

AEGIS LAW FIRM, PC

Samuel A. Wong, State Bar No. 217104
Kashif Haque, State Bar No. 218672
Jessica L. Campbell, State Bar No. 280626
9811 Irvine Center Drive, Suite 100
Irvine, California 92618
Telephone: (949) 379-6250
Facsimile: (949) 379-6251
Email: Jcampbell@aegislawfirm.com

Attorneys for Plaintiff, individually
and on behalf of all others similarly situated

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

JEREMY D. FRALEY AND JERRY
HAGERTY, individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

ROSEBURG FOREST PRODUCTS CO.; and
DOES 1 through 20, inclusive,

Defendant.

Case No. 23CV05757

*Assigned for All Purposes to:
Hon. JoAnn Bicego
Department 2*

**DECLARATION OF JESSICA L.
CAMPBELL IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: October 23, 2025
Time: 9:30 a.m.
Dept: 2

1 I, Jessica L. Campbell, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all the courts of the State of
3 California. I am a partner at Aegis Law Firm, PC, counsel for Plaintiff Jeremy D. Fraley
4 (“Plaintiff”) in this matter. I am thoroughly familiar with and have personal knowledge of all
5 the facts set forth herein.

6 2. I submit this declaration in support of Plaintiff’s Motion for Final Approval of
7 Class Action Settlement (“Final Approval Motion”). If called as a witness, I could and would
8 competently testify thereto.

9 **Counsel’s Qualifications**

10 3. Aegis Law Firm prosecutes wage and hour cases, including class actions on
11 behalf of employees and others who have had their rights violated. Aegis, either on its own or
12 with co-counsel is currently serving as plaintiffs’ counsel of record in dozens of wage and hour
13 and employment class action cases pending in both state and federal court.

14 4. The attorneys working on this case have been appointed class counsel in many
15 cases, through both contested motions and settlement approval motions.

16 5. Aegis has litigated and successfully resolved many wage and hour class action
17 cases involving failure to pay wages and derivative Labor Code claims and penalties. *See, e.g.,*
18 *Calma v. Scooter Brew, Inc.*, San Diego Superior Court, Case No. 37-2021-00050379-CU-OE-
19 CTL (class certification granted on April 12, 2024 for non-exempt restaurant employees’ on issues
20 of expense reimbursement, unpaid wages for off-the-clock work, meal violations, inaccurate
21 wage statements and waiting time penalties); *Vinalay v. Union City Hotel Management Corp. et*
22 *al.*, Case No. 37-2019-00021268-CU-OE-CTL (class certification granted on April 4, 2022 for
23 non-exempt employees on issues of unpaid overtime, automatic meal period deductions,
24 inaccurate wage statements, and waiting time penalties); *Roman, et al. v. TRM Manufacturing,*
25 *Inc.*, Riverside Superior Court, Case No. RIC1706458 (class certification granted on December 17,
26 2020 for all current and former non-exempt workers’ on issues of rounding, meal period, and rest
27 period claims); *Gamboa v. Kamran, et al.*, San Bernardino Superior Court, Case No.
28 CIVDS1605273 (class certification granted on September 16, 2019, for factory workers on issues

