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Attorneys for Plaintiff Francisco Garcia,
and all others similarly situated

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

FRANCISCO GARCIA, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

REFRESCO BEVERAGES US, INC., a
Georgia Corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. CIVSB2313159

Assigned To: Hon. Kevin C. Lee

**DECLARATION OF JASON HATCHER
IN SUPPORT OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Date: June 17, 2026

Time: 8:30 a.m.

Dept.: S26

Complaint Filed: June 8, 2023

FAC Filed: September 5, 2023

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I, Jason Hatcher, declare as follows:

1. I am an attorney at The Myers Law Group, A.P.C. counsel for the named Plaintiff
 co Garcia (“Plaintiff”), on behalf of himself and other similarly situated individuals, in the
 entitled action. I am a member in good standing of the bar of the State of California and
 admitted to practice in this Court. I have personal knowledge of the matters set forth herein,
 called upon as a witness to testify thereto, I could and would competently do so.

2. I graduated from Southwestern Law School in 2012. I am an active member in standing with the State Bar of California and State Bar of Nevada. I was admitted to the State California on or about December 3, 2012. I was admitted to the State Bar of Nevada on or May 7, 2021. I am admitted to practice before the United States District Court – Northern, Southern, and Eastern Districts of California; United States Ninth Circuit Court of Appeals; and all of California State Courts. During law school, I externed for the Honorable Judge V. Wilson in the U.S. District Court in the Central District of California and for the Honorable Anthony J. Mohr in Los Angeles County Superior Court's Complex Civil Department. I have been an attorney with The Myers Law Group, A.P.C. ("MLG") since March 2015. Prior to 2015, I was an attorney at the Law Office of Joseph Antonelli from December 2012 to January 2013. I have also achieved the honor of Southern California Rising Star by Super Lawyers for the years 2017 to 2022. I was selected as a Southern California Super Lawyer in 2023.

3. I have helped litigate numerous successful wage and hour class actions in California. I have also been successful in supporting efforts in obtaining favorable published decisions for employees in the state of California:

- a. *Vazquez v. SaniSure, Inc.*, 101 Cal.App.5th 139 (2024);
- b. *Vasserman v. Henry Mayo Newhall Memorial Hospital*, 65 F.Supp.3d 932 (Central District 2014); and
- c. *Falk v. Children's Hospital Los Angeles*, 237 Cal.App.4th 1454 (2015).

These cases were significant decisions related to wage and hour class actions, as in *Vazquez*.¹⁰ The Court of Appeal held that an employer and employee can agree to arbitrate claims related to

1 their employment relationship, but the termination of that relationship revokes the arbitration
2 agreement and when there is no evidence that the parties agreed to arbitrate claims arising from a
3 subsequent employment relationship, any claims arising solely from that subsequent relationship
4 are not subject to arbitration (*Vazquez*); in *Vasserman* the Court held that no federal preemption
5 or federal question jurisdiction exists over claims that arise under state law, rather than Collective
6 Bargaining Agreements that govern employment of putative class members, so long as the
7 resolution of the state law claims will not substantially depend on interpretation of those
8 agreements (*Vasserman*); to the application of the tolling doctrine as applied to subsequent class
9 actions being filed when the previous action was disposed of without a ruling on certification
10 (*Falk*).

11 4. I have previously supported, or am currently supporting, the litigation of multiple
12 wage and hour class actions that resulted in approved settlements for the class members. The
13 following is a sample of those cases:

14 **HCA Healthcare**

15 (A) Declarant helped litigate the certified class action matter of *Rum v. HCA*
16 *Healthcare, Inc.*, Central District of California US District Court Case No: 23-cv-5142-JFW
17 (BFMx). On or about February 1, 2024, the Honorable John F. Walter. granted certification of
18 class action and appointed The Myers Law Group, A.P.C. –David P. Myers, Jason Hatcher, and
19 Andriana Bravo as class counsel. *Rum v. HCA Healthcare, Inc.* (C.D.Cal. Feb. 1, 2024, No. CV
20 23-5142-JFW(BFMx)) 2024 U.S.Dist.LEXIS 53269.

21 **Children’s Hospital of Orange County**

22 (B) Declarant supported and helped litigate the class action matter of *De La Pena v.*
23 *Children’s Hospital of Orange County*, Orange County Superior Court Case No: 30-2018-
24 01014749-CU-OE-CXC. On or about June 10, 2025, the Honorable David A. Hoffer granted final
25 approval of the class action and PAGA action settlement for the total amount of \$10,000,000.00
26 and confirmed The Myers Law Group, A.P.C. – David P. Myers, Jason Hatcher, and Andriana N.
27 Bravo as co-class counsel.

