

JAMES HAWKINS APLC
James R. Hawkins, Esq. (#192925)
Gregory Mauro, Esq. (#222239)
Michael Calvo, Esq. (#314986)
9880 Research Drive, Suite 200
Irvine, CA 92618
Tel.: (949) 387-7200
Fax: (949) 387-6676
Email: James@jameshawkinsaplc.com
Email: Greg@jameshawkinsaplc.com
Email: Michael@jameshawkinsaplc.com

Attorneys for Plaintiffs and the Putative Classes
[Additional counsel on following page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

QUINCY GRIFFIN PERKINS, JOSE
JOHNSON, IGNACIO PARKS, AND
TIWAN JOHNSON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

HADCO METAL TRADING SANTA FE
SPRINGS CA dba RYDER
INTEGRATED
LOGISTICS INC.: and DOES 1-50,
inclusive,

Defendants.

Lead Case No. 3:23-cv-00502-WHO
[Consolidated for all purposes with Case
No. 3:23-cv-01694-WHO & Case No.
4:22-cv-07456-JST]

[Assigned to the Honorable William H.
Orrick]

FRCP RULE 23 CLASS ACTION

**DECLARATION OF JOSHUA
FALAKASSA IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT**

FALAKASSA LAW, P.C.

Joshua S. Falakassa, Esq. (Bar No. 295045)

josh@falakassalaw.com

1901 Avenue of the Stars, Suite 450

Los Angeles, California 90067

Tel: (818) 456-6168; Fax: (888) 505-0868

BOKHOUR LAW GROUP, P.C.

Mehrdad Bokhour, Esq. (Bar No. 285256)

mehrdad@bokhourlaw.com

1901 Avenue of the Stars, Suite 450

Los Angeles, California 90067

Tel: (310) 975-1493; Fax: (310) 675-0861

Attorneys for Plaintiffs and the Putative Class

DECLARATION OF JOSHUA FALAKASSA

I, Joshua Falakassa, say and declare as follows:

1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California. I am the principal of Falakassa Law, PC, and I serve as attorney of record, along with my co-counsel, for Plaintiffs Quincy Griffin Perkins, Jose Johnson, Ignacio Parks, and Tiwan Johnson (collectively, “Plaintiffs”) and the Putative Class.

2. I am familiar with the file in this matter, and if called as a witness, I could and would competently testify to the following facts.

3. I have no knowledge of the existence of any conflicting interests between my firm and our co-counsel, The Bokhour Law Group, PC, James Hawkins, APLC, on the one hand, and Plaintiffs or any other Class Member, on the other.

4. I submit this declaration in support of the Plaintiffs’ Motion for Final Approval of the Class Action Settlement and Request Attorneys’ Fees and Costs.

5. The Court has preliminarily approved the class action settlement between Plaintiffs and Defendants (collectively, the “Parties”), and the notice and settlement administration process as set forth in the Court Order granting preliminary approval of class action settlement (the “PA Order”) and the Class Action and PAGA Settlement Agreement (the “Settlement” or “Settlement Agreement”) is ongoing.

6. Plaintiffs now seek approval of Class Counsel’s award of attorneys’ fees in the amount of 33.33% of the Settlement amount (*i.e.*, \$983,333.33) to be shared amongst the three (3) law separate law firms representing the Plaintiffs and the Class.

7. I have been a member, in good standing, of the State Bar of California since 2012. I am admitted to practice before all California state courts, the United States Ninth Circuit Court of Appeal, and the United States District Court for each District of California, and I have litigated class action and Private Attorney General Act (“PAGA”) representative action cases in various courts in California.

1 8. I have been a member, in good standing, of the State Bar of California
2 since 2013. I am admitted to practice before all California state courts, and the
3 United States District Court of California for the Central, Northern, and Eastern
4 Districts and have litigated class action and Private Attorney General Act (“PAGA”)
5 representative action cases in various courts across California.

