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

ANNETTE DEARING, an individual,
REBECCA TAYLOR, an individual,
JANETTE TELLO, an individual, on behalf of
themselves, and on behalf of all others
similarly situated;

Plaintiffs,

vs.

LOVE'S COUNTRY STORES OF
CALIFORNIA, a California corporation; and
DOES 1 through 50,

Defendants.

Case No. MCV090813

**DECLARATION OF NICOLE BARVIE
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, ATTORNEY'S
FEES AND COSTS, AND SERVICE
PAYMENTS**

(Filed concurrently with Motion for Final
Approval; Supporting Declarations; and
[Proposed] Judgment and Order)

Date: July 27, 2026
Time: 8:30 a.m.
Judge: Hon. Michael J. Jurkovich
Dept.: 411B

Action Filed: November 28, 2023
Trial Date: Not Set

1 I, Nicole Barvie, hereby declare as follows:

2 1. I am an attorney licensed to practice law in the state of California and have been admitted
3 to practice before this Court. I am an attorney with the law firm of Barvie Law, APC, counsel of record
4 for Plaintiff Rebecca Taylor (“Plaintiff Taylor”) in this action. I have personal knowledge of the matters
5 stated herein and if called and sworn as a witness, I would and could competently testify under oath
6 thereto.

7 2. My firm and I have extensive experience in class action and employment litigation,
8 including wage and hour class actions, and do not have any conflict with the Class. Attached hereto as
9 **Exhibit 1** is a true and correct copy of my resume, describing Class Counsel’s experience.

10 3. Plaintiff Taylor worked for Defendant as a non-exempt employee in California from
11 October 14, 2020 through March 14, 2022. At all times during their employment, Plaintiff earned an
12 hourly wage and was entitled to legally compliant meal and/or rest periods, and minimum, regular and
13 overtime wages for all hours worked and were subject to Defendant’s written policies and procedures.

14 4. On January 6, 2023, Plaintiff Taylor served Defendant and LWDA with PAGA Notices,
15 which set forth the facts and theories supporting Defendant’s alleged violations of the Labor Code and
16 applicable IWC Wage Order and of their intent to pursue claims under California Labor Code Private
17 Attorneys General Act, Cal. Lab. Code Sections 2698, *et seq.* (“PAGA”).

18 5. On May 14, 2023, Plaintiff Taylor filed PAGA Complaint at the San Bernardino Superior
19 Court, Case Number CIVSB2406560, asserting wage-and-hour claims arising from Defendant’s uniform
20 employment policies and practices applicable to non-exempt employees in California. As part of the
21 proposed global resolution, Plaintiff Taylor’s claims were consolidated for settlement purposes into this
22 action pursuant to the Second Amended Complaint.

23 6. Plaintiff Rebecca Taylor propounded two sets of written discovery and participated in the
24 *Belaire West* Notice process to which Defendant provided responses. In preparation for mediation, the
25 Parties further agreed to informally exchange additional documents and data points subject to the
26 mediation privilege, including but not limited to, the Class Members’ time data and certain payroll data
27 points.
28

1 7. Prior to filing suit and throughout the litigation, my firm conducted an extensive
2 investigation into Plaintiff Taylor's claims, and those of the proposed Settlement Class, including
3 interviews of putative Class Members, review of employment records and policies, legal research, review
4 of documents produced by Defendant, review and production of documents by Plaintiff Taylor, and
5 analysis of the risks and potential recovery associated with continued litigation.

6 8. The parties engaged in substantial discovery and exchanged sufficient information to
7 evaluate the strengths and weaknesses of the claims and defenses. In addition, I conducted numerous
8 interviews of putative class members who responded to the *Belaire West* Notice regarding their
9 experiences working at Love's Country Stores. These interviews provided valuable insight into the nature
10 and scope of the alleged violations and further supported the claims asserted on behalf of the putative
11 class.

12 9. In connection with mediation, the Parties engaged in informal discovery. Defendants
13 produced (1) a class list with employee numbers, dates of employment, location worked, position, and
14 average hourly rate; (2) a random 25% sampling of employee time and payroll records exported on
15 Excel; (3) Defendant's employee handbook and relevant standalone policies and procedures, including
16 pay codes; and (4) Plaintiffs' personnel files and wage statements.

17 10. In preparation for mediation, Class Counsel engaged and work with an expert data
18 scientist, Berger Consulting Group, to conduct a comprehensive analysis and extrapolation of the payroll
19 and timekeeping data produced by Defendants to create a detailed exposure analysis for all claims at
20 issue. This discovery and analysis allowed the Parties to assess the merits and value of Plaintiffs' claims,
21 the chances of certification of Plaintiffs' claims, and Defendants' potential defenses.

