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Attorneys for Plaintiff Sharese Casey

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF KERN

RILEY J. SMALL, individually, and SHARESE
CASEY, individually, and on behalf of all others
similarly situated,

Plaintiffs,

vs.

RIDGECREST REGIONAL HOSPITAL, a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: BCV-23-102418

[Assigned for All Purposes to Hon. Thomas S.
Clark, Dept. 17]

CLASS ACTION

**DECLARATION OF ANDREW J.
ROWBOTHAM IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS AND
PAGA REPRESENTATIVE ACTION
SETTLEMENT**

Date: July 8, 2025
Time: 8:30 a.m.
Courtroom: Dept. 17

Action Filed: July 26, 2023
SAC Filed: October 23, 2024
Trial Date: Not Set

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I, Andrew J. Rowbotham, declare as follows:

1. I am a Partner at the Haines Law Group, APC, and counsel for named Plaintiff Casey (“Plaintiff”) in the above-captioned matter. I am a member in good standing of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I am a 2014 graduate of Pepperdine University School of Law and was admitted to the California State Bar in December 2014. Since that time, I have practiced exclusively in the area of plaintiff's employment litigation. From October 2014 to May 2015, I worked as an attorney at the Mesriani Law Group, an employment law firm in Santa Monica, California. The majority of my work focused on representing employees in wage and hour and wrongful termination actions. Although non-exhaustive, the type of work I performed included: conducting legal research; performing pre-filing research and analysis; drafting complaints and letters to the U.S. Department of Labor and the California Labor Commissioner; attending court hearings; corresponding with employers; drafting and responding to written discovery; analyzing payroll and timekeeping records and employee handbooks; drafting complaints and mediation briefs; conducting mediations; and drafting long-form settlement agreements.

3. Since April 2016, I have worked at my current firm, Haines Law Group, APC. I am currently involved with approximately fifty (50) active wage and hour class actions, including a number of “hybrid” actions asserting nationwide wage and hour claims under the Fair Labor Standards Act, as well as California-specific claims under Rule 23 of the Federal Rules of Civil Procedure.

4. The following is a non-exhaustive list of wage and hour class actions (which have not yet been granted final approval) in which I have been named as Class Counsel:

- *Rodriguez v. Spartan, Inc.*, Case No. BCV-15-100007-DRL, California Superior Court, County of Kern, Honorable David R. Lampe, presiding;

- *Tapper v. Squad Security CA, Inc.*, Case No. BC607241, California Superior Court, County of Los Angeles, Honorable John Shepard Wiley Jr., presiding;
- *Nieves v. Ta Chen International, Inc.*, Case No. BC609005, California Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman, presiding;
- *Mansilla v. Haeco Americas Line Services, LLC*, Case No. BC615310, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;
- *Rodriguez v. Mersen USA Oxnard-CA Inc.*, Case No. 56-2015-00471031-CU-OE-VTA, California Superior Court County of Ventura, Honorable Kent M. Kellegrew, presiding;
- *Khosravi v. Enterprise Rent-A-Car Company of Los Angeles, LLC*, Case No. 30-2016-00829923-CU-OE-CXC, Superior Court of California, County of Orange, Honorable Thierry Patrick Colaw presiding;
- *De Loera v. Pharmaceutic Litho & Label Company, Inc.*, Case No. 56-2016-00479931-CU-OE-VTA, Superior Court of California, County of Ventura, Honorable Kent M. Kellegrew presiding;
- *Ortiz v. Endologix, Inc.* Case No. 30-2016-00873893-CU-OE-CXC, Superior Court of California, County of Orange, Honorable William D. Claster presiding;
- *Delgado v. Pacific Coast Cabling, Inc.*, Case No. BC600419, Superior Court of California, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Valsabel v. Vintage Tile & Stone, Inc.*, Case No. 30-2016-00848602-CU-OE-CXC, Superior Court of California, County of Orange, Honorable Randall J. Sherman presiding;
- *Ramos v. Da/Pro Rubber, Inc.*, Case No. BC621297, Superior Court of California, County of Los Angeles, Honorable William F. Highberger presiding;
- *Lopez v. Bornt & Sons, Inc.*, Case No. ECU09820, Superior Court of California, County of Imperial, Honorable Jeffrey B. Jones presiding;

