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6 Attorneys for Plaintiff
NOEL LATORRE
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **SAN MATEO COUNTY**
10

11 NOEL LATORRE, on behalf of all aggrieved
employees,

12 Plaintiffs,

13 v.

14 PATRIOT GROUP GLOBAL, INC., a New
15 Hampshire corporation; and DOES 1 through 25,
inclusive,

16 Defendants.
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) Case No. 23-CIV-05561

) Date: March 7, 2025

) Time: 9:00 AM

) Dept: 24

) **DECLARATION OF JEFFREY T.
GREEN IN SUPPORT OF PLAINTIFF'S
AMENDED MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

) Judge: Hon. Jeffrey R. Finigan

) Dept: 24

) Action Filed: November 21, 2023
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including overtime, off-the-clock work, meal and rest break violations, as well as other derivative claims. Approximately 4,226 class members. Approval granted **November 24, 2021**.

B. Duro v. Splitsville Bowling. Orange County Superior Court- Complex. Co-counsel in a state law class action for resolving a California Labor Code dispute between employees and management. Final Approval granted on **June 28, 2022**.

C. Vasquez v. Bank of America. USDC Northern District of California. Cocounsel in a nationwide FLSA and state law class action for **\$4 million** resolving a dispute between Bank of America and over 4,226 employees for PAGA case. Approval granted on **July 29, 2022**.

D. Cali v. Smitty's Grill. Los Angeles Superior Court Complex Division. Counsel on certified class action of approximately 150 employees for Labor Code claims. Final approval granted **September 9, 2022**.

E. Giebe v. Bed Bath & Beyond. San Bernardino Superior Court – Complex Division. Counsel on a Certified Class Action relating to Labor Code claims for approximately 300 employees. Final Approval granted **December 6, 2022**.

F. Allison v. Dignity Health. San Francisco Superior Court. Co-Counsel on a Certified Class Action for approximately 3,000+ employees. Class Certified in **January 2022**. Currently on appeal.

G. Bell v. Redfin. USDC Southern District of California. Co-Counsel on state-wide class and PAGA action between 3,000 misclassified employees and management for \$3 million. Final Approval granted July 21, 2024.

5. I have continued my practice of employee wage and hour class action and PAGA litigation with Kring & Chung, LLP. Some of my success with Kring & Chung, LLP (since April of 2023) includes:

H. Gonzalez v. Imperial Imports. San Bernardino Superior Court. Co-counsel in statewide PAGA action for approximately 600 employees, which settled for \$325,000.00. Final Approval granted on July 12, 2024.



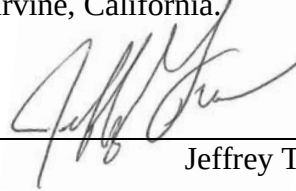
1 6. My hourly rate requested is \$550.00 and I believe that I am sufficiently experienced
2 and qualified to evaluate the claims asserted by Plaintiff and viability of Defendants' defenses.

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

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

7 Executed this 28th day of October, 2024, at Irvine, California.

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Jeffrey T. Green



1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF ORANGE

3 I, the undersigned, am employed in the County of Orange, State of California. I am over
4 the age of eighteen (18) years and not a party to the within action. My business address is 38
Corporate Park, Irvine, CA 92606-5105. My business e-mail address is
mbennett@kringandchung.com.

5 On October 29, 2024, I served true copies of the foregoing document(s) described as
6 **DECLARATION OF JEFFREY T. GREEN IN SUPPORT OF PLAINTIFF'S AMENDED**
7 **MOTION FOR APPROVAL OF PAGA SETTLEMENT** on the interested parties in this action,
addressed as follows:

8 **SEE ATTACHED SERVICE LIST**

9 ☒ BY E-MAIL: By transmitting a true copy of the foregoing document(s) to the e-mail
10 addresses set forth on the attached mailing list.

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

12 Executed on October 29, 2024, at Irvine, California.

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14 _____

15 MICHELLE BENNETT
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NOEL LATORRE V. PATRIOT GLOBAL GROUP, INC.

K&C CLIENT: **Noel Latorre**
CLIENT NO.: **9300.0347**

SERVICE LIST

Counsel of Record	Phone/Fax Nos.	Party(ies) Represented
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Via Electronic Submission
Attn.: PAGA Administrator
Department of Industrial Relations
Accounting Unit
455 Golden Gate Avenue, 10th Floor
San Francisco, CA 94102