22 11. On June 9, 2025, the Parties participated in a full-day mediation with Steven Rottman,
23 Esq. a well-respected wage and hour class action mediator. During mediation, the Parties vigorously
24 debated their opposing legal positions, the likelihood of certification of Plaintiffs' claims, and the legal
25 basis for the claims and defenses. The Parties ultimately reached a tentative class and PAGA settlement
26 with the assistance of a mediator's proposal and then finalized the terms of the Settlement and executed
27 Agreement now before the Court.

28 12. The settlement was reached after arm's-length negotiations with the assistance of mediator

1 Steven Rottman. Based upon the investigation conducted, discovery obtained, and risks associated with
2 further litigation, it remains my opinion that the settlement is fair, reasonable, adequate, and in the best
3 interests of the Settlement Class and Aggrieved Employees.

4 13. The Settlement Administrator successfully disseminated notice pursuant to the Court's
5 Preliminary Approval Order. The details of the settlement administration are included in the Declaration
6 of Apex Class Action LLC.

7 14. There were no objections or exclusions made to the Settlement. Thus, the reaction of the
8 Settlement Class strongly supports final approval.

9 15. The Settlement provides for an attorney's fee up to one-third of the Gross Settlement
10 Amount, which was identified in the Class Notice. Given the substantial California and Federal authority
11 approving the percentage of the fund method for awarding attorney's fees, Class Counsel believe the Court
12 should employ the percentage of recovery method in this case and award Class Counsel their requested
13 fee of one-third of the Gross Settlement Amount, which totals \$964,466.34.

14 16. From the outset of the case to the present, prosecution of this action has involved significant
15 financial risk for Class Counsel. My firm undertook this matter solely on a contingent basis, with no
16 guarantee of recovery. My firm placed its own resources at risk to prosecute this action with no guarantee
17 of success.

18 17. Practice in wage and hour class action litigation requires knowledge and skill of the
19 constantly evolving substantive law as well as the procedural requirements of class action litigation. The
20 issues presented in the case required more than just a general appreciation of statutory wage and hour laws
21 and class action procedure. My firm has been involved in and appointed as class counsel in other class
22 actions against employers. *See, e.g.,* Exhibit 1. Thus, the complexity and potential duration of the case
23 weigh in favor of awarding the requested attorney's fees.

24 18. Additional work was available to my firm that we had to forgo to devote the time necessary
25 to pursue this litigation.

26 19. Here, Class Counsel negotiated a one-third contingency fee arrangement, which is a
27 reasonable arrangement to obtain competent counsel in the marketplace for representation in wage and
28 hour class actions of this nature, and it is only equitable that Settlement Class who share in the excellent

1 results achieved by this Settlement bear their pro rata share of the attorney's fees award to Class
2 Counsel.

3 20. I have been practicing for 14 years, and my current hourly rate is \$650.00 an hour. As such,
4 my hourly rate is well within the comparable range for class action attorneys. Barvie Law devoted
5 substantial time and effort to the prosecution of this action, expending approximately 241.20 hours over
6 the three years since the case was filed, resulting in a lodestar of \$152,390.00

7 21. The total lodestar, to date, for Barvie Law is \$152,390.00. These fees will be combined
8 with co-counsel for the total lodestar of all Class Counsel. Because there were three cases litigated prior
9 to consolidation, the work performed on each case was not duplicative. Rather, it was essential to come
10 to a global resolution of this now consolidated settlement.

11 22. I have reviewed my lodestar in this matter and believe the charges are reasonable and were
12 reasonably necessary to the conduct of the case.

Name	Laffey Matrix Fee	Actual Billing Rate	Hours Billed	Lodestar
Nicole Barvie (14 th Year Attorney)	\$1,019	\$550-\$650	237.87	\$152,390.00
Shilesky Montalvo Cruz (Paralegal)	\$258	\$200.00	3.33	\$666.00
		TOTAL	241.20	\$153,056.00

18
19 23. The work performed by myself, the only attorney at Barvie Law, in this matter has been
20 extensive and includes, without limitation: conducting interviews and phone calls with putative class
21 members and class representatives who responded to the Belaire West Notice regarding their work
22 experiences at Defendant's company; reviewing numerous employee files and payroll records,
23 propounding two sets of written discovery on Defendant, including Special Interrogatories, Set one and
24 Two, Request for Production of Documents, Set One, Request for Admission, Set One, Form
25 Interrogatories- Employment, Set One; numerous meet and confer conferences with opposing counsel
26 regarding deficient discovery responses, case management, mediation, settlement documents, and
27 settlement approval; numerous meetings with Plaintiff Taylor regarding her work experience and the
28 status of the litigation, mediation, settlement, and settlement approval; extensive research and analysis