1 of rounding, automatic deduction of first meal period, and second meal period); *Romo, et. al, v.*
2 *GMRI, Inc. d/b/a/ Olive Garden*, United States District Court Central District of California, Case
3 No. EDCV-12-0715-JLQ (class certification granted for restaurant workers' rest period claims);
4 *Sawyer v. Retail Data, LLC*, Orange County Superior Court, Case No. 30-2014-00753767-CU-
5 OE-CXC (unpaid wage and rest break claims for piece rate workers); *Gonzalez v. SFFI Company,*
6 *Inc., et. al*, San Bernardino County Superior Court, Case No. CIV DS1504287 (unpaid wages,
7 meal period and rest break claims for non-exempt employees); *Antoine v. Riverstone Residential*
8 *California, Inc., et. al*, Sacramento County Superior Court, Case No. 34-2013-00155974 (rate of
9 pay, on-call time, unpaid wage, meal period, rest break, and expense reimbursement claims for
10 non-exempt employees); *Nguyen v. Pharmerica*, Orange County Superior Court, Case No. 30-
11 2014-00716072-CU-OE-CXC (unpaid wages and unreimbursed expenses for pharmacists);
12 *Orellana v. Westlake*, Los Angeles County Superior Court, Case No. BC539614 (unpaid
13 overtime, meal period and rest break claims for call center employees); *Kent v. Mountain View*
14 *Child Care, Inc.*, Los Angeles County Superior Court, Case No. BC539633 (minimum wage,
15 overtime, meal period, and rest break claims for hospital workers); *Durroh v. East West Bank,*
16 Los Angeles County Superior Court, Case No. BC528860 (overtime claims for failure to include
17 bonuses in regular rate of pay for bank workers); *O'Brien et al. v. Pizza Hut of Southeast Kansas,*
18 *Inc. et al.*, Riverside County Superior Court, Case No MCC 1301030 (meal period and expense
19 reimbursement claims for delivery drivers); *Bell v. Prime Healthcare*, Orange County Superior
20 Court, Case No. 30-2011-00475240-CU-OE-CXC (overtime claims for failure to include shift
21 premiums in regular rate of pay and failure to provide meal and rest periods to hospital workers),
22 *Grana v. Toys R US-Delaware, Inc.*, Central District of California, Case No. 2:13-cv-01302-DSF-
23 JCG (bag check claims for unpaid wages and failure to provide meal periods and rest breaks to
24 retail employees); *Mendez v. H.J. Heinz Company, L.P., et. al*, Orange County Superior Court,
25 Case No. 30-2013-00644915-CU-OE-CXC (failure to pay all wages to factory workers due to
26 rounding practice); *Fresh & Easy Wage and Hour Cases*, Los Angeles Superior Court, Cas No.
27 JCCP 4705 (failure to provide meal and rest periods to supermarket workers); *Lunsford v Stater*
28 *Bros.*, Riverside Superior Court, Case No. RIC 1104475 (failure to provide meal and rest periods

1 to supermarket workers); *Gregg v. Belo*, Riverside Superior Court, Case No. RIC 523697 (unpaid
2 wages and missed meal and rest periods due to misclassification of newspaper delivery
3 employees); *Brown v. Experian Information Solutions, Inc., et. al.*, Orange County Superior
4 Court, Case No. 30-2012-00375163 (misclassification of engineers and similar positions); *Tereth*
5 *v. Shakey's USA, Inc.*, Los Angeles Superior Court, Case No. BC441359 (failure to provide meal
6 and rest periods to restaurant employees); *Azurin v. Harbor Distributing LLC, et. al.*, Los Angeles
7 Superior Court, Case No. BC421392 (failure to pay overtime wages, provide meal and rest
8 periods, reimburse business expenses to Account Managers); *Caffero v. ABC* (failure to provide
9 meal periods and reimburse expenses of therapists).

10 6. Samuel A. Wong is a graduate of University of Pennsylvania Law School, where
11 he received his J.D. in 2001. Mr. Wong received a Bachelors of Arts in Sociology from the
12 University of California at Berkeley in 1997.

13 7. After graduation from law school in 2001, the same year in which Mr. Wong took
14 and successfully passed the California Bar Exam, Mr. Wong moved to back to Los Angeles,
15 California where he was employed at Paul Hastings, Janofsky & Walker, LLP. While working in
16 the employment department at Paul Hastings, he was involved in numerous wage and hour class
17 action lawsuits and other employment related matters.

18 8. Mr. Wong became a founding partner of Aegis Law Firm, PC in 2003, and focused
19 his practice on plaintiff's side employment work. Throughout his years of practice, Mr. Wong
20 represented and obtained successful outcomes for his clients, including awards through
21 arbitration and trial.

22 9. Mr. Wong is a member of the Orange County Bar Association, Orange County
23 Trial Lawyers Association, and California Employment Lawyers Association.

24 10. Mr. Wong was chosen by Law and Politics Magazine as a Super Lawyer Rising
25 Star, representing one of the top 2.5% of lawyers under 40 in Southern California in 2011, 2012,
26 2013, and 2014. He was chosen by Law and Politics Magazine as a Super Lawyer in 2015, 2016,
27 2017, and 2018. Mr. Wong was also chosen as a Top Attorney in the field of employment law by
28 OC Metro in 2014, 2015, and 2018. Mr. Wong currently bills at a rate of \$950 per hour.

1 11. Kashif Haque received his J.D. in 2001 from Washington University School of
2 Law. While in law school, Mr. Haque was a member of the Law Review Editorial Board, author
3 of an article published in the Law Review, Executive Board Member of Moot Court, and a
4 member of the Dean's List. He received a Bachelor's of Science in Business Administration from
5 the University of Central Missouri in 1998, where he was a member of the Beta Alpha Psi honors
6 fraternity.

