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Counsel for Plaintiffs
AMANDA NUNEZ AND MARLISHA JAMES

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN MATEO

AMANDA NUNEZ and MARLISHA L.
JAMES, individuals, on behalf of themselves and
on behalf of all persons similarly situated,

Plaintiff,

vs.

UNIVERSITY HEALTHCARE ALLIANCE, a
Corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 23-CIV-05931

**DECLARATION OF JAMES R.
HAWKINS IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
SETTLEMENT**

Dept: 4
Judge: Hon. Nancy LK. Fineman

Action Filed: December 14, 2023

1 I, James Hawkins, declare as follows:

2 1. I am an attorney, duly licensed to practice before all the Courts of the State of
3 California and I am the principal of James Hawkins, APLC, counsel of record for Plaintiffs Amanda
4 Nunez and Marlisha James (“Plaintiffs”) in this action. I have personal knowledge of the facts set
5 forth below, and if called to testify regarding them, I could and would do so competently.

6 2. I submit this declaration in support of Plaintiffs’ Motion for Final Approval of Class
7 Settlement.

8 3. I have no knowledge of the existence of any conflicting interests between my firm
9 and any of its attorneys, my co-counsel’s firms or any of their attorneys, and Plaintiffs or any other
10 Class Member.

11 **THE SETTLEMENT IS FAIR, REASONABLE AND ADEQUATE**

12 4. Based upon all known facts and circumstances as detailed more extensively in the
13 declaration I submitted on October 1, 2025, in support of Plaintiffs’ motion for preliminary
14 approval, I continue to endorse the Settlement Agreement as it is fair, reasonable and adequate,
15 and in the best interests of the Class.

16 5. I believe that based upon my extensive experience as a class and representative
17 action employment and wage and hour litigator, I am qualified to evaluate the claims and viability
18 of the defenses. Based on the history of this case, the strength of the claims and defenses, and the
19 overwhelmingly positive response of the Class to the notice process, it continues to be my view
20 that the settlement is fair, reasonable, and adequate, and in the best interest of the Class.

21 6. As set forth in greater detail in the Motion for Preliminary Approval of Class Action
22 and PAGA Settlement and accompanying declarations, the Settlement Agreement was the product
23 of arms-length negotiations between highly capable and experienced attorneys on both sides who
24 possessed the relevant data and extensive legal research which they had carefully analyzed. Class
25 Counsel obtained significant pertinent policies, documentation, sampling data and class data prior
26 to the mediation which allowed Class Counsel to perform a detailed analysis of the potential
27 damages. The Parties then engaged in a full day of arm’s length negotiations aided by well-
28 respected mediator, Tripper Ortman, Esq. Following the mediation, the Parties reached the
Settlement Agreement which they now request the Court finally approve.

1 7. On February 19, 2026, the Court Approved the Class and PAGA Settlement and
2 Setting the hearing on the motion for final approval.

3 8. As detailed in the concurrently filed declaration of the administrator, notice was
4 sent to the Class and it was overwhelmingly well-received. The fact that no Class Members
5 objected to the Settlement and none have requested exclusion confirms the conclusion that the
6 Settlement is fair, reasonable and adequate and in the best interests of the Class Members

7 **ADEQUACY OF CLASS COUNSEL**

8 9. In 1993, I graduated from the University of California, Los Angeles with a Bachelor
9 of Arts Degree. Following graduation, I attended Whittier Law School. In 1996, while a full-time
10 law student, I was also a full-time Judicial Extern for the Honorable Consuelo B. Marshall, United
11 States District Court, Central District. After approximately five months of service for Judge
12 Marshall, I became a full-time extern for the United States Attorney's Office, Central District of
13 California. My externship lasted for approximately five months. Thereafter, in 1997, I graduated
14 from Whittier Law School. The same year, I was admitted to practice law in the State of California.

15 10. From 1997-2007, I was a named partner at Hawkins & Sofonio, a law firm based out
16 of Irvine, California. At Hawkins & Sofonio, I pioneered the employment department litigating
17 Plaintiffs related employment issues such as: Wrongful Termination, Age Discrimination,
18 Disability, Wage and Hour and Sexual Harassment claims. Through the success and experience I
19 obtained litigating employment related matters, I commenced the Wage and Hour division of our
20 employment department in 2002. Since then, I have spent the vast majority of my practice litigating
21 wage and hour class actions.

