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9 Attorneys for Plaintiffs PHILLIP BERNAL and TRUHILL NOEL,
10 on behalf of themselves and all others similarly situated.

11 *[Additional Counsel listed on following page]*

12 **SUPERIOR COURT OF CALIFORNIA**

13 **COUNTY OF SAN BERNARDINO**

14 PHILLIP BERNAL, TRUHILL NOEL,
15 KHYELL MARTIN, DAMIEN
16 MCNORTON, WADDIE EARNEST,
17 GILBERT ESTRADA, CARMEN
18 HERNANDEZ, and WENDY QUINTERO,
19 individually, on behalf of themselves and all
20 others similarly situated,

21 Plaintiffs,

22 vs.

23 EXPRESS MESSENGER SYSTEMS, INC.,
24 dba ONTRAC, a Minnesota Corporation,
25 ONTRAC LOGISTICS, INC., a Delaware
26 Corporation, and DOES 2-10, Inclusive,

27 Defendants.
28

Case No. CIVSB2319614

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Joseph Ortiz

Department S-17

**DECLARATION OF JESSICA L.
CAMPBELL IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: July 21, 2026

Time: 1:30 p.m.

Dept.: S-17

1
2 **UNITED EMPLOYEES LAW GROUP**

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 Attorneys for Plaintiffs WENDY QUINTERO AND CARMEN HERNANDEZ

1 I, Jessica L. Campbell, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all the courts of the State of
3 California. I am a Partner at Aegis Law Firm, PC, counsel for Plaintiff Gilbert Estrada
4 (“Plaintiff”) in this matter. I am thoroughly familiar with and have personal knowledge of all
5 the facts set forth herein.

6 2. I submit this declaration in support of Plaintiff’s Motion for Final Approval of
7 Class Action Settlement (“Final Approval Motion”). If called as a witness, I could and would
8 competently testify thereto.

9 **Case History**

10 3. On January 17, 2024, Plaintiff Estrada filed a class action alleging wage and hour
11 claims.

12 4. On January 17, 2024, before adding a PAGA claim, Plaintiff provided written
13 notice to the LWDA and Defendant regarding Defendant's alleged Labor Code violations, as
14 required by Lab. Code § 2699.3(a). The LWDA did not respond to this notice, indicating it did not
15 intend to investigate, thus allowing Plaintiff to bring a PAGA claim against Defendant.

16 5. As part of the global settlement, Plaintiff Estrada was added to this case through
17 the filing of the Second Amended Complaint.

18 **Counsel’s Qualifications**

19 6. Aegis Law Firm prosecutes wage and hour cases, including class actions on
20 behalf of employees and others who have had their rights violated. Aegis, either on its own or
21 with co-counsel is currently serving as plaintiffs’ counsel of record in dozens of wage and hour
22 and employment class action cases pending in both state and federal court.

23 7. The attorneys working on this case have been appointed class counsel in many
24 cases, through both contested motions and settlement approval motions.

25 8. Aegis has litigated and successfully resolved many wage and hour class action
26 cases involving failure to pay wages and derivative Labor Code claims and penalties. *See, e.g.,*
27 *Calma v. Scooter Brew, Inc.*, San Diego Superior Court, Case No. 37-2021-00050379-CU-OE-
28 CTL (class certification granted on April 12, 2024 for non-exempt restaurant employees’ on issues