7 12. Since 2004, Mr. Haque has exclusively focused his practice on plaintiff's
8 employment litigation with a specific focus on wage and hour claims. Since then, he has
9 represented over 500,000 employees with their employment claims, many of which included
10 wage and hour claims. He has been appointed class counsel in approximately 100 cases and is
11 currently litigating over 150 employment wage and hour class action cases.

12 13. Mr. Haque authored a book on employment litigation strategies with West
13 Publishing and has been invited to speak on class action and wage and hour issues on numerous
14 occasions. He has spoken at seminars by the State Bar of California, California Employment
15 Lawyer's Association (CELA), Orange County Bar Association, and various other CLE
16 providers. Mr. Haque is the former Chair for the Labor and Employment Section of the Orange
17 County Bar Association. He was selected as one of the Top 50 Attorneys in Orange County by
18 Super Lawyers for 2017 and 2019. He has been a Super Lawyer for every year from 2009 to the
19 present. OC Register/Metro has selected him as one of the Top 5 Employment Lawyers in Orange
20 County for every year the list was published, from 2012 to 2021. Mr. Haque currently bills at a
21 rate of \$950 an hour.

22 14. I am a partner at Aegis Law Firm. I was admitted to the California Bar in December
23 of 2011, and received my J.D. from Santa Clara University School of Law and my B.A. from the
24 University of California, Berkeley. I have dedicated my career to plaintiffs' side class actions.
25 My experience includes successful work on class action appeals, class certification motions, and
26 class settlements. I was chosen by Law and Politics Magazine as a Super Lawyer Rising Star,
27 representing one of the top 2.5% of lawyers under 40 in Southern California for several years. I
28 currently bill at a rate of \$800 per hour.

1 15. Carolyn Bell is a senior attorney at Aegis Law Firm. She is a graduate of Whittier
2 Law School, where she received her J.D. in 2014. Ms. Bell received her B.A. from California
3 State University, Santa Barbara. Prior to working at Aegis, she worked at a civil litigation firm
4 focused on plaintiff-side employment actions. She currently bills at a rate of \$675 per hour.

5 **Class Counsel's Fees and Costs**

6 16. Aegis' hourly rates are comparable to those charged by other class action
7 plaintiff's counsel and the firms defending class actions. *See*
8 <http://www.laffeymatrix.com/see.html> (Laffey Matrix); *see also Ellis v. Harder Mech.*
9 *Contractors, Inc.*, No. 21-CV-00844-JSW, 2023 WL 2620145, at *5 (N.D. Cal. Mar. 22, 2023)
10 (finding "hourly rates of \$950 for partners and \$675 for senior associates" to be "reasonable and
11 consistent with the rates charged by other attorneys with similar experience"). Our attorneys have
12 specifically been approved at these rates. *See, e.g., Victor Rangel v. President and Board of*
13 *Trustees of Santa Clara College*, Santa Clara Superior Court, Case No. 23CV413920, Order dated
14 August 15, 2024 (approving Jessica Campbell at \$800 per hour, stating "counsel's hourly rates
15 are reasonable"); *Karen Hecker v. Mathew Enterprise, Inc.*, Santa Clara County, Case No.
16 22CV405334, Order dated August 21, 2024, (finding \$600 per hour reasonable for an Aegis class
17 action attorney Julia Toscano who graduated in 2018).

18 17. Aegis' current lodestar reflects 269.2 hours of work resulting in \$223,962.50 in
19 fees, excluding the time Counsel will spend at the final approval hearing and helping with
20 Settlement Administration after final approval.

21 18. Aegis dedicated significant resources to this case by dividing the tasks required
22 according to skill level, and the professional hours generated by each attorney are neither
23 unreasonable nor duplicative. This time could have been spent on other potentially lucrative
24 cases. Aegis' lodestar reflects the efficiencies achieved by a law firm experienced in this field.
25 The chart below shows the calculation of hours spent by each of Aegis' attorneys on this case.

Attorney	Hours	Hourly Rate	Total
Kashif Haque	127.1	\$950.00	\$120,745.00
Jessica L. Campbell	58.4	\$800.00	\$46,720.00
Carolyn Bell	83.7	\$675.00	\$56,497.50
Totals	269.2		\$223,962.50

19. Our firm along with our co-counsel bore the entire risk of recovery. We took this case on a pure contingency basis, with no guarantee of any payment. Before mediation, we spent significant time investigating and preparing for mediation despite the risk of recovering nothing.