- *Ruvalcaba Quiroz v. Circle M Contractors, Inc.*, Case No. 30-2016-00885065-CU-OE-CXC, Superior Court of California, County of Orange, Honorable William D. Claster presiding;
- *Armenta, et al., v. California Friends Homes d/b/a Quaker Gardens*, Case No. 30-2016-00883282-CU-OE-CXC, Superior Court of California, County of Orange, Honorable Randall J. Sherman presiding;
- *Ayala, et al., v. Dearden's*, Case No. BC679750, Superior Court of California, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Becerra v. All Valley Washer Service, Inc.*, Case No. BC663448, Superior Court of California, County of Los Angeles, Honorable Amy D. Hogue presiding;
- *Song, et al. v. Blendtec, Inc.*, Case No. STK-CV-VOE-2016-6272, Superior Court of California, County of San Joaquin, Honorable Roger Ross presiding;
- *Zinnerman v. Tumbleweed Educational Enterprises, Inc.*, Case No. BC673708, Superior Court of California, County of Los Angeles, Honorable Maren E. Nelson presiding;
- *Chairez v. B.E. McCarty, Inc.*, Case No. 56-2017-00503353-CU-OE-VTA, Superior Court of California, County of Ventura, Honorable Vincent O'Neill presiding;
- *Garcia, et al. v. Simplified Labor Staffing Solutions, Inc.*, Case No. BC696898, Los Angeles County Superior Court, Honorable Elihu M. Berle, presiding (approving an hourly rate of \$400 for work performed in 2018 and 2019);
- *Delgado v. Spears Manufacturing Co.*, Case No. BC709665, Los Angeles County Superior Court, Honorable Maren E. Nelson, presiding (approving an hourly rate of \$425 for work performed in 2018, 2019, and 2020);
- *Soto v. L I Metal Systems*, Case No. 37-2017-00009607-CU-OE-CTL, San Diego County Superior Court, Honorable Timothy Taylor, presiding (approving an hourly rate of \$425 for work performed from 2017-2020);

- *Fishback v. Paragon Framing, Inc.*, Case No. CIVDS1906610, San Bernardino County Superior Court, Honorable David Cohn, presiding (approving an hourly rate of \$425 for work performed in 2019 and 2020);
- *Fishback v. J.D. Miller Construction Inc.*, Case No. CIVDS1906611, San Bernardino County Superior Court, Honorable David Cohn, presiding (approving an hourly rate of \$425 for work performed from 2019-2021);
- *Teeba v. Brill, Inc.*, Case No. CIVDS1923242, San Bernardino County Superior Court, Honorable David Cohn, presiding (approving an hourly rate of \$425 for work performed from 2019-2021);
- *Gonzalez v. Precision Hospitality & Development, LLC*, Case No. 30-2020-01127597-CU-OE-CXC, Orange County Superior Court, Honorable Randall J. Sherman, presiding (approving an hourly rate of \$450 for work performed in 2020 and 2021);
- *Vides v. Celoseal Roofing, Inc.*, Case No. 30-2020-01162478-CU-OE-CXC, Orange County Superior Court, Honorable Randall J. Sherman, presiding (approving an hourly rate of \$475 for work performed from 2020-2022);
- *Qawas v. Socal Framing, Inc.*, Case No. RIC1902588, Riverside County Superior Court, Honorable Sunshine S. Sykes, presiding (approving an hourly rate of \$475 for work performed from 2019-2022);
- *Nelson v. Santini Foods, Inc.*, Case No. RG21090890, Alameda County Superior Court, Honorable Evelio Grillo, presiding (approving an hourly rate of \$475 for work performed in 2021 and 2022);
- *Zuniga v. Sonar Inc.*, Case No. 30-2019-01117310-CU-OE-CXC, Orange County Superior Court, Honorable Peter Wilson, presiding (approving an hourly rate of \$575 for work performed from 2019-2023); and
- *Gonzalez v. Guardian Industries LLC*, Case No. 19CECG02134, Fresno County Superior Court, Honorable Jonathan M. Skiles, presiding (approving an hourly rate of \$575 for work performed from 2019-2023).

