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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

IN AND 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,

v.

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 JEAN-CLAUDE
LAPUYADE, ESQ. IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT**

1 RUBEN ESCOBEDO (SBN 277866)
2 **WORKWORLD LAW CORP.**

3 A Professional Corporation
4 6907 El Camino Real, Suite A
5 Atascadero, CA 93422
6 Telephone: (805) 335-2476
7 Facsimile: (805) 892-6213
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9 Attorney for PABLO CAMPOS HERNANDEZ,
10 as Private Attorney General

11 **ZAKAY LAW GROUP, APLC**

12 Shani O. Zakay (State Bar #277924)
13 shani@zakaylaw.com
14 Jennifer Gerstenzang (State Bar #279810)
15 jenny@zakaylaw.com
16 Nicole Noursamadi (State Bar #357246)
17 nicole@zakaylaw.com
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19 eden@zakaylaw.com
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21 jaclyn@zakaylaw.com
22 3110 Camino Del Rio S, Suite 308
23 San Diego, CA 92108
24 Telephone: (619) 255-9047

25 **JCL LAW FIRM, APC**

26 Jean-Claude Lapuyade (State Bar #248676)
27 jlapuyade@jcl-lawfirm.com
28 5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292

Attorneys for Plaintiff MARCOS RODRIGUEZ

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1 I, JEAN CLAUDE LAPUYADE, declare as follows:

2 1. I am the managing partner of JCL Law Firm, APC, and co-counsel of record for Plaintiff
3 MARCOS RODRIGUEZ (hereinafter "Plaintiff"). As such, I am fully familiar with the facts,
4 pleadings, and history of the matter.

5 2. This declaration is being submitted in support of Plaintiffs' Motion for Final Approval of
6 Class Action and PAGA Settlement.

7 **I. EXHIBITS**

8 3. Attached hereto as **Exhibit #1** is a true and correct copy of the JCL Law Firm, APC's
9 "Transaction Summary" detailing JCL Law Firm, APC's actually incurred litigation expenses for this
10 matter as of April 29, 2026. As shown in detail in the attached transaction summary, JCL Law Firm,
11 APC, incurred a total of \$2,376.97 in litigation costs prosecuting this action.

12 4. Attached hereto as **Exhibit #2** is a true and correct copy of the JCL Law Firm, APC's
13 "Firm Resume" detailing the credentials and a summary of cases on which Counsel has been appointed
14 Class Counsel.

15 **II. LODESTAR**

16 5. As of April 29, 2026, JCL Law Firm, APC, incurred a total lodestar of \$81,675.00 for
17 99.1 hours worked by attorneys and staff successfully litigating this matter. I have reviewed my firm's
18 lodestar in this matter and believe the charges are reasonable and were reasonably necessary to the
19 conduct of the case.

20 6. In assessing the reasonableness of the billing rates for the attorneys and staff at JCL Law
21 Firm, APC, the firm refers to the "*Laffey Matrix*" to set our hourly billing rates. *See*
22 <http://www.laffeymatrix.com/>. The *Laffey Matrix* is a fee schedule used by many courts throughout
23 the United States, including some California state courts and California Federal District Courts. The
24 *Laffey Matrix* is a well-established objective source that California courts have relied on in assessing
25 hourly rates since 2005. (see *In Re HPL Technologies, Inc. Securities Litigation*, 366 F.Supp.2d 912,
26 921 (N.D. Cal. 2005) (Confirming use of the *Laffey Matrix* adjusted to account for locality pay
27 differentials); *Rubalcaba v. Albertson's, LLC*, No. BC528755, 2017 WL 4330597, at *4 (Cal. Super.
28 Ct. May 25, 2017), reversed on other grounds.)

7. The attorneys and staff at the JCL Law Firm, APC, have been providing extensive class action services throughout state and federal courts in California for more than seventeen years. Since its founding, the JCL Law Firm, APC, has recovered more than \$100 million dollars for its clients.

8. When comparing the billing rates for the staff and attorneys at JCL Law Firm, APC with the *Laffey* Matrix, the attorneys and staff at JCL Law Firm, APC, either bill at or below the rate for similarly skilled and tenured legal professionals:

Name	Laffey Matrix Fee	Actual Billing Rate	Hours Billed	Lodestar
Jean-Claude Lapuyade, Esq. (Managing Attorney)	\$948	\$850	94	79,900.00
Sydney Castillo-Johnson, Esq. (Handling Attorney)	\$581	\$500	2	1,000.00
Jennifer Heming (Handling Paralegal)	\$258	\$250	3.1	775.00