1 into Defendant's corporate background and litigation history, liability theories, and available defenses;
2 review and analysis of a significant volume of documents produced by Defendant through both formal
3 discovery and informal pre-mediation production; extensive meet and confer conferences between Class
4 Counsel regarding joint prosecution, mediation, settlement, and settlement approval; analyzing and
5 recreating Defendant's regular rate analysis based on Plaintiffs' records; preparation and submission of
6 Plaintiffs' PAGA notice letters; preparation of the Complaints and attendance at status conferences;
7 drafting written discovery requests; working with an expert data scientist to analyze records and prepare
8 a damages model; conducting an independent analysis of pre-mediation data to verify the expert's findings;
9 research and preparation of Plaintiffs' mediation brief and participation in mediation; negotiating multiple
10 drafts of the Memorandum of Understanding, Settlement Agreement, and attachments thereto; research,
11 preparation, finalization, and filing of the Motion for Preliminary Approval, Motion for Final Approval,
12 and all accompanying filings; preparing for and attending hearings on these Motions; overseeing the notice
13 administration process and distribution of funds; and ongoing communications with Class Members
14 regarding the Settlement, notice administration, and settlement approval process.

15 24. Additional time will be spent finalizing the Motion for Final Approval and monitoring the
16 distribution of class payments following the effective date, for which I estimate an additional 10 to 20
17 hours will be required. In total, the work performed by Class Counsel in this matter has been substantial
18 and meaningful, and the hourly rates sought are commensurate with counsel's experience and consistent
19 with prevailing rates among both plaintiffs' and defense firms that regularly litigate wage and hour class
20 actions in California.

21 25. All of Barvie Law cases are accepted and worked on are on a contingency basis. My firm
22 does not charge any upfront fees or receive any unless and until the case is either settled or resolved
23 through judgment. My firm invests money in the form of attorney and staff salaries and cost advances
24 including those related to filing fees, depositions, mediations, experts, trial preparation, and trial. As such,
25 there is a tremendous financial risk involved in all of the cases my firm take. Barvie Law has kept detailed
26 records of costs expended in this matter, which supports the request for litigation costs under the terms of
27 the settlement to be sought at final approval. Barvie Law has incurred \$18,445.93 in out-of-pocket
28 litigation costs to date, exclusive of future anticipated costs estimated to range between \$50 and \$200, for

1 a total anticipated litigation costs of between \$18,495.93 and \$18,645.93. My firm's costs are those that
2 are the type typically billed by attorneys to paying clients in the marketplace and include such costs as
3 court costs, filing fees, mediation fees, expert fees, printing costs, postage, document retrieval costs, and
4 research specific to this case. A true and correct copy of the costs maintained by Barvie Law is attached
5 hereto as **Exhibit 2**.

6 26. The requested service awards of \$10,000 for each of the Representative Plaintiffs are
7 intended to compensate them for the critical roles they played in this litigation, and the time, effort, and
8 risks undertaken in helping secure the result obtained on behalf of the Class Members.

9 27. Plaintiff Taylor's participation was invaluable in the litigation, discovery, and settlement
10 process. Throughout the three years of litigation, she spent considerable time providing information to
11 counsel, assisting in the drafting of pleadings and other documents, reviewing discovery requests,
12 producing documents, providing contact information for witnesses, assisting in the preparation of
13 information necessary for mediation, staying updated about the terms of the mediation process, reviewing
14 the Settlement Agreement and Notices, providing declarations for preliminary and final approval, and
15 regularly discussing the facts and proceedings with my firm. She has been an active participant in this
16 litigation from the outset. Throughout the long process of preliminary and final approval, Plaintiff has
17 consistently checked in about the proceedings.

18 28. Plaintiff Taylor willingly came forward to protect and advance the rights of the Settlement
19 Class on an important legal dispute affecting California employees. By way of example, Plaintiff assumed
20 the serious risk of liability for Defendant's costs and potentially fees if the case was unsuccessful.
21 Nevertheless, Plaintiff knowingly and voluntarily undertook the risk to vindicate the rights of the
22 Settlement Class.

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

25 Executed on June 23, 2026 at San Diego, California.

26 

27 Nicole Barvie
28

EXHIBIT 1

Firm Practice Areas:

Plaintiff's Employment Litigation, Employment Wage and Hour Class Action, Personal Injury and Civil Litigation.

Nicole Barvié, Esq.**Biography:**

Nicole Barvié is a San Diego-based attorney and the founding attorney of Barvié Law, APC. She represents employees throughout California in complex wage-and-hour class actions and PAGA representative actions, as well as matters involving wrongful termination, retaliation, and employment discrimination. In addition to her employment law practice, Ms. Barvié also represents individuals in personal injury and general civil litigation matters arising from negligence, contractual breaches, and other unlawful conduct.