1 of expense reimbursement, unpaid wages for off-the-clock work, meal violations, inaccurate
2 wage statements and waiting time penalties); *Vinalay v. Union City Hotel Management Corp. et*
3 *al.*, Case No. 37-2019-00021268-CU-OE-CTL (class certification granted on April 4, 2022 for
4 non-exempt employees on issues of unpaid overtime, automatic meal period deductions,
5 inaccurate wage statements, and waiting time penalties); *Roman, et al. v. TRM Manufacturing,*
6 *Inc.*, Riverside Superior Court, Case No. RIC1706458 (class certification granted on December
7 17, 2020 for all current and former non-exempt workers' on issues of rounding, meal period, and
8 rest period claims); *Gamboa v. Kamran, et al.*, San Bernardino Superior Court, Case No.
9 CIVDS1605273 (class certification granted on September 16, 2019, for factory workers on issues
10 of rounding, automatic deduction of first meal period, and second meal period); *Romo, et. al, v.*
11 *GMRI, Inc. d/b/a/ Olive Garden*, United States District Court Central District of California, Case
12 No. EDCV-12-0715-JLQ (class certification granted for restaurant workers' rest period claims);
13 *Sawyer v. Retail Data, LLC*, Orange County Superior Court, Case No. 30-2014-00753767-CU-
14 OE-CXC (unpaid wage and rest break claims for piece rate workers); *Gonzalez v. SFFI*
15 *Company, Inc., et. al*, San Bernardino County Superior Court, Case No. CIV DS1504287 (unpaid
16 wages, meal period and rest break claims for non-exempt employees); *Antoine v. Riverstone*
17 *Residential California, Inc., et. al*, Sacramento County Superior Court, Case No. 34-2013-
18 00155974 (rate of pay, on-call time, unpaid wage, meal period, rest break, and expense
19 reimbursement claims for non-exempt employees); *Nguyen v. Pharmerica*, Orange County
20 Superior Court, Case No. 30-2014-00716072-CU-OE-CXC (unpaid wages and unreimbursed
21 expenses for pharmacists); *Orellana v. Westlake*, Los Angeles County Superior Court, Case No.
22 BC539614 (unpaid overtime, meal period and rest break claims for call center employees); *Kent*
23 *v. Mountain View Child Care, Inc.*, Los Angeles County Superior Court, Case No. BC539633
24 (minimum wage, overtime, meal period, and rest break claims for hospital workers); *Durroh v.*
25 *East West Bank*, Los Angeles County Superior Court, Case No. BC528860 (overtime claims for
26 failure to include bonuses in regular rate of pay for bank workers); *O'Brien et al. v. Pizza Hut of*
27 *Southeast Kansas, Inc. et al.*, Riverside County Superior Court, Case No MCC 1301030 (meal
28 period and expense reimbursement claims for delivery drivers); *Bell v. Prime Healthcare*,

1 Orange County Superior Court, Case No. 30-2011-00475240-CU-OE-CXC (overtime claims for
2 failure to include shift premiums in regular rate of pay and failure to provide meal and rest
3 periods to hospital workers), *Grana v. Toys R US-Delaware, Inc.*, Central District of California,
4 Case No. 2:13-cv-01302-DSF-JCG (bag check claims for unpaid wages and failure to provide
5 meal periods and rest breaks to retail employees); *Mendez v. H.J. Heinz Company, L.P., et. al.*,
6 Orange County Superior Court, Case No. 30-2013-00644915-CU-OE-CXC (failure to pay all
7 wages to factory workers due to rounding practice); *Fresh & Easy Wage and Hour Cases*, Los
8 Angeles Superior Court, Cas No. JCCP 4705 (failure to provide meal and rest periods to
9 supermarket workers); *Lunsford v Stater Bros.*, Riverside Superior Court, Case No. RIC
10 1104475 (failure to provide meal and rest periods to supermarket workers); *Gregg v. Belo*,
11 Riverside Superior Court, Case No. RIC 523697 (unpaid wages and missed meal and rest periods
12 due to misclassification of newspaper delivery employees); *Brown v. Experian Information*
13 *Solutions, Inc., et. al.*, Orange County Superior Court, Case No. 30-2012-00375163
14 (misclassification of engineers and similar positions); *Tereth v. Shakey's USA, Inc.*, Los Angeles
15 Superior Court, Case No. BC441359 (failure to provide meal and rest periods to restaurant
16 employees); *Azurin v. Harbor Distributing LLC, et. al.*, Los Angeles Superior Court, Case No.
17 BC421392 (failure to pay overtime wages, provide meal and rest periods, reimburse business
18 expenses to Account Managers); *Caffero v. ABC* (failure to provide meal periods and reimburse
19 expenses of therapists).

20 9. Samuel A. Wong is a graduate of University of Pennsylvania Law School, where
21 he received his J.D. in 2001. Mr. Wong received a Bachelors of Arts in Sociology from the
22 University of California at Berkeley in 1997.

23 10. After graduation from law school in 2001, the same year in which Mr. Wong took
24 and successfully passed the California Bar Exam, Mr. Wong moved to back to Los Angeles,
25 California where he was employed at Paul Hastings, Janofsky & Walker, LLP. While working
26 in the employment department at Paul Hastings, he was involved in numerous wage and hour
27 class action lawsuits and other employment related matters.

28

1 11. Mr. Wong became a founding partner of Aegis Law Firm, PC in 2003, and
2 focused his practice on plaintiff's side employment work. Throughout his years of practice, Mr.
3 Wong represented and obtained successful outcomes for his clients, including awards through
4 arbitration and trial.

5 12. Mr. Wong is a member of the Orange County Bar Association, Orange County
6 Trial Lawyers Association, and California Employment Lawyers Association.