9. Moreover, the Firm's billing rates have been approved within the last twelve months by California Superior Court judges. (See generally *Bartram v. Lakeshore Learning Materials, LLC*, Los Angeles Superior Court Case No. 23STCV21174 (July 3, 2025) Hon. Laura A. Seigle approved an \$850 billing rate and appointed Jean-Claude Lapuyade, Esq. of JCL Law Firm, APC, as Class Counsel; *Garcia v. Hilton Resorts Corporation, et al.*, San Diego Superior Court Case No. 37-2023-00024664-CU-OE-CTL (July 25, 2025) Hon. Loren Freestone approved an \$850 billing rate and appointed Jean-Claude Lapuyade, Esq. of JCL Law Firm, APC, as Class Counsel; *Lowe v. Ash's First LLC, et al.*, San Diego Superior Court Case No. 37-2022-00010114 (August 8, 2025) Hon. Carolyn M. Caietti approved an \$850 billing rate and appointed Jean-Claude Lapuyade, Esq. of JCL Law Firm, APC, as Class Counsel; *Solis v. 51st St. & 8th Ave. Corp., et al.*, San Diego Superior Court Case No. 37-2023-00021359-CU-OE-CTL (August 8, 2025) Hon. Carolyn M. Caietti approved an \$850 billing rate and appointed Jean-Claude Lapuyade, Esq. of JCL Law Firm, APC, as Class Counsel; *Jourden v.*

1 7-Eleven, Inc., et al., San Diego Superior Court Case No. 37-2023-00055846-CU-OE-CTL (October
2 31, 2025) Hon. Wendy M. Behan approved an \$850 billing rate and appointed Jean-Claude Lapuyade,
3 Esq. of JCL Law Firm, APC, as Class Counsel.)

4 10. Further, Class Counsel will be performing additional work, including finalizing the
5 motion for final approval, attending the hearing on final approval, finalizing the orders and judgment,
6 drafting a joint motion to dismiss the related federal court action, and monitoring completion of the
7 settlement process over the course of several years. I expect this additional work will result in an
8 additional 20-30 hours of additional work and an additional lodestar between \$11,000 and \$16,500.

9 **III. COSTS**

10 11. As of the filing of the Motion for Attorneys' Fees and Expenses and Service Award, JCL
11 Law Firm, APC, has expended \$2,376.97 prosecuting this action. See **Exhibit #1**.

12 12. All of Class Counsel's out-of-pocket expenses are the types of expenses normally charged
13 to paying clients including the following: filing fees; copying; telephone; postage; mediation fees; and
14 expert costs, which were all incurred during, and were necessary for the successful prosecution of, the
15 litigation and, therefore, should be reimbursed.

16 **IV. CLASS COUNSEL'S EXPERIENCE**

17 13. Plaintiff is represented by competent and experienced counsel to pursue their claims. I
18 established JCL Law Firm, APC ("Firm") in 2010. The Firm is a boutique plaintiff firm representing
19 aggrieved employees and consumers throughout California in wage and hour class actions and complex
20 multi-party product liability matters. The Firm currently consists of myself, Jean-Claude Lapuyade,
21 Esq. (Partner/Owner), Sydney Castillo-Johnson, Esq. (Associate Attorney), Perssia Razma, Esq.
22 (Associate Attorney), John L. Nitti, Esq. (Associate Attorney), Carolina Faccin, Esq. (Associate
23 Attorney), Jennifer Heming (Paralegal), Allysa Castillo (Paralegal), Andrew Ward (Law Clerk), Hana
24 McAnally (Law Clerk), Elsa Torres, (Legal Assistant), Lizeth Ponce (Legal Assistant), Reyna Garcia
25 (Legal Assistant), and Sabrina Carle-Parra (Secretary).

26 14. I am qualified to represent the Plaintiff, the Class Members, the State of California, and
27 the Aggrieved Employees. I have extensive experience with wage and hour class and representative
28 actions litigation like this matter, and employment matters in general. Additionally, I have extensive

1 complex mass tort litigation experience and complex construction product liability experience. I can,
2 will and have adequately represented the interests of the Plaintiff, the Class Members, the State of
3 California, and the Aggrieved Employees throughout this action. My credentials are reflected in the
4 JCL Law Firm, APC, Firm Resume, a true and correct copy of which is attached hereto as **Exhibit #2**.
5 Some of the major cases the Firm has undertaken are also set forth in **Exhibit #2**.

6 15. I have represented consumers and employees in California class actions, and complex
7 multi-party product liability actions exclusively for more than 17 years. I have been practicing as a
8 plaintiffs' civil litigation attorney since April 2007.

9 16. Since 2010, I have successfully tried two (2) cases to conclusion, each resulting in a
10 favorable verdict for the firm's clients.

