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County of Los Angeles
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David W. Slayton,
Executive Officer/Clerk of Court,
By J. Gnade, Deputy Clerk

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Attorneys for Plaintiffs CESAR EDUARDO RODRIGUEZ REVELO
and FURKATJON UMAROV and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CESAR EDUARDO RODRIGUEZ REVELO,) Case No. 23STCV20804
an individual; FURKATJON UMAROV, an)
individual; on behalf of themselves and all) [Assigned for All Purposes to:
others similarly situated and the general) The Hon. Elaine Lu, Dept. 9]
public,)

Plaintiffs,

vs.

TRAVEL TRADERS HOTEL STORES,
INC., a Delaware corporation; and DOES 1 to
100, inclusive,

Defendants.

**DECLARATION OF PEGGY J. REALI IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: March 10, 2026
Time: 8:30 a.m.
Dept: 9

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1. I am an attorney at law, duly licensed to practice before all of the Courts of the State of California, and since June 2023 I am a shareholder of United Employees Law Group, PC (“UELG”). I am co-counsel of record and my firm is Class Counsel for the Plaintiffs Cesar Eduardo Rodriguez Revelo, Furkatjon Umarov and all others similarly situated. I am a member in good standing of the State Bar of California.

Qualifications of Counsel

4. I am a graduate of the University of San Diego School of Law, and have practiced law since 1991. I have extensive experience in class action litigation, including wage and hour litigation, and have been involved in litigating numerous mass torts in state and federal courts throughout the United States, to include, among others, against Big Tobacco culminating in the 1998 Big Tobacco Master Settlement, and other mass tort litigations to include L-Tryptophan, Fen-Phen Litigation, Breast Implant Litigation, Vioxx Litigation, and the *2007 San Diego Wildfire Litigation*. I have conducted at least three trials, to include two jury trials and one bench trial, and have prepared for numerous trials which settled on the eve of trial.

1 5. I have been class counsel in numerous wage and hour class actions in federal and
2 state courts in California and in other states, since at least 2007, when I was employed as an
3 attorney with the wage and hour class action firm of the then Cohelan & Khoury (now Cohelan,
4 Khoury & Singer). In addition to extensive class action / PAGA work with that firm, since then
5 my additional experience is as follows: Reali Law, APC was co-counsel in *Merino v. Wells Fargo*
6 *and Company*, United States District Court, District of New Jersey Case No. 2:16-cv-07840-ES-
7 MAH, which settled for \$35 million in 2019; in *Villalobos v. Cornwall*, Los Angeles Superior
8 Court Case No. 22STCV 28166 (which settled in 2024); in *Montgomery v CEC Entertainment,*
9 *Inc.*, San Diego Superior Court Case No. 37-2020-00009952-CU-OE-CTL which matter settled in
10 2020 for a solid six figures (but which settlement was reduced after defendants' bankruptcy.
11 Further, as an actively litigating independent contractor, associate and/or "of counsel" with various
12 firms around the country, I have obtained many large class action settlements which have
13 benefitted consumers and employees. For instance, in 2009 while working as an independent
14 contractor with the Louisiana law firm of the then Herman, Herman Katz & Cotlar, an \$85 million
15 settlement was obtained against JCCP case Tenet Healthcare on behalf of California hospital
16 nurses for overtime and meal and rest break violations. More recently, while "Of Counsel" to The
17 Markham Law Firm, a settlement of \$27.5 million was reached on behalf of personal bankers in
18 the *Wells Fargo Wage and Hour Cases*, JCCP 004821, Alameda County Superior Court, with final
19 approval on March 16, 2018. Other recent wage and hour settlements include the \$4.9 million
20 settlement for insurance adjusters in *Alvarez v. Farmers*, case number 3:14-cv-00574-WHO, with
21 final approval on January 18, 2017 by Judge Orrick (Dkt. No. 189); \$3.77 million settlement for
22 California warehouse workers in *Saldana v. Amazon*, case number 3:14-cv-00290-DJH (W.D.
23 Ky.), finally approved on October 31, 2016 (Dkt. No. 228); a \$3 million settlement in
24 *Vangsoulatda v. Blue Shield*, case number CGC-14-543296, San Francisco Superior Court, finally
25 approved on January 25, 2018; the *Wells Fargo Bank Wage and Hour Cases*, JCCP 4702, in the
26 Los Angeles Superior Court, consolidated with USDC Northern District of California case *Layog*
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1 v. *Wells Fargo, et al.*, on behalf of Wells Fargo tellers, settled for eight figures, with final approval
2 on May 31, 2018. I have also litigated the following recent California wage and hour settlements:
3 *Kogok v. T-Mobile USA, Inc.*, Case No. 37-2012-00076945 (San Diego Super. Ct. Jan. 2015) was
4 settled for \$2,750,000; *Johnson v. Metlife Ins. Co.*, Case No. 13-cv-128-JLS-RNB (C.D. Cal. Mar.
5 19, 2015) for \$1,970,000; *Erickson v. Old Republic Title Company*, Case No. 13-cv-1210-NLS,
6 (S.D. Cal. Jan. 17, 2014) for \$12,000,000 (co-counsel); *Loeza v. Chase Bank, NA*, Case No. 3:13-
7 cv-95-L-BGS (S.D. Cal. Feb. 10, 2016) for \$970,000 plus payroll taxes; *Campagna et al. v.*
8 *Language Line Services, Inc.*, Case No. 30-2012-00578934-CU-OE-CXC (Orange County
9 Superior Court, Mar. 14, 2014) for \$900,000; *Anderson et al. v. Oracle Corp.*, Case No.
10 CIV469916/JCCP No. 4597 (Alameda Super. Ct., June 2013) for \$850,000; *Santini v. Wells*
11 *Fargo*, United States District Court, Northern District of California, Case No. 4:16-cv-01992-
12 YGR, substantial six figure sum obtained for phone center employees; *McDonagh v. Harrah's Las*
13 *Vegas, Inc, et al.*, Case No. 13-cv-01744 (United States District Court for the District of Nevada,
14 Dec. 13, 2016), for \$850,000. My Curriculum Vitae will be produced upon request. As a
15 shareholder of United Employees Law Group, I have continued adding to my extensive experience
16 with class action / PAGA cases.

