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SETAREH LAW GROUP

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BREANA DAUGHERTY
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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF SAN MATEO**

12 **CIVIL COMPLEX DEPARTMENT**
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14 SOLARCITY WAGE AND HOUR CASES,
15 Coordination Proceeding
16 Special Title (CRC Rule 3.550)
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Pursuant to Judicial Council Coordination
Proceedings No. JCCP 4945

[*Daugherty v. Solarcity Corporation*, Northern
District of California, Case No. 3:16-cv-05155-
WHA]

Department 2, Hon. Marie S. Weiner
Assigned Coordination Trial Judge

**DECLARATION OF SHAUN SETAREH
IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

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1 closing shifts).

2 b. *Padilla v. UPS*, U.S. District Court, Central District of California, Case No.
3 08-CV-1590 (granted final approval in a case involving claims for failure to provide meal periods to
4 part time employees engaged in sort operations and failure to pay final wages in a timely manner to
5 terminated employees).

6 c. *Vang v. Burlington Coat Factory Warehouse Corp.*, U.S. District Court,
7 Central District of California Case No. 09-CV-8061 (granted final approval in a case involving,
8 among other things, vacation pay forfeitures, failures to provide meal and rest periods, and failures to
9 pay overtime wages based on employee misclassification).

10 d. *Garcia v. Am. Gen. Fin. Mgmt. Corp.*, U.S. District Court, Central District of
11 California, Case No. 09-CV-1916 (granted final approval in a case filed on behalf of account
12 managers in case involving, among other things, alleged overtime miscalculations and meal and rest
13 period violations).

14 e. *O'Neill v. Genesis Logistics, Inc.*, U.S. District Court, Northern District of
15 California, Case No. 08-CV-4707 (granted final approval in a case involving claims for failure to
16 provide meal periods to employees who worked as drivers delivering goods to 7-11 stores throughout
17 California and failure to pay final wages in a timely manner to terminated employees).

18 f. *Spokes v. Lush Cosmetics, LLC*, Los Angeles Superior Court, Case No.
19 BC391397 (granted final approval in a case alleged failures to provide meal and rest periods and
20 failure to timely pay all final wages to California sales associates and key holders).

21 g. *Green v. Staples Contract and Commercial, Inc.*, Los Angeles Superior Court,
22 Case No. BC389789 (granted final approval in a case involving claims for unprovided meal and rest
23 periods, inaccurate wage statements, waiting time penalties, and unfair business practices on behalf
24 of truck drivers delivering Staples office supplies in California).

25 h. *Green v. Universal Music Group*, Los Angeles Superior Court, Case No.
26 BC374253 (granted final approval in a case involving misclassification claims of current or former
27 IT Support employees, including engineers, server analysts, desktop support, and technical leads).

28 i. *Jones v. Shred-It USA, Inc.*, U.S. District Court, Central District of California,

1 Case No. 11-CV-00526 (granted final approval in a case brought on behalf of customer service
2 representatives and balers for alleged off-the-clock work and meal and rest period violations).

3 j. *Alvarez v. Gary Grace Enterprises, LP*, Marin Superior Court, Case No. CIV
4 1002553 (granted final approval in a case on behalf of hair salon employees for overtime
5 miscalculation and related claims).

6 k. *Calderon v. GreatCall, Inc.*, San Diego Superior Court, Case No. 37-2010-
7 00093743-CU-OE-CTL (granted final approval in a case on behalf of customer service employees
8 for, among other things, alleged meal and rest period violations and overtime calculation errors).

9 l. *Jones v. Shred-It USA, Inc.*, U.S. District Court, Central District of California,
10 Case No. 11-CV-00526 (granted final approval in a case brought on behalf of customer service
11 representatives and balers for alleged off-the-clock work and meal and rest period violations).

12 m. *Calderon v. GreatCall, Inc.*, San Diego Superior Court, Case No. 37-2010-
13 00093743-CU-OE-CTL (granted final approval in a case on behalf of customer service employees
14 for, among other things, alleged meal and rest period violations and overtime calculation errors).

15 n. *Douglas v. California Credit Union*, Los Angeles Superior Court, Case No.
16 BC445050 (granted final approval in a case on behalf of customer service representatives alleging
17 overtime miscalculation claims).

18 o. *Cerdenia v. USA Truck, Inc.*, U.S. District Court, Central District of California,
19 Case No. 10-CV-1489-JVS (granted final approval in an action on behalf of truck drivers for meal
20 and rest period violations, off-the-clock pre- and post-shift work, and unauthorized wage deductions).

21 p. *Butler v. Lexxiom, Inc.*, San Bernardino Superior Court, Case No. CIVRS
22 1001579 (granted final approval in an action on behalf of debt resolution center employees alleging,
23 among other things, meal and rest period violations and overtime calculation errors).

24 q. *Valencia v. SCIS Air Security Corp.*, Los Angeles Superior Court, Case No.
25 BC421485 (granted class certification through contested motion in case on behalf of former security
26 workers based on late final wage payments in violation of Labor Code §§ 201–203; subsequently
27 granted preliminary approval of proposed class action settlement).

28 r. *Sandoval v. Rite Aid Corp.*, Los Angeles County Superior Court, Case No.

BC431249 (granted class certification through contested motion in case on behalf of former pharmacy employees based on late final wage payments in violation of Labor Code §§ 201–203; subsequently granted final approval of class action settlement).

7. I received my undergraduate degree at UCLA in 1996 and my law degree from Loyola Law School in 1999. Since being admitted to the State Bar of California in 1999, I have actively practiced civil litigation for the entirety of that time period.

Attorneys' Fees

8. Setareh Law Group prosecuted this matter on a contingent basis meaning that if the case were unsuccessful the firm would have received no compensation or reimbursement of costs. The time spent on the litigation took a considerable amount of time and effort that could have been spent on other fee generating work.

9. I have reviewed the work performed on the case and the billing entered by the attorneys working on this case at my firm. The table below includes a summary of all the hours worked. My firm's lodestar is presently \$92,295.

Attorney	Experience	Rate/Hour	Hours	Total
Shaun Setareh	18	\$750	26.9	\$20,175
H. Scott Leviant	18	\$675	20.9	\$14,107.50
Thomas Segal	16	\$650	28.1	\$18,265
William M. Pao	16	\$450	4.15	\$1,867.50
Farrah Grant	5	\$425	65.1	\$27,667.50
Stacey Shim	3	\$375	14.4	\$5,400
Lilit Ter-Astvatsatryan	Newly Admitted	\$350	13.75	\$4,812.50
TOTAL				\$92,295

10. The work done by Setareh Law Group includes drafting pleadings, propounding written discovery, responding to written discovery, filing an opposition to Defendant's motion to compel arbitration, filing an opposition to Defendant's motions to dismiss, traveling to and attending oral argument for the motion to compel arbitration and motion to dismiss, filing a discovery letter regarding discovery disputes, traveling to and attending a discovery hearing in court, filing a motion for leave to file a second amended complaint, and preparing for mediation.

11. Setareh Law Group incurred costs in the amount of \$10,366.74. The total expenses include filing charges, travel expenses, photocopying charges, and postage.

1 I declare under the penalty of perjury of the laws of the State of California that the foregoing
2 is true and correct to the best of my knowledge.

3 Executed on Thursday, January 03, 2019 at Beverly Hills, California.

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6 SHAUN SETAREH
7 Declarant
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