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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN JOAQUIN**

10
11 SOMALIA GOODWIN and JOHN A.
12 MCGEHEE, On behalf of the general public as
private attorney general,

13 Plaintiffs,

14
15 v.

16 SAVE MART SUPERMARKETS, LLC, a
California Limited Liability Company; and
17 DOES 1-100, inclusive,

18 Defendants.
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Case No.: (Lead) STK-CV-UOE-2023-2062;
SCV-273343 (MCGEHEE class action) filed
in Sonoma county; SCV-273793
(MCGEHEE PAGA action) filed in Sonoma
county

**DECLARATION OF BRANDON
BROUILLETTE IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: August 26, 2025
Time: 9:00 a.m.
Dept.: 10D

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Attorneys for DUSTIN JOHNSON

I, BRANDON BROUILLETTE, declare:

2. Crosner Legal, P.C. is co-counsel representing Plaintiff Somalia Goodwin in the above entitled action.

4. Through formal and informal discovery, before the mediation Defendant produced time and pay records, wage statements, documents regarding its wage and hour policies and practices during the class period, a class list, and information the total number of current and former employees, the estimated total amount of workweeks and pay periods, their average hourly rate, and other relevant data.

6. In April 2024, the Parties participated in a private mediation with professional neutral Steve Mehta, Esq. The settlement negotiations were at arm's length and, although conducted in a professional manner, were adversarial. The parties went into the mediation willing

1 to explore the potential for a settlement of the dispute, but each side was also prepared to litigate
2 their or its position through trial and appeal if a settlement had not been reached. After extensive
3 negotiations and discussions regarding the claims and defenses in this action, as well as the risks
4 involved in further litigation, the Parties reached agreement on all material terms.

5 7. My office, along with co-counsel, has conducted a thorough investigation into the
6 facts of this case. Based on the foregoing informal discovery and independent investigation and
7 evaluation, I am of the opinion that the Settlement is fair, reasonable, and adequate and is in the
8 best interests of the Settlement Class Members in light of all known facts and circumstances, the
9 risk of significant delay, the defenses that could be asserted by Defendant both to certification and
10 on the merits, trial risk, and appellate risk

11 8. Although we believe that we could have prevailed, there was no guarantee that
12 Plaintiff would prevail on his theories. When the risks of prevailing at both certification and trial
13 are factored into the equation, the settlement value is reasonable and supported, as the \$950,000
14 total recovery on behalf of the class represents a substantial part of the maximum exposure.
15 Notably, the assigned certification probabilities far exceed the rate of certification in contested
16 motions in California over the past 5 years, based upon data available through the California Courts
17 website. *See, Findings of the Study of California Class Action Litigation, 2000-2006*, available at
18 <http://www.courts.ca.gov/documents/class-action-lit-study.pdf> (finding that only 21.4% of all
19 class actions were certified either as part of a settlement or as part of a contested certification
20 motion). In other words, well under 20% of all class actions are certified by way of contested
21 motion.
22

23 9. While Plaintiffs, co-counsel and I are confident in the merits of these claims, a
24 legitimate controversy exists as to each cause of action. We also recognized that proving the
25 amount of wages due to each Class Member would be an expensive, time-consuming, and
26 uncertain proposition.

27 10. The settlement obviates the significant risk that this Court may deny certification
28 of all or some of Plaintiffs' claims. Furthermore, even if Plaintiffs obtained certification of all or

1 some of the claims, continued litigation would be expensive, involving a trial and possible appeals,
2 and would substantially delay and reduce any recovery by the Settlement Class Members.

3 11. In sum, when the risks of litigation, the uncertainties involved in achieving class
4 certification, the burdens of proof necessary to establish liability, and the probability of appeal of
5 a favorable judgment are accounted for, it is clear the overall amount of \$5,600,000 is within the
6 “ballpark” of reasonableness and I respectfully submit final settlement approval is appropriate.

7 12. Through the filing the motion for final approval, Crosner Legal’s lodestar is
8 **\$157,015.00**, based on 207.3 attorney hours litigating the case. A true and correct summary of
9 the work we performed and time we expended on the case is attached hereto as Exhibit 1.

10 13. All of this time was reasonable and necessary to achieve the excellent settlement
11 for the Class.

12 14. Additional time will be incurred following final approval of the settlement. Based
13 on my experience, we will field a large number of phone calls and e-mails from class members
14 asking about the status of the settlement, when they can expect their settlement checks, income
15 tax issues, etc. We also will have additional communications with the Settlement Administrator
16 during the distribution process and regarding the final compliance report.