6 9. I graduated with a Bachelor of Arts with a major in History and a Minor
7 in Public Affairs from the University of California, Los Angeles (“UCLA”) in 2009.
8 I received my J.D. from University of California, Berkeley, School of Law
9 (“Berkeley Law”) in 2013 and became a member of the California State Bar in
10 December 2013.

11 10. During law school, I successfully completed courses in Labor Law,
12 Employment Discrimination and Labor/Employment Arbitrations. I also served as a
13 summer associate at Sanford, Wittels and Heisler LLP, a boutique plaintiffs’ side
14 employment law firm focusing on FMLA wage and hour class action litigation, and
15 other public interest lawsuits. As a second-year law student, I served as a summer
16 associate at the San Francisco office of Littler Mendelson, P.C., I aided employers
17 in defending wage and hour class action lawsuits filed under California and federal
18 law.

19 11. From August 2018-January 2019, I served as an associate at the Paul
20 Haines Law Group, where I actively managed a caseload of more than 50 wage and
21 hour class and PAGA action lawsuits in California and federal courts.

22 12. Thereafter, as principal of Falakassa Law, P.C., I have handled over
23 100 employee vs. employer litigation matters, including more than 60 class action
24 wage/hour and PAGA cases. Over the last few years, my practice has almost entirely
25 consisted of representing employees, the majority of which has included class action
26 and representative action wage and hour matters.

27 13. Below is a non-exhaustive list of the cases which I was appointed Class
28 and/or PAGA Counsel:

- 1 • San Bernardino County Superior Court, CIVSB2133520, *Wilquin*
2 *Orozco v. Taylored Services, LLC*;
- 3 • Santa Clara County Superior Court, 21CV386657, *Brandon Moore, an*
4 *individual, on behalf of the State of California, as a private attorney*
5 *general, and on behalf of all others similarly situated v. Pure Storage*
6 *Inc.*; CVRI2101452;
- 7 • Riverside County Superior Court, Case No. 0029574, *Sergio Enriquez*
8 *Jr., on behalf of himself and all others similarly situated v. Shipbob Inc*;
- 9 • Sacramento County Superior Court, *Brynn Salvador Lopez Benavides*
10 *individually and on behalf of all others similarly situated v. Production*
11 *Framing Inc.*;
- 12 • Alameda County Superior Court, Case No. RG21088637, *Orlando*
13 *Camp, on behalf of himself and all others similarly situated v. Matson*
14 *Logistics Warehousing Inc*;
- 15 • Sacramento County Superior Court, Case No. 00291534, *Rebecca*
16 *Gibson on behalf of herself and all others similarly situated v. Syblon*
17 *Reid Construction Inc.*;
- 18 • Alameda County Superior Court, Case No. RG20080657, *Jonathan*
19 *Buckner, on behalf of himself and all others similarly situated v. Xpress*
20 *Global Systems LLC.*;
- 21 • Stanislaus County Superior Court, *Patrick B. Farley on behalf of*
22 *himself and all others similarly situated v. Bimbo Bakeries USA Inc.*;
- 23 • Alameda County Superior Court, Case No. RG20063636, *Zirl Wilson,*
24 *on behalf of himself and all others similarly situated v. TCG Oakland*
25 *LLC; NWLA Delivery Inc.*;
- 26 • Riverside County Superior Court, Case No. RIC2001892, *Christopher*
27 *Joe Becerra, on behalf of himself and all others similarly situated v.*
28 *Luxfer Inc.*;