28 ///

1 **US Bank**

2 (C) Declarant supported and helped litigate the class action matter of *Rodriguez v. U.S.*
3 *Bank National Association*, Los Angeles Superior Court Case No: BC617356. On or about October
4 11, 2022, the Honorable Lawrence P. Riff granted final approval of the class action settlement for
5 the total amount of \$10,750,000.00 and confirmed The Myers Law Group, A.P.C. – David P.
6 Myers, Robert M. Kitson, and Jason Hatcher as co-class counsel.

7 **City of Oxnard**

8 (D) Declarant supported and helped litigate the certified class and collective action of
9 *Alvarez, et al. v. City of Oxnard*. See *Alvarez v. City of Oxnard* (C.D. Cal. Dec. 17, 2020, No. CV
10 19-8044 PSG (JCx)) 2020 U.S.Dist.LEXIS 250524 (granting preliminary collective FLSA
11 certification); *Alvarez v. City of Oxnard* (C.D. Cal. Dec. 17, 2020, No. CV 19-8044 PSG (JCx))
12 2020 U.S.Dist.LEXIS 250522 (granting class certification). On or about March 20, 2023, the
13 Honorable Philip S. Gutierrez granted final approval of the class action settlement for the total
14 amount of \$3,500,000.00. See US Central District Case No. 19-cv-08044 at Dkt. 100.

15 **Cox Communications Cal., LLC, et al.**

16 (E) Declarant supported and helped litigate the certified class action matter of *Feltzs v.*
17 *Cox Communications Cal., LLC, et al.* The U.S. District Court Central District of California
18 partially certified a class action on June 1, 2021. *Feltzs v. Cox Communs. Cal., LLC* (C.D. Cal.
19 June 1, 2021, No. SACV 19-2002 JVS (JDEx)) 2021 U.S.Dist.LEXIS 146447. On or about August
20 1, 2022, the Honorable James V. Selna granted final approval of the class action settlement for the
21 total amount of \$1,850,000.00. See Central District Case No. 18-cv-02136 at Dkt. 126.

22 **Seasons Hospice & Palliative Care**

23 (F) Declarant supported and helped litigate the class action matter of *Dunn v. Seasons*
24 *Hospice & Palliative Care of California, Inc., et al.*, San Bernardino Superior Court Case No:
25 CIVDS1824275. On or about July 21, 2022, the Honorable David S. Cohn granted final approval
26 of the class action settlement for the total amount of \$800,000.00 and confirmed The Myers Law
27 Group, A.P.C. – David P. Myers, Jason Hatcher, and Cassandra A. Castro as class counsel.

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1 **Penn Ridge Transportation, Inc.**

2 (G) Declarant supported and helped litigate the class action matter of *Castellon v. Penn-*
3 *Ridge Transp., Inc.*, Central District Court Case No: ED CV 18-02136. On July 19, 2019, the
4 Court certified The Myers Law Group, APC—David P. Myers, Robert M. Kitson, and Jason
5 Hatcher—as adequate class counsel for settlement. *Castellon v. Penn-Ridge Transp.* (C.D. Cal.
6 July 19, 2019, No. EDCV 18-02136 AG (KKx)) 2019 U.S. Dist. LEXIS 237071. On November 3,
7 2020, the Honorable John A. Kronstadt granted final approval of the class action settlement for
8 the total amount of \$1,962,157.27 *Castellon v. Penn-Ridge Transp., Inc.* (C.D. Cal. Nov. 3, 2020,
9 No. ED CV18-02136 JAK (KKx)) 2020 U.S. Dist. LEXIS 245742.

10 **Compass Group USA, Inc.**

11 (H) Declarant supported and helped litigate the class action matter of *Gonzalo Romero,*
12 *et al. v. Compass Group USA, Inc. dba Canteen Vending Services*, San Bernardino Superior Court
13 Case No. CIVDS1512026 as an attorney at The Myers Law Group, APC. On or about October 3,
14 2017, the Honorable Thomas S. Garza granted final approval of the class action settlement in the
15 *Compass* matter for the amount of \$4,000,000.00 and confirmed David P. Myers, Robert M. Kitson
16 and Jason Hatcher as class counsel.

17 **Transtreme, LLC**

18 (I) Declarant supported and helped litigate the class action matter of *Jackie Solgan v.*
19 *Transtreme, LLC*. (“*Transtreme*”), San Bernardino Superior Court Case No. CIVDS1919244, as
20 an attorney at The Myers Law Group, APC. On or about October 5, 2020, the Honorable Janet M.
21 Frangie granted final approval of the class action settlement in the *Transtreme* matter for the
22 amount of \$1,000,000.00 and confirmed David P. Myers, Robert M. Kitson and Jason Hatcher of
23 the Myers Law Group, A.P.C. as Class Counsel.