11 17. Finally, I have published appellate experience in *William Blanchette et al., v. The*
12 *Superior Court of Imperial County, (GHA Enterprises)* (2017) 8 Cal.App.5th 521, and *Duran v.*
13 *EmployBridge Holding Company, LLC* (2023) 92 Cal.App.5th 59.

14 18. Consequently, I have been named to the prestigious Thomson Reuters, Super Lawyers,
15 Rising Star in 2015, 2016, 2017 and, again, in 2018. According to Thomson Reuters, the Super
16 Lawyers, Rising Star list recognizes the top 2.5% of eligible attorneys. (see
17 https://www.superlawyers.com/about/selection_process.html.) Additionally, I have been named a
18 Super Lawyer for Employment Law in 2025 and 2026.

19
20 I declare under the penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct. Executed this 29th day of April 2026, at San Diego, California.

22
23 **JCL LAW FIRM, APC**

24 By: 
25 Jean-Claude Lapuyade, Esq.
26 Attorneys for PLAINTIFFS
27
28

EXHIBIT 1

JCL Law Firm

Transaction Report

All Dates

DATE	TRANSACTION TYPE	NUM	NAME	MEMO/DESCRIPTION	AMOUNT	BALANCE
Rodriguez v. Performance Foods (002-395)						
08/31/2022	Journal Entry	August 2022		Copies for August 2022	0.70	0.70
		Postage				
08/31/2022	Journal Entry	August 2022		Postage for August 2022	15.64	16.34
		Postage				
09/02/2022	Expense		One Legal LLC	One Legal Order Number: 18853185 - Filing Fee Re: Complaint, Civil Case Cover Sheet, Summons	1,497.36	1,513.70
09/09/2022	Expense		One Legal LLC	One Legal Order Number: 18886676 - Filing Fee Re: Proof of Service by Substituted Service	20.02	1,533.72
09/30/2022	Journal Entry	Sept. 2022		Copies for September 2022	0.70	1,534.42
		Postage				
09/30/2022	Journal Entry	Sept. 2022		Postage for September 2022	15.64	1,550.06
		Postage				
10/31/2022	Journal Entry	Oct. 2022		Copies for October 2022	13.00	1,563.06
		Postage				
10/31/2022	Journal Entry	Oct. 2022		Postage for October 2022	15.64	1,578.70
		Postage				
11/09/2022	Expense		One Legal LLC	One Legal Order Number: 19259375 - Filing Fee Re: Complaint, Summons,, Civil Case Cover Sheet	467.86	2,046.56
11/22/2022	Expense		One Legal LLC	One Legal Order Number: 19343536 - Filing Fee Re: Notice and Acknowledgment of Receipt	20.02	2,066.58
11/30/2022	Journal Entry	Nov. 2022		Copies for November 2022	2.60	2,069.18
		Postage				
11/30/2022	Journal Entry	Nov. 2022		Postage for November 2022	56.33	2,125.51
		Postage				
12/15/2022	Expense		One Legal LLC	One Legal Order Number: 19481252 - Filing Fee Re: Declaration, Request for Dismissal, Proof of Service	12.87	2,138.38
12/20/2022	Expense		One Legal LLC	One Legal Order Number: 19482012 - Filing Fee Re: Declaration, Request for Dismissal, Proof of Service	12.87	2,151.25
12/21/2022	Expense		One Legal LLC	One Legal Order Number: 19512049 - Filing Fee Re: Request for Dismissal, Proof of Service	20.02	2,171.27
12/21/2022	Expense		One Legal LLC	One Legal Order Number: 19510093 - Filing Fee Re: Order, Declaration, Proof of Service	12.87	2,184.14
12/31/2022	Journal Entry	Dec 2022		Copies for December 2022	3.20	2,187.34
		Postage				
12/31/2022	Journal Entry	Dec 2022		Postage for December 2022	17.02	2,204.36
		Postage				
01/31/2023	Journal Entry	Jan 2023		Postage for January 2023	0.57	2,204.93
		Postage				