17 15. I am a graduate of Loyola Law School, Los Angeles, from which I received a
18 *juris doctorate* degree in 2009. Prior to attending law school, I attended the University of
19 Southern California, from which I received a *bachelors of science* in Business Administration in
20 2006.

21 16. I have been a Partner at Crosner Legal since February 1, 2023. Prior to joining
22 Crosner Legal, I was a Senior Associate and Team Director of a Wage and Hour Litigation Team
23 at Capstone Law APC, which I originally joined as an associate attorney in May 2016.

24 41. Since being admitted to the California State Bar in 2010, my entire legal career
25 has been dedicated to protecting employee and consumer rights through the prosecution of class
26 action and representative actions filed on behalf of plaintiffs in class actions and statewide
27 representative actions. Throughout my career I have managed or co-managed more than 100
28

1 class action and PAGA representative cases, from initial filing of the complaint through final
2 resolution.

3 17. In particular, I have served as class counsel in several certified class action cases,
4 including:

- 5 a. *Party City Wage and Hour Cases*, JCCP4781 (class counsel for certified class of non-
6 exempt hourly employees who worked for Defendants in California)
- 7 b. *Lewis v. Express Messenger Systems*, Los Angeles Superior Court Case No.
8 BC501521 (class counsel for certified class of last-mile delivery drivers who were
9 alleged to be misclassified as independent contractors)
- 10 c. *Ramirez-Vivar v. Grifols Diagnostic Solutions, Inc., et al.*, Alameda County Superior
11 Court, Case No. RG21099519 (class counsel for certified classes of non-exempt
12 hourly employees who worked for Defendants in California)
- 13 d. *Jones v. LA Live*, Los Angeles County Case No. BC687908 (class counsel for
14 certified issue classes consisting of hourly employees who worked at Staples Center
15 and Nokia Theater)

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17 18. The following is a representative sample of settlements in wage and hour class
18 action and PAGA representative cases in which I was listed as an attorney of record and either
19 managed, or co-managed with attorneys at my firm and other co-counsel:

- 20 e. *Cruz v. Walmart*, Los Angeles County Super. Ct. Case No. 18STCV03128 (\$15
21 million global PAGA settlement on behalf of hourly employees statewide for alleged
22 Labor Code violations.)
- 23 f. *Vorise v. 24 Hour Fitness USA, Inc.*, Contra Costa County Super. Ct., Case No. C 15-
24 02051 (\$11 million global PAGA settlement on behalf of over 36,000 employees for
25 Labor Code violations.)
- 26 g. *Gross v. Sodexo*, Kern County Super Ct., Case No. BCV-18-101746 Capstone (\$4.75
27 million class and PAGA settlement on behalf of class of non-hourly employees for
28 Labor Code violations.)

- 1 h. *Campbell v. AEG* (\$1.8M class and PAGA settlement on behalf of group of hourly
2 employees who worked at concert venues in California for alleged Labor Code
3 violations)
- 4 i. *Fiebelkorn v. AEG, et al.* Los Angeles Superior Court Case No. BC717337 (\$1.75M
5 class settlement on behalf of group of hourly employees who worked at Oakland
6 Coliseum for alleged Labor Code violations)
- 7 j. *Amaro v. Anaheim Arena Management*, Orange County Superior Court Case No. 30-
8 2017-00917542 (\$2,212,500 class and PAGA settlement on behalf of group of hourly
9 employees who worked at Honda center in Anaheim California for alleged Labor
10 Code violations)
- 11 k. *Espindola v. Panda Express*, San Bernardino Superior Court Case No.
12 CIVDS1931455 (\$3.125M class and PAGA settlement on behalf of hourly employees
13 statewide for alleged Labor Code violations)
- 14 l. *Gold v. Benihana*, San Diego Court Superior Court Case No. 37-2016-00022320-CU-
15 OE-NC (\$2.25M class and PAGA settlement on behalf of hourly employees statewide
16 for alleged Labor Code violations)
- 17 m. *Party City Wage and Hour Cases*, JCCP4781 (\$6.5M class and PAGA settlement on
18 behalf of hourly employees statewide for alleged Labor Code violations)
- 19 n. *Lewis v. Express Messenger Systems*, Los Angeles County Super Court Case No.
20 BC501521 (\$10.5M class and PAGA settlement on behalf of a statewide group of
21 independent contractor last-mile delivery drivers alleged to be misclassified)
- 22 o. *Flores v. Tesla*, Alameda County Superior Court Case No. RG18907072 (\$4M class
23 and PAGA settlement on behalf of statewide group of hourly employees for alleged
24 Labor Code violations)
- 25 p. *Ruiz v. Disney Stores*, San Bernardino Superior Court Case No. CIVDS2016983
26 (\$2M class and PAGA settlement on behalf of statewide group of hourly employees
27 who worked at retail stores in California for alleged Labor Code violations)
28