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18 6. Based on my and my firm's background, our resources, and continuing efforts on
19 behalf of the Class, I confirm that I and my firm United Employees Law Group remain adequate
20 and committed to representing the Class through judgment, settlement administration, and
21 distribution of proceeds. Accordingly, I respectfully request that the Court make final its
22 appointment of United Employees Law Group as Class Counsel.

23 7. I have no conflicts of interest with the class or with the class representatives. I am
24 not related to the representative Plaintiff. I have not previously represented defendant in any
25 matter. I do not represent opposing factions within the class in that all claims are predicated upon
26 the same theories of liability and benefit all class members equally. In sum, I and my firm are well
27 suited to act as Class Counsel and will continue to vigorously represent the interests of the class.
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1 **Lodestar and Costs**

2 8. I have rendered legal service in this matter solely on a contingent-fee basis and have
3 been completely at risk that it would not receive any compensation for prosecuting claims against
4 the defendant.

5 9. The hours submitted with this declaration are solely for work I performed on behalf
6 of the class alleged in the above-entitled California action and not any other state or federal matter.

7 10. **Lodestar.** I have rendered 4.00 hours of documented legal services in this matter,
8 for a **lodestar of \$3,118.75**, as follows: 6/17/2024: Prepare for mediation (.50 hours); 6/18/2024:
9 appear at and participate in mediation; de-brief texts and phone calls after mediation with co-
10 counsel (2.25 hours); 1/28/2026: prepare declaration for final approval (1.25). My hourly rate in
11 2024 was \$725 / hour; in 2025 was \$750 / hour; and in 2026 is \$900 / hour.

12 11. No charges have been included for paralegal or staff time spent on this matter.

13 12. The fees incurred were reasonable and necessary in order to prosecute this case.
14 Based on my experience, the rates charged by Class Counsel are well within reasonable market
15 rates in Southern California, and generally modest when compared to other employment law
16 attorneys with comparable experience, and do not reflect the risk with this being a contingency
17 case.
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19 13. My firm will continue to work with co-counsel to represent the proposed Class
20 vigorously through the final settlement approval process and will collaborate with the Settlement
21 Administrator to ensure that the settlement administration goes smoothly and Class members
22 receive their settlement payments.

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1 14. Costs. I personally have incurred no additional costs attributable to United
2 Employees Law Group; those costs are submitted via the Declaration of Walter Haines, filed and
3 served concurrently herewith.

4 I declare under penalty of perjury of the laws of California and of the United States of
5 America that the foregoing is true and correct. Executed this 4th day of February, 2026, at San
6 Diego, California.

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10 Peggy J. Reali
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