22 11. In 2007, I incorporated my wage and hour class action practice as James Hawkins
23 APLC. Since its inception, this law firm has been exclusively involved in class action and complex
24 litigation. In 2009, I opened an additional office in Miami, Florida, prosecuting wage and hour
25 class actions. I have been lead or co-lead counsel in all of the cases listed below.

26 12. I have a great deal of experience in wage and hour class action litigation. I have
27 been certified and approved as class counsel in many other wage/hour class actions, and I am
28 currently litigating numerous others before this Court and others. Although not an all-inclusive list,

1 over the years I have prosecuted the following class action matters as lead and/or co-lead counsel,
2 all of which implicated similar law and facts to those associated with this Action:

- 3 a. *Mojica v. Compass Group, Inc., et. al.* USDC Central District, Case No. 8:13-cv-
4 01754. Wage and Hour Class Action case seeking past wages for meal and rest break
5 violations for production workers in the State of California. Plaintiffs' Counsel
6 preliminarily appointed as Class Counsel. Case settled. Final approval granted, and
7 funds fully disbursed.
- 8 b. *Dao v. 3M Company, et al.* USDC, CENTRAL DISTRICT, Case No. CV-08-04554.
9 Wage and Hour Class Action case seeking past wages for "off the clock", overtime
10 and meal and rest break violations for production workers in the State of California.
11 Plaintiffs' Counsel appointed as Lead Counsel. Case settled, Final Approval granted,
12 no objections and funds fully distributed.
- 13 c. *Ortiz v. Kmart*, USDC, CENTRAL DISTRICT, Case No. SACV 06-638 ODW.
14 Wage and Hour Class Action case seeking past wages for meal and rest period
15 violations for retail employees in the State of California. Plaintiffs' counsel
16 appointed co-lead counsel. Case settled, Final Approval granted, no objections and
17 funds fully distributed.
- 18 d. *Morgan v. Aramark Campus, LLC*, USDC, CENTRAL DISTRICT, Case No.
19 SACV08-00412. Wage and Hour Class Action case seeking past wages for meal
20 and rest period violations for retail employees in the State of California. Plaintiffs'
21 Counsel appointed as Lead Counsel. Case settled, Final Approval granted, no
22 objections and funds fully distributed.
- 23 e. *West v Iron Mountain Information Management, Inc, et. al.*; Los Angeles County
24 Superior Court, Case No. BC393709. Wage and Hour Class Action seeking past
25 wages for overtime, meal and rest break violations for driver employees in the State
26 of California. Stipulation for "binding arbitration." Arbitration Award for Plaintiffs
27 Class. Arbitration Award confirmed. Plaintiffs' counsel lead trial counsel and class
28 counsel.

- 1 f. *Gonzalez v. Superior Industries International, Inc.*, et al., Los Angeles County
2 Superior Court, Case No. BC 357912. Wage and Hour Class Action seeking past
3 wages for overtime, meal and rest breaks violations for production employees in the
4 State of California. Plaintiffs' counsel appointed as lead counsel. Case settled, Final
5 Approval granted, no objections and funds fully distributed.
- 6 g. *Acosta v. Fleetwood Travel Trailers of California, Inc.*, et al., Riverside County
7 Superior Court, Case No. RIC 440630. Wage and Hour Class Action seeking past
8 wages for overtime, meal and rest break violations for production employees in the
9 State of California. Plaintiffs' counsel appointed as co-lead counsel. Case settled,
10 Final Approval granted, no objections and funds fully distributed.
- 11 h. *Walker v. Sharkeez*, et al., Orange County Superior Court, Case No. 05CC00293.
12 Wage and Hour Class Action seeking past wages for unlawful deductions, meal and
13 rest break violations for restaurant employees in the State of California. Plaintiffs'
14 counsel appointed as lead counsel. Case settled. Final Approval granted and funds
15 fully distributed.
- 16 i. *Padron v. Universal Protection Service, et al*, Orange County Superior Court, Case
17 No. 05CC00013. Wage and Hour Class Action seeking past wages for overtime,
18 meal and rest break violations for security officers in the State of California.
19 Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final Approval
20 granted, no objections and funds fully distributed.
- 21 j. *Martinez v. Securitas Security Services USA, et al.*, Santa Clara Superior Court, Case
22 No. 105-CV047499, et al. J.C.C.P. No. 4460. Wage and Hour Class Action seeking
23 past wages for meal and rest break violations for security officers employed by
24 defendant in the State of California. Plaintiffs' counsel and co-counsel. Case settled,
25 Final Approval granted and funds fully distributed.
- 26 k. *Velasquez-Lopez v. Hotel Cleaning Services, Inc. et al.*, Riverside Superior Court,
27 Case No. RIC 420909. Wage and Hour Class Action seeking past wages for
28 overtime, meal and rest break violations for housekeepers employed by defendant in

