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Attorneys for Plaintiff
ALEXA ROS COLEMAN

[ADDITIONAL COUNSEL ON NEXT PAGE]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN**

ALEXA ROS COLEMAN, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

LL FLOORING, INC., a Delaware corporation;
and DOES 1 through 100, inclusive,

Defendant.

Case No. BCV-23-103493

[Assigned to Hon. David Zulfa, Division J]

**DECLARATION OF RAPHAEL A.
KATRI IN SUPPORT OF PLAINTIFF'S
MOTION FOR SETTLEMENT
APPROVAL OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT AND REASONABLE
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT AWARD**

Date: March 18, 2024
Time: 8:30 a.m.
Div.: J

Complaint Filed: October 18, 2023
Trial Date: None Set

DECLARATION OF RAPHAEL A. KATRI IN SUPPORT OF PLAINTIFF'S MOTION FOR SETTLEMENT
APPROVAL OF CLAIMS BROUGHT UNDER THE PRIVATE ATTORNEYS GENERAL ACT AND REASONABLE
ATTORNEYS' FEES, COSTS, AND ENHANCEMENT AWARD

1 **LAW OFFICES OF RAPHAEL A. KATRI, APC**

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5 Attorneys for Plaintiff

ALEXA ROS COLEMAN

1 I, RAPHAEL A. KATRI, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California and am the
3 principal attorney at the Law Offices of Raphael A. Katri and am co-Counsel for Alexa Ros Coleman
4 in the above-captioned matter. I have personal knowledge of the matters set forth herein, and would
5 and could testify thereto if called as a witness herein. I make this declaration in support of the
6 adequacy of my representation as Co-Counsel in this matter, and in support of approval of the
7 representative action settlement at issue in this matter.

8 2. I graduated from the University of California at Los Angeles in 1999 with a degree in
9 Sociology. I graduated from Loyola Law School of Los Angeles in 2002. I am currently the principal
10 attorney in The Law Offices of Raphael A. Katri in Los Angeles. I am an attorney duly licensed to
11 practice law in the States of California, Texas, New York, Washington and Michigan, and am a
12 member in good standing with the Bar of this Court.

13 3. The majority of my legal experience since becoming a member of the California Bar in
14 2002 has been devoted to the practice of California and federal employment law. Indeed, my current
15 law practice is devoted almost exclusively to employment law; namely representing plaintiffs in wage
16 and hour and representative claims and actions with the same or similar causes of actions brought
17 forth in the matter pending before this Court.

18 4. I have actively participated in the prosecution and successful settlement of multiple
19 wage and hour class action lawsuits and representative actions, helping to recover millions of dollars
20 on behalf of the respective class members and/or aggrieved employees in those cases, Hernandez, et al
21 v. Tyco International (US), Inc., et al. (Case No. BC315749), Enterprise Wage and Overtime Cases,
22 (Consolidated Case No. JCCP 4417), Tejeda, et al. v. La-Z-Boy Inc. (Case No. CIVDS1311851),
23 Pandey v. Sheridan Assisted Living, Inc. (Case No. BC519461), Lukasik v. Design Within Reach, Inc.
24 (Case No. BC528661), Montalvo v. Swift Transportation Corp. (Case No. 37-2011-00094313-CU-
25 OE-CTL), Terrazas v. Avanti Agency Corp. (Case No. RIC1409978), Thomas v. Universal Home
26 Care, Inc. (Case No. BC600623), Vaquero v. Stoneledge Furniture LLC (Case No. BC522676),
27 Sforza v. Go Wireless, Inc. (Case No. BC636573), Jesus Lopez v. InTouch Mobile (Case No.

