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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

RUBEN HERNANDEZ, PATRICK JOSEPH
NEIMS, ARTURO RAMIREZ, AND MIGUEL
MORENO, as individuals and on behalf of all
others similarly situated,

Plaintiffs,

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 FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

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 an associate at with Aegis Law Firm, PC, counsel for Plaintiffs Patrick
4 Joseph Neims and Arturo Ramirez (“Plaintiffs”) in this matter. I am thoroughly familiar with
5 and have personal knowledge of all the facts set forth herein.

6 2. I submit this declaration in support of Plaintiffs’ 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 **Counsel’s Qualifications**

10 3. Aegis Law Firm prosecutes wage and hour cases, including class actions on
11 behalf of employees and others who have had their rights violated. Aegis, either on its own or
12 with co-counsel is currently serving as plaintiffs’ counsel of record in dozens of wage and hour
13 and 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 workers);
27 *Gonzalez v. SFFI Company, Inc., et. al*, San Bernardino County Superior Court, Case No. CIV
28 DS1504287 (unpaid wages, meal period and rest break claims for non-exempt employees);

1 *Antoine v. Riverstone Residential California, Inc., et. al*, Sacramento County Superior Court,
2 Case No. 34-2013-00155974 (rate of pay, on-call time, unpaid wage, meal period, rest break, and
3 expense reimbursement claims for non-exempt employees); *Nguyen v. Pharmerica*, Orange
4 County Superior Court, Case No. 30-2014-00716072-CU-OE-CXC (unpaid wages and
5 unreimbursed expenses for pharmacists); *Orellana v. Westlake*, Los Angeles County Superior
6 Court, Case No. BC539614 (unpaid overtime, meal period and rest break claims for call center
7 employees); *Kent v. Mountain View Child Care, Inc.*, Los Angeles County Superior Court, Case
8 No. BC539633 (minimum wage, overtime, meal period, and rest break claims for hospital
9 workers); *Durroh v. East West Bank*, Los Angeles County Superior Court, Case No. BC528860
10 (overtime claims for failure to include bonuses in regular rate of pay for bank workers); *O'Brien*
11 *et al. v. Pizza Hut of Southeast Kansas, Inc. et al.*, Riverside County Superior Court, Case No
12 MCC 1301030 (meal period and expense reimbursement claims for delivery drivers); *Bell v.*
13 *Prime Healthcare*, Orange County Superior Court, Case No. 30-2011-00475240-CU-OE-CXC
14 (overtime claims for failure to include shift premiums in regular rate of pay and failure to provide
15 meal and rest periods to hospital workers), *Grana v. Toys R US-Delaware, Inc.*, Central District
16 of California, Case No. 2:13-cv-01302-DSF-JCG (bag check claims for unpaid wages and failure
17 to provide meal periods and rest breaks to retail employees); *Mendez v. H.J. Heinz Company,*
18 *L.P., et. al*, Orange County Superior Court, Case No. 30-2013-00644915-CU-OE-CXC (failure
19 to pay all wages to factory workers due to rounding practice); *Fresh & Easy Wage and Hour*
20 *Cases*, Los Angeles Superior Court, Cas No. JCCP 4705 (failure to provide meal and rest periods
21 to supermarket workers); *Lunsford v Stater Bros.*, Riverside Superior Court, Case No. RIC
22 1104475 (failure to provide meal and rest periods to supermarket workers); *Gregg v. Belo*,
23 Riverside Superior Court, Case No. RIC 523697 (unpaid wages and missed meal and rest periods
24 due to misclassification of newspaper delivery employees); *Brown v. Experian Information*
25 *Solutions, Inc., et. al.*, Orange County Superior Court, Case No. 30-2012-00375163
26 (misclassification of engineers and similar positions); *Tereth v. Shakey's USA, Inc.*, Los Angeles
27 Superior Court, Case No. BC441359 (failure to provide meal and rest periods to restaurant
28 employees); *Azurin v. Harbor Distributing LLC, et. al.*, Los Angeles Superior Court, Case No.

1 BC421392 (failure to pay overtime wages, provide meal and rest periods, reimburse business
2 expenses to Account Managers); *Caffero v. ABC* (failure to provide meal periods and reimburse
3 expenses of therapists).

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

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

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

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

18 10. Mr. Wong was chosen by Law and Politics Magazine as a Super Lawyer Rising
19 Star, representing one of the top 2.5% of lawyers under 40 in Southern California in 2011, 2012,
20 2013, and 2014. He was chosen by Law and Politics Magazine as a Super Lawyer in 2015, 2016,
21 2017, and 2018. Mr. Wong was also chosen as a Top Attorney in the field of employment law by
22 OC Metro in 2014, 2015, and 2018. Mr. Wong currently bills at a rate of \$950 per hour.