24 **Professional Electrical Construction Services, Inc.**

25 (J) Declarant supported and helped litigate the class action matter of *Salvador Ayon v.*
26 *Professional Electrical Construction Services, Inc.* (“PECS”), San Bernardino Superior Court
27 Case No. CIVSB2203994, as an attorney at The Myers Law Group, APC. On or about September
28 12, 2023, the Honorable Jessica Morgan granted final approval of the class action settlement in

1 the PECS matter for the amount of \$770,000.00 and confirmed David P. Myers and Jason Hatcher
2 of The Myers Law Group, A.P.C. as Class and Collective Counsel.

3 **Image International Manufacturing, LLC**

4 (K) Declarant supported and helped litigate the class action matter of *Lynn Hodge v.*
5 *Image International Manufacturing, LLC, et al.* (“Image”), U.S. District Court Central District
6 Case No. EDCV 18-925 JGB (SHKx) as an attorney at The Myers Law Group, APC. On or about
7 October 7, 2019, the Honorable Jesus G. Bernal granted final approval of the class action
8 settlement in the *Image* matter where the Court had appointed The Myers Law Group, A.P.C.,
9 David P. Myers, Robert M. Kitson and Jason Hatcher as counsel on behalf of the Settlement Class
10 for purposes of settlement only.

11 **D&R Glass, Inc.**

12 (L) Declarant supported and helped litigate the class action matter of *Aaron Tellez-*
13 *Giron v. D&R Glass, Inc.* (“D&R Glass, Inc.”), San Bernardino Superior Court Case No.
14 CIVDS1821562, as an attorney at The Myers Law Group, APC. On or about February 2, 2021,
15 the Honorable David Cohn granted final approval of the class action settlement in the *D&R Glass,*
16 *Inc.* matter for the amount of \$675,000.00 and confirmed David P. Myers and Jason Hatcher of
17 The Myers Law Group, A.P.C. as Class Counsel.

18 **Investment Concepts, Inc.**

19 (M) Declarant supported and helped litigate the class action matter of *Lisa Miller v.*
20 *Investment Concepts, Inc.* (“ICI”), Santa Barbara Superior Court Case No. 19CV04672, as an
21 attorney at The Myers Law Group, APC. On or about October 26, 2022, the Honorable James F.
22 Rigali granted final approval of the class action settlement in the *ICI* matter for the amount of
23 \$546,677.68 and confirmed David P. Myers and Jason Hatcher of The Myers Law Group, A.P.C.
24 as Class Counsel.

25 **Children’s Hospital Los Angeles**

26 (N) Declarant supported and helped litigate the class action matter of *Denise Mays v.*
27 *Children’s Hospital Los Angeles* (“CHLA”), Los Angeles Superior Court Case No. BC477830
28 during the time Declarant was an associate attorney at the Law Office of Joseph Antonelli. In or

1 about September 2016, the Honorable Ann I. Jones granted final approval of the class action
2 settlement in the *CHLA* matter for the amount of \$27,000,000.00.

3 **Micro World Corp. dba Barska**

4 (O) Declarant supported and helped litigate the class action matter of *Angelo Fabela*
5 *and Jesse Ortiz v. Micro World Corp. dba Barska* (“Barska”), Los Angeles Superior Court Case
6 No. BC509643 during the time Declarant was an associate attorney at the Law Office of Joseph
7 Antonelli. In or about May 2014, the Honorable Elihu M. Berle granted final approval of the class
8 action settlement in the *Barska* matter for the amount of \$1,050,000.00 and “appoint[ed], for
9 settlement purposes only, Joseph Antonelli, Janelle Carney, and Jason Hatcher [Declarant] . . . as
10 class counsel.”

11 **UniFirst Corporation**

12 (P) Declarant supported and helped litigate the class action matter of *Evelia Mosqueda*
13 *v. UniFirst Corporation* (“UniFirst”), United States District Court Central District of California
14 Case No. CV 14-05324-AB (VBKx), during the time Declarant was an associate attorney at the
15 Law Office of Joseph Antonelli. In or about December 2015, the Honorable Andre Birotte, Jr.
16 granted final approval of the class action settlement in the *UniFirst* matter for the amount of
17 \$2,600,000.00.