7 13. Mr. Wong was chosen by Law and Politics Magazine as a Super Lawyer Rising
8 Star, representing one of the top 2.5% of lawyers under 40 in Southern California in 2011, 2012,
9 2013, and 2014. He was chosen by Law and Politics Magazine as a Super Lawyer in 2015, 2016,
10 2017, and 2018. Mr. Wong was also chosen as a Top Attorney in the field of employment law
11 by OC Metro in 2014, 2015, and 2018. Mr. Wong currently bills at a rate of \$950 per hour.

12 14. Kashif Haque received his J.D. in 2001 from Washington University School of
13 Law. While in law school, Mr. Haque was a member of the Law Review Editorial Board, author
14 of an article published in the Law Review, Executive Board Member of Moot Court, and a
15 member of the Dean's List. He received a Bachelor's of Science in Business Administration
16 from the University of Central Missouri in 1998, where he was a member of the Beta Alpha Psi
17 honors fraternity.

18 15. Since 2004, Mr. Haque has exclusively focused his practice on plaintiff's
19 employment litigation with a specific focus on wage and hour claims. Since then, he has
20 represented over 500,000 employees with their employment claims, many of which included
21 wage and hour claims. He has been appointed class counsel in approximately 100 cases and is
22 currently litigating over 150 employment wage and hour class action cases.

23 16. Mr. Haque authored a book on employment litigation strategies with West
24 Publishing and has been invited to speak on class action and wage and hour issues on numerous
25 occasions. He has spoken at seminars by the State Bar of California, California Employment
26 Lawyer's Association (CELA), Orange County Bar Association, and various other CLE
27 providers. Mr. Haque is the former Chair for the Labor and Employment Section of the Orange
28 County Bar Association. He was selected as one of the Top 50 Attorneys in Orange County by

1 Super Lawyers for 2017 and 2019. He has been a Super Lawyer for every year from 2009 to the
2 present. OC Register/Metro has selected him as one of the Top 5 Employment Lawyers in
3 Orange County for every year the list was published, from 2012 to 2021. Mr. Haque currently
4 bills at a rate of \$950 an hour.

5 17. I am a partner at Aegis Law Firm. I was admitted to the California Bar in
6 December of 2011, and received my J.D. from Santa Clara University School of Law and my
7 B.A. from the University of California, Berkeley. I have dedicated my career to plaintiffs' side
8 class actions. My experience includes successful work on class action appeals, class certification
9 motions, and class settlements. I was chosen by Law and Politics Magazine as a Super Lawyer
10 Rising Star, representing one of the top 2.5% of lawyers under 40 in Southern California for
11 several years. I currently bill at a rate of \$800 per hour.

12 18. Ali Carlsen is a Senior Associate Attorney at Aegis Law Firm. She was admitted
13 to the California Bar in June of 2013. She received her J.D. from Golden Gate University School
14 of Law and B.S. from California State University, East Bay. Prior to joining Aegis Law Firm,
15 she worked at Magarian & DiMercurio, APLC, where she primarily handled employment
16 litigation matters representing both employers and employees, including matters involving wage
17 and hour issues, harassment and discrimination, and wrongful termination. She was chosen by
18 Law and Politics Magazine as a Super Lawyer Rising Star, representing one of the top 2.5% of
19 lawyers under 40 in Southern California from 2017-2023. She has been selected as Best
20 Lawyers: Ones to Watch every year since 2023. Ms. Carlsen bills at a rate of \$750 per hour.

21 19. Elizabeth Robles is a former associate at Aegis Law Firm. She was admitted to
22 the California Bar in December of 2019. She is a graduate of Loyola Law School Los Angeles,
23 where she received her J.D. with a concentration in Public Interest Law. While in law school,
24 Ms. Robles was a certified law student for two semesters, externed for Judge Consuelo B.
25 Marshall in the U.S. District Court for the Central District of California, and received various
26 awards such as the Mexican American Bar Foundation Scholarship. She received her B.A. from
27 the University of Notre Dame. Ms. Robles billed at a rate of \$600 per hour while working on
28 this case.

20. We negotiated a settlement that we considered fair, adequate and reasonable, based on our prior experience litigating these types of cases.