BC619823), Garcia v. General Coatings Corporation (Case No. 37-2016-00041617-CU-OE-CTL), Jose Balbastro v. Premier Insurance Services, Inc. (Case No. 37-2018-00023269-CU-OE-CTL), Loughrie v. Target Corporation (Case No. CIVDS1804580), Bennett v. Alorica, Inc. (Case No. 30-2018-00997257-CU-OE-CXC), Chacon v. Exel, Inc. (Case No. CIVDS1721284), Gonzalez v. CVS Pharmacy, Inc. (Case No. 30-2017-00951164-CU-OE-CXC), Bell v. CEVA Logistics U.S., Inc. (Case No. Case No.: 5:19-cv-00352-SVW (KK)), Salgado v. T-Mobile USA, Inc. (Case No.: 1:17-cv-00339-JLT), Suazo v. Leslie's Poolmart, Inc. (Case No. RIC185126), Woods v. Fresno Valves & Castings, Inc. (Case No.: 16CECG01134), Cahilig v. Ikea U.S. Retail, LLC (Case No.: 2:19-cv-01182), Elayda v. Physassist Scribe, Inc. (Case No.: CIVDS 2002023), Mier v. Mainfreight, Inc. (Case No.: 19STCV04465), McLucas v. Michael's Store Procurement Company, Inc. (Case No.: BC720953), Partida v. Fleetpride, Inc. (Case No.: 20STCV15187), Larry Lucas Lee v. Metal Sales Manufacturing Corporation (Case No.: CV2020-1643), Bonafort v. Sticker Mule LLC (Case No.: 1:20-cv-01222), Rankins v. ATV, Inc. (Case No.: 19STCV24428), Vivian Ly v. Prime Comms Retail, LLC (Case No. 34-2020-00281668), McClanahan v. CIK Power Distributors, LLC (Case No.: 20STCV00307) and Juarez v. Schenker (Case No. RIC1818680), Jarvis Patterson v. Budget Wireless California LLC (Case No.: BC719426), Gogerty v. Atlas Lift Tech, Inc. (Case No.: CVCV21-01088), Quintero v. Ready Pac Foods, Inc. (Case No.: 20PSCV00586), Rushworth v. Wineshipping.com LLC (Case No.: 20CV001179), Kim v. Wireless Vision, LLC (Case No.: CIVDS2000074), Hardmon v. Ascena Retail Group, Inc. (Case No.: 5:19-cv-2207-MFW-KKx), Strawn v. Bridgestone Retail Operations, LLC (Case No.: 34-2018-00242049), Rodriguez v. TMSO, Inc. (Case No.: RIC1906104), Soward v. Moore Advanced, Inc. (Case No.: RIC1900029), Dunham v. Autism Spectrum Therapies, LLC (Case No.: 19STCV25183), Koontz v. Clark Pest Control of Stockton, Inc. (Case No.: 18CV-04754), Vae v. Moga Transport, Inc. (Case No.: BCV-20-103017 BCB), Martinez v. Curative, LLC (Case No.: 21STCV20778) and Reyes v. S.J. Distributors, Inc. (Case No.: 21CV390665).

5. My firm has also been involved in multiple favorable appellate court decisions which have been very important in wage and hour class action law. These appellate decisions include the following cases:

1 A. Vaquero v. Ashley Furniture Industries Inc. 824 F.3d 1150, 2016 WL 3190862 (9th
2 Cir. June 8, 2016) (limits the impact of *Wal-Mart v. Dukes* (2011) 564 U.S. 338 with
3 respect to the issue of commonality, limits the impact of *Comcast v. Behrend* (2013)
4 133 S.Ct. 1426 with respect to predominance and underscores the 9th Circuit rule that
5 the need for individualized finding with respect to damages does not defeat class
6 certification); and

7 B. Vaquero v. Ashley Furniture Industries Inc. (2017) 9 Cal.App.5th 98 (expands the
8 impact of *Bluford v. Safeway Stores, Inc.* (2013) 216 Cal.App.4th 864 to commissioned
9 employees for the first time; they must be separately compensated for rest breaks).

10 6. Although I am experienced in employment, class actions and PAGA actions, I
11 associated in as co-counsel on this case the law firms of Haines Law Group, APC and Lidman Law,
12 APC. These firms also have a great deal of experience in wage and hour class action employment
13 cases and representative actions, and together all of our firms have and will continue to aggressively
14 and competently represent the named plaintiff and the other aggrieved individuals in this case. In
15 light of the foregoing, I am qualified to act as co-Class Counsel in this matter.

16 7. My law office has incurred a total of 22.5 attorney hours as of today and I expect to
17 spend approximately 10 hours to prepare for and/or attend the final settlement hearing, contact with
18 aggrieved employees requesting case status updates over the next several months, and to ensure that
19 proper claims administration and distribution occurs to all aggrieved employees. Though I normally
20 work on a contingency basis, for purposes of calculating a lodestar, my standard hourly rate for class
21 and/or representative action litigation is \$725 per hour. Thus, my office's lodestar will be \$23,562.50.

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8. The declaration of my co-Counsel, Scott M. Lidman filed concurrently herewith, sets forth the of the work completed in this case by attorneys in my co-Counsel's firms.

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

Executed this 17th day of January, 2024, at Los Angeles, California.

By: Raphael A. Katri
RAPHAEL A. KATRI
 Declarant