18 **Iron Mountain**

19 (Q) Declarant supported and helped litigate the class action matter of *Marc Casanova,*
20 *et al. v. Iron Mountain Information Management Services, Inc., et al.* (“Iron Mountain”), Los
21 Angeles Superior Court Case No. BC543256 during the time Declarant was an associate attorney
22 at the Law Office of Joseph Antonelli. In or about January 2016, the Honorable Kenneth Freeman
23 granted final approval of the class action settlement in the *Iron Mountain* matter for the amount of
24 \$2,800,000.00.

25 **Classic Residence Management, LP dba Vi at La Jolla**

26 (R) Declarant supported and helped litigate the class action matter of *Shiela Victoriano*
27 *v. Classic Residence Management, LP dba Vi at La Jolla* (“Vi”), San Diego Superior Court Case
28 No. 37-2014-00028031-CU-OE-CTL during the time Declarant was an associate attorney at the

1 Law Office of Joseph Antonelli. In or about May 2016, the Honorable Richard E.L. Strauss granted
2 final approval of the class action settlement in the *Vi* matter for the amount of \$3,000,000.00.

3 **Parkview Community Hospital Medical Center**

4 (S) Declarant supported and helped litigate the class action matter of *Amber Bart v.*
5 *Parkview Community Hospital Medical Center* (“*Parkview*”), Riverside Superior Court Case No.
6 RIC1406044 during the time Declarant was an associate attorney at the Law Office of Joseph
7 Antonelli. In or about September 2016, the Honorable Sharon J. Waters granted final approval of
8 the class action settlement in the *Parkview* matter for the amount of \$2,550,000.00.

9 5. Ms. Castro graduated from Boston University School of Law in 2020 and is an
10 active member in good standing with the State Bar of California. She was admitted to the State
11 Bar of California on or about January 19, 2021. Ms. Castro is admitted to practice before the United
12 States District Court – Northern, Central, Southern, and Eastern Districts of California; United
13 States Ninth Circuit Court of Appeals; and all of California State Courts. During law school, Ms.
14 Castro externed as a summer Law Clerk at MLG and later worked at MLG as part of the State Bar
15 of California’s Practical Training of Law Students (also known as Certified Law Student) program
16 under the supervision of me. In December 2020, Ms. Castro was admitted to practice under Cal.
17 Rule of Court, Rule 9.49, as a Provisionally Licensed Lawyer under the supervision of David P.
18 Myers. After being licensed on January 19, 2021, Ms. Castro worked as an associate attorney at
19 MLG until December 16, 2022. At MLG, Ms. Castro focused solely on plaintiff-side employment
20 matters, including wage and hour class actions and PAGA actions. Ms. Castro supported and
21 helped litigate the certified class and/or collective actions of:

- 22 • *Alvarez, et al. v. City of Oxnard. See Alvarez v. City of Oxnard* (C.D. Cal. Dec. 17,
23 2020, No. CV 19-8044 PSG (JCx)) 2020 U.S.Dist.LEXIS 250524 (granting
24 preliminary collective FLSA certification); *Alvarez v. City of Oxnard* (C.D. Cal.
25 Dec. 17, 2020, No. CV 19-8044 PSG (JCx)) 2020 U.S.Dist.LEXIS 250522
26 (granting class certification);
- 27 • *Feltzs v. Cox Communications Cal., LLC, et al.* The U.S. District Court Central
28 District of California partially certified a class action on June 1, 2021. *Feltzs v. Cox*

1 *Communs. Cal., LLC* (C.D. Cal. June 1, 2021, No. SACV 19-2002 JVS (JDEx))
2 2021 U.S.Dist.LEXIS 146447. On or about August 1, 2022, the Honorable James
3 V. Selna granted final approval of the class action settlement for the total amount
4 of \$1,850,000.00. *See* Central District Case No. 18-cv-02136 at Dkt. 126.

- 5 • *Dunn v. Seasons Hospice & Palliative Care of California, Inc., et al.*, San
6 Bernardino Superior Court Case No: CIVDS1824275. On or about July 21, 2022,
7 the Honorable David S. Cohn granted final approval of the class action settlement
8 for the total amount of \$800,000.00 and confirmed The Myers Law Group, A.P.C.
9 – David P. Myers, Jason Hatcher, and Cassandra A. Castro as class counsel.
- 10 • *Lisa Miller v. Investment Concepts, Inc. (“ICI”)*, Santa Barbara Superior Court Case
11 No. 19CV04672, as an attorney at The Myers Law Group, APC. On or about
12 October 26, 2022, the Honorable James F. Rigali granted final approval of the class
13 action settlement in the *ICI* matter for the amount of \$546,677.68 and confirmed
14 David P. Myers, Jason Hatcher, Mordan J. Good, and Cassandra A. Castro of The
15 Myers Law Group, A.P.C. as Class Counsel.