Prior to founding Barvié Law, APC, Ms. Barvié spent more than eight years practicing insurance defense, where she represented insurance companies and corporate defendants in a wide range of civil litigation matters. This extensive defense-side experience provides her with a comprehensive understanding of insurer evaluation, litigation strategy, and risk assessment, which she now leverages to effectively advocate for individuals and employees in plaintiff-side litigation.

Ms. Barvié routinely litigates cases involving off-the-clock work, meal and rest period violations, unpaid business expense reimbursements, and employee misclassification. She is known for her strategic and client-focused approach to litigation, providing diligent, responsive, and results-driven advocacy at every stage of the legal process, including pre-litigation negotiations, mediation, arbitration, and trial. Through individual, class, and representative actions, Ms. Barvié has successfully recovered millions of dollars on behalf of California workers and injury victims.

Ms. Barvié has been recognized by her peers and the legal community for excellence in advocacy. She was selected as a Super Lawyers Rising Star by Thomson Reuters in 2022 and 2023, an honor reserved for no more than 2.5 percent of attorneys statewide. She was subsequently named a Super Lawyer in 2024, 2025, and 2026, a distinction awarded to the top five percent of attorneys in California based on peer recognition and professional achievement.

Ms. Barvié is deeply committed to advancing workplace justice, advocating for the injured, and guiding her clients through complex legal challenges with professionalism, integrity, and confidence.

- Licenses, Bar Admissions & Memberships:

- State of California, Bar No. 282352;
- United States District Court for the Southern District and Central District;
- Court of Appeals for the Ninth Circuit;
- The Supreme Court of the State of California;
- State of Arizona, Bar No. 033062 (Inactive);
- California Employment Lawyers Association, Member (2021 to present);
- Consumer Attorneys of San Diego, Member (2021 to present); and
- Consumer Attorneys of California, Member (2025 to present).





- Professional Experience:
 - Barvié Law, APC, (Founder, April 2021), San Diego, California.
 - McCormick, Mitchell & Rasmussen, (Associate, January 2013 through March 2021), San Diego, California.
- Accolades:
 - Thomson Reuters, Super Lawyers, Rising Star in 2022 and 2023.
 - Thomas Reuters, Super Lawyers in 2024, 2025 and 2026.
- Education:
 - California Western School of Law, San Diego, CA
 - Juris Doctor, April 2011.
 - American Jurisprudence Award in Civil Procedure II & Law and Technology.
 - The University of Arizona, Tucson, AZ
 - Bachelor of Arts, Political Science, Minor in Spanish, August 2005.
 - Sigma Kappa Sorority.
 - Universidad de Alcalà, Madrid Spain, Spanish Literature & Culture, Spring 2004.

Lead Counsel – Class Action & Representative Cases:

- Hallor v. OS Pacific, LLC

Court	San Diego Superior Court
Case No.	30-2022-00000074-CU-OE-CTL
Nature	PAGA; Individual Meal/Rest Break claims, overtime and regular rate claims as well as Sexual Harassment.
Status	Settled – The Court granted a \$100,000.00 PAGA action settlement. The Court appointed Barvie Law, APC as representative PAGA Counsel for the State of California.

- Phan v. Bartell Hotels, et al

Court	San Diego County Superior Court
Case No.	37-2022-00009712-CU-OE-CTL
Nature	PAGA, Individual Meal/Rest Break claims, overtime, regular rate claims, and failure to accommodate disability.
Status	Settled– The Court granted a \$390,000.00 PAGA action settlement. The Court appointed Barvie Law, APC as representative PAGA Counsel for the State of California.

- Karnachova v. INTO North America

Court	San Diego Superior Court
Case No.	37-2021-00023758
Nature	Class Claims for Meal/Rest Break Claims and regular rate claims & PAGA.
Status	Settled– The Court granted a \$150,000.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.



- Sanit v. Ano Douka, Inc.

Court	San Diego Superior Court
Case No.	37-2021-00046578-CU-OE-CTL
Nature	Class Claims for Meal/Rest Break Claims and Off the Clock work.
Status	Settled– The Court granted a \$325,000.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.

- Spires v. Panorama Meadows

Court	Los Angeles Superior Court
Case No.	21STCV19567
Nature	PAGA and Individual Meal/Rest Break Claims, failure to pay wages.
Status	Settled Individually

- Savoy v. Jaqui Foundation

Court	Alameda County Superior Court
Case No.	22CV006497
Nature	Class Claims for Meal/Rest Break Claims, failure to pay wages, overtime claims, PAGA, and Individual Claims.
Status	Settled

- Matthews v. Lusk Quality Machine Products

Court	Los Angeles County Superior Court
Case No.	22STCV15409
Nature	Class Claims for Meal/Rest Break Claims, failure to pay wages, overtime claims and PAGA.
Status	Settled– The Court granted a \$365,000.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.

