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17 **SUPERIOR COURT OF CALIFORNIA**

18 **COUNTY OF MONTEREY**

19
20 SIMON EDEZA CAMPANA,

21 Plaintiff,

22 v.

23 VISTA VERDE LABOR, INC.; and DOES 1
through 50, inclusive,

24 Defendants.
25
26
27
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Case No. 23CV000638

**DECLARATION OF JUSTIN LO IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: March 13, 2026
Time: 8:30 A.M.
Dept.: 14

1
2 **DECLARATION OF JUSTIN LO**

3 I, Justin Lo, declare as follows:

4 1. I am an attorney licensed to practice before all courts of the State of California. I am a
5 principle at Work Lawyers PC, one of the attorneys of record for Plaintiffs PABLO ORTIZ GARCIA
6 and CARINA MERINO RAMIREZ (collectively, “Plaintiffs”) in the above-entitled action. I have
7 personal knowledge of the facts stated herein except those based on information and belief, and if called
8 upon to testify as a witness, I could and would competently testify thereto.

9 2. This Declaration is submitted in support of Plaintiffs’ motion for final approval of class
10 action settlement (the “Motion”).

11 3. On or around March 2, 2023, Plaintiffs filed a separate wage-and-hour class action
12 against defendants Vista Verde and Maria Maldonado asserting substantially similar claims (the
13 “*Garcia* Action”).

14 4. I am one of the primary attorneys on this matter. Based on my independent
15 investigation and assessment, I believe the settlement described in the Motion (“Agreement” or
16 “Settlement Agreement”) is fair, reasonable, and adequate. The terms of the Agreement were
17 reached through arms’ length negotiations—between skilled and experienced counsel on both sides,
18 who had access to and thoroughly analyzed the relevant data and legal issues— including one full-
19 day private mediation. I am unaware of any conflict of interest between myself or my law firm and
20 any member of the proposed Class which should or would preclude me from representing the Class.
21 I am also unaware of any other cases raising any issues that overlap with the proposed class or issues
22 raised in this matter.

23 5. All work performed by Work Lawyers, PC on this matter was done on a contingency
24 basis. The firm has received no compensation for the time invested or expenses incurred in litigating
25 this case. The firm has prosecuted this litigation up to this point, taking the risk that it ultimately
26 would be faced with not receiving any compensation for our work.

27 6. I am familiar with most aspects of this case and tasks undertaken by the various
28 members of the firm in litigating this case. I have been assisted by attorney Jarrod Y. Nakano. Mr.
Nakano and I are experienced and well-qualified class action litigators who have litigated many

1 wage and hour class actions and have each been certified as class counsel in numerous other class
2 actions, particularly wage and hour class actions.

3 7. Since the outset of this case, Class Counsel has conducted a thorough factual
4 investigation and in-depth legal analysis. Further, due to Defendant's workforce being
5 predominately transitory and temporary, many putative Class Members worked between one day or
6 a few days and departed without completing onboarding paperwork or providing reliable contact
7 information. These circumstances created both practical and data-related obstacles to provide notice
8 to all Class Members which necessitated extensive meet and confer efforts with Co-Counsel and
9 Defense Counsel, multiple requested continuances of the final approval hearing, and Court
10 intervention. Attorneys at the Firm have devoted 206.5 hours on this case, which includes
11 anticipated future time attending the hearing, responding to inquiries from Class Members,
12 preparing reports to the court, and any other issues that may arise during the settlement payout
13 period. Attached hereto as **Exhibit A** is a detailed summary of tasks and hours spent by the Firm's
14 attorneys in litigating this case.