16 From August 2023 to August 2025, Ms. Castro was a Senior Associate Attorney at Lavi &
17 Ebrahimian, LLP, where her practice focused solely on wage and hour class actions, PAGA
18 actions, and individual wage and hour matters. While at Lavi & Ebrahimian, Ms. Castro was
19 confirmed as Class Counsel in several class and/or PAGA actions, including but not limited to the
20 following actions: *Nunez v. E & T Foods, Inc.*, Los Angeles Superior Court Case No.
21 21STCV22410 (Settlement Class Approved); *Raygoza v. Raven Industries, Inc., et al.*, San
22 Bernardino Superior Court Case No. CIVSB2211390 (Settlement Class Approved); *Stuart v. AIO*
23 *Acquisition, Inc., et al.*, San Bernardino Superior Court Case No. CIVSB2209113 (PAGA
24 Settlement Approved in 2025, billable rate of \$675/hr); *Minas et al. v. Panda Express, Inc. et al.*,
25 Los Angeles Superior Court Case No. 22STCV07753 (PAGA Settlement Approved in 2024,
26 billable rate of \$675/hr). Ms. Castro rejoined The Myers Law Group, A.P.C. in September 2025.

27 6. Andriana N. Bravo, Esq. was admitted to practice in California on May 9, 2023.
28 Ms. Bravo completed her undergraduate studies at the University of San Francisco with Bachelor

1 of Arts degrees in both Economics and International Studies, while also completing minors in
2 Legal Studies and African Studies. Ms. Bravo graduated from the University of the Pacific,
3 McGeorge School of Law, in May 2022. As a law student, Ms. Bravo was a law clerk with Legal
4 Services of Northern California and the California Attorney General's Office, Employment
5 Administrative Mandate Section as well as a certified law student with McGeorge Community
6 Legal Services. Upon graduating from law school Ms. Bravo worked as a law clerk with Cal-
7 Lawyer PLC, and upon becoming a member of the State Bar of California, Ms. Bravo joined The
8 Myers Law Group, A.P.C. as an attorney focusing primarily on wage and hour class action
9 litigation cases. Ms. Bravo supported and helped litigate the following proposed and/or approved
10 class action cases: *Madison v. ECMD, Inc.*, US District Court, Central District, Case No. 2:24-cv-
11 07887-MWC-MAA; *Johnson v. North Coast Property Group, Inc.*, San Bernardino Superior
12 Court, Case No. CIVSB2400231; *Rum v. HCA Healthcare, Inc.*, US District Court, Central District
13 of California, Case No: 2:23-cv-05142-JFW-BFM; *De La Pena v. Children's Hospital of Orange*
14 *County*, Orange County Superior Court, Case No. 30-2018-0104749-CUOE- CXC; *Sanchez v. Air*
15 *Methods Corporation*, San Bernardino Superior Court, Case No. CIVSB2208677. Ms. Bravo also
16 supported efforts in obtaining *Vazquez v. SaniSure, Inc.*, 101 Cal.App.5th 139 (2024), a favorable
17 published opinion for employees in the state of California.

18 7. MLG's lodestar includes paralegal time for Yvonne Medina, a certified paralegal,
19 with a previously approved hourly rate of \$195.00. (*Alvarez v. City of Oxnard* (C.D.Cal. Mar. 20,
20 2023, No. CV 19-8044 PSG (JCx)) 2023 U.S.Dist.LEXIS 242920, at *29). Ms. Medina joined
21 MLG in 2012 after receiving her paralegal certificate from the UC Riverside paralegal program
22 and was the primary paralegal assigned to support this litigation since its inception.
23 "Administrative" labor even short of "paralegal" status has been held compensable. *See Ellis v.*
24 *Toshiba America Information Systems, Inc.* (2013) 218 Cal.App.4th 853, 888-890. "In applying
25 the 'lodestar method,' courts consider non-attorney fees, such as paralegal, secretarial, and
26 technician services, as part of the attorney's fees calculation." *Castellon v. Penn-Ridge Transp.,*
27 *Inc.* (C.D. Cal. Nov. 3, 2020, No. ED CV18-02136 JAK (KKx) 2020 U.S.Dist.LEXIS 245742, at
28 *30.

