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13 *Attorneys for Plaintiffs and the Certified Class*

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA

15 COUNTY OF SAN DIEGO

16 **FRANCESCA O'CONNOR** and **TATYANA**
17 **CHALIK**, individually and on behalf of all others
similarly situated,

18 Plaintiffs,

19 vs.

20 **HRL LABORATORIES, LLC**, a Delaware
Limited Liability Company,

21 Defendant.
22
23

Case No.: 37-2022-00048942-CU-OE-CTL

**DECLARATION OF WILLIAM JHAVERI-
WEEKS IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY APPROVAL
OF CLASS AND REPRESENTATIVE
ACTION SETTLEMENT**

Date: January 16, 2026

Time: 9:00 a.m.

Dept: C-67, Judge Michael T. Smyth

Complaint Filed: December 7, 2022

Trial Date: None Set

1 I, William C. Jhaveri-Weeks, declare as follows:

2 **I. INTRODUCTION**

3 1. I am over the age of 18 and have personal knowledge of the facts set forth in this
4 declaration and could and would testify competently to them.

5 2. I am a member in good standing of the Bars of the States of California and New York.

6 3. I am the owner of The Jhaveri-Weeks Firm, P.C. Along with the law firm HammondLaw,
7 P.C., I am Class Counsel for the named Plaintiffs and the certified class of 700 employees of Defendant
8 HRL Laboratories, LLC ("HRL") in California who worked remotely at any point between March 13,
9 2020, and February 28, 2022 ("Class Members").

10 4. I have no knowledge of the existence of any conflict of interest between Class Counsel
11 and Plaintiff, on the one hand, and any Class Member, on the other hand.

12 5. I have no knowledge of the existence of any conflict of interest between Class Counsel
13 and the Settlement Administrator ILYM Group, Inc.

14 6. I am not aware of any other pending matter or action asserting claims that will be
15 extinguished or adversely affected by the Settlement.

16 7. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class
17 and Representative Action Settlement.

18 **II. ATTORNEY EXPERIENCE**

19 8. I graduated from law school in 2007, was admitted to practice in New York in 2008, and
20 have been practicing continuously (other than a one-year judicial clerkship) in the nearly 18 years since
21 I was admitted. I relocated to California in 2013 and was admitted to the California Bar that year. Since
22 2013, I have devoted nearly all of my practice to representing employees in employment cases, with a
23 large percentage of my practice consisting of representing employees in class and other group actions
24 involving wage and hour violations.

25 9. I founded The Jhaveri-Weeks Firm, P.C. (initially called Jhaveri-Weeks Law) in San
Francisco, California, in 2018. We focus almost exclusively on representing plaintiffs in individual and
class action employment law cases. Since founding the firm, I have been appointed by courts as class
counsel in *O'Connor v. HRL Laboratories, LLC*, 37-2022-00048942-CU-OE-CTL (San Diego Cty.
Super. Ct.) (class counsel for 700 employees in expense reimbursement case); *Daniel v. Mars Wrigley
Confectionery US, LLC*, CVRI2204632 (Riverside County) (\$1.8 million settlement approved in 2024 in
outside sales misclassification case for 56 California and approximately 218 non-California employees);
Foster v. Embry-Riddle University, Inc., CVRI2202995 (Riverside Cty. Super. Ct.) (\$559,483 settlement

1 approved in 2024 for approximately 123 part-time adjunct instructors in misclassification case); *Harris*
2 *v. Southern New Hampshire Univ.*, RG21109745 (Alameda Cty. Super. Ct.) (\$1,475,000 settlement
3 approved in 2023 for approximately 475 adjunct instructors in misclassification case); *Burleigh v. Walden*
4 *University et al.*, RG21106062 (Alameda Cty. Super. Ct.) (\$815,000 settlement approved in 2022 for
5 approximately 235 part-time adjunct instructors in misclassification case); *Senese v. University of San*
6 *Diego*, 37-2019-00047124-CU-OE-CTL (San Diego Cty. Super. Ct.) (approximately \$3.8 million
7 settlement approved in 2022 for over 2,000 adjunct instructors in misclassification case), *Ott v. Cal.*
8 *Baptist Univ.*, RIC 1904830 (Riverside Cty. Super. Ct.) (\$700,000 settlement approved in 2021 for over
9 900 adjunct instructors in misclassification case), and *Hoyle Zuta v. Fuzzy Pet Health, Inc.*, CGC-19-
579373 (S.F. Cty. Super. Ct.) (\$150,000 class settlement for 20 veterinary assistants in misclassification
case).

10 10. Before starting my firm nearly eight years ago, I was a partner at Goldstein, Borgen,
11 Dardarian & Ho (“GBDH”), a plaintiff-side class action firm in Oakland, California. GBDH is a
12 pioneering class action firm that has been operating for nearly 50 years (although its name has changed
13 during that time). While there, I was appointed class counsel, along with other attorneys at the firm, in
14 at least five class actions in California, including *Talamantes v. PPG Industries, Inc.*, 13-cv-4062-WHO
15 (N.D. Cal.) (California class and nationwide collective of Business Development Representatives
16 allegedly misclassified as exempt from overtime; settled for \$5 million); *Willey v. Techtronic Indus. N.A.*,
17 RG 16806307 (Alameda Cty. Super. Ct.) (off-the-clock claims on behalf of California class of Sales
18 Representatives; settled for \$3.5 million); *In re Uber FCRA Cases*, 14-cv-5200-EMC (background check
19 violation case on behalf of class of drivers; settled for \$7.5 million); *Garcia v. PPG Industries, Inc.*, 15-
20 cv-319-WHO (N.D. Cal.) (California class of employees whose non-discretionary bonus pay was not
21 factored into their overtime rates; settled for \$500,000); *Munguia-Brown v. Equity Residential et al.*, 16-
22 cv-1225-JSW (certified class of tens of thousands of tenants challenging late fee charges under California
23 law – individual attorneys not named as class counsel, but I authored the motion for class certification).