15 8. The hourly rate for attorneys staffed on this matter ranges from \$750 to \$850 per
16 hour. I was approved at an hourly rate of \$750.00 per hour has been approved in other wage and
17 hour lawsuits in state court. *Motaghedi v. Natera Inc.* San Mateo Case No. 22-CIV-03458, *Hooper*
18 *v. Vizio* Orange County Case No. 30-2020-01144007, *Salgado v. Festo Corporation* Alameda Case
19 No. 22CV010098 *Adrienne Lucero v. Les Boutique Clarins, LTD.* LASC Case No. 21STCV17296.
20 My hourly rate of \$750 has also been approved of after a bench trial involving similar claims in
21 *Bedoni vs. LPDB Joint Ventures et al.* Yuba Case No. CVCV19-01058. In another contested
22 arbitration matter, my hourly rate of \$750 was approved of in *Castro vs. Elizabeth's Food Co. Inc.*
23 JAMS Arbitration No. 1220073726. In addition, I have approved as class counsel in numerous
24 representative class and PAGA matters over the last 7 years.

25 9. In this motion, Class Counsel requests a reduced attorney hourly rate of \$595.00.
26 Accordingly, the total lodestar for the firm's hours will be approximately \$122,867.50 based on an
27 hourly rate of \$595.00 per hour [206.5 hours x \$595.00].

28 10. At the time the Parties negotiated the Settlement Agreement, I did not have a final
tally of the litigation costs incurred to date. As such, the Parties included a maximum amount that

1 could be attributed to costs under the settlement. To date, Work Lawyers, PC has incurred costs in
2 the amount of \$2,970.45 for litigation related expenses. Attached hereto as **Exhibit B** is a true and
3 correct copy of the cost report.

4 11. My qualifications are as follows: I have 15 years of experience as a practicing
5 attorney. I graduated from University of California Irvine in 2006 and graduated from the University
6 of California Los Angeles School of Law in 2011. While in law school, I obtained a specialization in
7 business law and policy. I was selected as a 2019, 2020 and 2021 as a Rising Star in Employment
8 Law by Super Lawyers. I have successfully represented hundreds of employees in legal matters
9 including Wage and hour class actions, PAGA lawsuits, complex and individual wage and hour and
10 employment related matters. Work Lawyers PC's practice is devoted entirely to the prosecution of
11 employment-related violations of the California Labor Code on behalf of California employees.

12 12. Our firm focuses entirely on labor and employment matters on behalf of California
13 employees, and we have been exclusively practicing labor and employment, wage and hour class
14 and PAGA actions since 2017. My firm is currently lead or co-lead counsel in over 50 wage and
15 hour class actions and/or representative actions brought under the Private Attorneys' General Act of
16 2004 ("PAGA") in both federal and state court. Attached as **Exhibit C** is a list of my representative
17 wage and hour cases where I am lead or co-counsel

18
19 I declare under penalty of perjury under the laws of the State of California that the foregoing
20 is true and correct. Executed on February 19, 2026 in Torrance, California.

21
22 /s/ Justin Lo

23 _____
Justin Lo
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EXHIBIT A

WORK LAWYERS, P.C. TIME & TASK SUMMARY

Pablo Ortiz Garcia, Carina Merino Ramirez v. Vista Verde Labor, Inc., et. al.
Superior Court of California, County of Monterey Case No. 23CV000632

I. FACTUAL AND LEGAL INVESTIGATION

- Initial intake meetings with clients.
- Phone discussion with clients regarding litigation expectations, risks, costs and timeline
- Legal research and analysis re proper entities to name in lawsuit; conferences with co-counsel re same.
- Legal research and analysis re theories of liability and probability of class certification; conferences with co-counsel re same.
- Legal research and analysis prior class action settlement agreements; conferences with co-counsel re same.
- Draft and Serve an introductory letter to Defendant requesting clients' personnel files.
- Follow up meetings with clients regarding their employment and alleged violations.