- 1 • Orange County Superior Court, Case No. 30-2020-01140863-CU-OE-
2 CXC, *Manuel A. Villanueva v. Leach International corporation*;
- 3 • Sacramento County Superior Court, Case No. 00279448, *Nicholas B.*
4 *Toy on behalf of himself and all others similarly situated v. Myers &*
5 *Sons Construction LLC; Myers & Sons LP*;
- 6 • Alameda County Superior Court, Case No. RG20061789, *Deborah*
7 *Churchill, an individual, on behalf of the State of California, as a*
8 *private attorney general, and on behalf all others similarly situated v.*
9 *MK Marketing LLC*;
- 10 • Solano County Superior Court, Case No. FCS054576, *Thomas*
11 *Anderson Doty, on behalf of himself and all others similarly situated v.*
12 *Underground Construction Co. Inc.*;
- 13 • San Francisco County Superior Court Case No. CIVDS2006687,
14 *Counselo Jasso Ayala v. Fabfitfun, Inc; et al.*;
- 15 • Sacramento County Superior Court, Case No. 00272761, *Shaun*
16 *Brasier individually and on behalf of all others similarly situated v.*
17 *Valdez Painting Inc.*;
- 18 • Sacramento County Superior Court, Case No. 00272729, *Randy L. Hoff*
19 *individually and on behalf of all others similarly situated v. Dependable*
20 *Highway Express Inc.*;
- 21 • Solano County Superior Court, Case No. FCS054121, *Robert Earl*
22 *Mann, on behalf of himself and all others similarly situated v. Altec*
23 *Industries Inc.*;
- 24 • Sacramento County Superior Court Case No. 00269947, *Gary Sifuentes*
25 *individually and on behalf of all others similarly situated v. Roofline*
26 *Inc. dba Roofline Supply & Delivery*;
- 27 • Alameda County Superior Court, Case No. RG19038041, *Kevin Cistian*
28 *Bautista, an individual, on behalf of the State of California, as a private*

1 *attorney general, and on behalf of all others similarly situated v.*
2 *Builder Services Group Inc.;*

- 3 • Sacramento County Superior Court, Case No. 00262122, *Sajida Zaman*
4 *individually and on behalf of all others similarly situated v. Liqui-Box*
5 *Corp.;*
- 6 • Alameda County Superior Court, Case No. RG19013755 *Carla Bran*
7 *Hernandez, on behalf of herself and all others similarly situated v.*
8 *Screen-Tech Inc.*

9 14. I was selected as a “Super Lawyer Rising Star” in Employment
10 Litigation during the years 2017, 2018 and 2019, 2020, 2021, 2022, 2023, 2024, a
11 distinction that is reserved for the top 2.5% of lawyers in the practice area. I was
12 also recognized by TopVerdicts.com for obtaining several of the highest wage and
13 hour class and PAGA action settlements in the State of California.

14 15. As set forth above, I have handled upwards of 90 class and representative
15 actions, have been appointed as class counsel and have successfully litigated and
16 resolved several class actions, and many others remain pending.

17 16. My firm has the experience, resources, and means necessary to allow
18 us to provide adequate representation to all Settlement Class Members in this
19 Action.

20 17. As co-counsel in this matter, I initially undertook an active role in
21 prosecuting the case on behalf of my client, Plaintiff Ignacio Parks. Subsequently, I
22 also retained Plaintiff Tiwan Johnson, who was added as an additional Class
23 Representative. My involvement has included conducting a thorough investigation
24 of the claims, which involved speaking with various putative class members,
25 interviewing Plaintiffs, collaborating closely with co-counsel, and engaging in
26 comprehensive research on relevant facts and legal theories. Additionally, I
27 participated in hearings, managed motion practice, and reviewed and analyzed both
28 formal and informal discovery. I also examined the documents and data produced in
preparation for mediation, actively participated in the settlement process, and

1 reviewed the Memorandum of Understanding (MOU), Settlement Agreement, and
2 motions for preliminary and final approval. Throughout the case, I remained involved
3 in ensuring a fair resolution on behalf of the class members.

4 18. My current billing rate is \$650 per hour, which is also usual and customary
5 for class action practitioners with my level of expertise and expertise.

6 19. A copy of my firm's itemized time records for this case is attached hereto
7 as Exhibit A. The table includes a summary of the hours worked on preparing my
8 declaration, plus an estimated 10 hours likely required to finalize and file the final
9 approval motion and any future tasks associated with completing the case.

10 20. I declare under penalty of perjury under the laws of California that the
11 foregoing is true and correct on this 31st day of October 2024, in Los Angeles,
12 California.