1 8. Attached to this filing as **Exhibit A** is a spreadsheet of time recorded for MLG
2 attorneys (“Class Counsel”) for this case. **Exhibit A** provides the total lodestar by attorneys and
3 paralegal as well as a breakdown by task: (1) Task – Motions covering work related to meeting
4 and conferring regarding the intended motion, drafting, filing, and serving motions in the case as
5 well as attending hearings (including hearing prep); (2) Task – Mediation & Settlement covering
6 work related to the mediation and settlement of the case (including informal mediation discovery,
7 drafting mediation brief, attending mediation, and drafting/finalizing settlement documents); (3)
8 Task – Case Dev/Mgt/Correspondence/Intake covering work related to general correspondence in
9 the case, case review, case meetings, case planning, case calendaring, case task assignments, client
10 intake; (4) Task – Pleadings covering work related to drafting and reviewing pleadings, case
11 initiation, complaint filing, and service; (5) Task – Status Conference covering work related to
12 drafting, filing, and service of status conference statements, etc.; (6) Task – Arbitration covering
13 work related to the arbitration proceeding; (7) Task – Discovery covering work related to written
14 discovery drafting and service, etc.. MLG’s attorney times are recorded using common law firm
15 billing software (“Merus”), in increments of 1/10th of an hour. The MLG billing entries are
16 intended to convey the substance of what time was spent on in working up this case, and by whom,
17 without requiring substantial redactions to conceal attorney-client privileged information in fee
18 motions. Attorneys are instructed to record their time at or near the time of the event being
19 recorded. The spreadsheet entries contain standard abbreviations such as “OC” for opposing
20 counsel. Individuals are usually referred to by initials. Far less reliable methods have been accepted
21 to establish the amount of time a law firm spent working on a given matter. *See Mardirossian &*
22 *Associates, Inc. v. Ersoff* (2007) 62 Cal.Rptr.3d 665 (2007) (finding after-the-fact declarations and
23 testimony of counsel estimating percentage of total work time spent on a given matter to be
24 competent and sufficient to establish entitlement to fees for the time claimed.)

25 9. MLG attorneys’ hourly rates are between \$475 and \$775 and are in line with rates
26 typically approved in wage and hour class action litigation. The hourly rate for myself is \$775.00.
27 The hourly rate for Ms. Castro is \$675.00. These rates reflect the current value of hourly rate
28 applied to these attorneys for a lodestar cross-check and/or are consistent with market rates for a

1 lodestar cross-check based on the skill and experience of these attorneys and/or as previously
2 approved. (See **Exhibit C**). A true and correct copy of the Laffey Matrix, pdf printed on January
3 30, 2026, is attached as **Exhibit C**. MLG's practice is dedicated to litigation with a significant
4 focus on the representation of employees in wage and hour class action matters as well as
5 employees for actions involving unlawful employment practices, and have been appointed class
6 counsel or co-class counsel in multiple cases.

7 10. Based on MLG's time entries for this matter, through January 29, 2026, there are
8 no less than 214.80 reasonable hours recorded for MLG attorneys and paralegal.¹ From this,
9 MLG's base lodestar is \$116,376.00 based on the applicable market hourly rates for MLG
10 attorneys and paralegal. Class Counsel only seek an attorney's fee award of \$183,333.33 (equal to
11 one-third of the common fund gross settlement amount of \$550,000.00), which represents a
12 multiplier of only 1.58. The work performed by MLG was particularly justified, reasonable and
13 necessary in light of the extraordinary result achieved.

14 11. Plaintiff's counsel's one-third fee request of the common fund is fair and reasonable
15 given the time and labor required, the novelty and difficulty of the wage and hour claims at-issue
16 in this matter; the skill required to properly litigate a wage and hour PAGA action of this type; a
17 one-third percentage of the common fund is the customary fee; the fact that MLG took this matter
18 on under a contingency agreement; the significant recovery obtained based on the claims alleged;
19 the experience, reputation and ability of the plaintiff's attorneys working on this case, and awards
20 in similar cases.

21 12. Plaintiff's counsel only seek reimbursement of actual litigation costs and expenses
22 for an unreimbursed amount of \$14,765.98. Attached to this filing as **Exhibit B** is a table itemizing
23 these litigation costs and expenses ("Litigation Expenses").

24 13. These costs were all reasonable and necessary to the prosecution of this case and
25 the results achieved and are fair, reasonable, and unopposed by Defendant pursuant to the
26 Settlement Agreement.

27 ¹ This does not account for additional hours that MLG will put into this case through the hearing
28 and distribution process.

1 14. I believe that the proposed Settlement is fair, reasonable, and adequate given the
2 known facts and circumstances.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct.

5
6 Dated: 1/30/2026

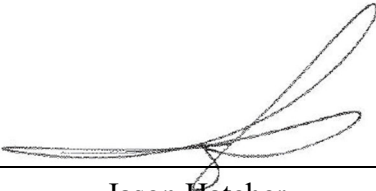
By: 
Jason Hatcher

Exhibit A

The Myers Law Group, APC
Garcia v. Refresco Beverages US, Inc.