Class Counsel's Fees and Costs

21. Aegis' hourly rates are comparable to those charged by other class action plaintiff's counsel and the firms defending class actions. See <http://www.laffeymatrix.com/see.html> (Laffey Matrix); see also *Ellis v. Harder Mech. Contractors, Inc.*, No. 21-CV-00844-JSW, 2023 WL 2620145, at *5 (N.D. Cal. Mar. 22, 2023) (finding "hourly rates of \$950 for partners and \$675 for senior associates" to be "reasonable and consistent with the rates charged by other attorneys with similar experience"). Our attorneys have specifically been approved at these rates. See, e.g., *Victor Rangel v. President and Board of Trustees of Santa Clara College*, Santa Clara Superior Court, Case No. 23CV413920, Order dated August 15, 2024 (approving Jessica Campbell at \$800 per hour, stating "counsel's hourly rates are reasonable"); *Karen Hecker v. Mathew Enterprise, Inc.*, Santa Clara County, Case No. 22CV405334, Order dated August 21, 2024, (finding \$600 per hour reasonable for an Aegis class action attorney Julia Toscano who graduated in 2018).

22. Aegis' current lodestar reflects 164.4 hours of work resulting in \$125,960.00 in fees, excluding the time Counsel will spend at the final approval hearing and helping with Settlement Administration after final approval.

23. Aegis dedicated significant resources to this case by dividing the tasks required according to skill level, and the professional hours generated by each attorney are neither unreasonable nor duplicative. This time could have been spent on other potentially lucrative cases. Aegis' lodestar reflects the efficiencies achieved by a law firm experienced in this field. The chart below shows the calculation of hours spent by each of Aegis' attorneys on this case.

Attorney	Hours	Hourly Rate	Total
Samuel Wong	48.3	\$950.00	\$45,885.00
Jessica Campbell	36.7	\$800.00	\$29,360.00
Ali Carlsen	20.5	\$750.00	\$15,375.00
Elizabeth Robles	58.9	\$600.00	\$35,340.00
Totals	164.4		\$125,960.00

24. Our firm bore the entire risk of recovery. We took this case on a pure contingency basis, with no guarantee of any payment.

25. In litigation costs, Aegis has spent \$3,441.84 on items such as filing fees related to the litigation. All of the costs were reasonable and necessary for the prosecution of this case.

26. A true and correct copy of Class Counsel's cost report for costs incurred in this Action is attached hereto as **Exhibit 1**.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 17, 2026 at Irvine, California.


Jessica L. Campbell

EXHIBIT 1

Matter Billing Detail

Aegis Law Firm, PC

Date Range: 03/01/2011 to 06/16/2026

Client: 4563 - Gilbert Estrada

Matter: 547 - Estrada v. OnTrac

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
01/17/2024	FF	Filing Fee	\$1,645.74		Unbilled				
01/19/2024	SOP	Service of Process - Ontrac Logistics Inc	\$129.25		Unbilled				
01/24/2024	FF	Filing Fee	\$65.00		Unbilled				
03/18/2024	FF	Filing Fee	\$38.45		Unbilled				
06/06/2024	FF	Filing Fee	\$17.20		Unbilled				
06/27/2024	COU	Courier Charges	\$40.25		Unbilled				
06/27/2024	FF	Filing Fee	\$37.25		Unbilled				
07/19/2024	FF	Filing Fee	\$17.20		Unbilled				
08/26/2024	RES	Database Research Fee	\$16.00		Unbilled				
09/03/2024	FF	Filing Fee	\$17.20		Unbilled				
03/25/2025	RES	Database Research Fee	\$10.50		Unbilled				
04/23/2025	FF	Filing Fee	\$18.90		Unbilled				
04/23/2025	COU	Courier Charges	\$42.75		Unbilled				
04/23/2025	COU	Courier Charges	\$42.75		Unbilled				
07/10/2025	FF	Filing Fee	\$18.90		Unbilled				
06/16/2026	CC	Cumulative Copies, Faxes, Scans, Postage	\$1,284.50		Unbilled				
		Total:	\$3,441.84	\$0.00					
		Balance:	\$3,441.84						

Matter Billing Detail

Aegis Law Firm, PC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total Fees Billed-----			\$0.00						
Total Fees Unbilled : -----			\$0.00						
Total Fees Received : -----			\$0.00						
Total Soft Cost Billed : -----			\$0.00						
Total Soft Cost Unbilled : -----			\$0.00						
Total Soft Cost Received : -----			\$0.00						
Total Hard Cost Billed : -----			\$0.00						
Total Hard Cost Unbilled : -----			\$3,441.84						
Total Hard Cost Received : -----			\$0.00						
Total Taxes Billed : -----			\$0.00						
Total Taxes Unbilled : -----			\$0.00						
Total Taxes Received : -----			\$0.00						
Total Late Charges Billed : -----			\$0.00						
Total Late Charges Unbilled: -----			\$0.00						
Total Late Charges Received : -----			\$0.00						
Trust Balance: -----			\$0.00						