13 By: _____

14 Joshua Falakassa
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

Time Records

9/27/22	Joshua Falakassa	Client intake, document review, , and discuss potential next steps with co counsel and staff	2.3	\$650	\$ 1,495.00	Investigations/Complaint
9/27/22	Joshua Falakassa	Draft lettter requesting personnel file and payroll records	0.3	\$650	\$ 195.00	Investigations/Complaint
10/14/22	Joshua Falakassa	Draft and review LWDA PAGA Notice Letter and discuss facts/theory with client and co-counsel	1	\$650	\$ 650.00	Investigations/Complaint
10/18/22	Joshua Falakassa	Draft/Edit Class Action Complaint and supporting documents (summons, civil case cover sheet, etc.)	1.3	\$650	\$ 845.00	Investigations/Complaint
10/27/22	Joshua Falakassa	Call with client and review and analyze payroll and personnel records.	1.5	\$650	\$ 975.00	Investigations/Complaint
11/22/22	Joshua Falakassa	Review Aanswer to Complaint and assess Affirmative Defenses	0.8	\$650	\$ 520.00	Investigations/Complaint
11/23/22	Joshua Falakassa	Analyze/Review Defendant's Notice of Removal to Federal Court and Exhibits, Declartaions; Analyze potential for Remand	1.2	\$650	\$ 780.00	Federal Complaint
3/3/23	Joshua Falakassa	Reivew Court's Order and research requirements in anticipation of meet and confer with opposing counsel regarding Rule 26(f) report.	2.3	\$650	\$ 1,495.00	Federal Complaint
3/7/23	Joshua Falakassa	Draft/edit Rule 26(f) Report	0.8	\$650	\$ 520.00	Federal Complaint
3/15/23	Joshua Falakassa	Review Analyze Court's Scheduling Order	0.3	\$650	\$ 195.00	Federal Complaint
3/15/23	Joshua Falakassa	Research and investigatation in preparation for drafting First Amended Class and PAGA Action Complaint; speak to client	1.4	\$650	\$ 910.00	Federal Complaint
3/21/23	Joshua Falakassa	Review/Anaylze Defendant's Initial Disclosures.	0.3	\$650	\$ 195.00	Federal Complaint
3/28/23	Joshua Falakassa	Review Defendant's Requests for Production, and Rogs to Plaintiff; prepare email to client	1.8	\$650	\$ 1,170.00	Discovery
4/21/23	Joshua Falakassa	Review Defendant's Notice of Related Cases; investigate related cases and consuk=lt with co-counsel	1.2	\$650	\$ 780.00	Investigations/Complaint
4/25/23	Joshua Falakassa	Draft/Edit Plaintiff's First Set of Written Discovery	3.4	\$650	\$ 2,210.00	Discovery
4/27/23	Joshua Falakassa	Draft/Edit Plaintiffs' responses to Defendant's Rogs and RFPs, Set one; confer with client, send email.	4.1	\$650	\$ 2,665.00	Discovery
6/1/23	Joshua Falakassa	Conduct legal research re removal jurisdictionl, and meet and confer regarding status of removal	1.4	\$650	\$ 910.00	Investigations/Complaint
6/3/23	Joshua Falakassa	Review/Analyze meet and confer letter regarding Plaintiffs' discovery responses; set up meeting with client and send email to client.	0.6	\$650	\$ 390.00	Discovery
6/16/23	Joshua Falakassa	Draf/Edit and Finalizet Case Management Conference Statement : discuss with co-counsel	1	\$650	\$ 650.00	Federal Complaint
7/19/23	Joshua Falakassa	Draft/Edit and Finaluze linformal Discovery Requests in advance of mediation	0.9	\$650	\$ 585.00	Informal Discovery
7/27/23	Joshua Falakassa	Review/Analyze Defendant's Informal Discovery Requests; speak with clients and send email.	1.1	\$650	\$ 715.00	Informal Discovery
9/15/23	Joshua Falakassa	Meet and confer with counsel in re. Joint Case Mmanagement Conference Statement.	1.2	\$650	\$ 780.00	Federal Complaint
