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8 CAMERON CRARY

Electronically Filed
Superior Court of California
County of San Joaquin
2025-09-23 17:48:47
Clerk: Monica Jones

Motion
2025-11-07 9:00AM in 11B

9
10 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
11
12 IN AND FOR THE COUNTY OF SAN JOAQUIN
13

14 CAMERON CRARY, an individual

15 Plaintiff,

16 v.

17 FARAGE FAMILY COMPANY, LLC.;
18 APRIL FARAGE, an individual, & DOES 1
19 through 10,

20 Defendants.

Case No.: STK-CV-UOE-2023-0009637

Honorable Robert T. Waters

**DECLARATION OF JOHN CLAASSEN IN
SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEY'S FEES; REIMBURSEMENT
OF LITIGATION COSTS; AND
ADMINISTRATIVE AND SERVICE
PAYMENTS**

Date: November 7, 2025

Time: 9:00 a.m.

Dept.: 11B

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1. I am the attorney of plaintiff Cameron Crary (“Plaintiff”). I submit this declaration in support of Plaintiff’s Motion for Attorney’s Fees, costs reimbursement, incentive payment, and a PAGA award. Unless otherwise indicated, I have personal knowledge of facts stated herein and could testify competently thereto if asked to so.

3. I agreed to represent Plaintiff on a contingency fee, which allowed him to elect between court awards of fees and one third. Although it was contingent, the agreement also set an hourly rate of \$500 per hour. In my experience, this hourly rate is a reasonable hourly rate given my experience and I frequently, though not always, charge paying clients fees greater than this amount. I have received court awards for fees at an hourly rate of \$650 in the past in the San Francisco Bay Area.

5. I have a practice of recording my hours on most contingency cases. I typically record time contemporaneously with work performed. Between April 2023 when I took this case and the present, I recorded at least 250 hours on this case. At the hourly rate, the fees earned are at least \$86,500. Far more than \$9,000 of the fees incurred relate solely to my prosecution of the PAGA claims. I reviewed my time records in this case. Between preparation of the PAGA notice, and reviewing and analyzing all supervisor's time records against the time stamps of messages they sent to each other alone, I spent more than 40 hours. I believe all of these hours were reasonable and necessary. I spent them to understand the case and not with any effort to work for the sake of driving up expenses.

6. Through July 31, 2025, my firm has paid no less than \$18,600 in out-of-pocket expenses for this Action. Attached hereto as **Exhibit A** is a true and correct copy of a Quickbooks report that

1 reflect “accrued” (the report says “accrual” but the referenced expenses have also been paid) expenses in
2 this Action. I mention July 31, 2025 because applicable accounts are reconciled through that date.

3 7. Plaintiff Cameron Crary provided material benefits to other aggrieved employees. He
4 spent countless hours on the phone with me helping me get up to speed and significant time helping me
5 prepare responses to discovery, collect documents, and prepare the complaint. He spent time preparing
6 for and attending his deposition. He attended the other depositions in this case. Particular to PAGA
7 claims, he helped me with payroll schedules, explaining how employees communicated together, the job
8 duties of various positions, workloads, how directors spent their days, and many other things.

9 8. I have been in contact with Phoenix Class Action Administrators. They have agreed to
10 administer the payments to the State of California and aggrieved employees in this case. We received a
11 quote for slightly under \$5,000 from them. A true and correct copy of the quote is attached hereto as

