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Attorneys for Plaintiff and the Putative Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

DEVINA VAUGHAN, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

DRS IMAGING SERVICES, LLC., a
Delaware Corporation; and DOES 1-50,
inclusive.

Defendants.

CASE NO.: 30-2023-01326591-CU-OE-CXC

Assigned to the Hon. William Cluster

**DECLARATION OF JOSHUA
FALAKASSA IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing:

Date: October 10, 2025

Time: 9:00 a.m.

Dept.: CX105

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1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California, and I am the principal of Falakassa Law, P.C., co-counsel with Mehrdad Bokhour, as attorney of record for Plaintiff Devina Vaughan and the Settlement Class. As such, I am familiar with the file in this matter, and if called as a witness, I could and would competently testify to the following facts of my own personal knowledge.

3. I am a 2013 graduate from the University of California, Berkeley, School of Law, (“Berkeley Law”) where I successfully completed courses in Labor Law, Employment Discrimination and Labor/Employment Arbitrations. During law school, I served as a summer associate at Sanford, Wittels and Heisler LLP, a boutique plaintiffs’ side employment law firm focusing on FMLA wage and hour class action litigation, and other public interest lawsuits. As a second-year law student, I served as a summer associate at the San Francisco office of Littler Mendelson, P.C., I aided employers in defending wage and hour class action lawsuits filed under California and federal law.

5. Thereafter, as principal of Falakassa Law, P.C., I have handled over 100 employee vs. employer litigation matters, including more than 40 class action wage/hour and PAGA cases. Over the last few years, my practice has almost entirely consisted of representing employees, the majority of which has included class action and representative action wage and

1 hour matters. In total, I have handled upwards of 90 class action and representative action
2 wage/hour cases.

3 6. I was selected as a “Super Lawyer Rising Star” in Employment Litigation during
4 the years 2017-2025, a distinction that is reserved for the top 2.5 % of lawyers in the practice
5 area. I have also been recognized by Topverdicts.com for achieving Top 20 and Top 50 wage
6 and hour class and PAGA actions settlements in California.

7 7. My firm has the experience, resources, and means necessary to allow us to
8 provide adequate representation to all Settlement Class Members in this Action. Currently, my
9 firm is acting as counsel in at least twenty-five wage-and-hour class actions and co-counsel in
10 at least twenty-five other wage-and-hour class actions.

11 8. Class Counsel are experienced California litigators with established track records
12 prosecuting complex class actions to successful resolution. After investigating the claims,
13 analyzing Defendant’s defenses, and preparing to litigate through certification and trial, both
14 Plaintiff and Class Counsel unequivocally support the proposed Settlement as the best outcome
15 for the Settlement Class under the circumstances described herein.

16 9. In my judgment, the per-capita recovery is well within—and in many instances
17 exceeds—the reasonable range for cases of this type. The Settlement delivers prompt, certain
18 compensation and avoids the substantial risks, expense, and delay of continued litigation and
19 potential appeals. The Class’s reaction confirms this assessment: no objections were filed and
20 no requests for exclusion were submitted. This uniformly positive response strongly supports
21 final approval.

22 10. All Rule 23(e)/California approval factors favor the Settlement. The agreement
23 was negotiated at arm’s length with the assistance of an experienced, respected mediator; Class
24 Counsel conducted extensive investigation and analysis of the claims; and, based on our
25 experience, the Settlement provides an excellent result for the Class. Given the robust process,
26 the informed evaluation of risks, and the Class’s unanimous support, the Settlement is fair,
27 adequate, and well within the range of reasonableness, and should be finally approved.

28 11. Class Counsel’s application for an award of Attorneys’ Fees in an amount of

approximately 33.33% of the Settlement Amount on behalf of the Settlement Class is reasonable and fair. The requested fee falls on the lower end of the Ninth Circuit's historical benchmark for attorneys' fees of 20% to 40% of a common fund. It is fair compensation for undertaking complex, risky, expensive, and time-consuming litigation on a contingent basis.

12. For Class Counsel, the fees here were wholly contingent in nature, and the case presented far more risk than the usual contingent fee case. There was the prospect of the enormous cost inherent in class action litigation and a long battle with the corporate Defendant. That prospect has become a reality in trial courts and the Court of Appeal in other wage and hour class litigations. Class Counsel risked not only a great deal of time but also a great deal of expense to ensure the successful litigation of this action on behalf of all Settlement Class Members. Based upon the foregoing, Class Counsel respectfully requests that the Court award Attorneys' Fees in the amount of \$93,666.67 and costs incurred in the amount of \$14,692.10.