- Kosonoy v. Weldcraft Industries

Court	Tulare County Superior Court
Case No.	VCU291864
Nature	Class Claims for Meal/Rest Break Claims, failure to pay wages, overtime claims and PAGA.
Status	Settled– The Court granted a \$265,000.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.

- Allen v. Crescent Northwood Inn, Inc.

Court	Del Norte County Superior Court
Case No.	CVUS-2022-1192
Nature	Class Claims for Meal/Rest Break Claims & overtime claims and PAGA.
Status	Settled– The Court granted a \$247,500.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court



	appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.
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- Gonzalez v. Toro Company

Court	San Diego County Superior Court
Case No.	37-2022-00042665
Nature	Class Claims fro Meal/Rest Break Claims & Off the Clock work and PAGA.
Status	Settled– The Court granted a \$1,475,000.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.

- Sanchez et al v. Staley Technologies, Inc.

Court	Riverside County Superior Court
Case No.	CVRI2204614
Nature	Meal/Rest Break Claims, Expense Reimbursement, & Off the Clock work. Individual claims for Racial Discrimination.
Status	Settled– The Court granted a \$425,000.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.

- Paduano v. Rockler Retail Group

Court	Sacramento County Superior Court
Case No.	2022-00330079
Nature	Class Claims for Meal/Rest Break Claims, Regular Rate, & Off the Clock work and PAGA.
Status	Settled– The Court granted a \$187,500.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.

- Avalos v. Summit Foods, Inc.

Court	San Diego County Superior Court
Case No.	37-2022-00034903-CU-OE-CTL
Nature	Class Claims for Meal/Rest Break Claims, Regular Rate, & Off the Clock work and PAGA.
Status	Settled Individually.

- Ochoa v. 8110 Aero Drive

Court	San Diego County Superior Court
Case No.	37-2022-00049091-CU-OE-CTL
Nature	Class Claims for Meal/Rest Break Claims, Gratuities, Regular Rate, & Off the Clock work and PAGA.
Status	Settled– The Court granted a \$525,000.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court



	appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.
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- **Figueroa v. Casetta Management**

Court	San Diego County Superior Court
Case No.	37-2022-00050082-CU-OE-CTL
Nature	Class Claims for Meal/Rest Break Claims, Gratuities, Regular Rate, & Off the Clock work and PAGA.
Status	Settled– The Court granted a \$160,000.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.

- **Perkins v. Sun Communities**

Court	Amador County Superior Court
Case No.	22CV12888
Nature	Class Claims for Meal/Rest Break Claims, Regular Rate, & Off the Clock work and PAGA.
Status	Settled– The Court granted a \$700,000.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.

- **Alonso v. MNRO Holding, LLC**

Court	San Diego County Superior Court
Case No.	37-2023-00007450-CU-OE-CTL
Nature	PAGA Claims Meal/Rest Break Claims, Regular Rate, & Off the Clock work.
Status	Settled Individually.

- **Taylor v. Love's Country Stores of California**

Court	San Bernardino County Superior Court
Case No.	CIVSB2306560
Nature	Class Claims for Meal/Rest Break Claims, Regular Rate, & Off the Clock work and PAGA.
Status	Settled – Drafting Preliminary Approval Motion.

- **Lee v. Cal Chef, et al**

Court	San Joaquin County Superior Court
Case No.	STK-CV-UOE-2023-0005894
Nature	Class Claims for Meal/Rest Break Claims, Regular Rate, & Off the Clock work and PAGA
Status	Settled– The Court granted a \$735,000.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.



- Rodriguez-Polanco et al v. Sushi Ventures et al.

Court	San Diego Superior Court
Case No.	37-2023-000039005-CU-OE-CTL
Nature	Misclassification, Meal/Rest Break Claims, Regular Rate, & Off the Clock work.
Status	Settled Individually

- Aguirre v. Continuum Care of San Diego

Court	San Diego Superior Court
Case No.	37-2023-00043954-CU-OE-CTL
Nature	Class Claims for Meal/Rest Break Claims, Regular Rate, & Off the Clock work and PAGA.
Status	Settled– The Court granted a \$55,000.00 class action and PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as class counsel and as representative PAGA counsel for the State of California.