DATE	TRANSACTION TYPE	NUM	NAME	MEMO/DESCRIPTION	AMOUNT	BALANCE
01/31/2023	Journal Entry	Jan 2023 Postage		Copies for January 2023	1.40	2,206.33
02/10/2023	Expense		LWDA		75.00	2,281.33
02/28/2023	Journal Entry	Feb 2023 Postage		Copies for February 2023	22.30	2,303.63
02/28/2023	Journal Entry	Feb 2023 Postage		Postage for February 2023	48.00	2,351.63
03/07/2023	Expense		One Legal LLC	One Legal Order no. 19826874 - Filing Fee Re: Amendment to Complaint, Proof of Service	20.49	2,372.12
03/31/2023	Journal Entry	Mar 2023 Postage		Copies for March 2023	0.70	2,372.82
10/31/2023	Journal Entry	Oct. 2023 Postage		Copies for October 2023	0.35	2,373.17
07/31/2024	Journal Entry	July 2024 Copies		Copies for July 2024	2.10	2,375.27
09/30/2024	Journal Entry	Aug/Sept. 2024 Print.		Aug/Sept. 2024 Printing	0.30	2,375.57
11/30/2024	Journal Entry	Nov 2024 Copies		November 2024 Copies	0.20	2,375.77
12/31/2024	Journal Entry	Dec 2024 Copies		December 2024 Copies	0.20	2,375.97
01/31/2025	Journal Entry	Jan 2025 Printing		January 2025 Printing	0.20	2,376.17
02/28/2025	Journal Entry	Feb 2025 Printing		Feb 2025 Printing	0.20	2,376.37
03/31/2025	Journal Entry	March 2025 Printing		Mar 2025 Printing	0.20	2,376.57
07/31/2025	Journal Entry	July 2025 Copies		July 2025 Copies	0.20	2,376.77
01/31/2026	Journal Entry	Jan. 2026 Copies		January 2026 Copies	0.20	2,376.97
Total for Rodriguez v. Performance Foods (002-395)					\$2,376.97	
TOTAL					\$2,376.97	

EXHIBIT 2

JCL LAW FIRM, APC
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Tel: (619) 599-8292
Fax: (619) 599-8291

FIRM RESUME

Areas of Practice: Employee Class Actions, Wage and Hour Class Actions, Civil Litigation, and Unlawful Housing Practices.

ATTORNEY BIOGRAPHIES

Jean-Claude Lapuyade, Esq.
California Bar Number 248676
Founding Partner

Biography:

Mr. Lapuyade is a San Diego based labor and employment attorney representing aggrieved California employees and the victims of unlawful housing practices throughout the State of California. Mr. Lapuyade's litigation practice focuses on representing California employees in wage and hour class actions for unpaid wages, missed meal and rest breaks, and misclassification, wrongful termination cases and tenants in unlawful housing class actions. Mr. Lapuyade prides himself on providing his clients with aggressive, attentive and result driven representation through the litigation process, trial and arbitration. Since 2007, Mr. Lapuyade successfully recovered in excess of \$200 million in monetary awards for his clients.

Mr. Lapuyade served as co-editor of the Insurance Column for Consumer Attorneys of San Diego from 2011 to 2014. As editor, Mr. Lapuyade was responsible for publishing monthly articles in the Trial Bar News periodical analyzing complex insurance coverage issues. Mr. Lapuyade is a four-time recipient of the Super Lawyers Rising Star by Thomson Reuters. To be eligible for inclusion in Rising Stars, a candidate must be either 40 years old or younger or in practice for 10 years or less. While up to 5 percent of the lawyers in a state are named to Super Lawyers, no more than 2.5 percent are named to Rising Stars.

Bar Admissions:

- California
- U.S. District Court Southern District of California
- U.S. District Court Central District of California
- U.S. District Court Eastern District of California
- U.S. District Court Northern District of California

Professional Associations:

- California Employment Lawyers Association, 2007 to Present
- Consumer Attorneys of San Diego, 2007 to 2020
- American Bar Association, Section of Litigation, Member, 2007 to 2020
- American Bar Association, Labor & Employment Section, Member, 2007 to 2020
- American Bar Association, Tort, Trial & Insurance Section, Member, 2007 to 2020
- California Bar Association, Labor & Employment Section, Member, 2007 to Present
- California Bar Association, Litigation Section, Member, 2007 to Present

Education:

- **California Western School of Law**
 - J.D. - 2006
 - Honors: Deans Merit Scholarship, California Western School of Law 2005 - 2006
- **University of Arizona**
 - B.A. - 2001
 - Major: History

Honors:

- Super Lawyers Rising Star, Thomson Reuters, 2015 – 2018
- Super Lawyers 2025 - 2026
- Distinguished Advocate Award for Outstanding Oral Advocacy, 2005 – 2006

Perssia Razma, Esq.
California Bar Number 351398
Associate Attorney

Biography:

Ms. Razma is a San Diego based labor and employment attorney representing California employees throughout the state of California. Ms. Razma's litigation practice focuses on representing current and former employees in wage and hour class actions for unpaid wages, missed meal and rest breaks, misclassification, and wrongful termination.

Perssia was born and raised in Los Angeles, California. She earned a Bachelor of Arts in 2020 at San Diego State University in Psychology. In 2023, Perssia earned her Juris Doctor from the University of San Diego School of Law.