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

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

6 13. Mr. Haque authored a book on employment litigation strategies with West
7 Publishing and has been invited to speak on class action and wage and hour issues on numerous
8 occasions. He has spoken at seminars by the State Bar of California, California Employment
9 Lawyer's Association (CELA), Orange County Bar Association, and various other CLE
10 providers. Mr. Haque is the former Chair for the Labor and Employment Section of the Orange
11 County Bar Association. He was selected as one of the Top 50 Attorneys in Orange County by
12 Super Lawyers for 2017 and 2019. He has been a Super Lawyer for every year from 2009 to the
13 present. OC Register/Metro has selected him as one of the Top 5 Employment Lawyers in
14 Orange County for every year the list was published, from 2012 to 2021. Mr. Haque currently
15 bills at a rate of \$950 an hour.

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

23 15. Fawn Bekam is a former senior associate at Aegis. She is a graduate of University
24 of California Irvine School of Law, where she received her J.D. in 2015. Ms. Bekam also received
25 her B.A. from University of California, Los Angeles in 2012. While in law school, she was the
26 recipient of numerous honors, including multiple Dean's Awards, Dean's Merit Scholarship, and
27 pro bono graduation honors. Ms. Bekam has been chosen as a Super Lawyer – Rising Star since
28 2020, and Best Lawyers: Ones to Watch since 2021. She focused her practice on representing

plaintiffs in wage and hour class and representative actions. Her billing rate was \$700.00 per hour.

Class Counsel's Fees and Costs

16. Aegis' hourly rates are comparable to those charged by other class action plaintiff's counsel and the firms defending class actions. Aegis' hourly rates have been approved by other courts in the same geographical area. *See, e.g., Perez v. Hal Hays*, C.D. Cal, Case No. EDCV 16-01461 AG (SPx) (approving Aegis hourly rates); <http://www.laffeymatrix.com/see.html> (Laffey Matrix).

17. Aegis' current lodestar reflects 163.6 hours of work resulting in \$119,355.00 in fees, excluding the time Counsel will spend at the final approval hearing and helping with Settlement Administration after final approval.

18. 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	11.3	\$950.00	\$10,735.00
Jessica L. Campbell	20.1	\$800.00	\$16,080.00
Fawn Bekam	132.2	\$700.00	\$92,540.00
Totals	163.6		\$119,355.00

19. Class Counsel bore the entire risk of recovery. Class Counsel took this case on a pure contingency basis, with no guarantee of any payment. Before mediation, Class Counsel spent significant time on discovery, resolving discovery disputes and preparing for mediation despite the risk of recovering nothing. Had the litigation continued, Defendants would undoubtedly have mounted an aggressive defense at the certification stage and at the merits stage. A defeat at one of these stages could have foreclosed the possibility of Class Counsel recovering any remuneration for their time and effort. Given the extensive discovery and exhaustive negotiations in this case, Class Counsel have achieved a large settlement through efficient and diligent work. The result achieved by Class Counsel in this case merits applying a

multiplier to reward counsel for taking on the risk of filing a case, and achieving a great result through efficient means.

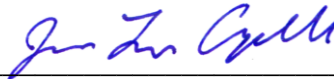
20. In litigation costs, Aegis has spent \$3,595.73 on items such as filing fees, postage, mediation fees, and other fees related to the litigation. A true and correct copy of Aegis' Cost Report is attached hereto as Exhibit 1.

Exhibits

21. 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 December 20, 2024 at Irvine, California.



Jessica L. Campbell

EXHIBIT 1

Matter Billing Detail

Aegis Law Firm, PC

Date Range: 01/01/1900 to 12/19/2024
Client: 48074 - Patrick Joseph Neims
Matter: 1380 - Neims v. Neovia Logistics Distribution

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
10/27/2022	FF	Filing Fee - LWDA Filing Fee	\$75.00		Unbilled				
10/28/2022	FF	Filing Fee - Complaint (rec'vd stamp)	\$90.56		Unbilled				
03/08/2023	FF	Filing Fee	\$452.40		Unbilled				
03/14/2023	FF	Filing Fee	\$93.76		Unbilled				
03/15/2023	SOP	Service of Process - Neovia Logistics	\$99.00		Unbilled				
03/15/2023	SOP	Service of Process - Neovia Logistics Services	\$45.60		Unbilled				
03/28/2023	FF	Filing Fee	\$61.25		Unbilled				
03/28/2023	FF	Filing Fee	\$61.25		Unbilled				
08/16/2023	RES	Database Research Fee - sbcourt settlement in earlier case	\$6.00		Unbilled				
08/17/2023	FF	Filing Fee (Ramirez)	\$1,587.86		Unbilled				
09/13/2023	SOP	Service of Process-Neovia Logistics Services	\$99.85		Unbilled				
09/13/2023	SOP	Service of Process- Neovia Logistics Services	\$46.45		Unbilled				
09/15/2023	FF	Filing Fee	\$61.25		Unbilled				
09/15/2023	FF	Filing Fee	\$61.25		Unbilled				
05/22/2024	CTC	Court Call	\$72.00		Unbilled				
12/19/2024	CC	Cumulative Copies, Faxes, Scans, Postage	\$682.25		Unbilled				
		Total:	\$3,595.73	\$0.00					
		Balance:	\$3,595.73						

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 : -----			\$3,595.73						
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						