- Enriquez v. Ponce Ground Service

Court	San Bernardino Superior Court
Case No.	CIVSB2319435
Nature	Class Claims for Meal/Rest Break Claims, Overtime, Regular Rate of Pay & Off the Clock work.
Status	Settled- Preliminary Approval Scheduled for December 17, 2025

- Duenas v. Braswell Rehabilitation

Court	Los Angeles Superior Court
Case No.	24STCV02786
Nature	Class Claims for Meal/Rest Break Claims, Overtime, Regular Rate & Off the Clock work and PAGA.
Status	Settled – The Court granted a \$210,000.00 class action and PAGA settlement resolving violations of California wage-and-hour laws and appointed Barvié Law, APC as Class Counsel and as representative PAGA counsel on behalf of the State of California.

- Cruz et al v. Tristrux, et al

Court	Alameda Superior Court
Case No.	23CV047527
Nature	PAGA for Meal/Rest Break Claims, Overtime, Regular Rate & Off the Clock work.
Status	Settled– The Court granted a \$400,000.00 PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvie Law, APC as representative PAGA counsel for the State of California.

- Castro v. Pomona Valley Mining Company

Court	Los Angeles Superior Court
Case No.	24PSCV00758
Nature	PAGA for Meal/Rest Break Claims, Overtime, Regular Rate, Gratuities, & Off the Clock work.



Status	Settled– The Court granted a \$200,000.00 PAGA Action settlement for violations of California Wage and hour laws. The Court appointed Barvié Law, APC as representative PAGA counsel for the State of California.
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- Cardoso v. AMCS Carpone, Inc.

Court	San Diego Superior Court
Case No.	37-2024-00024587-CU-OE-CTL
Nature	Class claims Meal/Rest Break Claims, Overtime, Gratuities, Off the Clock work and PAGA.
Status	Settled – The Court granted a \$200,000.00 class action and PAGA settlement resolving violations of California wage-and-hour laws and appointed Barvié Law, APC as Class Counsel and as representative PAGA counsel on behalf of the State of California.

- Salazar v. Southwest Patrol

Court	Los Angeles Superior Court
Case No.	24PSCV00311
Nature	PAGA for Meal/Rest Break Claims, Overtime, and Off the Clock work.
Status	Settled – The Court granted a \$200,000 PAGA settlement resolving violations of California wage-and-hour laws and appointed Barvié Law, APC as PAGA counsel on behalf of the State of California.

- Prasad et al v. Vacuum Process Engineering, Inc.

Court	Sacramento Superior Court
Case No.	24CV010094
Nature	Class Claims for Meal/Rest Break Claims, Overtime, reimbursements, and Off the Clock work and PAGA.
Status	Settled – The Court granted a \$500,000.00 class action and PAGA settlement resolving violations of California wage-and-hour laws and appointed Barvié Law, APC as Class Counsel and as representative PAGA counsel on behalf of the State of California

- Combs v. Insomnia Cookies

Court	Northern District of California
Case No.	5:24-CV-02321-EKL
Nature	Class claims for Meal/Rest Break Claims, Overtime, and Off the Clock work and PAGA.
Status	Settled – The Court granted \$419,000 PAGA settlement resolving violations of California wage-and-hour laws and appointed Barvié Law, APC as PAGA counsel on behalf of the State of California.

- Jensen v. Arm Strong Towing

Court	Orange County Superior Court
Case No.	30-2024-01402141-CU-OE-CXC
Nature	Class Claims for Meal/Rest Break Claims, Overtime, and Off the Clock work and PAGA.
Status	Settled Individually



- Bedell v. Alexanders Contract Services

Court	Los Angeles County Superior Court
Case No.	24STCV15048
Nature	Class claims for Meal/Rest Break Claims, Overtime, Misclassification case, and Off the Clock work.
Status	Settled- The Court granted a \$335,000.00 class action and PAGA settlement resolving violations of California wage-and-hour laws and appointed Barvié Law, APC as Class Counsel and as representative PAGA counsel on behalf of the State of California

- Ford v. Simplified Driver Staffing, LLC, et al

Court	Los Angeles County Superior Court
Case No.	24STCV16547
Nature	Class Claims for Meal/Rest Break Claims, Overtime, and Off the Clock work and PAGA.
Status	Settled Individually.

- Rose v. Work Training Center for the Handicapped

Court	Butte County Superior Court
Case No.	24CV03076
Nature	Class Claims for Meal/Rest Break Claims, Overtime, and Off the Clock work and PAGA
Status	Settled. The Court granted a \$285,000.00 class action and PAGA settlement resolving violations of California wage-and-hour laws and appointed Barvié Law, APC as Class Counsel and as representative PAGA counsel on behalf of the State of California

- Carpenter et al v. EasyBreathe

Court	Los Angeles County Superior Court
Case No.	24STCV23480
Nature	Class Claims for Meal/Rest Break Claims, Overtime, Regular Rate and Off the Clock work and PAGA.
Status	Settled. Awaiting Preliminary Approval.