9/15/23	Joshua Falakassa	Draft/Edit and Finalize Joint Case Management Conference Statement.	1	\$650	\$ 650.00	Federal Complaint
9/22/23	Joshua Falakassa	Review and Analyze Defendant's Notice of Related Cases and investigate related cases and discuss with co-counsel.	0.5	\$650	\$ 325.00	Federal Complaint
9/22/23	Joshua Falakassa	Review/Analyze Documents Produced by Defendants in anticipation of Mediation.	1.3	\$650	\$ 845.00	Informal Discovery
10/11/23	Joshua Falakassa	Client intake with potential new Class Representative.	1	\$650	\$ 650.00	Investigations/Complaint
10/12/23	Joshua Falakassa	Discuss with co counsel to add additional representative.	0.3	\$650	\$ 195.00	Investigations/Complaint
10/12/23	Joshua Falakassa	Follow up call with new class representative; send follow up email in re agreement and documents for case.	0.5	\$650	\$ 325.00	Investigations/Complaint
10/12/23	Joshua Falakassa	Review/Analyze Second Set of Documents Produced by Defendants in anticipation of Mediation	3.2	\$650	\$ 2,080.00	Informal Discovery
10/18/23	Joshua Falakassa	Draft Mediation Brief; call clients to obtain information; discuss mediation brief with co-counsel.	4.7	\$650	\$ 3,055.00	Mediation/Settlement
10/19/23	Joshua Falakassa	Draft/Edit and Finalize, and submit mediation brief; conduct legal research and factual investigation	2.3	\$650	\$ 1,495.00	Mediation/Settlement
10/20/23	Joshua Falakassa	Review/Analyze Defendant's Mediation Brief in preparation for mediation; call client for update and questions.	1.9	\$650	\$ 1,235.00	Mediation/Settlement
10/23/23	Joshua Falakassa	Review/Analyze Final Set of Documents Produced by Defendants in anticipation of Mediation	2.6	\$650	\$ 1,690.00	Informal Discovery
10/24/23	Joshua Falakassa	Attend mediation.	10	\$650	\$ 6,500.00	Mediation/Settlement
	Joshua Falakassa	Draf/Edit and Finalizet Joint Case Management Conference Statement.	0.4	\$650	\$ 260.00	Federal Complaint
12/12/23	Joshua Falakassa	Draft/Edit Memorandum of Understanding	1.3	\$650	\$ 845.00	Mediation/Settlement
12/13/23	Joshua Falakassa	Review Memorandum of Understanding with clients; send follow up email.	2	\$650	\$ 1,300.00	Mediation/Settlement
2/21/24	Joshua Falakassa	Draft/Edit Class Action Ssettlement Agreement; class notice and other documents; call with clients re. the same	2.9	\$650	\$ 1,885.00	Mediation/Settlement
2/22/202	Joshua Falakassa	Review settlement agreement with clients.	3.1	\$650	\$ 2,015.00	Mediation/Settlement
4/8/24	Joshua Falakassa	Review/Edit stipulation to amended settlement agreement.	0.4	\$650	\$ 260.00	Mediation/Settlement
4/10/24	Joshua Falakassa	Call with clients to obtain declarations and discuss settlement	1.2	\$650	\$ 780.00	Motion for Preliminary Approval

Time Records

4/10/24	Joshua Falakassa	Draft and finalize Plaintiff's 'Declarations in Support of Preliminary Approval	1.3	\$650	\$ 845.00	Motion for Preliminary Approval
6/30/24	Joshua Falakassa	Revie/Anlayze Aamended Settlement Agreement with clients and co-counsel; send email to clients	1.6	\$650	\$ 1,040.00	Mediation/Settlement
	Joshua Falakassa	Draft, Edit and Review Motion for Final Approral and supporting documents	2.2	\$650	\$ 1,430.00	Motion for Preliminary Approval
	Joshua Falakassa	<i>Estimated:</i> work with team to finalize matter	10	\$650	\$ 6,500.00	Est. Future Work
Subtotals for Joshua Falakassa			85.9		\$ 55,835.00	