13. Class Counsel will collectively work approximately 145.3 hours on this case. Class Counsel's hourly rate, in this case for Mehrdad Bokhour, is \$750 per hour. My hourly rate for matters like this is \$700 per hour, and I worked approximately 40.5 hours on this case since its inception. Accordingly, this results in a total lodestar amount of \$101,710, summarized in the following table and the declaration of Class Counsel. The hourly rates above are comparable to those of other attorneys with equal or similar experience.

Attorney	Experience	Hourly Rate	Hours	Total Lodestar
Mehrdad Bokhour	13 years	\$700	104.8	\$73,360
Joshua Falakassa	12 years	\$700	40.5	\$28,350
Total Lodestar				\$101,710

14. Attached hereto as **Exhibit "A"** are my firm's billing entries for this matter.

15. The ultimate result was far from certain. When this case was taken on a contingency fee basis, the firm agreed to assume responsibility for all litigation costs. In the course of this Action, Class Counsel paid all costs, including filing fees, court costs, research fees, and mediation costs. There was never a guarantee that we would recoup those expenditures.

16. It has been my experience that the benchmark for an attorney fee award in California state cases is one-third of a common settlement fund, which the California Supreme

1 Court recently upheld in the *Robert Half* case. Here, in accordance with the Settlement
2 Agreement, Class Counsel is seeking a fee of \$93,666.67, which is one-third of the Settlement
3 Amount.

4 17. The fee is warranted because of the results achieved for the Settlement Class
5 Members, both in terms of the immediate cash settlement and the fact that the Settlement Class
6 Members resoundingly supported the Settlement. Defendant does not oppose this fee request.

7 18. As set forth at the time of preliminary approval, Class Counsels' investigation into
8 the facts and merits of the wage and hour claims alleged included analyzing substantial amounts
9 of information, correspondence, documents, timekeeping and pay data, policies and procedures,
10 and evidence relating to the class size and the commonality of the claims. During this process,
11 Plaintiff and Class Counsel investigated the potential claims of the similarly situated employees
12 and researched and investigated Defendant's defenses. Finally, Class Counsel synthesized and
13 analyzed information provided by Defendant as to the total Settlement Class Members, the
14 number of current and former employees, and the number of employees who worked during
15 various time periods and prepared comprehensive damages calculations regarding the wage and
16 hour claims at issue.

17 19. In light of the uncertainties of protracted litigation, this negotiated Settlement
18 reflects the best practicable recovery for the Settlement Class. While the total Settlement amount
19 is, of course, a compromise figure, the potential risks and opportunities of both parties were
20 effectively weighed and considered by the parties, resulting in a fair and equitable Settlement.
21 Based upon detailed data obtained through discovery and information exchanges and factoring in
22 claim certification and liability probabilities, Class Counsel formulated detailed damages models
23 to evaluate the claims in preparation for mediation and reach a realistic and reasonable resolution.
24 Of course, Defendant denies that any damages should be assessed and denies all of the value
25 assessed by Plaintiff.
26

27 20. Moreover, as further detailed in Plaintiff's Motion for Preliminary Approval of
28 Class Action Settlement, Defendant strongly disputed the merits of the case and the damages on

1 several grounds.

2 21. The Settlement should be approved, and judgment entered based on the
3 determination that the Settlement is fair, reasonable, adequate, and in the best interests of the
4 Settlement Class.

5 22. In compliance with California Rules of Professional Conduct section 1.5.1,
6 Plaintiff signed a fee split agreement that provides fees will be allocated between Class Counsel
7 as follows: fifty percent (50%) to the Bokhour Law Group, P.C. and fifty percent (50%) to the
8 Falakassa Law, P.C.

9 I declare under penalty of perjury under the laws of California that the foregoing is true
10 and correct, this 16th day of September 2025, at Los Angeles, California.