- Green v. SCA Senior Care, Inc.

Court	Los Angeles County Superior Court
Case No.	CV24007976
Nature	Class Claims for Meal/Rest Break Claims, Overtime, Minimum Wage and Off the Clock work and PAGA.
Status	Settled individually.

- Randall v. E & E Elite, Inc.

Court	Los Angeles County Superior Court
Case No.	25PSCV00074
Nature	Class Claims for Meal/Rest Break Claims, Overtime, Reimbursement, and Off the Clock work.
Status	Settled individually



- Darman v. New Canvassing Experience

Court	San Diego County Superior Court
Case No.	24CU030547C
Nature	Class Claims for Meal/Rest Break Claims, Overtime, and Off the Clock work and PAGA.
Status	In Litigation

- Griffin v. Community Housing Works

Court	San Diego County Superior Court
Case No.	25CU004161C
Nature	Class Claims for Meal/Rest Break Claims, Overtime, and Off the Clock work and PAGA.
Status	Settled. Court granted preliminary approval. Awaiting Final Approval.

- Zendejas v. Portillo Concrete, Inc.

Court	San Diego County Superior Court
Case No.	25CU001198C
Nature	Class Claims for Meal/Rest Break Claims, Business Expenses, Overtime, and Off the Clock work.
Status	In Litigation

- Gazalyan v. Santa Monica BMW

Court	Los Angeles County Superior Court
Case No.	25SMCV00209 and 25STCV12227
Nature	Class claims for Meal/Rest Break Claims, Business Expense, Overtime, and Off the Clock work and PAGA
Status	In Litigation – PAGA Approval scheduled for June 30, 2026.

- Ortega v. Entrussed, LLC.

Court	Placer County Superior Court
Case No.	S-CV-0054299
Nature	Class claims for Meal/Rest Break Claims, Overtime, and Off the Clock work and PAGA.
Status	Settled. Preliminary Approval scheduled for June 30, 2026.

- Leonard v. NFS Unlimited LLC

Court	Los Angeles County Superior Court
Case No.	24TRCV01469 (PAGA Only)
Nature	Meal/Rest Break Claims, Overtime, and Off the Clock work.
Status	Arbitration (JAMS Reference No. 5220006774); Representative PAGA stayed.

- Sierra Hernandez v. Railway Jonata, LLC

Court	Santa Barbara County Superior Court
Case No.	25CV01042
Nature	Meal/Rest Break Claims, Overtime, and Off the Clock work.
Status	Settled. Preliminary Approval scheduled for June 24, 2026.



- Orocio v. Freshway Farms, LLC

Court	Santa Barbara County Superior Court
Case No.	25CV02173
Nature	Meal/Rest Break Claims, Overtime, and Off the Clock work.
Status	In Litigation. Mediations scheduled for September 9, 2026.

- Bejar v. Ayres Group

Court	San Luis Obispo County Superior Court
Case No.	25-CVP-0043
Nature	Meal/Rest Break Claims, Overtime, and Off the Clock work.
Status	In Arbitration (JAMS) – Mediation Scheduled for July 8, 2026.

- Fernandez v. Motor City Sales & Service, et al

Court	Kern County Superior Court
Case No.	BCV-25-100392
Nature	Class claims for Meal/Rest Break Claims, Overtime, and Off the Clock work at PAGA.
Status	Settled Individually

- Mendez v. Carefusion

Court	San Diego Superior Court
Case No.	25CU026069C / 3:25-cv-01691-TWR-MMP
Nature	Class claims for Meal/Rest Break Claims, Overtime, and Off the Clock work at PAGA.
Status	Settled individually.

- Gardner v. Alternative Adult Day Services

Court	Los Angeles Superior Court
Case No.	
Nature	Class claims for Meal/Rest Break Claims, Overtime, and Off the Clock work at PAGA.
Status	In Litigation - Preliminary Approval scheduled for September 9, 2026.

- Greenough v. SoCal Investment Group, Inc.

Court	Orange County Superior Court
Case No.	30-2025-01488601-CU-OE-CXC
Nature	Class Claims for Meal/Rest Break Claims, Overtime, and Off the Clock work at PAGA.
Status	In Litigation.

- Lenning v. Peters Excavating, Inc.

Court	Sonoma County Superior Court
Case No.	25CV03355
Nature	Class Claims for Meal/Rest Break Claims, Overtime, and Off the Clock work at PAGA.
Status	Settled Individually.



- Smith v. Norman S. Wright Climatec Mechanical Equipment

Court	County of Los Angeles Superior Court
Case No.	25CHCV01777
Nature	Class Claims for Meal/Rest Break Claims, Overtime, and Off the Clock work and PAGA.
Status	Settled Individually.