Education:

- **University of San Diego School of Law**
 - J.D. - 2023
- **San Diego State University**
 - B.A. – 2020
 - Major: Psychology

Sydney Castillo-Johnson, Esq.
California Bar Number 343881
Associate Attorney

Biography:

Ms. Castillo-Johnson is a San Diego based labor and employment attorney representing California employees throughout the state of California. Ms. Castillo-Johnson's litigation practice focuses on representing current and former employees in wage and hour class actions for unpaid wages, missed meal and rest breaks, misclassification, and wrongful termination.

Ms. Castillo-Johnson volunteered her time at California Western School of Law first as a student intern and later as a student manager with the Community Law Project which offers legal services to the low-income community of San Diego.

Education:

- **California Western School of Law**
 - J.D.- 2022
 - Honors:
 - Dean's Honor List: Spring 2021, Fall 2021
 - Public Service Honor Society Fall 2021
 - 3L Academic Merit Scholarship
 - Dean's Diversity, Service, and Leadership Scholarship
 - Activities: Community Law Project Student Manager
- **Azusa Pacific University**
 - B.A. – 2018
 - Major: Criminal Justice

JCL Law Firm, APC - REPORTED CASES

- *Blanchette et al., v. Superior Court (GHA Homes)*, 8 Cal.App.5th 521 (2017).
- *Duran v. Employbridge Holding Co.*, 92 Cal.App.5th 59 (2023).

EXAMPLES OF THE JCL LAW FIRM'S REPRESENTATIVE CLASS ACTION & REPRESENTATIVE CASES

- *Ware v. Shake Shack Enterprises, LLC*, Alameda Superior Court Case No. 21CV002063 (October 19, 2023) Hon. Brad Seligman approved a \$1,330,000.00 class action and PAGA action settlement for violations of California wage and hour laws. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Trinh v. Precision Metal Products, Inc., et al.*, San Diego Superior Court Case No. 37-2022-00000965-CU-OE-CTL (October 16, 2023) Hon. Matthew C. Braner approved a \$450,000.00 class action and PAGA action settlement for, *inter alia*, unpaid off the clock work. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Anderson v. Barton Myers Associates, Inc., et al.*, Los Angeles Superior Court Case No. 21STCV43314 (October 12, 2023) Hon. Elihu M. Berl approved a \$900,000.00 class action and PAGA action settlement for meal and rest period violations. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *DeSanctis v. Douglas Products and Packaging Company, LLC*, Contra Costa Superior Court Case No. C21-01874 (October 11, 2023) Hon. Charles S. Treat approved a \$372,500.00 class action and PAGA action settlement for, *inter alia*, failure to pay for all hours worked. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Jackson v. White Fir, LLC, et al.*, Sacramento Superior Court Case No. 34-2021-00301656 (October 6, 2023) Hon. Lauri A. Damrell approved a \$750,000.00 class action and PAGA action settlement for violations of California wage and hour laws. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Kneisly v. SR Machining, Inc., et al.*, Riverside Superior Court Case No. CVRI2201491 (October 5, 2023) Hon. Harold W. Hopp approved a \$220,000.00 class action and PAGA action settlement for meal and rest period violations. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Mendez v. Bondz, Inc., et al.*, San Joaquin Superior Court Case No. STK-CV-UOE-2020-0007486 (September 14, 2023) Hon. George J. Abdallah, Jr. approved a \$180,000.00 class action and PAGA action settlement for, *inter alia*, failure to comply with piece-rate laws. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Baray v. Curation Foods, Inc., et al.*, Santa Barbara Superior Court Case No. 21CV02834 (August 29, 2023) Hon. James F. Rigali approved a \$495,000.00 class action and PAGA action settlement for meal and rest period violations. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Rodriguez, et al. v. Ferma Greenbox, Inc., et al.*, Alameda Superior Court Case No. RG21101104 (August 23, 2023) Hon. Evelio Grillo approved a \$200,000.00 class action and PAGA action settlement for, *inter alia*, unpaid off-the-clock work. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *O'Quinn v. Laugh Factory, Inc.*, Los Angeles Superior Court Case No. 19STCV28155 (August 1, 2023) Hon. Carolyn B. Kuhl approved a \$144,000.00 class action and PAGA action settlement for, *inter alia*, unlawful tip pooling. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Toler v. Total Testing Solutions, LLC*, Los Angeles Superior Court Case No. 21STCV38452 (July 27, 2023) Hon. Elihu M. Berle approved a \$160,000.00 class action and PAGA action settlement for meal and rest period violations. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Rodriguez v. EAH, Inc.*, Santa Cruz Superior Court Case No. 21CV00884 (July 25, 2023) Hon. Marjorie Carter approved a \$1,450,000.00 class action and PAGA action settlement for, *inter alia*, failure to compensate overtime and redeemed sick pay at the regular rate of pay. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Neutall v. Urban Alchemy*, San Francisco Superior Court Case No. CGC-20-588622 (July 13, 2023) Hon. Richard B. Ulmer approved a \$980,000.00 class action settlement for violations of California wage and hour laws. The Court appointed JCL Law Firm, APC as Class Counsel.
- *Rodriguez v. RM Parks Place, Inc.*, San Joaquin Superior Court Case No. STK-CV-UOE-2021-6050 (June 7, 2023) Hon. Erin Guy Castillo approved a \$175,000.00 class action and PAGA action settlement for, *inter*

alia, wage statement violations. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.

