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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

RUBEN HERNANDEZ, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

NEOVIA LOGISTICS SERVICES, LLC, a
Delaware Limited Liability Company; NEOVIA
LOGISTICS DISTRIBUTION, LP, a Delaware
Limited Partnership; and DOES 1 through 100,

Defendants.

Case No.: CIVSB 2305867

**DECLARATION OF JESSICA L.
CAMPBELL IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: September 11, 2024
Time: 8:30 a.m.
Dept.: S36

Action Filed: March 2, 2023
Trial Date: None Set

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

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

6 2. I submit this declaration in support of Plaintiffs’ Motion for Preliminary
7 Approval of Class Action Settlement. If called as a witness, I could and would competently
8 testify thereto.

9 **Counsel’s Qualifications**

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

14 4. The attorneys working on this case have been appointed class counsel in many
15 cases, through both contested motions and settlement approval motions.

16 5. Aegis has litigated and successfully resolved many wage and hour class action
17 cases involving failure to pay wages and derivative Labor Code claims and penalties. *See, e.g.,*
18 *Roman, et al. v. TRM Manufacturing, Inc.*, Riverside Superior Court, Case No. RIC1706458 (class
19 certification granted on December 17, 2020 for all current and former non-exempt workers’ on
20 issues of rounding, meal period, and rest period claims); *Gamboa v. Kamran, et al.*, San Bernardino
21 Superior Court, Case No. CIVDS1605273 (class certification granted on September 16, 2019, for
22 factory workers on issues of rounding, automatic deduction of first meal period, and second meal
23 period); *Romo, et. al, v. GMRI, Inc. d/b/a/ Olive Garden*, United States District Court Central
24 District of California, Case No. EDCV-12-0715-JLQ (class certification granted for restaurant
25 workers’ rest period claims); *Sawyer v. Retail Data, LLC*, Orange County Superior Court, Case
26 No. 30-2014-00753767-CU-OE-CXC (unpaid wage and rest break claims for piece rate
27 workers); *Gonzalez v. SFFI Company, Inc., et. al*, San Bernardino County Superior Court, Case
28 No. CIV DS1504287 (unpaid wages, meal period and rest break claims for non-exempt

employees); *Antoine v. Riverstone Residential California, Inc., et. al*, Sacramento County Superior Court, Case No. 34-2013-00155974 (rate of pay, on-call time, unpaid wage, meal period, rest break, and expense reimbursement claims for non-exempt employees); *Nguyen v. Pharmerica*, Orange County Superior Court, Case No. 30-2014-00716072-CU-OE-CXC (unpaid wages and unreimbursed expenses for pharmacists); *Orellana v. Westlake*, Los Angeles County Superior Court, Case No. BC539614 (unpaid overtime, meal period and rest break claims for call center employees); *Kent v. Mountain View Child Care, Inc.*, Los Angeles County Superior Court, Case No. BC539633 (minimum wage, overtime, meal period, and rest break claims for hospital workers); *Durroh v. East West Bank*, Los Angeles County Superior Court, Case No. BC528860 (overtime claims for failure to include bonuses in regular rate of pay for bank workers); *O'Brien et al. v. Pizza Hut of Southeast Kansas, Inc. et al.*, Riverside County Superior Court, Case No MCC 1301030 (meal period and expense reimbursement claims for delivery drivers); *Bell v. Prime Healthcare*, Orange County Superior Court, Case No. 30-2011-00475240-CU-OE-CXC (overtime claims for failure to include shift premiums in regular rate of pay and failure to provide meal and rest periods to hospital workers), *Grana v. Toys R US-Delaware, Inc.*, Central District of California, Case No. 2:13-cv-01302-DSF-JCG (bag check claims for unpaid wages and failure to provide meal periods and rest breaks to retail employees); *Mendez v. H.J. Heinz Company, L.P., et. al*, Orange County Superior Court, Case No. 30-2013-00644915-CU-OE-CXC (failure to pay all wages to factory workers due to rounding practice); *Fresh & Easy Wage and Hour Cases*, Los Angeles Superior Court, Cas No. JCCP 4705 (failure to provide meal and rest periods to supermarket workers); *Lunsford v Stater Bros.*, Riverside Superior Court, Case No. RIC 1104475 (failure to provide meal and rest periods to supermarket workers); *Gregg v. Belo*, Riverside Superior Court, Case No. RIC 523697 (unpaid wages and missed meal and rest periods due to misclassification of newspaper delivery employees); *Brown v. Experian Information Solutions, Inc., et. al.*, Orange County Superior Court, Case No. 30-2012-00375163 (misclassification of engineers and similar positions); *Tereth v. Shakey's USA, Inc.*, Los Angeles Superior Court, Case No. BC441359 (failure to provide meal and rest periods to restaurant employees); *Azurin v. Harbor Distributing LLC, et. al.*, Los Angeles Superior