- Abdulahad v. Bright Star Horizons

Court	Los Angeles Superior Court
Case No.	25STCV03232
Nature	Class Claims for Meal/Rest Break Claims, Overtime, and Off the Clock work and PAGA.
Status	Settled.

- Powell v. Girls Incorporated

Court	Alameda Superior Court
Case No.	25STCV03232
Nature	Class Claims for Meal/Rest Break Claims, Overtime, and Off the Clock work and PAGA.
Status	Settled Individually.

- McDonald v. Linde, Inc.

Court	County of Orange Superior Court
Case No.	30-2025-01488593-CU-OE-CXC
Nature	Class Claims for Meal/Rest Break Claims, Overtime, and On Call hours, Off the Clock work and PAGA.
Status	Settled.

- Beatriz Perez v. King Henry

Court	County of Los Angeles
Case No.	25STCV20424
Nature	Class Claims for Meal/Rest Break Claims, Rounding, Overtime, and On Call hours, Off the Clock work and PAGA.
Status	In Litigation. Mediation scheduled for October 15, 2026.

- Ben Tov v. Sunny Builders, et al

Court	County of San Diego
Case No.	25CU037028C
Nature	Improperly Misclassified as exempt and Class Claims for Meal/Rest Break Claims, Rounding, Overtime, and On Call hours, Off the Clock work and PAGA.
Status	In Litigation.

- Parquette v. AG Monrovia

Court	County of Los Angeles
Case No.	24STCV13226



Nature	Class Claims for Meal/Rest Break Claims, Rounding, Overtime, and On Call hours, Off the Clock work and PAGA.
Status	Settled. The Court granted PAGA settlement and appointed Barvié Law, APC as representative PAGA counsel on behalf of the State of California

EXHIBIT 2

Activities Export

06/23/2026

1:49 PM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/04/2026		Notice of Remote Appearance ● Unbilled	00041-Taylor Wage and hour Terminated while on medical leave.	SHILESKY MONTALVO- CRUZ	1.00	\$41.75	-	\$41.75
01/09/2026		Courtcall for Further Status Conference ● Unbilled	00041-Taylor Wage and hour Terminated while on medical leave.	SHILESKY MONTALVO- CRUZ	1.00	\$72.00	-	\$72.00
07/16/2025		Courtcall Status Conference- Mediation Completion ● Unbilled	00041-Taylor Wage and hour Terminated while on medical leave.	SHILESKY MONTALVO- CRUZ	1.00	\$72.00	-	\$72.00
06/12/2025		Damage analysis 50% ● Unbilled	00041-Taylor Wage and hour Terminated while on medical leave.	Nicole Barvié	1.00	\$5,940.00	-	\$5,940.00
10/10/2024		Plaintiff's half Belaire West Notice fee ● Unbilled	00041-Taylor Wage and hour Terminated while on medical leave.	Nicole Barvié	1.00	\$1,484.68	-	\$1,484.68
09/04/2024		Mediation fee with Steve Rotman ● Unbilled	00041-Taylor Wage and hour Terminated while on medical leave.	Nicole Barvié	1.00	\$10,000.00	-	\$10,000.00
05/24/2024		Initial TSC Statement Filing on 4/7/ 24 ● Unbilled	00041-Taylor Wage and hour Terminated while on medical leave.	SHILESKY MONTALVO- CRUZ	1.00	\$35.75	-	\$35.75
03/04/2024		Court Call Fee ● Unbilled	00041-Taylor Wage and hour Terminated while on medical leave.	Nicole Barvié	1.00	\$72.00	-	\$72.00
10/30/2023		Filing of the Initial Trial Setting Conference and Joint Stip to Continue TSC.	00041-Taylor Wage and hour Terminated while on medical leave.	Nicole Barvié	1.00	\$57.50	-	\$57.50
							\$0.00 0.00h	\$18,445.93 0.00h

Activities Export

06/23/2026
1:49 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Unbilled						
03/14/2023		Filing of PAGA Complaint. Unbilled	00041-Taylor Wage and hour Terminated while on medical leave.	Nicole Barvié	1.00	\$571.25	-	\$571.25
02/02/2023		Prepare pleading template. Unbilled	00041-Taylor Wage and hour Terminated while on medical leave.	Nicole Barvié	1.00	\$24.00	-	\$24.00
01/06/2023		LWDA PAGA Notice Filing Unbilled	00041-Taylor Wage and hour Terminated while on medical leave.	Nicole Barvié	1.00	\$75.00	-	\$75.00
							\$0.00 0.00h	\$18,445.93 0.00h