- *Chrestensen v. Northeastern Rural Health Clinics* Lassen, Superior Court Case No. 63703 (April 13, 2023) Hon. Leonard J. La Casse approved a \$270,000.00 class action and PAGA action settlement for, *inter alia*, unpaid overtime wages. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Hernandez, et al. v. Parenting Network, Inc.*, Tulare Superior Court Case No. VCU287027 (March 14, 2023) Hon. Bret Hilman approved a \$225,000.00 class action and PAGA action settlement for, *inter alia*, unpaid off-the-clock work. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Sarmiento v. Caduceus Healthcare Inc.*, San Diego Superior Court Case No. 37-2021-00002597 (March 10, 2023) Hon. Richard S. Whitney approved a \$315,000.00 class action and PAGA action settlement for, *inter alia*, unpaid off-the-clock work. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Garces, et al. v. DriverDo, LLC*, Los Angeles Superior Court Case No. 19STCV32773 (January 24, 2023) Hon. Carolyn B. Kuhl approved a \$700,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *De Jesus v. Guardian Angel Home Care, Inc.*, San Diego Superior Court Case No. 37-2020-00021049-CU-OE-CTL (July 29, 2022) Hon. Ronald F. Frazier approved a \$300,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Kaur v. Aces 2020 I, LLC, et al.*, Contra Costa Superior Court Case No. MSC20-02482 (December 22, 2022) Hon. Edward G. Weil approved a \$585,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Molina v. Hawaiian Airlines, Inc.*, Los Angeles Superior Court Case No. 20STCV28079 (November 23, 2022) Hon. Maren Nelson approved a \$250,000 class action settlement for meal and rest period violations. The JCL Law Firm, APC, represented the Plaintiff.
- *Lang Jr. v. Pathways Community Services LLC*, San Diego Superior Court Case No. 37-2019-00049969-CU-OE-CTL (September 9, 2022) Hon. James A. Mangione approved a \$160,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Martinello v. Century Wilshire, Inc.*, Los Angeles Superior Court Case No. 20STCV32613 (March 1, 2022) Hon. Carolyn Kuhl approved a \$550 billing rate and appointed Jean Claude Lapuyade, Esq. of the JCL Law Firm, APC, as Class Counsel.
- *Wilson v. Spreen Inc. (dba Spreen Honda)*, San Bernardino Superior Court Case No. CIVSB2119857 (April 6, 2022) Hon. David Cohn approved a \$300,000 PAGA action settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Ledesma v. TVJ Sons I, Inc.; Porter and Howard, Inc.* Santa Barbara Superior Court Case No. 20CV03573 (November 10, 2021) Hon. Jed Beebe approved a \$350,000 PAGA action settlement for meal and rest period violations. The JCL Law Firm, APC represented the State of California and the Aggrieved Employees.
- *Jacobs v. Rush Media Company, LLC; XLT Management Services, Inc.*, Los Angeles Superior Court Case No. 20STCV32350 (May 2, 2022) Hon. Daniel J. Buckley appointed the JCL Law Firm, APC as Class Counsel and approved a \$330,000 class action settlement for, *inter alia*, independent contractor misclassification.
- *Chavez v. HTL Conrad Domestic, LLC; HTL Conrad Domestic Employer, LLC*, San Diego Superior Court Case No. 37-2020-00016193-CU-OE-CTL (June 9, 2022) Hon. John S. Meyer approved a \$850,000 PAGA action settlement for, *inter alia*, failure to compensate overtime at the regular rate of pay. The JCL Law Firm, APC acted as representative PAGA counsel for the State of California and the Aggrieved Employees.
- *Renteria v. Love's Country Stores of California*, San Bernardino Superior Court Case No. CIVDS20164481 (June 14, 2022) Hon. David Cohn approved a \$2.2 million dollar class action and PAGA action settlement for, *inter alia*, unpaid overtime and sick pay. The JCL Law Firm, APC acted as Class Counsel and as representative PAGA counsel for the State of California.
- *Lopez v. Adidas America, Inc.*, Ventura Superior Court Case No. 56-2021-005498444-CU-OE-VTA (April 4, 2022) Hon. Mark Borrell approved a \$1.5 million dollar class action and PAGA action settlement for, *inter alia*, inaccurate overtime calculations, and appointed the JCL Law Firm, APC as Class Counsel.
- *Felix v. TVI, Inc., d.b.a. Savers*, Santa Clara Superior Court Case No. 21CV376407 (February 18, 2022) Hon. Sunil R. Kulkarni approved a \$1.8 million dollar class action and PAGA action settlement for, *inter alia*, unpaid off-the-clock work. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Munoz v. AMTCR*, San Bernardino Superior Court Case No. CIV-DS2001914 (August 24, 2021) Hon. David Cohn approved a \$1.8 million dollar class and PAGA settlement for, *inter alia*, inaccurate itemized wage