- 1 q. *Ramirez v. Yin Management*, Sacramento County Superior Court Case No. 34-2021-
2 00301530 (\$1.8M class and PAGA settlement on behalf of statewide group of hourly
3 employees who worked at Defendant's McDonald's franchises in California for
4 alleged Labor Code violations).
- 5 r. *Suhartono v. RRG Besh*, Los Angeles County Superior Court Case No.
6 19STCV22184 (\$2.25 class and PAGA settlement on behalf of statewide group of
7 hourly employees who worked at Defendant's McDonald's franchises in California
8 for alleged Labor Code violations).
- 9 s. *Gomes v. Kura Sushi*, Los Angeles County Superior Court Case No. 19STCV18977
10 (\$1.75M class and PAGA settlement on behalf of statewide group of hourly
11 employees who worked at Defendant's restaurants in California for alleged Labor
12 Code violations)
- 13 t. *Saldana v. Hydrochem*, Contra Costa Superior Court Case No. CIVMSC19-02624
14 (\$1.38M class and PAGA settlement on behalf of statewide group of hourly
15 employees for alleged Labor Code violations).

16
17 19. In addition, below are settlements in consumer class action cases in which I was
18 listed as an attorney of record and either managed, or co-managed with attorneys at my firm:

- 19 u. *Lopez v. Seterus, et al.*, Los Angeles Superior Court Case No. BC484297 (\$3M Class
20 settlement on half of thousands of borrowers in California, Florida, and Texas for
21 UCL violations premised on improper late fee collections)
- 22 v. *McGill v. Citibank*, Riverside County Superior Court Case No. RIC 1109398 (in
23 landmark case that established the 'McGill rule' precluding the waiver of public
24 injunctive relief in pre-dispute arbitration agreements, negotiated confidential
25 settlement on behalf of consumer who sued for damages and class injunctive relief
26 stemming from marketing of credit protector plan)

27 20. Finally, I have been selected by my peers as a Super Lawyers 'Rising Star' every
28 year since 2016 through 2022, which is a recognition that is provided to only 2.5% of active

1 lawyers practicing within the State of California

2 21. Zachary Crosner is a 2010 graduate of University of San Diego School of Law. He
3 has some thirteen years of experience as a practicing attorney, all of which have focused on
4 litigation of employment, labor law, consumer, and class action claims. Following graduation, he
5 immediately began working for a nationally recognized plaintiff-side complex litigation firm,
6 CaseyGerry, where he had the fortune of working directly with past presidents of the consumer
7 attorneys and recipients of trial attorneys of the year awards. He also worked for former CAALA
8 and CLAY trial attorney of the year recipient, attorney Conal Doyle, as his sole associate attorney.
9 During his tenure at these firms, he focused on advocating for the rights of consumers and
10 employees in class action litigation, civil rights and employment litigation, catastrophic injuries,
11 insurance bath faith, and appellate litigation.

12 22. In 2013, he founded the law firm of Crosner Legal, P.C., which since its inception
13 has focused almost exclusively on wage and hour class actions and other labor and employment
14 law cases representing plaintiffs. Currently, over ninety percent (90%) of the firm's practice is
15 dedicated exclusively to the prosecution of wage and hour class actions, and the law firm is
16 currently responsible as lead counsel or co-lead counsel for prosecuting well over fifty (50) wage
17 and hour class actions and/or PAGA representative actions in both federal and state courts
18 throughout California.

19 23. Mr. Crosner currently is an executive board member of the Wage and Hour
20 Committee and the Legislative Committee for the California Employment Lawyers Association; a
21 member of the Grassroots Advocacy Team for the National Employment Lawyers Association;
22 Wage and Hour Committee member and Class Action Committee member for the National Trial
23 Lawyers; a member of the American Association for Justice; and a member of the Pound Civil
24 Justice Institute. He also was selected by Super Lawyers as a "Southern California Rising Star"
25 for employment and labor law for 2018-2023.