1 Court, Case No. BC421392 (failure to pay overtime wages, provide meal and rest periods,
2 reimburse business expenses to Account Managers); *Caffero v. ABC* (failure to provide meal
3 periods and reimburse expenses of therapists). All cases cited above were successfully resolved
4 for the plaintiff classes.

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

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

13 8. Mr. Wong became a founding partner of Aegis Law Firm, PC in 2003, and
14 focused his practice on plaintiff's side employment work. Throughout his years of practice, Mr.
15 Wong represented and obtained successful outcomes for his clients, including awards through
16 arbitration and trial.

17 9. Mr. Wong is a member of the Orange County Bar Association, Orange County
18 Trial Lawyers Association, and California Employment Lawyers Association.

19 10. Mr. Wong was chosen by Law and Politics Magazine as a Super Lawyer Rising
20 Star, representing one of the top 2.5% of lawyers under 40 in Southern California in 2011, 2012,
21 2013, and 2014. He was chosen by Law and Politics Magazine as a Super Lawyer in 2015, 2016,
22 2017, and 2018. Mr. Wong was also chosen as a Top Attorney in the field of employment law
23 by OC Metro in 2014, 2015, and 2018.

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

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

8 13. Mr. Haque authored a book on employment litigation strategies with West
9 Publishing and has been invited to speak on class action and wage and hour issues on numerous
10 occasions. He has spoken at seminars by the State Bar of California, California Employment
11 Lawyer's Association (CELA), Orange County Bar Association, and various other CLE
12 providers. Mr. Haque is the former Chair for the Labor and Employment Section of the Orange
13 County Bar Association. He was selected as one of the Top 50 Attorneys in Orange County by
14 Super Lawyers for 2017 and 2019. He has been a Super Lawyer for every year from 2009 to the
15 present. OC Register/Metro has selected him as one of the Top 5 Employment Lawyers in
16 Orange County for every year the list was published, from 2012 to 2018.

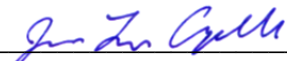
17 14. I am a Partner at Aegis Law Firm. I was admitted to the California Bar in
18 December of 2011, and received my J.D. from Santa Clara University School of Law and my
19 B.A. from the University of California, Berkeley. I have dedicated my career to plaintiffs' side
20 class actions. My experience includes successful work on class action appeals, class certification
21 motions, and class settlements. I was chosen by Law and Politics Magazine as a Super Lawyer
22 Rising Star, representing one of the top 2.5% of lawyers under 40 in Southern California in 2018-
23 2021.

24 15. Aegis Law Firm has performed significant work and expended litigation costs in
25 prosecuting the matter with no guarantee of any payment.

26 16. At final approval, Plaintiffs' Counsel will fully brief the merits of its request for
27 the award of attorneys' fees and litigation costs.
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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

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4 Executed on August 19, 2024 at Irvine, California.

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