statements. The JCL Law Firm, APC acted as class counsel for the settlement class and as representative PAGA counsel the State of California and the Aggrieved Employees.)

- *Nunes v. Home Depot U.S.A., Inc.*, San Joaquin Superior Court Case No. STK-CV-UOE-2020-0011011 (October 20, 2021 – Hon. Roger Ross approved a \$1.5 million dollar class and PAGA settlement for, *inter alia*, miscalculated meal period premiums and appointed Jean-Claude Lapuyade, Esq. as Class Counsel.)
- *Pillsbury v. T&T Restaurants CA, Inc.*, Del Norte Superior Court Case No. CVUJ-20-1214 (December 14, 2021 – Hon. Darren McElfresh approved \$550 billing rate and appointed Jean-Claude Lapuyade, Esq. as Class Counsel in a wage and hour class action settlement.)
- *Latin v. OneMain General Service Corporation*, Stanislaus County Superior Court Case No. CV-20-002498 (October 22, 2021) Hon. Stacy Speiller approved a PAGA action settlement for \$700,000 wage statement violations. The JCL Law Firm, APC acted as counsel for the plaintiff, the State of California and the Aggrieved Employees.
- *Elias Kaser v. Aviation Consultants, Inc.*, Orange County Superior Court Case No. 30-2021-01191204-CU-OE-CXC (September 22, 2021 – Hon. Peter J. Wilson approved \$550 billing rate in a representative California Labor Code Private Attorney General Act settlement).
- *Rodriguez v. RSI Home Products, Inc.*, San Bernardino Superior Court Case No. CIVDS2023354 (July 30, 2021 – Hon. David Cohn approved a \$1.45 million class and PAGA settlement for, *inter alia*, failure to comply with piece-rate laws, and appointed the JCL Law Firm, APC as Class Counsel)
- *Jer Vang v. Bridge Property Management*, Alameda County Superior Court, Case No RG19047434 (January 8, 2021 – Hon. Winifred Smith approved a class and PAGA settlement for, *inter alia*, unpaid off the clock work. The JCL Law Firm, APC acted as class counsel for the settlement class and as representative PAGA counsel the State of California and the Aggrieved Employees.)
- *Johnson v. Volt Management Corp., Inc. et al.*, Los Angeles County Superior Court, Case No. 19STCV16466 (December 11, 2020 – Hon. Amy Hogue approved a PAGA Settlement negotiated on behalf of the State of California and the aggrieved employees by the JCL Law Firm, APC.)
- *Salazar v. Frontier Auto Sales Inc., dba Frontier Toyota*, Los Angeles Superior Court, Case No. 19STCV20382 (November 24, 2020 – Hon. John P. Doyle appointed the JCL Law Firm, APC as class counsel and approved a class and PAGA settlement for, *inter alia*, missed meal and rest periods.)
- *Villalobos v. Alterra Group, LLC et al.*, Los Angeles County Superior Court, Case No. 19STCV19448 (November 11, 2020 – Hon. Richard Fruin approved a PAGA Settlement for, *inter alia*, unreimbursed business expenses. The JCL Law Firm, APC acted as counsel for the plaintiff, the State of California and the Aggrieved Employees.)
- *Stevens et al., v. Bank of England*, San Diego County Superior Court Case No. 37-2019-00018662-CU-OE-CTL (October 16, 2020 – Hon. John Meyer appointed JCL Law Firm as Class Counsel and granted final approval of wage and hour class action for, *inter alia*, off-the-clock work.)
- *Frazier v. ASA Carlton, Inc.*, San Diego Superior Court Case No. 37-2019-00036147 (October 9, 2020 Hon. Kenneth Medel appointed the JCL Law Firm as Class Counsel and granted final approval of wage and hour class action for off-the-clock work.)
- *Krake et al., v. Central Valley Diner, Inc.*, Placer County Superior Court Case No. SCV0041645 (September 4, 2020 – Hon. Michael Jones appointed JCL Law Firm as class counsel and granted final approval of wage and hour class action for meal period violations.)
- *Conner v. Ascendant Marketing, LLC et al.*, San Diego Superior Court Case No. 37-2019-00026864-CU-OE-CTL (July 24, 2020 Hon. Joel Wohlfeil granted approval of PAGA Settlement for, among other things, off-the-clock work. JCL Law Firm, APC acted as lead counsel.)
- *Guerrero v. Estancia Operations, LLC.*, San Diego Superior Court Case No. 37-2019-00028963 (August 25, 2020 – Hon. Katherine Bacal approved PAGA Settlement for, *inter alia*, missed meal and rest periods. JCL Law Firm, APC, acted as lead counsel.)
- *Moreno v. Dash Lube, et al.*, United States District Court, Southern District of California, Case No. 18cv1922 DMS (AHG) (December 13, 2019 – Granted class certification of Labor Code Section 226 claim and appointed JCL Law Firm, APC, as Class Counsel.)
- *Perkins et al., v. Tahiti Enterprises, Inc., et al.*, Orange County Superior Court Case No. 30-2016-00863095 (October 22, 2019 – Hon. Peter Wilson appointed JCL Law Firm, APC, as Class Counsel and granted final approval for an unlawful housing class action settlement arising out of Civil Code Section 1940.1.)
- *Hill v. Stemak Holdings, Ltd.*, San Diego Superior Court Case No., 37-2018-00000747 (January 28, 2020 – Hon. Kenneth Medel appointed JCL Law Firm, APC as class counsel and granted final approval of wage and hour class action for unpaid overtime.)
- *Shachno et al., v. KT Hotels, LLC, et al.* San Diego Superior Court Case No Case No. 37-2018-00043601 (May 31, 2019 – Hon. Gregory Pollack appointed JCL Law Firm, APC, as Class Counsel and granted preliminary approval for the wage and hour class action settlement involving nearly 900 current and former employees. Final approval scheduled for October 4, 2019)
- *Almanza v. The Express Group, Inc.*, San Bernardino Superior Court Case No. CIVDS1722542 (April 19, 2019 – Hon. David Cohn appointed the JCL Law Firm, APC, as Class Counsel and granted final approval