26 24. Branden Hamilton obtained her undergraduate degree from UCLA in 2004, and her
27 law degree from George Washington University in 2007. She has been affiliated with my firm
28

1 since 2017 and became Of Counsel with Crosner Legal in 2019, and her practice focuses almost
2 exclusively on wage and hour class and representative actions. She has spent her entire career
3 representing plaintiffs in employment litigation, including several years as an associate at well-
4 known plaintiff's firm Carlin & Buchsbaum.

5 25. Kiara Bramasco received her undergraduate degree, magna cum laude, from
6 Loyola Marymount University in Political Science, and then received her JD from Loyola Law
7 School in 2018. She then spent several years with well-known plaintiff's firm Moss Bollinger,
8 first as a law clerk and then as an associate, where her practice focused on employment law,
9 particularly wage and hour class action and PAGA litigation. She joined Crosner Legal in 2021
10 and is head of the Firm's Pre-Litigation Department.

11 26. Samantha A. Smith is a former Partner of Crosner Legal P.C. where her practice
12 focused on managing wage and hour class action and PAGA settlements. Ms. Smith was
13 admitted to the California Bar in December of 2004, and received a J.D. from University of
14 California, Hastings College of the Law and a B.A. from University of California, Davis. Ms.
15 Smith has dedicated her 20-year career to plaintiffs'-side class action litigation. Her wealth of
16 experience includes successful work on all stages of class action litigation, including class action
17 appeals, class certification motions, and class settlements. See, e.g., *Blue Diamond Growers*
18 *Product Labeling Cases*, JCCP No. 4822 (Los Angeles County Superior Court) (false advertising
19 of Blue Diamond food products); *Adam vs. eHealth, Inc.*, Case No. 17CV309050 (Santa Clara
20 Superior Court) (employee data breach); *Overton v. Armour-Eckrich Meats, LLC*, Case No.
21 CIVDS1501325 (San Bernardino County Superior Court) (unpaid wages, meal period and rest
22 break claims, and PAGA violations for nonexempt employees); *DeLeon et al. v. Westlake*
23 *Services, LLC*, Case No. BC 526750 (Los Angeles County Superior Court) (unpaid overtime,
24 meal period and rest break claims for call center employees); *Sawyer v. Retail Data, LLC*, Case
25 No. 30-2014-00753767-CU-OE-CXC (Orange County Superior Court) (unpaid wage and rest
26 break claims for piece rate workers); *Nguyen v. Pharmerica Corporation et al.*, Case No. 30-
27 2014-00716072-CU-OE-CXC (Orange County Superior Court) (unpaid wages and unreimbursed
28

1 expenses for pharmacists); *Laumea v. Performance Food Group, Inc.*, Case No. CIVDS1407509
2 (San Bernardino Superior Court) (unpaid wages, meal and rest break claims for non-exempt
3 employees); *Durroh v. East West Bank*, Case No. BC528860 (Los Angeles Superior Court)
4 (overtime claims for failure to include bonuses in regular rate of pay for bank workers);
5 *Gonzalez et al. v. SFFI Company, Inc. et al.*, Case No. CIVDS1504287 (San Bernardino
6 Superior Court) (unpaid wages, meal period and rest break claims for non-exempt employees).

7 27. Jonathan Stilz is a former associate with Crosner Legal. He graduated from the
8 University of California, San Diego, in 2010, and graduated cum laude from California
9 Western School of Law in 2015. He has extensive experience in employment matters,
10 including wrongful termination, class action, and representative PAGA lawsuits. He formerly
11 worked at a national firm defending employers in various employment related matters prior to
12 joining Crosner Legal in October, 2021, as an associate attorney.

