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Attorneys for MARIA ISORDIA, on behalf of herself,
All others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY SONOMA

MARIA ISORDIA, on behalf or herself, all
others similarly situated, and on behalf of the
general public,

Plaintiffs,

vs.

TRESTLES HOLDINGS LLC DBA
HILLCREST POST ACTURE; and DOES 1
through 100,

Defendants.

Case No.: SCV-273468
(Consolidated with Case No. 23CV01288)

*[Assigned for All Purposes to the Honorable
Kenneth G. English, Dept. 18]*

**DECLARATION OF SABRINA SANDERS
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF SABRINA SANDERS

I, Sabrina Sanders, declare:

1. I am a member of the bar of the State of California, the managing attorney of Lawyers for Employee and Consumer Rights (“LFEER”), and counsel of record for Plaintiff and the class members in this matter. I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. I received my Juris Doctorate in 2003 from Golden Gate University, School of Law. I have been admitted to the State Bar of California since December 2004. Prior to being licensed, I was as a research attorney for the Los Angeles Superior Court. Due to my academic background, which focused on employment law, I was assigned as the research attorney to handle complex employment class action cases throughout Los Angeles County.

3. I have served as LFEER’s managing attorney since 2016. LFEER is a law firm dedicated to protecting the rights of employees in the workplace. We are dedicated to the prosecution of wage and hour and wrongful termination matters in state and federal courts, and before various arbitration tribunals.

4. My firm and I handle exclusively employee-side employment cases which involve violations of the California Labor Code and Industrial Welfare Commission Wage Orders, such as wage and hour class actions and cases alleging violations of the Private Attorneys General Act of 2004 (“PAGA”). Since 2004, I have been engaged in litigation. I have served as lead counsel on hundreds of employment cases and tried cases in State courts, resulting in verdicts in favor of all my clients. Much of my practice has been dedicated to litigating labor and employment disputes, with the last 10 years exclusively dedicated to representing employees on claims against their employers on a contingency basis.

1 5. LFECR is currently involved in litigation in over fifty (50) PAGA and class cases.

2 6. My firm has been granted class certification in both state and federal courts.

3 7. Former lead attorney on this matter, Peter Horton, graduated from California
4 Western School of Law and was admitted to practice law in California in December 2003.

5 8. Mr. Horton shares the same experience as me since being licensed in 2003. Peter
6 and I have practiced in State and Federal courts since being admitted to practice law.

7 9. All services were performed by Plaintiff's Counsel on a contingent basis with no
8 guarantee of any payment. Had the litigation continued, the Defendant would undoubtedly have
9 mounted an aggressive defense. A defeat on the merits would have foreclosed the possibility of
10 any remuneration for Plaintiff's Counsel's time and effort.

11 10. This was a highly contested matter which required a significant amount of time
12 and labor. Class Counsel had to investigate and analyze documents and dates for Plaintiff and a
13 sampling of Class Members. In addition, as part of the above investigation and analysis,
14 Plaintiff had to marshal the evidence in a manner in which it could be adjudicated on a class-
15 wide basis. So often, lawyers unskilled in the class action aspect of wage and hour cases do not
16 pay attention to or put the work into how the evidence must be presented for class-wide
17 adjudication. Strong class-wide cases perish in the hands of inexperienced counsel because the
18 case has not been worked up to succeed at certification. Class Counsel here has considerable
19 experience in class litigation and from the beginning of the case, is marshaling the evidence
20 with a sharp focus on class-wide proof needed for the matter to get certified. This case was no
21 different. This filtering of voluminous evidence into class-wide proof while keeping an eye on
22 the merits of the litigation required a considerable amount of attorney time and skill.
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11. Class Counsel's hourly rates are between \$600 and \$800 and are in line with rates typically approved in wage and hour class action litigation, and which rates have been approved by Courts in California in the Los Angeles, Sacramento, San Francisco, Alameda, Orange, and San Diego Superior Courts.

12. Peter Horton devoted 23.10 hours to this case. I devoted 2.3 hours, exclusive of time spent receiving updates in my role as firm managing attorney. The following is a summary of the tasks and activities performed in the litigation of this matter: analyzing records produced by Defendant relating to its policies, pay structures and timekeeping; reviewing and revising mediation brief and mediation damage and exposure model; preparing and attending mediation, reviewing and revising the settlement agreement and the Notice to the Class; reviewing and revising stipulations; reviewing and revising approval motions and supporting papers; drafting declaration in support of preliminary and final approval; and reviewing status reports from the Settlement administrator.

13. Peter Horton and my hourly rate is \$665. Based on our hourly rate and the total hours expended, 25.4, the fees are \$16,891.00, which is reasonable and necessary to the successful litigation of this matter.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 22 day of April 2025, in Austin, Texas.

Sabrina Sanders

SABRINA SANDERS