<u>THE MYERS LAW GROUP, APC TOTAL LODESTAR</u>			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jason Hatcher, Esq. (12th Year Attorney)	64.1	\$ 775.00	\$ 49,677.50
Cassandra A. Castro, Esq. (5th Year Attorney)	18.7	\$ 675.00	\$ 12,622.50
Andriana N. Bravo, Esq. (1-2 Year Attorney)	101.2	\$ 475.00	\$ 48,070.00
<i>Attorney Subtotal:</i>	<i>184</i>		<i>\$ 110,370.00</i>
Yvonne Medina (Paralegal)	30.8	\$ 195.00	\$ 6,006.00
<i>Staff Subtotal:</i>	<i>30.8</i>		<i>\$ 6,006.00</i>
Total Lodestar:	214.8		\$ 116,376.00

The Myers Law Group, APC
Garcia v. Refresco Beverages US, Inc.

<u>TASK - Motions</u>			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jason Hatcher, Esq. (12th Year Attorney)	22.4	\$ 775.00	\$ 17,360.00
Cassandra A. Castro, Esq. (5th Year Attorney)	6.4	\$ 675.00	\$ 4,320.00
Andriana N. Bravo, Esq. (1-2 Year Attorney)	38.2	\$ 475.00	\$ 18,145.00
<i>Attorney Subtotal:</i>	<i>67</i>		<i>\$ 39,825.00</i>
Yvonne Medina (Paralegal)	5.9	\$ 195.00	\$ 1,150.50
<i>Staff Subtotal:</i>	<i>5.9</i>		<i>\$ 1,150.50</i>
Total:	72.9		\$ 40,975.50

The Myers Law Group, APC
Garcia v. Refresco Beverages US, Inc.

<u>TASK - Mediation & Settlement</u>			
ATTORNEY	Hours Billed	Billing Rate	Billed Amount
Jason Hatcher, Esq. (12th Year Attorney)	16.8	\$ 775.00	\$ 13,020.00
Cassandra A. Castro, Esq. (5th Year Attorney)	9	\$ 675.00	\$ 6,075.00
Andriana N. Bravo, Esq. (1-2 Year Attorney)	35	\$ 475.00	\$ 16,625.00
<i>Attorney Subtotal:</i>	<i>60.8</i>		<i>\$ 35,720.00</i>
Yvonne Medina (Paralegal)	4.6	\$ 195.00	\$ 897.00
<i>Staff Subtotal:</i>	<i>4.6</i>		<i>\$ 897.00</i>
Total	65.4		\$ 36,617.00

The Myers Law Group, APC
Garcia v. Refresco Beverages US, Inc.

<u>TASK - Case Dev/Mgt/Correspondence/Intake</u>			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jason Hatcher, Esq. (12th Year Attorney)	12.1	\$ 775.00	\$ 9,377.50
Cassandra A. Castro, Esq. (5th Year Attorney)	3.3	\$ 675.00	\$ 2,227.50
Andriana N. Bravo, Esq. (1-2 Year Attorney)	3.9	\$ 475.00	\$ 1,852.50
<i>Attorney Subtotal:</i>	<i>19.3</i>		<i>\$ 13,457.50</i>
Yvonne Medina (Paralegal)	4.4	\$ 195.00	\$ 858.00
<i>Staff Subtotal:</i>	<i>4.4</i>		<i>\$ 858.00</i>
Total:	23.7		\$ 14,315.50

The Myers Law Group, APC
Garcia v. Refresco Beverages US, Inc.

<u>TASK - Pleadings</u>			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jason Hatcher, Esq. (12th Year Attorney)	3.6	\$ 775.00	\$ 2,790.00
Cassandra A. Castro, Esq. (5th Year Attorney)	0	\$ 675.00	\$ -
Andriana N. Bravo, Esq. (1-2 Year Attorney)	0.6	\$ 475.00	\$ 285.00
<i>Attorney Subtotal:</i>	<i>4.2</i>		<i>\$ 3,075.00</i>
Yvonne Medina (Paralegal)	4	\$ 195.00	\$ 780.00
<i>Staff Subtotal:</i>	<i>4</i>		<i>\$ 780.00</i>
Total:	8.2		\$ 3,855.00

The Myers Law Group, APC
Garcia v. Refresco Beverages US, Inc.

