motions. I served as the Employee Co-Chair of the ABA
26 Workplace & Occupational Safety and Health Law Committee for the period of 2024-2026.

27 11. I have served as counsel either for the prosecution or defense in connection with
28 approximately 100 class and representative PAGA actions throughout my career.

1 12. I have reviewed the Joint Stipulation for Settlement and Release of Class Action
2 and Representative Action Claims and respectfully request that this Court approve the same for
3 the reasons set forth in the Motion for Final Approval of Class Action Settlement.

4 13. Throughout this action, I have been responsible for the prosecution and
5 investigation of the claims of Plaintiff against Defendant. I have performed an appropriate
6 amount of work performed in this action. I conducted legal research, investigation, and analysis
7 of each potential cause of action and claim in Plaintiff's case. I have assessed the strengths and
8 weaknesses of the claims pled and defenses available in this case and the benefits of the
9 proposed Settlement under the circumstances of the case, and have reached the informed
10 conclusion that the Settlement is fair, reasonable, and adequate and is in the best interest of the
11 Class Representatives and the Class Members.

12 14. It is my opinion that the requested fees and costs are reasonable. I have
13 committed and continue to commit significant financial and staffing resources to the
14 representation of the Class.

15 15. I have not previously charged any fees or costs to litigate this matter.
16 Representation was secured on a contingency basis, meaning there is a real risk of no recovery at
17 all. The result was highly uncertain and prone to delay.

18 16. During my career, I have negotiated attorneys' fees with numerous clients and
19 opposing counsel, including negotiations regarding associates' and partners' hourly rates. I was
20 also involved in negotiations regarding total bills submitted to clients and have reviewed
21 hundreds of pre-bills. In law firm billing, attorneys must review their time records carefully to
22 ensure that only hours reasonably spent litigating a matter are billed to a client. As in every
23 other law firm I have worked, as a solo practitioner I continue to record descriptions of legal
24 work and the amount of time spent on each described task (excluding time spent performing non-
25 billable administrative work). To date, I have recorded and spent approximately 39.1 reasonably-
26 spent billable hours litigating this case and expect that, by the time this litigation is concluded, I
27 will have spent a total of 50 billable hours litigating this case.
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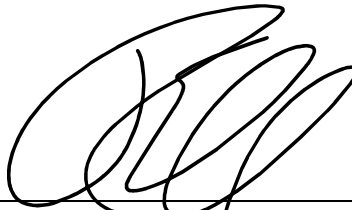
1 17. My standard hourly rate for employment law matters including this action is
2 \$500, which has been approved by numerous courts as reasonable in representative employment
3 law actions such as this. Accordingly, my requested lodestar before any adjustments is \$25,000
4 (50 hours times \$500).

5 18. My office has also incurred \$606.10 in out-of-pocket costs to prosecute this
6 matter, and I respectfully request that the Court approve reimbursement of these costs. A true
7 and correct copy of my law firm's record of costs incurred in this action is attached hereto as
8 **Exhibit 1.**

9 19. I respectfully request that the Court grant the present motion, and enter final
10 approval of the proposed settlement.

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct. Executed this 4th day of May 2026.

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16 By:



RUBEN ESCOBEDO
Declarant

EXHIBIT 1

Date	Description	Cost
8/28/2021	Postage for records request	0.5
1/5/2022	PAGA filing fee charged by State	75
1/5/2022	Certified mail cost for PAGA claim	5.31
3/14/2022	Filing fee for complaint	451.66
3/25/2022	One legal service fee for service of process	41.2
4/15/2022	Certified mail cost for amended PAGA claim	4.53
4/15/2022	Fee for filing amended Complaint	3.6
5/3/2022	Filing fee for notice and acknowledgment form for service on Defendant	3.6
8/5/2022	Postage for service of Second Amended Complaint	0.58
8/5/2022	Filing fee for Second Amended Complaint	16.57
8/29/2022	Filing fee for Case Management Statement	3.6
	Total	606.1