

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com

Peter J. Carlson, Esq. [CSB No. 295611]
peter@lmlfirm.com

LAUBY, MANKIN & LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Mehrdad Bokhour, Esq., CA Bar No. 285256
mehrdad@bokhourlaw.com
BOKHOUR LAW GROUP, P.C.
1901 Avenue of the Stars, Suite 920
Los Angeles, California 90067
Tel: (310) 975-1493; Fax: (310) 675-0861

Attorneys for Plaintiff and the Putative Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

YVONNE LABRA and ANABEL
MADRIGAL, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

PENN EMBLEM COMPANY, a
Pennsylvania Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CVRI2300385

Assigned to the Hon. Harold Hopp

**DECLARATION OF MEHRDAD
BOKHOUR IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Hearing

Date: October 22, 2025

Time: 8:30 a.m.

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1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California, and I am the principal of Bokhour Law Group, P.C. as attorney of record for Plaintiffs and the Settlement Class.

Class Counsel Are Experienced Class Litigators

4. Before beginning my legal career, I served as a judicial extern for the Honorable Justice Fred Woods of the Second District Court of Appeal, Division Seven. I was also an appellate law clerk at Greines, Martin, Stein & Richland LLP.

6. I have handled approximately 150 employment litigation matters during my 13-year practice. Over the last ten years, my practice has exclusively represented employees, most of which included class action and representative action wage and hour matters. I have been appointed by various courts as class counsel and have received final court approval and judgment in numerous class actions. I anticipate receiving final approval in many more in the future.

DECLARATION OF MEHRDAD BOKHOUR ISO PLAINTIFFS' MOTION FOR FINAL APPROVAL

1 8. I was selected as a “Super Lawyer Rising Star” in Employment Litigation from
2 2017 through 2022 and as a “Super Lawyer” in 2023 through 2025. This distinction is reserved
3 for the top 2.5% of lawyers in the practice area. I have also been recognized by TopVerdicts.com
4 for achieving several of the top wage and hour class and PAGA action settlements in California.

5 9. I am an active member of the California Employment Lawyers Association
6 (“CELA”) and have attended numerous Continuing Legal Education courses on employee
7 advocacy.

8 10. My firm has the experience, resources, and means necessary to allow us to
9 provide adequate representation to all Settlement Class Members in this Action.

10 11. Currently, my firm is acting as co-counsel in at least fifty wage-and-hour class
11 actions.

12 12. Class Counsel are respected members of the California Bar with strong records
13 of vigorous and effective advocacy for their clients, and they are experienced in handling
14 complex class action litigation. Both Class Counsel and Plaintiffs were prepared to litigate the
15 claims in this action, but they strongly and unequivocally support the proposed Settlement as
16 being in the best interest of the Settlement Class based on the circumstances referenced herein.

17 13. In the opinion of Class Counsel, the recovery for each Settlement Class Member
18 is well within the acceptable range for this type of action. This Settlement is also favorable
19 given that the Settlement Class will promptly receive compensation rather than facing
20 uncertainties inherent in further litigation and waiting years for this action to be tried. It is also
21 telling that the Settlement Class have overwhelmingly supported the Settlement on the terms
22 set forth in the Settlement Agreement. No Settlement Class Member has objected to the class-
23 wide Settlement obtained in this matter, and no Settlement Class Member has requested
24 exclusion from the Settlement. Based on all considerations, this Settlement is highly favorable
25 and is in the best interests of the Settlement Class.

26 14. In sum, all relevant factors support final approval of the Settlement. The parties
27 negotiated at arm's length under the supervision of an experienced and well-respected mediator.
28 Class Counsel also investigated, discovered, and analyzed class claims extensively. Moreover,

1 Class Counsel, experienced class action litigators, strongly believe that this Settlement provides
2 an excellent result for the Settlement Class. Lastly, the fact that no objections were filed
3 requesting denial of final approval, and only three requests for exclusion from the Settlement,
4 weighs strongly in favor of approving the Settlement. For these reasons, this Court should
5 conclude that under the circumstances of this case, the proposed Settlement is fair, adequate,
6 and well within the range of reasonableness.