24 11. Before joining GBDH, I was an associate at a Bay Area plaintiffs’ employment law firm
25 for two years, where I was heavily involved in representing classes of employees in a range of wage and
hour cases.

12 12. Prior to that, I practiced at the law firm Debevoise & Plimpton LLP in New York for four
13 years. There, I handled high-stakes complex litigation and arbitration, including class action defense. I
14 served as a law clerk in 2008-09 for the Honorable R. Guy Cole Jr. on the U.S. Court of Appeals for the
15 Sixth Circuit.

1 13. I graduated from New York University School of Law in 2007, *magna cum laude* and
2 Order of the Coif, and from Yale College in 2002, *cum laude* and with distinction in my major.

3 14. I regularly speak and publish on developing issues in litigation, with a focus on
4 employment class actions. In recent years, I have published many articles related to employment class
5 actions in *Plaintiff Magazine* and Continuing Education for the Bar (“CEB”). Previously, I published
6 articles in Lexis Practice Advisor, Law360, and the Georgetown Journal on Poverty Law and Policy
7 (addressing the difference between federal class and collective action certification standards; cited by the
8 U.S. Second Circuit Court of Appeals in a published decision). I have served as a panelist at CLE
9 presentations sponsored by the San Francisco Trial Lawyers Association, CEB, the Bar Association of
10 San Francisco, the National Employment Lawyers Association, the California Employment Lawyers
11 Association, Strafford CLE, and Bridgeport CLE, most often discussing developments in employment
12 law and/or class actions.

13 15. The Jhaveri-Weeks Firm, P.C. has been recognized by the “Best Law Firms” publication
14 (previously affiliated with U.S. News & World Report) in the area of Labor and Employment law (2022-
15 2025 editions) for San Francisco (currently rated as a “Tier 1” firm in that practice area). I have been
16 recognized as a Northern California Super Lawyer for the past four years, and as a “Rising Star” for four
17 years before that. I have also been recognized by other publications that rate attorneys.

18 16. I have been assisted in this case by associate attorney Sarah Abraham. Ms. Abraham
19 received her J.D. from Harvard Law School in 2017, and her B.A. from U.C. Berkeley in 2013, *magna*
20 *cum laude*. Before joining my firm in 2022, she practiced employment law and housing law at
21 Community Legal Services in East Palo Alto. Ms. Abraham also served as a councilmember for the
22 Santa Clara County Office of Labor Standards Enforcement (OLSE)’s Retail Food Advisory Council,
23 where she advised the OLSE on employment law. Ms. Abraham has published articles in *Plaintiff*
24 *Magazine* and the *Daily Journal* on employment law topics, and is a chapter update author for CEB’s
25 *Advising California Employers and Employees* publication. She has presented on COVID-19-related
employment law updates to the San Mateo County Department of Public Health and other organizations,
has been a guest lecturer at the Legal Aid at Work Workers’ Rights Clinic at UC Law SF (formerly
Hastings College of Law), and served as a panelist on the topic of employment law at a CLE presentation
sponsored by the National Arab American Bar Association. Ms. Abraham also serves as a volunteer
supervising attorney for the Santa Clara University School of Law’s Worker’s Rights Clinic and the
Legal Aid at Work Workers’ Rights Clinic. She was selected as a “Rising Star” in employment litigation

1 by Northern California Super Lawyers for the past three years. Ms. Abraham is admitted to practice in
2 California.

3 17. My co-counsel in this case, Julian Hammond of HammondLaw, is submitting a declaration
4 herewith describing his firm's extensive experience in handling class actions, particularly representing
5 adjunct instructors. *See* Decl. of Julian Hammond ISO Pls.' Mot. for Prelim. Approval of Class Action
Settlement ("Hammond Decl.") at ¶¶ 8-9 & Ex. 1 thereto.

6 18. Class Counsel's broad collective experience in the prosecution and resolution of wage and
7 hour class action litigation enabled us to competently represent Class Members, assess the value of the
claims, and obtain an excellent settlement.

8 19. The Settlement is fair, reasonable and adequate when considering the lengthy delays that
9 further litigation would entail.

10 **III. LODESTAR**

11 20. To date, my firm has spent 852 hours on this case. My firm's current lodestar is
12 \$564,205.00. This includes time spent on the following tasks: factual investigation prior to filing the
13 complaint, preparation of pleadings, drafting and responding to written discovery, preparing for and
14 taking the PMK deposition, defending the named Plaintiffs' depositions, drafting the class certification
motion, opposing Defendant's de-certification motion, preparing for and attending mediation, reviewing
and negotiating the SA, and preparing the preliminary approval papers, among other tasks.

15 I declare under penalty of perjury under the laws of the United States and the State of California
16 that the foregoing is true and correct. Executed on December 23, 2025 at San Francisco, CA.

17 
18 William C Jhaveri-Weeks