20. In our investigation of the case, we found multiple Collective Bargaining Agreements existed that applied to the class members, which meant we had to argue against potential exemptions faced by the class for the wage and hour claims. Additionally, there was a disagreement over whether the CBAs or the handbook took precedence on certain issues. We argued the language in the handbook controlling employee conduct in the parking lot (including whether they can use tobacco, loiter or use their cell phones) indicated employees should have been paid for their time spent under such control. We performed significant research into what constitutes control when an employer designates a parking area and maintains rules for conduct in the parking area. After extensive research and factual investigation, we presented these and other arguments at mediation to ensure we were obtaining fair value for the release of class claims. Had the litigation continued, Defendants would undoubtedly have mounted an aggressive defense at the certification stage and at the merits stage. A defeat at one of these stages could have foreclosed the possibility of our firm recovering any remuneration for our time and effort.

21. In litigation costs, Aegis has spent \$24,399.90 on items such as filing fees, postage, mediation fees, and other fees related to the litigation. A true and correct copy of Aegis' Cost Report is attached hereto as Exhibit 1. All of the costs were reasonable and necessary for the prosecution of this case.

Exhibits

22. A true and correct copy of Class Counsel's cost report for costs incurred in this Action is attached hereto as **Exhibit 1**.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 24, 2025 at Irvine, California.



Jessica L. Campbell

EXHIBIT 1

Matter Billing Detail

Aegis Law Firm, PC

Date Range:

03/01/2011 to 09/24/2025

Client:

48220 - Jeremy D. Fraley

Matter:

271 - Fraley v. Roseburg Forest Products Co.

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
06/19/2023	FF	LWDA Filing Fee	\$75.00		Unbilled				
06/19/2023	FF	Filing Fee	\$1,676.12		Unbilled				
06/28/2023	FF	Filing Fee	\$160.23		Unbilled				
07/26/2023	SOP	Service of Process- Roseburg Fores Proucts	\$99.85		Unbilled				
10/03/2023	FF	Filing Fee	\$210.47		Unbilled				
10/06/2023	FF	Filing Fee	\$168.73		Unbilled				
01/24/2024	FF	Filing Fee	\$341.85		Unbilled				
10/21/2024	MED	Vendor: Kyriacou Mediation; Date: 10/21/2024 - Mediation Services-	\$6,840.00		Unbilled			996947	Kyriacou Mediation
11/13/2024	FF	Filing Fee	\$15.45		Unbilled				
12/24/2024	EXP	Vendor: Berger Consulting Group, LLC; Date: 12/24/2024 - Expert Witness Fee-	\$13,065.00		Unbilled			996996	Berger Consulting Group, LLC
03/19/2025	FF	Filing Fee	\$16.45		Unbilled				
03/24/2025	FF	Filing Fee	\$78.85		Unbilled				
04/01/2025	FF	Filing Fee	\$12.95		Unbilled				
04/03/2025	FF	Filing Fee	\$16.45		Unbilled				
09/24/2025	CC	Cumulative Copies, Faxes, Scans, Postage	\$1,622.50		Unbilled				
		Total:	\$24,399.90	\$0.00					
		Balance:	\$24,399.90						

Matter Billing Detail

Report Date: 9/24/2025

Report Time: 12:51PM

Page: 2 of 2

User ID: Campbell

Aegis Law Firm, PC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total Fees Billed- -----			\$0.00						
Total Fees Unbilled : -----			\$0.00						
Total Fees Received : -----			\$0.00						
Total Soft Cost Billed : -----			\$0.00						
Total Soft Cost Unbilled : -----			\$0.00						
Total Soft Cost Received : -----			\$0.00						
Total Hard Cost Billed : -----			\$0.00						
Total Hard Cost Unbilled : -----			\$24,399.90						
Total Hard Cost Received : -----			\$0.00						
Total Taxes Billed : -----			\$0.00						
Total Taxes Unbilled : -----			\$0.00						
Total Taxes Received : -----			\$0.00						
Total Late Charges Billed : -----			\$0.00						
Total Late Charges Unbilled: -----			\$0.00						
Total Late Charges Received : -----			\$0.00						
Trust Balance: -----			\$0.00						