7 **The Proposed Enhancement Awards to Plaintiffs as Class Representatives are**
8 **Reasonable**

9 15. Plaintiffs and Class Counsel request that the Court finally approve a Class
10 Representative Service Payment of \$10,000 to each plaintiff for the time, effort, and risks each
11 undertook in participating in this Action. Because a named plaintiff is an essential ingredient
12 of any class action, a service payment is appropriate to induce individuals to step forward and
13 assume the burdens and obligations of representing the settlement class. In deciding the amount
14 of service payment for a class representative, relevant factors include the actions the plaintiff
15 has taken to protect the interests of the settlement class, the degree to which the settlement class
16 has benefited from those actions, and the amount of time and effort the plaintiff expended in
17 pursuing the action.

18 16. In the instant case, Plaintiffs assisted Class Counsel on many occasions with
19 investigating and prosecuting this action. Plaintiffs provided many documents and relevant
20 information to Class Counsel, spent numerous hours educating Class Counsel on the inner
21 workings of Defendant's operations and timekeeping practices, and made themselves available
22 for mediation. The amount sought for the Class Representative aligns with the service payments
23 in similar wage and hour class actions. In Class Counsel's experience, service payments in
24 wage and hour actions typically range from \$5,000 to \$40,000. Further, Defendant supports the
25 requested Class Representative Service Payment to Plaintiffs.

26 17. As such, the service payment requested is intended to compensate Plaintiffs for
27 their critical role in this case and the substantial time, effort, and risks they undertook to help
28 secure the result obtained on behalf of the Settlement Class. The Class Representative Service

1 Payments requested are well-deserved and warranted.

2 **The Requested Attorneys' Fees and Costs are Fair, Reasonable, and Appropriate**

3 18. Class Counsel's application for an award of Attorneys' Fees in an amount of
4 approximately one-third of the Gross Settlement Amount on behalf of the Settlement Class is
5 reasonable and fair. The requested fee falls within the lower end of the Ninth Circuit's historical
6 benchmark for attorneys' fees, which ranges from 20% to 40% of a common fund. It is fair
7 compensation for undertaking complex, risky, expensive, and time-consuming litigation on a
8 contingent basis.

9 19. For Class Counsel, the fees here were wholly contingent in nature, and the case
10 presented far more risk than the usual contingent fee case. There was the prospect of the
11 enormous cost inherent in class action litigation and a long battle with a corporate Defendant.
12 That prospect has become a reality in trial courts and the Court of Appeal in other wage and
13 hour class litigations. Class Counsel risked not only a great deal of time but also a great deal
14 of expense to ensure the successful litigation of this action on behalf of all Settlement Class
15 Members. Based upon the foregoing, Class Counsel respectfully requests that the Court award
16 Attorneys' Fees as requested.

17 20. I will have worked approximately 65 hours on this case, and my hourly rate is
18 \$700. Accordingly, this results in a total lodestar amount of \$45,500.

19 21. The ultimate result was far from certain. When this case was taken on a
20 contingency fee basis, the firm agreed to assume responsibility for all litigation costs. In the
21 course of this Action, Class Counsel paid all costs, including filing fees, court costs, research fees,
22 and mediation costs. There was never a guarantee that we would recoup those expenditures.

23 22. It has been my experience that the benchmark for an attorney fee award in
24 California state cases is one-third of a common settlement fund, a standard upheld by the
25 California Supreme Court in the *Robert Half* case. Here, in accordance with the Settlement
26 Agreement, Class Counsel is seeking a fee of one-third of the Settlement Amount.

27 23. The fee is warranted because of the results achieved for the Settlement Class
28 Members, both in terms of the immediate cash settlement and the fact that the Settlement Class

Members resoundingly supported the Settlement. Defendant does not oppose this fee request.

24. Pursuant to California Rule of Court 3.769, Class Counsel hereby discloses the existence of a Joint Prosecution and Fee Splitting Agreement among the counsel representing plaintiffs in the consolidated litigation. Under this agreement, any attorneys' fees awarded by the Court will be allocated among counsel as follows:

- Bokhour Law Group, P.C. – 42.50%;
- Lauby, Mankin & Lauby – 42.5%;
- Matern Law Group, PC – 15%

25. The following are the itemized litigation costs (actually incurred) for the above-referenced matter:

(1)	Expert Costs	\$3,397.50
(2)	Mediation	\$5,000
(3)	Total	\$8,397.50

I declare under penalty of perjury under the laws of California that the foregoing is true and correct, this 16th day of September 2025, at Los Angeles, California.

/s/ Mehrdad Bokhour

Mehrdad Bokhour