

4. Since I graduated from University of San Francisco Law School in 1998, I have settled upwards of 250 individual employment law cases, and I have handled the following class actions from start to finish: *Ramirez v. Arevalo Landscaping*, Los Angeles Superior Court case number BC397109; *Friedrich v. La Vaquita Corp.*, Los Angeles Superior Court case number BC564432; *Carvalho v. Staff Pro*, Alameda County Superior Court case number RG16812554; *Hart v. Marriott International, Inc.*, United States District Court case number 8:17-cv-2021-JVS; *Cole v. Saucey, Inc.*, Los Angeles Superior Court case number BC707895; *Rowe v. Laura Geller Beauty, LLC*, United States Bankruptcy Court case number 1:18-bk-14102-MEW (New York); *Rowe v. Ulta Salon, Beauty, and Cosmetics, LLC*, Sacramento Superior Court case number 34-2019-00267231, *Luna et al. v. Triple Canopy, Inc.*, Santa Clara Superior Court case number 19CV345169, *Smith v. Budget Rent A Car System, Inc.*, United States District Court case number 2:19-cv-4720-SVW, *Shrum v. Sacramento Elite Patrol, Inc.*, Sacramento Superior Court case number 34-2019-002767231, *Morris v. Blue Mountain Enterprises, LLC*, Solano County Superior Court case number FCS035858, *Lopez v. Mac Arthur Co.*, Riverside County Superior Court case number RIC1905043, *Diaz v. Marriott International, Inc.*, San Diego Superior Court case number 37-2019-00044740, *Castellanos et al. v. Southwest Patrol, Inc.*, San Diego Superior Court case number 37-2020-00024905, *Inacio v. Land O' Lakes*, Merced Superior Court case number 19CV-04520, *GSG Wage and Hour Cases*, San Diego Superior Court case number JCCP5055, *Marroquin v. Teleferic Barcelona*, Santa Clara Superior Court case number 21CV388821, *Gonzalez, et al. v. Golden Gate Bell*, Contra Costa Superior Court case number MSC21-00956, and *Navarro Garcia v. Widdicombe Enterprises, Inc.*, Orange County Superior Court case number 30-2021-01235358.

6. I also actively participated in and helped finalize class action settlements in the following: *Arya Security Services Cases*, Orange County Superior Court case number JCCP4991, *Allen v. Caine & Weiner*, Los Angeles Superior Court case number BC465806, *Terry v. SHAC, LLC dba Sapphire*, Eighth Judicial District of Nevada case number A-09-602800-C, *Carter v. Fantasy Castle*, Los Angeles Superior Court case number BC433666, *Blunt v. Valley Ball Cabaret*, Los Angeles Superior Court case number BC380265, *Hills v. Todd & Katie, Inc.*, Los Angeles Superior Court case number BC437919, *Lawrenz, et al. v. Blacktalon Enterprises, Inc., et al.*, Sacramento

1 Superior Court case number 34-2019-00267748, *Stricklin, et al. v. First Alarm Security & Patrol,*
2 *Inc.*, Santa Clara Superior Court case number 18CV323753, *Massey v. Hummel + Mann*, Santa
3 Barbara Court case number 21CV02985, and *Sunshine Retirement Wage and Hour Cases*,
4 Sacramento Superior Court case number JCCP5247.

5 5. I helped obtain class certification for *Van Bebber v. Dignity Health*, U.S. District Court case
6 number 1:19-cv-00264, and I obtained FLSA certification and finalized an FLSA settlements in
7 *Desio v. Russell Road Food & Beverage*, U.S. District Court case number 2:15-1440-GMN
8 (D.Nev.) and *Aguilar v. American-Paragon Protective Services*, U.S. District Court case number
9 5:20-cv-01892-EJD (N.D.Cal.).