1 • *Sanchez v. Dutton Home Services, LLC*, Case No. 22STCV01834, Los Angeles
2 County Superior Court, Honorable Maren E. Nelson, presiding (approving an hourly
3 rate of \$575 for work performed from 2022-2023).

4 • *Ramirez v. Wyndham Vacation Ownership, Inc.*, Case No. 20CV01715, Santa Barbara
5 County Superior Court, Honorable James F. Rigali, presiding (approving an hourly
6 rate of \$650 for work performed from 2020-2024).

7 5. I have also been named as Class Counsel for the certified class following a
8 contested class certification motion in the following case:

9 • *Staublein v. Wells Fargo Bank, National Association*, Case No. CIVDS1712267, San
10 Bernardino Superior Court, Honorable David Cohn presiding (certifying a wage
11 statement class).

12 6. In March 2023, I served as trial counsel for the plaintiff and the aggrieved
13 employees in the matter of *Abraham Taduran v. James R. Glidewell, Dental Ceramics, Inc. dba*
14 *Glidewell Laboratories*, Case No. 30-2017-00934037-CU-OE-CXC, Orange County Superior
15 Court, Honorable William Claster presiding, which was a case brought under the Private
16 Attorneys General Act, Labor Code §§ 2698 *et seq.*, that resulted in a six-figure verdict in favor
17 of the aggrieved employees.

18 7. In addition to the above cases, I also play a significant role in many of my firm's
19 current wage and hour class actions. The scope of my involvement includes but is not limited to:
20 corresponding with opposing counsel; attending court hearings; drafting and responding to
21 written discovery; preparing for and defending depositions; negotiating and drafting long-form
22 settlement agreements; attending mediations; and drafting motions for preliminary and final
23 approval.

24 8. Between 2020 and 2025, Thomson Reuters recognized me as a Top Young
25 Attorney in Southern California in the annual Rising Stars Edition of Super Lawyer. This is an
26 honor awarded to no more than two-and-a-half percent of attorneys under the age of forty in
27 Southern California each year.

9. As counsel for Plaintiff Casey, I have been closely involved in all aspects of this litigation since its inception. The details of the work completed by my firm in this case are set forth in the declaration of H. Scott Leviant, filed concurrently herewith

10. My firm requests \$2,093.18 in reimbursement for litigation costs. A true and correct copy of my firm's expense summary is attached hereto as **Exhibit 1**.

11. To date, my firm has devoted 129.9 hours to this matter, working entirely on a contingency basis. A non-exhaustive list of my firm's efforts includes conducting a pre-filing investigation; analyzing the claims of Plaintiff Casey and, later, those jointly asserted with Plaintiff Small; performing legal research on the viability of class and PAGA theories; reviewing and analyzing data and documents produced by Defendant, including timekeeping, payroll, and policy records; evaluating exposure; reviewing the mediation analysis and brief; preparing for and participating in a full-day mediation with Steven Rottman, Esq.; reviewing the Memorandum of Understanding and subsequent long-form Class Action and PAGA Settlement Agreement; reviewing the Notice Packet; reviewing and revising the motions for Preliminary and Final Approval; and monitoring the implementation and notice process. A table of the hours spent on this matter, along with the applicable billing rates for each attorney and staff member at my firm, is provided below:

Name	Rate	Hours	Pre-Multiplier Lodestar
Paul K. Haines (19th Year Attorney)	\$925	28.4	\$26,270.00
Fletcher W. Schmidt (13th Year Attorney)	\$825	39.9	\$32,917.50
Andrew J. Rowbotham (11th Year Attorney)	\$725	54.1	\$39,222.50
Susan J. Perez (6th Year Attorney)	\$550	3.2	\$1,760.00
Firm Paralegals	\$200	4.3	\$860.00
Total Lodestar			\$101,030.00

12. I confirm that I am not affiliated in any way with the proposed Settlement Administrator, ILYM Group, Inc. I do not have any financial interest, ownership interest, or other

1 relationship with ILYM Group that could create a conflict of interest or call into question the
2 neutrality of the settlement administration process.