Attorney Hours: 18.20

II. PLEADINGS & MOTION PRACTICE

- Outline and draft Complaint; including review of notes, research and client's intake
- Review, revise and finalize initial complaint.
- Prepare for and attend telephone conference with defense counsel re: case status and updates, complaint, causes of action, amendment of complaint.
- Review and revise and finalize first amended complaint.
- Review Defendants' answer to Plaintiffs' first amended complaint.
- Review, analyze, and research of notice of related case.
- Review, revise, supplement and edit joint stipulation to continue dates for class certification.
- Review and analyze signed order on stipulation to continue deadline to file motion for class certification re: short extension.

Attorney Hours: 22.50

III. DISCOVERY AND DOCUMENT ANALYSIS

- Conferences with co-counsel re discovery plan.
- Outline and draft special interrogatories (set one), requests for production (sets one) & Belaire West Notice to Defendant Vista Verde Labor, Inc.
- Review and revise special interrogatories (set one) & requests for production (sets one) to Defendant Vista Verde Labor, Inc.
- Propound special interrogatories (set one), requests for production (sets one), & Belaire West Notice to Defendant Vista Verde Labor, Inc.
- Review and analyze Defendants' initial discovery responses; conferences with co-counsel re same.
- Meet and confer with defense counsel re initial discovery responses.
- Communication with defense counsel re: staying discovery and mediation terms.
- Review of file and email opposing counsel re: requirements for mediation.

WORK LAWYERS, P.C. TIME & TASK SUMMARY

Pablo Ortiz Garcia, Carina Merino Ramirez v. Vista Verde Labor, Inc., et. al.
Superior Court of California, County of Monterey Case No. 23CV000632

- Conferences with co-counsel re status of meet and confer discussions with defense counsel.
- Outline and draft meet and confer letter to defense counsel re: discovery plan in light of the Court's short extension of time to file motion for class certification.
- Outline and draft meet and confer re: wage statements, data points, conflicting responses in Defendant's discovery responses.
- Outline and draft meet and confer letter re: Defendant's deficient responses to Plaintiffs' special interrogatories (set one).
- Outline and draft meet and confer letter re: Defendant's deficient responses to Plaintiffs' requests for production of documents (set one).
- Outline and draft meet and confer to defense counsel re: Belaire West Notice and class certification discovery.
- Meet and confer with defense counsel re: production of contact information of putative class members.
- Draft of motion to compel further responses to Plaintiffs' requests for production of documents (set one) re: statement of facts, discovery served, multiple extensions, incomplete responses, meet and confer attempts.
- Draft of motion to compel further responses to Plaintiffs' special interrogatories (set one) re: statement of facts, discovery served, multiple extensions, incomplete responses, meet and confer attempts, refusal to start the Belaire West process.
- Review and analyze correspondence from defense counsel re: Belaire West Notice and class discovery.
- Review and analyze defense counsel's edits to Belaire West Notice.

Attorney Hours: 47.50

IV. MEDIATIONS

- Meet and confer with defense counsel re informal production of data points for initial mediation.
- Review of informal production of wage statements and timecards and identify exhibits and arguments in preparation of mediation brief.
- Prepare for and attend telephone conference with defense counsel re: mediation.
- Review, revise, supplement and edit mediation brief; legal research and analysis re same; conferences with co-counsel re strategy for mediation.
- Plan and prepare for mediation re: data points, examples of violations.
- Attend mediation with Christopher Panetta on October 25, 2024, conferences with co-counsel post-mediation.
- Review correspondence from mediator, Christopher Panetta re: proposed settlement terms; discussion with client regarding proposed settlement terms.
- Review, revise, supplement and edit memorandum of understanding ("MOU").
- Review and analyze guaranty re: MOU.
- Review, revise, supplement and edit long form settlement agreement.