10 6. I have handled and finalized settlements on the following PAGA-only cases: *McAfee v.*
11 *Chief Protective Services*, Riverside County Superior Court case number RIC1721984, *Hall v.*
12 *Pirch, Inc.*, San Diego Superior Court case number 37-2016-00036606, *Green v. American Guard*,
13 Los Angeles Superior Court case number BC688437, *Hernandez v. Contemporary Services Corp.*,
14 Los Angeles Superior Court case number BC684206, *McNeal v. Platinum Security Services*, Los
15 Angeles Superior Court case number 19STCV05709, *Cruz v. Holder Construction Group, LLC*,
16 Santa Clara Superior Court case number 19CV341862, *Nunes v. Westmont Living*, San Luis Obispo
17 Superior Court case number 19CV-0935, *Gibson v. Swift Transportation Co.*, United States District
18 Court case number 5:20-cv-00318-ODW, *Katabyan v. Awesome Doughnut*, Los Angeles Superior
19 Court case number 20STCV19903, *Ayoub v. Harry Winston, Inc.*, United States District Court case
20 number 4:21-cv-01599-JST, *Williams v. St. Joseph Personal Care Services, LLC*, Orange County
21 Superior Court case number 30-2020-01134268-CU-OE-CXC, *German Rodriguez v. Modern*
22 *Parking, Inc.*, Los Angeles Superior Court case number 23STCV00936, *Michael Valdivieso v.*
23 *Universal Auto Group*, Los Angeles Superior Court case number 23GDCV00191, *Alexis Hanna v.*
24 *Ulta Salon, Cosmetics & Fragrance, Inc.*, Sacramento Superior Court case number 34-2019-
25 00252198, *Renee Bullock v. Atria Management*, Nevada County Superior Court case number
26 CU22-086285, *Ramirez-Batres v. Lee Mechanical Contractors, Inc.*, Kern County Superior Court
27 case number BCV-23-102686, *Mathews v. Assignment America, LLC*, Los Angeles Superior Court
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1 case number 22STCV13033, and *Castro v. Clay Lacy Aviation, Inc.*, Los Angeles Superior Court
2 case number 21VECV00304.

3 7. Thus, I believe the settlement is fair, reasonable, and adequate, and I respectfully request
4 the court to grant the motion for final approval.

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

8 Date: September 26, 2024

/s/ Adam Rose

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Exhibit A

Time, Fees and Expenses

for Fabian Amaury Herrera Gonzalez - Employment Claim - Seven Seas Associates LLC

Time and Fee entries

Date	Activity	Description	Staff	Duration	Rate	Billable ?	Write Off?	Status	Total
9/26/2024		Prepare declaration in support of final approval	Adam Rose	3.80	\$800.00	True	No	-	\$3,040.00
9/25/2024		Review draft of proposed order for final approval	Adam Rose	0.90	\$800.00	True	No	-	\$720.00
9/14/2024		Review work on motion for preliminary approval	Adam Rose	0.80	\$800.00	True	No	-	\$640.00
8/12/2024		Confirm final version of administrator declaration	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
8/7/2024		Phone Call To: Fabian Amaury Herrera Gonzalez	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
8/7/2024		Phone Call To: Fabian Amaury Herrera Gonzalez	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
8/5/2024		Review draft of administrator declaration	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
8/1/2024		Review administrator status report	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
7/25/2024		Review administrator status report	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
7/17/2024		Review administrator status report	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
7/8/2024		Review administrator status report	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
7/1/2024		Review administrator status report	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
6/25/2024		Review administrator status report	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
6/14/2024		Follow up re: mailing notices to class members	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
5/31/2024		Approve versions of documents to class members	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
5/30/2024		Provide Word version of notice	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
5/29/2024		Revise and reformat notice	Adam Rose	0.90	\$800.00	True	No	-	\$720.00
5/24/2024		Review formatted notices	Adam Rose	0.90	\$800.00	True	No	-	\$720.00
5/21/2024		Liaison with settlement administrator	Adam Rose	0.50	\$800.00	True	No	-	\$400.00

5/21/2024	Obtain copy of order	Adam Rose	0.20	\$800.00	True	No	-	\$160.00
5/19/2024	Check on status of order	Adam Rose	0.20	\$800.00	True	No	-	\$160.00
5/16/2024	Review tentative ruling, coordinate appearance	Adam Rose	1.40	\$800.00	True	No	-	\$1,120.00
4/25/2024	Upload settlement documents to LWDA website	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
4/25/2024	Organize and file motion for preliminary approval	Adam Rose	4.00	\$800.00	True	No	-	\$3,200.00
4/25/2024	Further work on motion for preliminary approval	Adam Rose	4.50	\$800.00	True	No	-	\$3,600.00
4/25/2024	Plaintiff's Confidential Mediation Brief (00680671xAF06A) reviewed	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
4/23/2024	1 email sent/reviewed regarding Seven Seas - Draft Damage set	Manny Starr	0.20	\$650.00	True	No	-	\$130.00
4/23/2024	Mediation notes reviewed	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
4/23/2024	Analysis 07.10.2023 Fabian Amaury Gonzalez v. Seven Seas Associates, LLC. reviewed	Manny Starr	0.30	\$650.00	True	No	-	\$195.00
4/23/2024	Email attachment reviewed - Seven Seas - Draft Damages - FEB 11 2024	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
4/23/2024	Plaintiff's Confidential Mediation Brief (00680671xAF06A) reviewed	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
4/23/2024	Work on Kullar Analysis	Manny Starr	3.50	\$650.00	True	No	-	\$2,275.00
4/22/2024	Further edit motion for preliminary approval	Adam Rose	3.80	\$800.00	True	No	-	\$3,040.00
4/16/2024	Phone Call To: Fabian Amaury Herrera Gonzalez	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
4/10/2024	Class Settlement_Final (1) reviewed	Manny Starr	0.80	\$650.00	True	No	-	\$520.00
4/4/2024	Communicate with client for supporting declaration	Adam Rose	1.40	\$800.00	True	No	-	\$1,120.00
4/4/2024	Phone Call To: Fabian Amaury Herrera Gonzalez	Adam Rose	0.20	\$800.00	True	No	-	\$160.00
4/4/2024	Gonzalez - signature pages created	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
4/2/2024	Finalize individual settlement agreement	Adam Rose	1.40	\$800.00	True	No	-	\$1,120.00
4/2/2024	Edit motion for preliminary approval	Adam Rose	5.10	\$800.00	True	No	-	\$4,080.00
3/29/2024	Review further edits to settlement agreement	Adam Rose	1.10	\$800.00	True	No	-	\$880.00
3/29/2024	1 email sent/reviewed regarding Gonzalez v. Seven Seas	Manny Starr	0.10	\$650.00	True	No	-	\$65.00