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13 Joshua Falakassa
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EXHIBIT “A”

DEVINA VAUGHN v. DRS IMAGING SERVICES, LLC

Table 1

<i>Task 1: Investigations/Complaint</i>			
Attorney	Rate	Hours	Fee
Joshua Falakassa	\$700	7.9	\$5,530.00
Subtotals for Task 1		7.9	\$5,530.00

<i>Task 2: Informal Discovery</i>			
Attorney	Rate	Hours	Fee
Joshua Falakassa	\$700	8.6	\$6,020.00
Subtotals for Task 4		8.6	\$6,020.00

<i>Task 3: Mediation/Settlement</i>			
Attorney	Rate	Hours	Fee
Joshua Falakassa	\$700	19.0	\$13,300.00
Subtotals for Task 5		19.0	\$13,300.00

<i>Task 4: Motion for Preliminary Approval</i>			
Attorney	Rate	Hours	Fee
Joshua Falakassa	\$700	2.6	\$1,820.00
Subtotals for Task 6		2.6	\$1,820.00

<i>Task 5: Motion for Final Approval</i>			
Attorney	Rate	Hours	Fee
Joshua Falakassa	\$700	2.4	\$1,680.00
Subtotals for Task 6		2.4	\$1,680.00

<i>Task 5: Est. Future Work</i>			
Attorney	Rate	Hours	Fee
Joshua Falakassa	\$700	0.0	\$0.00
Subtotals for Task 6		0.0	\$0.00

Grand Total for All Attorneys		40.5	\$28,350.00
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DEVINA VAUGHN v. DRS IMAGING SERVICES, LLC

Table 2

Attorney/Timekeeper	Rate	Task/Category	Hours	Fee
FALAKASSA LAW, P.C. JOSHUA FALAKASSA	\$700	1. Investigations/ Complaint	7.9	\$5,530.00
		2. Informal Discovery	8.6	\$6,020.00
		3. Mediation/Settlement	19.0	\$13,300.00
		4. Motion for Preliminary Approval	2.6	\$1,820.00
		5. Motion for Final Approval	2.4	\$1,680.00
		6. Est. Future Work	0.0	\$0.00
		TOTAL for Joshua Falakassa	40.5	\$28,350.00

DEVINA VAUGHN v. DRS IMAGING SERVICES, LLC

Detailed Class Counsel Time Records

5/4/23	Joshua Falakassa	Speak with Potential Client; Review and Analyze intake notes to decide to pursue a case.	3.6	\$700	\$ 2,520.00	Investigations/Complaint
5/5/23	Joshua Falakassa	Discuss with co-counsel to about pursuing class action case.	0.5	\$700	\$ 350.00	Investigations/Complaint
5/5/23	Joshua Falakassa	Draft and revise Class Action Contingency Fee Agreement.	0.4	\$700	\$ 280.00	Investigations/Complaint
5/11/23	Joshua Falakassa	Draft and edit Letter to LWDA; speak with client	1.3	\$700	\$ 910.00	Investigations/Complaint
5/17/23	Joshua Falakassa	Draft and Edit Class Action Complaint; review with client	2.1	\$700	\$ 1,470.00	Investigations/Complaint
10/25/23	Joshua Falakassa	Met and Confer with Opposing Counsel about Mediation	1	\$700	\$ 700.00	Mediation/Settlement
11/16/23	Joshua Falakassa	Draft and edit Pre-Mediation Informal Discovery Request Letter; discuss mediation strategy with co-counsel	2.5	\$700	\$ 1,750.00	Informal Discovery
4/5/24	Joshua Falakassa	Conference Call with Opposing Counsel in re. Mediation	1	\$700	\$ 700.00	Informal Discovery
5/12/24	Joshua Falakassa	Review Informal Discovery Production.	5.1	\$700	\$ 3,570.00	Informal Discovery
6/19/24	Joshua Falakassa	Confer and strategize with Co-Counsel about Mediation	4	\$700	\$ 2,800.00	Mediation/Settlement
6/20/24	Joshua Falakassa	Draft, and editt Mediation Brief; investigation; legal research; speak with client	4.7	\$700	\$ 3,290.00	Mediation/Settlement
6/25/24	Joshua Falakassa	Attend Mediation; debrief client	9.3	\$700	\$ 6,510.00	Mediation/Settlement
1/16/25	Joshua Falakassa	Draft and Edit Motion for Preliminary Approval and Supporting Documents.	2.6	\$700	\$ 1,820.00	Motion for Preliminary Approval
9/14/25	Joshua Falakassa	Draft and Finalize Motion for Final Approval of Class Action Settlement.	2.4	\$700	\$ 1,680.00	Motion for Final Approval
Subtotals for Joshua Falakassa			40.5		\$ 28,350.00	

Key for Billing Entries

Investigations/Complaint
Informal Discovery
Mediation/Settlement
Motion for Preliminary Approval
Motion for Final Approval
Est. Future Work