12 **Exhibit B.**

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

15
16 Dated: September 23, 2025

/s/ John Claassen

John Claassen

EXHIBIT A

EXHIBIT A

Type	Date	Name	Source Name	Memo	Account	Billing Status	Amount
Cameron Crary							
Bill	04/20/2023	Cameron Crary	GLS	Courier charg...	Advanced Client Co...	Unbilled	11.79
Bill	06/16/2023	Cameron Crary	Labor and Workforc...	Government f...	Advanced Client Co...	Unbilled	75.00
Bill	09/05/2023	Cameron Crary	San Joaquin County...	First court filin...	Advanced Client Co...	Unbilled	435.00
Bill	09/09/2023	Cameron Crary	City of Stockton Pat...		Travel Expense	Unbilled	1.00
Bill	10/20/2023	Cameron Crary	One Legal, LLC	Vendor fee for...	Advanced Client Co...	Unbilled	113.25
Bill	12/05/2023	Cameron Crary	GLS	Overnight deli...	Advanced Client Co...	Unbilled	11.89
Credit Card Charge	04/08/2024	Cameron Crary	ASAP Legal	Vendor fee for...	Advanced Client Co...	Unbilled	148.00
Credit Card Charge	06/25/2024	Cameron Crary	ASAP Legal	Vendor fee for...	Advanced Client Co...	Unbilled	148.25
Bill	08/26/2024	Cameron Crary	PayPro Global	"Backupperry" ...	Advanced Client Co...	Unbilled	319.00
Bill	10/30/2024	Cameron Crary	Lucas M. Bianchi		Advanced Client Co...	Unbilled	5,000.00
Bill	10/31/2024	Cameron Crary	Miscellaneous Vendor	Lunch with Ca...	Meals and Entertain...	Unbilled	17.68
Bill	11/22/2024	Cameron Crary	Veritext	Veritext Depo...	Advanced Client Co...	Unbilled	1,642.80
Bill	11/25/2024	Cameron Crary	ASAP Legal	Asap Legal fe...	Bank Service Charges	Unbilled	7.85
Bill	11/25/2024	Cameron Crary	ASAP Legal	Fee for filing d...	Advanced Client Co...	Unbilled	155.50
Bill	01/22/2025	Cameron Crary	San Joaquin County...	Motion fee.	Advanced Client Co...	Unbilled	63.00
Bill	02/19/2025	Cameron Crary	First Legal Deposito...	Farage depos...	Advanced Client Co...	Unbilled	3,780.30
Bill	02/27/2025	Cameron Crary	First Legal Deposito...	Google subpo...	Advanced Client Co...	Unbilled	130.00
Bill	02/27/2025	Cameron Crary	First Legal Deposito...		Advanced Client Co...	Unbilled	89.00
Bill	05/08/2025	Cameron Crary	Tally Court Reporters	April Farage d...	Advanced Client Co...	Unbilled	2,718.50
Bill	05/11/2025	Cameron Crary	ADR Services, Inc.		Advanced Client Co...	Unbilled	3,781.58
Total Cameron Crary							18,649.39
TOTAL							18,649.39

EXHIBIT B

EXHIBIT B



CASE ASSUMPTIONS

Aggrieved Members	230
Opt Out Rate	N/A
Opt Outs Received	
Total Aggrieved Claimants	230
Subtotal Admin Only	\$3,250.00

Not-to-Exceed Total \$3,250.00

For 230 Aggrieved Members

Pricing Good for Scope of Estimate Only

June 23, 2025

Case: Orellana v. KF Rinaldi PAGA Administration

Phoenix Contact: Jodey Lawrence

Contact Number: 949.566.1455

Email: Jodey@phoenixclassaction.com

Requesting Party: Susan Chamberlain

Firm: Claassen Law Corp.

Direct Tel: (925) 204-3885

Email: susan@cmpc.law

Assumptions and Estimate are based on information provided by counsel. If class size changes, PHX will need to adjust this Estimate accordingly.

Estimate is based on **230** Aggrieved Members. Class data **Must** be sent in Microsoft Excel or uploaded in the same format. Class Data Must be sent in one spreadsheet, with no additional programming needed. A rate of \$150 per hour will be charged for any additional analysis or programming. Pricing good for 90 days.

Case & Database Setup / Toll Free Setup & Call Center / NCOA (USPS)			
Administrative Tasks:	Rate	Hours/Units	Line Item Estimate
Programming Manager	\$125.00	1	\$125.00
Programming Database & Setup	\$125.00	1	\$125.00
Toll Free Setup*	\$37.49	1	\$37.49
Call Center & Long Distance	\$1.75	12	\$21.00
NCOA (USPS)	\$75.00	1	\$75.00
Total			\$383.49

* Up to 120 days after disbursement

Data Merger & Scrub / Notice Packet, Check & Postage			
Project Action	Rate	Hours/Units	Line Item Estimate
Notice Packet Formatting	\$125.00	1	\$125.00
Data Merge & Duplication Scrub	\$0.35	230	\$80.50
Notice and Check Packet	\$1.25	230	\$287.50
Estimated Postage (up to 1 oz.)*	\$0.69	230	\$158.70
Total			\$651.70

* Prices good for 90 days. Subject to change with the USPS Rate or change in Notice pages or Translation, if any.



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CLASS ACTION ADMINISTRATION SOLUTIONS

Skip Tracing & Remailing Notice Packets / Tracking & Programming Undeliverables

Project Action:	Rate	Hours/Units	Line Item Estimate
Case Associate	\$50.00	1	\$50.00
Skip Tracing Undeliverables	\$0.65	16	\$10.47
Remail Notice Packets	\$0.90	16	\$14.49
Estimated Postage	\$0.69	16	\$11.11
Programming Undeliverables	\$50.00	1	\$50.00
Total			\$136.06

Database Programming

Project Action:	Rate	Hours/Units	Line Item Estimate
Programming Claims Database	\$125.00	1	\$125.00
Case Manager	\$85.00	1	\$85.00
Total			\$210.00

Calculation & Disbursement Programming/ Create & Manage QSF/ Mail Checks

Project Action:	Rate	Hours/Units	Line Item Estimate
Programming Calculations	\$125.00	1	\$125.00
Disbursement Review	\$125.00	1	\$125.00
Programming Manager	\$95.00	1	\$95.00
QSF Bank Account & EIN	\$75.00	2	\$150.00
Check Run Setup & Printing	\$125.00	2	\$250.00
Total			\$745.00

