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9 Attorneys for Plaintiff Bao Cha
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12 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF FRESNO**
14

15 BAO CHA, in an individual capacity, as well as a
representative capacity on behalf of the State of
16 California,

17 Plaintiff,

18 vs.

19 ALLEN SPEES FAMILY HOME, an unknown
entity, and DOES 1 through 100, inclusive,
20

21 Defendants.

CASE NO.: 23CECG02451

**DECLARATION OF SANTOSH
NARAYAN, ESQ. IN SUPPORT OF
MOTION FOR APPROVAL OF
PAGA SETTLEMENT**

Date: July 8, 2025

Time: 3:30 p.m.

Dept: 403

22 I, SANTOSH NARAYAN, declare as follows:

23 1. I am an attorney at law duly licensed to practice law in every court in the State of
24 California, and I am one of the attorneys of record representing Plaintiff in this action.

25 2. I have personal knowledge of all the facts set forth herein, and if called as a
26 witness, I could and would competently testify to those facts. I am of sound mind. I am over the
27 age of eighteen years.
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1 3. I have been practicing law in California for nearly twenty years. I spend a
2 significant time of my time representing employees in employment matters. I am a regular
3 member of the California Employment Lawyer's Association (CELA), a statewide organization
4 of attorneys representing employees in termination, discrimination, wage and hour, and other
5 employment cases. I am also a member of the Consumer Attorneys Association of Los Angeles
6 (CAALA) and the Consumer Attorneys Association of California (CAOC).

7 4. I graduated from the Vanderbilt University School of Law in 2004; where I was
8 on the Dean's List.

9 5. During my time at Vanderbilt, I was on the Dean's List, the Mock Trial Team, the
10 International Mock Trial Team, Moot Court Board and the recipient of the Jordan B. Quick
11 Award for Outstanding Leadership. I was also a finalist for the Student Bar Association
12 President of the Year by the American Bar Association.

13 6. From 2014-2020 I was named to "Southern California Rising Stars" and from
14 2020-2025 have been named to the "Super Lawyers" list by Super Lawyers Magazine.

15 7. I worked in large defense firms prior to starting my own law firm and have been
16 assigned first chair trial responsibilities in both Plaintiff and Defense matters and tried numerous
17 jury trials to verdict.

18 8. A large portion of my practice is contingency-fee based work as an employment
19 lawyer representing employees.

20 9. Since, I have raised my hourly fee rates each year to account for inflation,
21 increased overhead costs as my practice has grown over the years, and the relatively rapid
22 increase in value of services that is typical as lawyers gain more experience and develop their
23 skills. My current (2025) hourly rate is \$850.00 an hour; as the Tulare Superior Court last
24 approved my rate of \$750.00 an hour in 2020.

25 10. I am familiar with rates charged by other attorneys in Fresno and my hourly rate
26 is reasonable and consistent with other attorneys with comparable skill, experience and
27 credentials in Fresno and the surrounding areas.
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1 11. Typically in litigation matters, I advance litigation costs on behalf of my clients
2 because my clients most often cannot afford to pay even their own litigation expenses, let alone
3 attorneys' fees for my services. I know from experience that representing employees in a
4 contingent fee basis and advancing litigation expenses is extremely risky. Employment cases are
5 riskier than cases such as personal injury cases because liability is almost always disputed.
6 Employment cases are much more complex than personal injury cases because there is often
7 much more discovery and law and motion work on an employment case, as opposed to a
8 personal injury matter, such as the instant motion to approve.

9 12. Contingency fee cases are particularly risky for me because I am a solo
10 practitioner, and I do not have any partners with whom I can share risk. Because I work alone
11 and can only take on a limited number of cases, there is an opportunity cost to take an
12 employment case as opposed to a personal injury case. Therefore, if an attorneys' fee award
13 were reduced, my firm would not take cases such as this one and decline representation for those
14 clients from the outset.

15 13. I took this case on a contingency fee basis and advanced litigation costs on behalf
16 of Ms. Cha.

17 14. As of the date of this declaration, I have worked a total of 40.6 hours on this case,
18 which figure excludes additional time I spent performing clerical work and duplicative tasks.
19 Therefore, I submit that my lodestar is \$34,510.00. None of the 40.6 hours I worked included
20 conferences with my co-counsel Kevin Schwin, Esq. which was also a significant portion of
21 time.

22 15. As of this date, I have also advanced a total of \$3,841.51 in litigation costs on this
23 case.

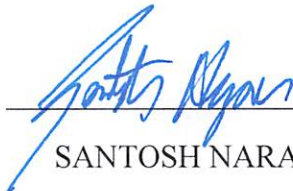
24 16. On March 20, 2024, the Parties engaged in mediation with mediator Lee
25 Jacobsen. Following the mediation, the Parties had separate meetings conducted by the mediator
26 under the mediation privilege to finalize the settlement and its terms.
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1 17. Plaintiff seeks court approval of attorneys' fees in the amount of \$40,000.00,
2 which is approximately 30% of the total settlement amount. My lodestar in this case is
3 \$34,510.00, calculated as follows: 40.6 hours times \$850 per hour. The requested fees does not
4 even include the lodestar for my co-counsel, Kevin Schwin, Esq. who I am informed and believe
5 independently spent a significant amount of time on this matter as well.

6 18. I have also advanced costs of \$3,841.51 that I request be reimbursed out of the
7 gross settlement amount.

8 19. On May 1, 2025, I reported this settlement to the Labor and Workforce
9 Development Agency.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing facts to which I attest are true and correct. Signed this the 1st day of May, 2025
12 in Fresno, California.

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15 SANTOSH NARAYAN
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