13 28. Crosner Legal, P.C. has obtained several multi-million dollar wage and hour class
14 action settlements while serving as lead class counsel in recent years, including but not limited to
15 a \$1.9 million wage and hour class action settlement in 2015 (*Smith v. Lux Retail North America,*
16 *Inc.*, Case No. 3:13-cv-01579-WHA (N.D. Cal.)); a \$4.1 million wage and hour class action
17 settlement in 2016 (*Aguirre v. Mariani Nut Company, Inc. et al.*, Case No. 34- 2016-00190252
18 (Sacramento Cty. Super Ct.)); a \$1.35 million wage and hour class action settlement in 2017
19 (*Montelone v. Ocean Cities Pizza, Inc.*, Case No. 56-2014-00458249 (Ventura Cty. Super. Ct.)),
20 a \$1.8 million wage and hour class action settlement in 2018 (*Latham v. K.W.P.H. Enterprises,*
21 *Inc. dba American Ambulance*, Case No. 17C-0162 (Kings Cty. Super Ct.)), a \$1.3 million wage
22 and hour class action settlement in 2019 (*Means, et al. v. AirGas USA, LLC*, Case No. 17-CV-
23 2160 JGB (C.D. Cal.)), a \$1.5 million wage and hour settlement in 2020 (*Babouchian, et al. v.*
24 *Wyndham Vacation Ownership, et al.*, Case No. CV18-14601 (San Diego Cty. Super. Ct.)), a
25 \$1.15 million wage and hour class action settlement in 2020 (*Buford v. Medical Solutions LLC*,
26 Case No. 4:18-CV-04864-YGR (N.D.Cal.)); a \$7.25 million wage and hour class action
27 settlement in 2020 in *Avina, et al. v. First Alarm Security & Patrol, Inc.*, Case No. 18CV323753
28

(Santa Clara Cty. Super Ct.); a \$2.2 million wage and hour class action settlement in 2021 (*Ghorchian, et al. v. West Hills Hospital, et al.*, Case No. LS029737 (Los Angeles Cty. Super. Ct.)); a \$2.85 million dollar wage and hour settlement in 2021 (*Valencia v. The Original Mowbray's Tree Service, Inc.*, Case No. CIVDS1825518 (San Bernardino Cty. Super. Ct.)); a \$1 million wage and hour class action settlement in 2022 (*Duong v. Loan Factory, Inc.*, Case No. 21CV382467 (Santa Clara Cty. Super. Ct.)), a \$1.4 million wage and hour class action settlement in 2023 in *Correa, et al. v. FedEx Supply Chain, Inc.*, Case No. CIVDS2023369 (San Bernardino Cty. Super. Ct.), a \$2.38 million wage and hour class action settlement in 2023 in *Michel, et al. v. Valley Thrift Store, Inc.*, Case No. 21STCV00925 (Los Angeles Cty. Super. Ct.); a \$2.5 million wage and hour class action settlement in 2023 in *Jajuga v. Pilot Travel Centers*, Case No. CIVDS1931464 (San Bernardino Cty. Super. Ct.); \$1.015 million wage and hour class action settlement in 2023 in *Gotishan v. Kyo Autism Therapy*, Case No. CGC-21-596378 (San Francisco Cty. Super. Ct); and a \$1.15 million wage and hour PAGA settlement in 2023 in *Vaughn v. Public Health Foundation Enters., Inc.*, Case No. 21STCV18512 (Los Angeles Cty. Super. Ct.); a \$1.5 million wage and hour class action settlement in *McKinnie v. Iron Mountain*, Case No. 21STCV05707 (Los Angeles Cty. Super. Court); a \$1.3 million wage and hour class action settlement in *Ellsworth, et al. v. Hallcon*, Case No. 20STCV06618 (Los Angeles Cty. Super. Court); a \$1.925 million wage and hour class settlement in 224 in *Lo v. Cyberpower, Inc.*, Case No. 21STCV31479 (Los Angeles Cty. Super. Ct); a \$1.19 million dollar wage and hour class action settlement in 2024 in *Herrera v. Signature Flight Support LLC*, Case No. 22STCV18367 (Los Angeles Cty. Super. Ct.); a \$2.65 million wage and hour class action settlement in 2024 in *Shilevinatz v. Airport Terminal Services*, Case No. CIVSB2229072 (San Bernardino Cty. Super Ct.); a \$1 million wage and hour class action settlement in 2025 in *Hernandez v YZER, LLC*, Case No. 23CV025345 (Alameda Cty. Superior Ct); a \$3.9 million wage and hour class action settlement in 2025 in *Bolanos et al. v. Newport Fab*, Case No. 30-2022-01280696-CU-OE-CXC (Orange Cty. Super. Ct.); and a \$5,093,537.50 wage and hour

1 class action settlement in 2025 in *Deaver, et al. v Blue Diamond Growers*, Case No. 34-2022-
2 00316490-CU-OE-GDS (Sacramento Cty. Super. Ct.).

3 29. Based upon the qualifications and experience set forth above, I submit the following
4 hourly rates are reasonable: Zachary M. Crosner, \$800/hour; Brandon Brouillette and Samantha
5 Smith \$750/hour; Kiara Bramasco and Jonathan Stilz \$650/hour; and Branden Hamilton
6 \$600/hour.