3/23/2024	Mediation notes reviewed	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
3/23/2024	Review long form settlement agreement, emails with co-counsel	Manny Starr	1.50	\$650.00	True	No	-	\$975.00
3/21/2024	Review further edits to settlement agreement	Adam Rose	1.10	\$800.00	True	No	-	\$880.00
3/13/2024	Review edits to settlement agreement	Adam Rose	1.10	\$800.00	True	No	-	\$880.00
3/8/2024	Review CMC notes	Adam Rose	0.70	\$800.00	True	No	-	\$560.00
3/8/2024	CMC (Co Counsel Coverage) (DEPT C-64) attended	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
2/26/2024	Edit settlement agreements	Adam Rose	3.40	\$800.00	True	No	-	\$2,720.00
2/26/2024	Analysis 07.10.2023 Fabian Amaury Gonzalez v. Seven Seas Associates, LLC. reviewed	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
2/23/2024	Review CMC statement	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
2/22/2024	Review case management statements	Adam Rose	0.90	\$800.00	True	No	-	\$720.00
2/17/2024	Mediation notes created, then edited	Manny Starr	3.20	\$650.00	True	No	-	\$2,080.00
2/16/2024	Obtain completed MOU	Adam Rose	0.80	\$800.00	True	No	-	\$640.00
2/16/2024	Participate in mediation	Adam Rose	7.40	\$800.00	True	No	-	\$5,920.00
2/16/2024	Mediation attended	Adam Rose	9.00	\$800.00	True	No	-	\$7,200.00
2/16/2024	Phone Call To: Fabian Amaury Herrera Gonzalez	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/16/2024	Mediation attended	Manny Starr	9.00	\$650.00	True	No	-	\$5,850.00
2/16/2024	Matter admin	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/16/2024	Analysis 07.10.2023 Fabian Amaury Gonzalez v. Seven Seas Associates, LLC. reviewed	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/16/2024	Memo edited - Seven Seas Witnesses	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/16/2024	Memo reviewed - Witness call - Jasmine Una Sanchez	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/16/2024	Memo edited - Witness call - Verenice Torres	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/15/2024	Further coordinate witness statements	Adam Rose	1.40	\$800.00	True	No	-	\$1,120.00
2/15/2024	Prep for mediation	Manny Starr	2.00	\$650.00	True	No	-	\$1,300.00