Attorney Hours: 60.30

WORK LAWYERS, P.C. TIME & TASK SUMMARY

Pablo Ortiz Garcia, Carina Merino Ramirez v. Vista Verde Labor, Inc., et. al.
Superior Court of California, County of Monterey Case No. 23CV000632

V. MOTION FOR PRELIMINARY APPROVAL

- Review, revise, supplement and edit Motion for Preliminary Approval of Class Action Settlement, supporting attorney and client declarations, and proposed order.
- Prepare for and attend Case Management Conference re: case status and updates, motion for class certification, and settlement.
- Prepare for and attend in-person OSC hearing in Monterey County on June 24, 2025.
- Extensive meet-and-confer efforts with defense counsel re: the identification and clarification of data-related issues to ensure notice of settlement was provided to all class members.
- Multiple conferences with co-counsel re: the Motion for Preliminary Approval and the requested continuance of the Motion for Final Approval hearing due to obstacles in providing notice to all class members.
- Conferences with settlement administrator and defense counsel re size of class and pay period calculations.
- Review and finalize class notice.

Attorney Hours: 46.00

VI. MOTION FOR FINAL APPROVAL

- Prepare Motion for Final Approval of Class Action Settlement, supporting attorney and client declarations, and proposed order.
- Conferences with co-counsel re Motion for Final Approval.
- Conferences with settlement administrator declaration re notice process.
- Anticipated preparation for and attendance at hearing.
- Anticipated communications with settlement class members re status of distribution of settlement.

Attorney Hours: 12.00

Total Attorney Hours: 206.5

EXHIBIT B

EXPENSE	DATE	PRICE	TOTAL	QTY
Rapid Legal Filing of Notice of Remote Appearance	2/11/2026	\$19.41	\$19.41	1
Rapid Legal For filing of Status Report Invoice no.: 13808131	1/22/2026	\$175.95	\$175.95	1
Rapid Legal Filing of Notice of Remote Appearance	12/17/2025	\$19.41	\$19.41	1
Rapid Legal Filing of Report Invoice no.: 13150074	10/23/2025	\$19.41	\$19.41	1
Hotel Stay at Marriott for in person OSC and CMC on June 2 and June 3, 2025	6/2/2025	\$775.54	\$775.54	1
Rapid Legal Filing of Case Management Statement Invoice no.: 12001790	5/22/2025	\$17.34	\$17.34	1
Courtfees Filing of Case Management Statement	3/12/2024	\$17.10	\$17.10	1
Courtfees Notice Of Remote Appearance	10/26/2023	\$17.10	\$17.10	1
Uncategorized Jury Fee Posting	10/25/2023	\$150.00	\$150.00	1

EXPENSE	DATE	PRICE	TOTAL	QTY
Courtfees E-Filing Joint Case Management	10/19/2023	\$33.70	\$33.70	1
Courtfees E-Filing CMC Statement	6/26/2023	\$33.70	\$33.70	1
Courtfees Documents: First Amended Class Action Complaint Amended CCC	5/15/2023	\$1,063.70	\$1,063.70	1
Courtfees Process of Service	3/17/2023	\$108.68	\$108.68	1
Courtfees Complaint	3/16/2023	\$481.75	\$481.75	1
Courtfees E-Filing POS	3/14/2023	\$33.70	\$33.70	1
Uncategorized Certified mailing for LC226 records	1/19/2023	\$0.99	\$3.96	4
			\$2,970.45 USD	