7 30. The requested rates also comport with the adjusted Laffey Matrix, which provides
8 that reasonable hourly rates for attorneys with 20+ years of experience, such as Mr. Donnelly,
9 are over \$1000/hour during the time this matter has been pending, while rates for attorneys such
10 as myself and Mr. Crosner, with 10+ years of experience are over \$800/hour. The adjusted
11 Laffey Matrix may be found at <http://www.laffeymatrix.com/see.html>.

12 31. As noted, Crosner Legal has represented Plaintiff Goodwin for over two years
13 with respect to this matter and has expended a significant amount of time and resources in that
14 representation. Our firm agreed to litigate this case on a purely contingent basis and in so doing
15 assumed considerable risk of non-payment for its fees and costs, as discussed above, and as is the
16 case with these cases in general. Under all relevant factors (as outlined herein, in the
17 declarations of co-counsel, and in the accompanying memorandum), I respectfully request the
18 Court award Plaintiffs' counsel the requested fees of \$1,866,666.67. These fees will be split
19 between Crosner Legal and our co-counsel per a written fee sharing agreement. All Plaintiffs
20 have been advised of the fee split and consented thereto in writing.

21 32. A true and correct itemization of the costs and expenses incurred by Crosner
22 Legal is set forth below:
23

24 DESCRIPTION	25 AMOUNT
26 Filing Fees/Service of Process/Attorney Service	\$6,405.12
27 Mediation Expenses	\$11,887.50
28 Expert Fees	\$7,965.00
PAGA Filing Fee	\$75.00
Postage/Delivery	\$125.56

Total Costs Requested	\$26,458.18
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I join with my co-counsel in requesting that the Court approve reimbursement of \$26,458.18 to Crosner Legal for costs, in addition to those amounts requested by co-counsel.

33. For all the foregoing reasons, I respectfully request the Court grant final approval to the proposed settlement in all particulars.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 24th day of July, at Los Angeles, California.



Declarant

EXHIBIT

1

Somalia Goodwin v. Save Mart Supermarkets LLC
(San Joaquin County Superior Court Case No. STK-CV-UOE-2023-2062)

Crosner Legal Time Report

Tasks	Zachary Crosner	Jamie Serb	Brandon Brouillette	Kiara Bramasco	Branden Hamilton	Samantha Smith	Jonathan Stilz
Pre-filing Case Investigation	4.7	1.3	---	3.5	5.5	--	--
Pleadings and Law and Motion	5.5	4.4	1.2	6.3	2.8	8.5	--
Discovery and Post-Filing Investigation	6.7	--	6.5	--	--	21.5	3.4
Court Appearances	--	--	--	--	--	--	--
Case Management; Litigation Strategy & Analysis	10.2	11.4	28.6	--	--	18.3	--
Mediation and Settlement	12.6	--	44.4	--	--	--	--
Total Hours	39.7	17.1	80.7	9.8	8.3	48.3	3.4
Hourly Rate	\$850	\$800	\$800	\$650	\$650	\$850	\$650
Lodestar	\$33,745.00	\$13,680.00	\$54,560.00	\$6,370.00	\$5,395.00	\$41,055.00	\$2,210.00

Total Hours: 207.30
Total Lodestar: \$157,015.00

1 **PROOF OF SERVICE**

2 *Somalia Goodwin v. Save Mart Supermarkets, LLC*
3 *Superior Court County of San Joaquin Case No.*
4 *STK-CV-UOE-2023-2062*

5 At the time of service, I was over 18 years of age and not a party to this action. I am
6 employed in the County of Los Angeles, State of California. My business address is 9440 Santa
7 Monica Blvd., Ste. 301, Beverly Hills, CA 90210.

8 On July 24, 2025, I served true copies of the following document(s) described as

9 **DECLARATION OF BRANDON BROUILLETTE IN SUPPORT OF MOTION**
10 **FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

11 on the interested parties in this action as follows:

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13 Ryan McCoy
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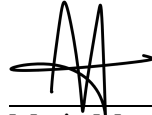
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[X] **BY EMAIL OR ELECTRONIC TRANSMISSION.** Based on an agreement of the parties to accept service by email or electronic transmission, I caused the document(s) to be sent from vardui@crosnerlegal.com to the person(s) at the email addresses listed in the service list. The email or electronic transmission was sent on the date below.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct and that I am employed in the office of a member of the bar of this
Court at whose direction the service was made.

3 Executed on July 24, 2025, in Los Angeles, California.

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