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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **IN AND FOR THE COUNTY OF LOS ANGELES**

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14 EDGARDO MARQUINA, MARVIN
LOUKA, ULISES URIBE and JULIAN
15 DOMINGO, individuals, on behalf of
themselves, and on behalf of all persons
16 similarly situated,

17 Plaintiffs,

18 vs.

19 AT&T MOBILITY SERVICES LLC,
20 a Limited Liability Company; and DOES
1 through 50, inclusive,

21 Defendants.
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Case No. 23STCV24512

**DECLARATION OF DAVID C. HAWKES
IN SUPPORT OF UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: December 4, 2025

Hearing Time: 11:00 a.m.

Judge: Hon. Timothy Patrick Dillon
Dept.: 15

Complaint Filed: October 9, 2023

Trial Date: Not Set

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1 I, David C. Hawkes, declare as follows:

2 1. I am an attorney at law duly admitted to practice before all courts of the State of
3 California and one of the attorneys of record herein for Plaintiffs EDGARDO MARQUINA,
4 MARVIN LOUKA, ULISES URIBE and JULIAN DOMINGO ("Plaintiffs") in Los Angeles
5 County Superior Court Case No. 23STCV24512. The following facts are known to me of my own
6 personal knowledge and circumstances in the above-entitled matter as they relate to this
7 Declaration, and if called upon, I could and would testify competently thereto.

8 2. I am a 2002 graduate of the University of San Diego School of Law, admitted to
9 practice before the United States District Court, Southern District of California (Northern and
10 Central Districts of California as well), United States Court of Appeals for the Ninth Circuit, and
11 all California State Courts. I am a partner at the law firm of Blanchard, Krasner & French.

12 3. Blanchard Krasner & French is a preeminent La Jolla based law firm and focuses
13 on business and civil litigation, corporate and tax matters, real estate matters and litigation, estate
14 planning and trust litigation, and representing both employers and employees in employment
15 matters and litigation. Blanchard Krasner & French has significant experience in complex class
16 action litigation, including wage and hour and consumer class actions. With Blanchard Krasner
17 & French, I personally have extensive experience litigating wage and hour class action matters,
18 including certification of numerous classes and approval of numerous class settlements. For
19 example –

- 20 • *Kee et al v. Hiossen, Inc.*, San Diego Superior Court Case No. 37-2019-
21 00023035-CU-OE-CTL, a certified wage and hour class action on behalf of a
22 class of California-based employees regarding unlawful forfeiture of Paid Time
23 Off.
- 24 • *O'Brien et al v. Cathy Jean, Inc.*, San Diego Superior Court Case No. 37-2011-
25 00085539-CU-OE-CTL, a certified wage and hour class action on behalf of a
26 class of retail sales employees.

- *Beza et al v. Boyd Gaming et al.*, Clark County District Court, Case No. A-21-845753, wage and hour class action certified for settlement purposes on behalf of a class of casino/hotel/resort employees for violations of Nevada’s SB-386 “Hospitality and Travel Workers Right To Return Act”.
- *Lopez et al v. Amazon.com, LLC et al.*, Case No. 22-cv-1414-RSH-KSC (S.D. Cal.), a wage and hour class action certified for settlement purposes on behalf of a class of California non-exempt delivery drivers.
- *Bennett et al. v. Wyndham Vacation Ownership, Inc. et al.*, Case No. 22-cv-01050 JES(BLM) (S.D. Cal.), a wage and hour class action certified for settlement purposes on behalf of a class of California non-exempt marketing employees.
- *Preston et al. v. Porch.com et al.*, Case No. 21-cv-00168 JLS(BLM) (S.D. Cal.), a wage and hour class action certified for settlement purposes on behalf of a class of non-exempt California employees.
- *Jones v. SeaWorld Parks & Entertainment, Inc., et al.* Case No. 37-2018-00057055-CU-OE-CTL, a wage and hour class action certified for settlement purposes on behalf of a class of non-exempt hourly California employees.
- *Walker et al. v. Corepower Yoga LLC*, San Diego Superior Court Case No. 37-2011-00101074-CU-OE-CTL, a wage and hour class action certified for settlement purposes on behalf of a class of California yoga instructors.
- *Alviz v. LHM CORP TSD, et al.*, Case No. 37-2020-00027584-CU-OE-CTL, a wage and hour class action certified for settlement purposes on behalf of a class of non-exempt California employees.

4. Additionally, both with Blanchard Krasner & French and previous law firms, I have extensive additional experience in class action litigation matters, including class action cases against defendants such as FH Paschen/FHP Techtonics/SN Nielsen, Coldwell Banker, Prudential, Re/Max, San Diego Padres, AOL/Time Warner, Daimler/Chrysler, Broadcom, Coleman

1 University, Fry's Electronics, and others, as well as defending class action cases against such
2 companies as Comprehensive Educational Services (d/b/a "ACES"), Roadrunner Sports,
3 Pedalheads USA, Inc., Reseda Discount Corporation, Melrose Facility Management, LLC,
4 Huntington Pacific Hotels, LLC, and Big Bully Turf, Inc.

5 5. My firm and I have thus committed and will continue to commit substantial
6 resources to adequately represent the Class in this action. Neither I nor Blanchard Krasner &
7 French have any conflicts of interest or antagonism with the proposed Class and will fairly and
8 adequately protect the interests of the Class. Blanchard Krasner & French has sufficient capital to
9 fund this case to its conclusion. Additionally, Blanchard Krasner & French has sufficient resources
10 and legal staffing to undertake all aspects of the litigation.

11 6. I am competent, skilled and experienced in litigating class action matters of this
12 type. I have substantial experience litigating class action cases before both trial and appellate
13 courts throughout California

14 7. To ensure that this case was properly prosecuted, I was precluded from taking on
15 other cases, and in fact had to turn away other meritorious fee generating cases. This case was
16 accepted on a contingency basis.

17 8. My co-counsel's and my experience in wage and hour class actions was integral in
18 evaluating the strengths and weaknesses of the case and the reasonableness of the settlement. We
19 collectively believe this settlement is fair, reasonable and adequate. My co-counsel and I believe
20 that under the proposed Settlement, Class Members will receive substantial benefits and will
21 achieve the desired relief sought by the claims brought on behalf of the Class in the present action,
22 in the most expeditious and efficient manner practicable.

23 9. The named Plaintiffs have performed their duties admirably by working with their
24 counsel, responding to discovery requests, communicating with putative class members, attending
25 mediation, and reviewing numerous drafts of the comprehensive Settlement and proposed Class
26 Notice.

10. On August 18, 2025, I submitted the proposed settlement to the California Labor and Workforce Development Agency (“LWDA”) via the LWDA’s website at <https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>. At 6:57 p.m. on August 18, 2025, I received a confirmation email from LWDA that the “Proposed Settlement was successfully processed”.

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

Executed this 18th day of August 2025 at La Jolla, California.

David Hawkes

David C. Hawkes