3 13. I declare under penalty of perjury under the laws of California and the United
4 States that the foregoing is true and correct. Executed on June 4, 2025, at El Segundo, California.

5 

6 _____
Andrew J. Rowbotham

Exhibit “1”

Small, et al. v. Ridgecrest Regional Hospital

Additional Charges :

			<u>Qty/Price</u>	<u>Amount</u>
9/30/2023	GB	Photocopies for September, 2023.	4 0.25	1.00
	ALL	Postage for September, 2023.	1 7.18	7.18
10/4/2023	IDLC	Filing fee for: LWDA Order #: [REDACTED]	1 75.00	75.00
10/5/2023	IDLC	One Legal's Filing fee for: Summons, civil case cover sheet, Complaint - complex Order #: [REDACTED]	1 1,494.53	1,494.53
10/18/2023	ALL	One legal's filing fee for: Notice of jury deposit, Proof of service Order #: [REDACTED]	1 171.62	171.62
10/31/2023	ALL	Postage for October, 2023.	1 11.23	11.23
	ALL	Copying cost for October, 2023.	37 0.25	9.25
	ALL	Westlaw cost for October, 2023.	1 4.63	4.63
11/15/2023	ALL	One legal's Filing fee for: Proof of service of summons/complaint Order #: [REDACTED]	1 13.33	13.33
	ALL	One legal's Filing fee for: Proof of service of summons/complaint Order #: [REDACTED]	1 13.33	13.33
11/22/2023	ALL	One legal's Filing fee for: Proof of service of summons/complaint Order #: [REDACTED]	1 17.04	17.04

			Qty/Price	Amount
12/12/2023	IDLC	One legal's filing fee for: Amended complaint - Amount unchanged (No Fee) Order #: [REDACTED]	1 17.04	17.04
12/31/2023	ALL	Copying cost for December, 2023.	21 0.25	5.25
	ALL	Postage for December, 2023.	1 2.03	2.03
1/16/2024	ALL	One legal's filing fee for: Proof of service of summons/complaint Order #: [REDACTED]	1 17.04	17.04
1/29/2024	IDLC	First legal's filing fee for: Proof of service Direct E-filing Order #: [REDACTED] Base charge + Additional charges	1 15.55	15.55
1/31/2024	ALL	Postage for January, 2024.	1 0.64	0.64
	ALL	Copying cost for January, 2024.	14 0.25	3.50
3/12/2024	ALL	First legal's filing fee for: Stipulation To Continue Case Management Conference; [Proposed] Order; Proof of Service. Order #: [REDACTED] Direct E-filing Base charge + Additional charges + Adv/wit ck + Check charge	1 36.50	36.50
3/31/2024	ALL	Copying cost for March, 2024.	6 0.25	1.50
7/29/2024	IDLC	First legal's filing fee for: Joint Case Management Statement; Proof of Service Order #: [REDACTED] Direct E-filing Base charge + Additional charges	1 15.70	15.70
7/31/2024	ALL	Postage for July, 2024.	1 0.69	0.69
	ALL	Copying cost for July, 2024.	71 0.25	17.75
8/31/2024	IDLC	CourtCall fee for hearing on 8/7/2024. CCID: [REDACTED]	1 72.00	72.00

		<u>Qty/Price</u>	<u>Amount</u>
11/1/2024	VG	First Legal's Filing fee for: Plaintiffs Request for Dismissal of Entire Action without Prejudice;Declaration of Andrew J. Rowbotham in Support of Plaintiffs Request for Dismissal of Entire Action without Prejudice;[Proposed] Order Granting Request for Dismissal of Entire Action without Prejudice;Proof of Service	1 15.70 15.70
		Order #: [REDACTED] Direct E-Filing Base Charge + Additional Charges	
11/5/2024	ML	Kern County Administrative fee. Receipt # [REDACTED]	1 45.90 45.90
11/30/2024	ML	Postage for November, 2024.	1 1.25 1.25
	ML	Postage for November, 2024.	22 0.25 5.50
4/30/2025	ML	Copying cost for April, 2025.	6 0.25 1.50
Total additional charges			\$2,093.18
Balance due			\$2,093.18