2/15/2024	1 email sent/reviewed regarding Gonzalez v. Seven Seas - mediation data	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
2/13/2024	Working with team to get witness statements, reviewing witness statements, game plan	Manny Starr	4.00	\$650.00	True	No	-	\$2,600.00
2/12/2024	Edit draft of MOU	Adam Rose	1.80	\$800.00	True	No	-	\$1,440.00
2/12/2024	Further edit mediation brief	Adam Rose	2.20	\$800.00	True	No	-	\$1,760.00
2/12/2024	Phone Call To: Fabian Amaury Herrera Gonzalez	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
2/12/2024	Phone Call To: Fabian Amaury Herrera Gonzalez	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
2/12/2024	Combined_client_docs (00674851xAF06A) reviewed	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
2/12/2024	BWSS 0001-0012 reviewed	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
2/11/2024	Work with expert re liability analysis, reviewing emails	Manny Starr	4.80	\$650.00	True	No	-	\$3,120.00
2/9/2024	Further review mediation data	Adam Rose	1.80	\$800.00	True	No	-	\$1,440.00
2/9/2024	Help with writing mediation brief and to prepare for mediation	Adam Rose	1.70	\$800.00	True	No	-	\$1,360.00
2/9/2024	1 email sent/reviewed regarding Gonzalez v. Seven Seas - mediation data	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/9/2024	Memo created - Pay periods	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/8/2024	Coordinate with client for witnesses	Adam Rose	0.70	\$800.00	True	No	-	\$560.00
2/8/2024	Phone Call To: Fabian Amaury Herrera Gonzalez	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
2/8/2024	Phone Call To: Fabian Amaury Herrera Gonzalez	Manny Starr	0.30	\$650.00	True	No	-	\$195.00
2/8/2024	Memo created - Witness call - Verenice Torres	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/8/2024	Memo created, then edited - Witness call - Jasmine Una Sanchez	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/8/2024	Memo created, then edited and reviewed - Seven Seas Witnesses	Manny Starr	0.20	\$650.00	True	No	-	\$130.00
2/8/2024	Analyze file, work on gathering witness statements	Manny Starr	2.00	\$650.00	True	No	-	\$1,300.00
2/7/2024	Phone Call To: Fabian Amaury Herrera Gonzalez	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
1/26/2024	Review answer to amended complaint	Adam Rose	1.50	\$800.00	True	No	-	\$1,200.00
1/23/2024	Liaison with economics expert	Adam Rose	1.30	\$800.00	True	No	-	\$1,040.00

1/22/2024	1 email sent/reviewed regarding Gonzalez v. Seven Seas - mediation data	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
1/19/2024	Review next batch of mediation data	Adam Rose	1.20	\$800.00	True	No	-	\$960.00
1/10/2024	Prepare mediation counterproposal	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
1/9/2024	Call with defense re: narrowing scope of mediation data	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
1/6/2024	Correspondence re: remaining data	Adam Rose	0.20	\$800.00	True	No	-	\$160.00
12/21/2023	Correspondence re: number of workweeks	Adam Rose	0.60	\$800.00	True	No	-	\$480.00
12/15/2023	Confirm mediation	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
12/12/2023	Discussion re: statute of limitations	Adam Rose	2.10	\$800.00	True	No	-	\$1,680.00
12/12/2023	Confirm mediation date	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
12/12/2023	Continue to set up mediation	Adam Rose	0.80	\$800.00	True	No	-	\$640.00
12/6/2023	Review first batch of mediation data	Adam Rose	2.10	\$800.00	True	No	-	\$1,680.00
12/6/2023	Begin to set up mediation	Adam Rose	0.80	\$800.00	True	No	-	\$640.00
12/1/2023	Review amended complaint	Adam Rose	1.50	\$800.00	True	No	-	\$1,200.00
11/16/2023	Continue to follow up for mediation	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
11/16/2023	Follow up re: mediation date	Adam Rose	0.20	\$800.00	True	No	-	\$160.00
11/16/2023	Complaint reviewed	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
11/6/2023	Review initial correspondence from defense	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
9/27/2023	Get filed copies of complaint	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
9/26/2023	Edit complaint	Adam Rose	2.40	\$800.00	True	No	-	\$1,920.00
9/25/2023	Edit PAGA letter	Adam Rose	1.30	\$800.00	True	No	-	\$1,040.00
9/12/2023	Begin case analysis	Adam Rose	2.10	\$800.00	True	No	-	\$1,680.00
9/12/2023	Analysis 07.10.2023 Fabian Amaury Gonzalez v. Seven Seas Associates, LLC. reviewed	Manny Starr	0.40	\$650.00	True	No	-	\$260.00
8/3/2023	001 Initial case review and evaluation	Manny Starr	3.00	\$650.00	True	No	-	\$1,950.00

Total - Write offs		0.00	\$0.00
Total - Unbillable		0.00	\$0.00
Total - Billable		0.00	\$100,007.50
Total		132.00	\$100,007.50

Expense entries

Date	Activity	Description	Staff	Quantity	Price	Billable ?	Write Off?	Status	Total
8/4/2023		Gonzalez F. Record Request Letter	Yasmin Ruiz	1	\$8.53	True	No	-	\$8.53
9/12/2023		InfoTrack - eSignature: SignIT - Sign Any Document	Alex Sherman	1	\$3.00	True	No	-	\$3.00
1/2/2024		INV NO 616686 for mediation	Taylor McCarthy	1	\$2,062.50	True	No	-	\$2,062.50
3/6/2024		JTC INV 240215 1/2 PAYMENT to expert	Taylor McCarthy	1	\$925.00	True	No	-	\$925.00
4/29/2024		One Legal Credit Card Sale_05955671	Rosemary Flores	1	\$77.16	True	No	-	\$77.16
Total - Write offs									
Total - Unbillable									
Total - Billable									
Total									