<u>TASK - Status Conference</u>			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jason Hatcher, Esq. (12th Year Attorney)	3.1	\$ 775.00	\$ 2,402.50
Cassandra A. Castro, Esq. (5th Year Attorney)	0	\$ 675.00	\$ -
Andriana N. Bravo, Esq. (1-2 Year Attorney)	3.8	\$ 475.00	\$ 1,805.00
<i>Attorney Subtotal:</i>	<i>6.9</i>		<i>\$ 4,207.50</i>
Yvonne Medina (Paralegal)	4.3	\$ 195.00	\$ 838.50
<i>Staff Subtotal:</i>	<i>4.3</i>		<i>\$ 838.50</i>
Total:	11.2		\$ 5,046.00

The Myers Law Group, APC
Garcia v. Refresco Beverages US, Inc.

<u>TASK - Arbitration</u>			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jason Hatcher, Esq. (12th Year Attorney)	5.6	\$ 775.00	\$ 4,340.00
Cassandra A. Castro, Esq. (5th Year Attorney)	0	\$ 675.00	\$ -
Andriana N. Bravo, Esq. (1-2 Year Attorney)	18	\$ 475.00	\$ 8,550.00
<i>Attorney Subtotal:</i>	<i>23.6</i>		<i>\$ 12,890.00</i>
Yvonne Medina (Paralegal)	5.6	\$ 195.00	\$ 1,092.00
<i>Staff Subtotal:</i>	<i>5.6</i>		<i>\$ 1,092.00</i>
Total:	29.2		\$ 13,982.00

The Myers Law Group, APC
Garcia v. Refresco Beverages US, Inc.

<u>TASK - Discovery</u>			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jason Hatcher, Esq. (12th Year Attorney)	0.5	\$ 775.00	\$ 387.50
Cassandra A. Castro, Esq. (5th Year Attorney)	0	\$ 675.00	\$ -
Andriana N. Bravo, Esq. (1-2 Year Attorney)	1.7	\$ 475.00	\$ 807.50
<i>Attorney Subtotal:</i>	<i>2.2</i>		<i>\$ 1,195.00</i>
Yvonne Medina (Paralegal)	2	\$ 195.00	\$ 390.00
<i>Staff Subtotal:</i>	<i>2</i>		<i>\$ 390.00</i>
Total:	4.2		\$ 1,585.00

Exhibit B

The Myers Law Group, APC
Litigation Costs and Expenses
Garcia v. Refresco Beverages US, Inc.

<u>Type</u>	<u>Date</u>	<u>Pay To</u>	<u>Ref. No</u>	<u>Memo</u>	<u>Amount</u>
Filing/Court Fees	6/9/2023	Sano A. Service	2023004837	Summons & Complaint	\$ 1,510.00
Filing/Court Fees	6/20/2023	San Bernardino Superior Court	228838216	Public Portal Case Document Purchase	\$ 5.00
Filing/Court Fees	6/22/2023	LWDA	LWDA-CM-963732-23	PAGA Filing	\$ 75.00
Service	6/22/2023	USPS	7022 3330 0000 1720 8451	PAGA Notice Certified	\$ 9.96
Service	6/26/2023	OnPoint Legal Services	185	Service of Process	\$ 85.00
Filing/Court Fees	6/29/2023	Sano A. Service	2023005519	File Proof of Service	\$ 37.50
Filing/Court Fees	8/26/2023	TurboCt	8200008	Initial Case Management Statement	\$ 9.95
Filing/Court Fees	9/5/2023	TurboCt	8237621	First Amended Complaint	\$ 9.95
Filing/Court Fees	10/19/2023	GreenFiling	8968114	Opposition Motion to Compel Arbitration	\$ 14.23
Filing/Court Fees	2/2/2024	JAMS	5230000351	JAMS Arbitration Fee	\$ 250.00
Filing/Court Fees	3/20/2024	JAMS	1338351527	JAMS Arbitration Fee	\$ 154.49
Filing/Court Fees	12/6/2024	GreenFiling	11278378	Notice of Continued CMC	\$ 15.90
Filing/Court Fees	1/24/2025	Sano A. Service	2025000171	Stipulation Re: Continued CMC	\$ 89.00
Mediation	5/30/2025	Steve Pearl Mediation	2025-436	Mediation with Steve Pearl	\$ 12,500.00
				Total:	\$ 14,765.98

Exhibit C

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389

6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $\frac{1}{2}$ Years Out of Law School $\frac{1}{2}$ is calculated from June 1 of each year, when most law students graduate. $\frac{1}{2}$ 1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $\frac{1}{2}$ 4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $\frac{1}{2}$ 1-3" from June 1, 1996 until May 31, 1999, would move into tier $\frac{1}{2}$ 4-7" on June 1, 1999, and tier $\frac{1}{2}$ 8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.