EXHIBIT C

- *Sanae Matsuda v. Harry T. Nomura, D.D.S. Inc.*, San Francisco Case No. CGC-19-574949
- *Hector Montoya v Kings Oil Tools Inc.*, San Luis Obispo Superior Court, Case No. 19CVP-0413;
- *Stephen Bailey v. Kinder Morgan G.P.* United States District Court, Case No. 3:18-cv-03424-TSH
- *Genevieve Rangel v. Bassett Furniture NC LLC.* Orange County Superior Court Case No. 30-2018-01040101-CU-OE-CXC
- *Martin Rubio v. Altman Specialty Plants, Inc.* Los Angeles Superior Court Case No. 18STCV09215
- *Caroline Villata v. Stars Recreation Center, Solano County Superior Court Case No. FCS054507*
- *Jason Hogan v. Wolverine Distribution Inc.*, Riverside County Superior Court Case No. RIC1902891
- *Jose Rosales v. IDT America Corp. et al.*, Los Angeles Superior Court Case No. 19STCV01581
- *Eric Hardie v. Mattel Inc. et al.*, Los Angeles Superior Court Case No. 21STCV11096
- *Richard Ward v. Miller Jones Mortuary & Crematory, Inc.* Riverside Superior Court Case No. RIC2002589
- *Michael Franchini v. General Consolidated Constructors, Inc.* Riverside Superior Court Case No. RIC2001600
- *Christopher Marrone v. Caffeine Studios LLC.*, San Mateo Superior Court Case No. 20-CIV-04830
- *Annette Arredondo v. UFIT Physical Therapy Enterprise* Los Angeles Superior Court Case No. 21STCV07346
- *Chelsea Bedoni v. LPDB Joint Ventures*, Yuba Superior Court Case No. CVCV19-01058 21STCV25740
- *Allan Castaneto v. Calop Business Systems, Inc.*, Los Angeles Superior Court Case No. 20STCV03772

- *Joaquin Del Cid, Jr. v. Jonathan Club, Los Angeles Superior Court Case No. 20STCV12113*
- *John Coles v. Sally Beauty Holdings, Inc., Los Angeles Superior Court Case No. 21STCV01648*
- *Adam Davidson v. Los Angeles Truck Centers, LLC, Los Angeles Superior Court Case No. 20STCV41572*
- *Donald Dumas v. Allied Nationwide Security, Inc., Los Angeles Superior Court Case No. 21STCV26647*
- *Shawn Fitzpatrick v. Concord Foods, Inc. San Bernardino Superior Court Case No. CIVSB2116303*
- *Eduardo Galeana v. Master Property Management, Inc., Los Angeles Superior Court Case No. 21STCV16625*
- *Ronak Garg v. Providence Medical Associates, Inc. Los Angeles Superior Court Case No. 22STCV03368*
- *Maria Magdalena Gomez v. Bel Aire Bridal, Inc., Los Angeles Superior Court Case No. 21STCV27188*
- *Brenda Hayden vs. Aftermath Services, LLC, Sacramento Superior Court Case No. 34-2020-00287716-CU-OE-GDS*
- *Chad Hooper v. Vizio, Inc., Orange Superior Court Case No. 30-2020-01144007-CU-OE-CXC*
- *Ghufran Khan v. Atlas Air, Inc., Los Angeles Superior Court Case No. 20STCV40478*
- *James Legare v. Lebo Automotive, Inc. Los Angeles Superior Court Case No. 20STCV03227*
- *Cheyenne Mallas v. Alexander Rivkin, MD, Inc. Los Angeles Superior Court Case No. 21STCV21726*
- *Charlie Meas v. Excel Test Prep Alameda Superior Court Case No. HG19027287*
- *Ashli Morris v. Kids Overcoming, LLC Alameda Superior Court Case No. HG20064207*
- *Sharon Park v. American Contractors Indemnity Company Los Angeles Superior Court Case No. 22STCV03555*
- *Fernando Pereyra v. Maverick Aerospace, LLC Los Angeles Superior Court Case No.*

20STCV29642

- *Natalie Randazzo v. BCSF, Inc. San Francisco Superior Court Case No. CGC-20-585430*
- *Geovanni Romero v. The Nu Paradigm House, LLC Los Angeles Superior Court Case No. 21STCV35414*
- *Gabriela Ruiz v. Cotton Citizen, Inc. Los Angeles Superior Court Case No. 21STCV18414*
- *Issa Sakhel v. One World Beef LLC San Diego Superior Court Case No. 37-2021-00043571-CU-OE-NC*
- *Christina Zamora v. Fresno Community Hospital Medical Center Fresno Superior Court Case No. 20CECG01220*