for a wage and hour class action settlement for *inter alia*, missed meal and rest periods and independent contractor misclassification.)

- *Moschetto v. Pillow Global, Inc.* San Diego Superior Court, Case No. 37-2017-00024031-CU-OE-CTL (April 5, 2019 – Hon. John S. Meyer appointed JCL LAW Firm, APC, as Class Counsel and granted final approval for a wage and hour wage class action settlement involving misclassified house cleaners.)
- *Burke v. Friendship Hotel, LLC*, San Diego County Superior Court Case No. 37-2017-00022517-CU-OE-CTL (March 10, 2019 – final approval granted on for an unlawful housing class action arising under Civil Code Section 1940.2)
- *Terrado et al., v. Accredited Debt Relief, LLC*, San Diego County Superior Court Case No. 37-2018-00014181-CU-OE-CTL (February 8, 2019 – Hon. Gregory W. Pollock appointed JCL Law Firm, APC as Class Counsel and granted final approval for a wage and hour class action settlement for meal and rest period violations);
- *Macaspac v. San Antonio Regional Hospital*, San Bernardino Superior Court Case No. CIVDS1512625, (July 27, 2018 – Hon. Thomas S. Garza appointed JCL Law Firm, APC, as Class Counsel and granted final approval for a wage and hour class action settlement involving claims for on duty meal and rest periods.);
- *Summerlin et al. v. Maplebear, Inc. dba Instacart*, Los Angeles Superior Court Case No. BC603030 (2018 - certified and settled wage and hour class action.)
- *Ortega v. Prime Healthcare*, San Diego Superior Court Case No. 37-2014-00011240-CU-OE-CTL (2018 – Approved PAGA only settlement for on duty meal and rest periods)
- *Engstrom v. Bender-Rosenthal, Inc.* San Diego Superior Court Case No. 37-2016-00012373-CU-OE-CTL (2017 - Certified and settled class action for employee misclassification);
- *Crawford v. Outlook Amusements, Inc.*, Los Angeles Superior Court Case No. BC617160 (2017 - Certified and settled wage and hour class action.);
- *Hernandez v. Sunglass Hut Trading, LLC*, San Bernardino Superior Court Case No. CIVDS1505181 (2016 - Certified and settled wage and hour class action);
- *Burns v. Shalom, LLC*, San Diego Superior Court, Case No., 37-2013-00058356-CU-BT-CTL (2015 - certified and settled class action for unlawful housing practices arising out of Civil Code Section 1940.1);