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14 Attorney(s) for Plaintiff,
15 ISIN AL OTAT, and on behalf of
16 similarly aggrieved employees

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF SAN FRANCISCO**

13 ISIN AL OTAT, an individual and on behalf of
14 similarly aggrieved employees,

15 Plaintiff,

16 v.

17 CYCLE GEAR, INC., a California
18 corporation; COMOTO HOLDINGS, INC., a
19 Delaware corporation; COMOTO
20 HOLDINGS, LLC, a Delaware limited liability
21 company; and DOES 1 – 50, inclusive;

22 Defendants.

Case No. CGC-23-606243

Assigned to the Honorable Jeffrey S. Ross
Dept. 606

**DECLARATION OF SAMANTHA
BIGONGER, ESQ. IN SUPPORT OF
MOTION FOR PRELIMINARY APPROVAL**

(Concurrently filed with the notice of motion and
motion for preliminary approval; declaration of
Jessica Gomez, Esq.; and Exhibits)

Complaint Filed: 05/01/2023

Trial Date: Not Set

22 I, Samantha Bigonger, Esq. declare as follows:

- 23 1. That I am an attorney at the LAW OFFICES OF BIGONGER & BIGONGER. I am attorney
24 of record on this matter and co-counsel with Jessica Gomez, Esq. I am a licensed attorney
25 in the state of California. I make this declaration based on my personal knowledge. If called
26 upon by this court, I could and would competently testify to the facts alleged herein.
- 27 2. In Spring of 2023, I partnered with Jessica Gomez, Esq. of the Law Office of Jessica Gomez

ELECTRONICALLY

FILED

Superior Court of California,
County of San Francisco

10/14/2025

Clerk of the Court

BY: JUDITH NUNEZ

Deputy Clerk

- 1 as co-counsel on this matter. After agreeing to represent Ms. al-Otat, Ms. Gomez and I
2 executed a retainer agreement with both of our respective firms. Ms. al-Otat is aware that
3 both Ms. Gomez and I would be representing her in this matter.
- 4 3. Ms. Gomez and I have co-counseled on several matters together. We have frequent
5 discussions about each of the cases including the al-Otat matter.
- 6 4. I assisted with the filing of the Complaint and service of process of the Defendants in this
7 matter including filing proofs of service and engaging a private investigator to locate a
8 Defendant. I also attended the Case Management Conference on 11/05/2024 and
9 08/08/2025, reviewed discovery requests and responses. Additionally, I assisted in
10 preparation of the mediation brief for this matter and attended the mediation.
- 11 5. To date I have paid \$ 20,743.91 which are outlined as followed:
- 12 a. E-filing Fee for Proofs of Service – \$ 38.63
 - 13 b. Skip Trace for Sneharth Mukherjee – \$ 150.00
 - 14 c. Mediation Fee – \$ 8,775.00
 - 15 d. Court Call for CMC - \$ 72.00
 - 16 e. Expert Invoice - \$ 11,708.28¹
- 17 6. Based on a review of my records, I estimate that my office has expended approximately at
18 minimum 200 hours of attorney time on this matter, including filing the Complaint and
19 proofs of service, working with a private investigator and an expert, reviewing the pleadings,
20 attending a Case Management Conference, reviewing discovery requests and responses and
21 other pleadings, assisting in preparation of a mediation brief and attending mediation, and
22 communicating with Plaintiff, my co-counsel about litigation strategy, as well as opposing
23 counsel.
- 24 7. Additionally, my legal assistant spent at minimum 50 hours calling and speaking with
25 numerous current and former employees of Defendants regarding the class action and
26 obtained information regarding their wages in preparation for class certification and
27 prosecution of the case. She contacted over 100 employees and communicated with them

28 ¹ Ms. Gomez paid for expert fees associated with mediation and initial review. My costs were associated with preparation for class certification.

- 1 over for approximately 30 minutes to 45 minutes. Her hourly rate is \$ 26.00/hour.
- 2 8. Pursuant to the contingency arrangement of this matter, my hourly rate for contingency cases
- 3 ranges from \$500-600/hour. The value is reasonable given my 13 years of experience.
- 4 9. I am an attorney licensed in California since 2012.
- 5 10. I attended Cal State University San Marcos and graduated cum laude in 2009 with a degree
- 6 in political science and a minor in global studies.
- 7 11. I attended Chapman Law School on full merit scholarship for the entire three years. I
- 8 passed the bar on my first attempt.
- 9 12. I began my legal career in 2012 practicing workers' compensation, personal injury and
- 10 employment law and continue to practice in those areas of law.
- 11 13. I have PAGA related experience and was co-lead counsel with Ms. Gomez on the *Joanne*
- 12 *Nishinaka v. Stevens & Company, LLC, et al.* (Los Angeles Superior Court Case No.
- 13 23STCV17284).
- 14 14. I have been a member of Bigonger & Bigonger since 2012.
- 15 15. I have been admitted to multiple federal courts located in California since 2012. My
- 16 practice for the past 7 years has included employment law where I have exclusively
- 17 represented Plaintiffs and obtained multiple 6 figure settlements.
- 18 16. Pursuant to the contingency fee arrangement, neither I nor my office will be compensated
- 19 for our time unless and until we prevail at trial or I successfully settle my client's cases.
- 20 Because of this, my office is taking the risk that it will not be reimbursed for our time
- 21 unless my client settles or wins his or her case.
- 22 17. My co-counseling retainer agreement with Ms. Gomez calls for a contingency fee arrangement
- 23 between 40-45% contingency fee depending on the status of litigation.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing is true

25 and correct. Executed this 7th day of October 2025, in Yorba Linda, California.

26 
27 Samantha Bigonger, Esq.