* Checks are printed on 8.5 x 11 in. sheets with W2/1099 Tax Filing



PHOENIX

CLASS ACTION ADMINISTRATION SOLUTIONS

Tax Reporting & Reconciliation / Re-Issuance of Checks / Conclusion Reports and Declarations

Project Action:	Rate	Hours/Units	Line Item Estimate
Case Supervisor	\$125.00	2	\$250.00
Remail Undeliverable Checks (Postage Included)	\$1.25	23	\$28.75
Case Associate	\$50.00	2	\$100.00
Reconcile Uncashed Checks	\$85.00	2	\$170.00
Conclusion Reports	\$100.00	1	\$100.00
Case Manager Conclusion	\$75.00	1	\$75.00
Final Reporting & Declarations	\$75.00	1	\$75.00
QSF Annual Tax Reporting * (State Tax Reporting Included)	\$325.00	1	\$325.00
Total			\$1,123.75

* All applicable California State & Federal taxes, which include SUI, ETT, and SDI, and FUTA filings. Additional taxes are Defendant's responsibility.

Estimate Total: \$3,250.00



CLASS ACTION ADMINISTRATION SOLUTIONS

TERMS AND CONDITIONS

Provisions: The case estimate is in good faith and does not cover any applicable taxes and fees. The estimate does not make any provision for any services or class size not delineated in the request for proposal or stipulations. Proposal rates and amounts are subject to change upon further review, with Counsel/Client, of the Settlement Agreement. Only pre-approved changes will be charged when applicable. No modifications may be made to this estimate without the approval of PSA (Phoenix Settlement Administrators). All notifications are mailed in English language only unless otherwise specified. Additional costs will apply if translation into other language(s) is required. Rates to prepare and file taxes are for Federal and California State taxes only. Additional charges will apply if multiple state tax filing(s) is required. **Pricing is good for ninety (90) days.**

Data Conversion and Mailing: The proposal assumes that data provided will be in ready-to-use condition and that all data is provided in a single, comprehensive Excel spreadsheet. PSA cannot be liable for any errors or omissions arising due to additional work required for analyzing and processing the original database. A minimum of two (2) business days is required for processing prior to the anticipated mailing date with an additional two (2) business days for a National Change of Address (NCOA) update. Additional time may be required depending on the class size, necessary translation of the documents, or other factors. PSA will keep counsel apprised of the estimated mailing date.

Claims: PSA's general policy is to not accept claims via facsimile. However, in the event that facsimile filing of claims must be accepted, PSA will not be held responsible for any issues and/or errors arising out of said filing. Furthermore, PSA will require disclaimer language regarding facsimile transmissions. PSA will not be responsible for any acts or omissions caused by the USPS. PSA shall not make payments to any claimants without verified, valid Social Security Numbers. All responses and class member information are held in strict confidentiality.

Payment Terms: All postage charges and 50% of the final administration charges are due at the commencement of the case and will be billed immediately upon receipt of the data and/or notice documents. PSA bills are due upon receipt unless otherwise negotiated and agreed to with PSA by Counsel/Client. In the event the settlement terms provide that PSA is to be paid out of the settlement fund, PSA will request that Counsel/Client endeavor to make alternate payment arrangements for PSA charges that are due at the onset of the case. The entire remaining balance is due and payable at the time the settlement account is funded by Defendant, or no later than the time of disbursement. Amounts not paid within thirty (30) days are subject to a service charge of 1.5% per month or the highest rate permitted by law.

Tax Reporting Requirements

PSA will file the necessary tax returns under the EIN of the QSF, including federal and state returns. Payroll tax returns will be filed if necessary. Under the California Employment Development Department, all taxes are to be reported under the EIN of the QSF with the exception of the following taxes: Unemployment Insurance (UI) and Employment Training Tax (ETT), employer-side taxes, and State Disability Insurance (SDI), an employee-side tax. These are reported under Defendant's EIN. Therefore, to comply with the EDD payroll tax filing requirements we will need the following information:

1. Defendant's California State ID and Federal EIN.
2. Defendant's current State Unemployment Insurance (UI) rate and Employment Training Tax (ETT) rate. This information can be found in the current year DE 2088, Notice of Contribution Rates, issued by the EDD.
3. Termination dates of the class members, or identification of current employee class members, so we can account for the periods that the wages relate to for each class member.
4. An executed Power of Attorney (Form DE 48) from Defendant. This form is needed so that we may report the UI, SDI, and ETT taxes under Defendant's EIN on their behalf. If this form is not provided we will work with the EDD auditors to transfer the tax payments to Defendant's EIN.
5. Defendant is responsible for reporting the SDI portion of the settlement payments on the class member's W-2. PSA will file these forms on Defendant's behalf for an additional fee and will issue an additional W-2 for each class member under Defendant's EIN, as SDI is reported under Defendant's EIN rather than the EIN of the QSF. The Power of Attorney (Form DE 48) will be needed in order for PSA to report SDI payments.