1 the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled,
2 Final Approval granted, no objections and funds fully distributed.

3 l. *Ruiz, et al. v. Unisource Worldwide, Inc., et al.*, USDC, CENTRAL DISTRICT,
4 Case No. CV09-05848. Wage and Hour Class Action seeking past wages for meal
5 and rest period violations for non-exempt employees employed by defendant in the
6 state of California. Case settled. Awaiting Preliminary Approval hearing. Plaintiffs
7 has petitioned the Court for Lead Counsel.

8 m. *Herrador v. Culligan International Company, et al.*, USDC, CENTRAL DISTRICT,
9 Case No. SACV 08-680. Wage and Hour Class Action seeking past wages for field
10 and branch employees of defendant in the State of California. Plaintiffs' counsel
11 appointed as lead counsel. Case settled and awaiting Final Approval.

12 n. *Defries v. Domain Restaurants, et al.*, Orange County Superior Court, Case No.
13 05CC00128. Wage and Hour Class Action seeking past wages for restaurant
14 employees of defendant in the State of California. Plaintiffs' counsel appointed as
15 lead counsel. Case settled, Final Approval granted, no objections and funds fully
16 distributed.

17 o. *Denton v. BLB Enterprises, Inc., et al.*, Orange County Superior Court, Case No.
18 07CC01292. Wage and Hour Class Action seeking unpaid overtime, meal and rest
19 break violations for security guards employed by defendant in the State of California.
20 Plaintiffs' counsel appointed as lead counsel. Case settled, Final Approval granted,
21 no objections and funds fully distributed.

22 p. *Rios v. Sandberg Furniture Manufacturing Co., Inc, et al.*, Los Angeles Superior
23 Court, Case No. BC411477. Wage and Hour Class Action seeking unpaid meal and
24 rest break violations for production employees employed by defendant in the State
25 of California. Plaintiffs' counsel appointed as lead counsel. Case settled, Final
26 Approval granted, no objections and funds fully distributed.

27 q. *McMurray v. Dave and Busters, Inc., et al.*, Orange County Superior Court, Case
28 No. 06CC00099. Wage and Hour Class Action seeking past wages for meal and rest

1 break violations for restaurant employees employed by defendant in the State of
2 California. Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final
3 Approval granted, no objections and funds fully distributed.

4 r. *Osuna v. DFG Restaurants, Inc., et al.*, Los Angeles Superior Court, Case No. BC
5 330145. Wage and Hour Class Action seeking past wages of overtime for mis-
6 classification of managers employed by Defendant, DBA Carl's Jrs. in the State of
7 California. Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final
8 Approval granted, no objections and funds fully distributed.

9 s. *Burns v. Gymboree Operations, Inc., et al.*, San Francisco Superior Court, Case No.
10 CGC-07-461612. Wage and Hour Class Action seeking past wages for meal and
11 rest break violations for retail employees employed by defendant in the State of
12 California. Plaintiffs' counsel appointed lead counsel. Case settled, Final Approval
13 granted, no objections and funds fully distributed.

14 t. *Willems v. Diedrich Coffee, Inc., et al.*, Orange County Superior Court, Case No.
15 07CC00015. Wage and Hour Class Action seeking past wages of overtime for mis-
16 classification of managers employed by Defendant in the State of California.
17 Plaintiffs' counsel appointed lead counsel. Case settled, Final Approval granted, no
18 objections and funds fully distributed.

19 u. *Davila, et al. v. Beckman Coulter, Inc., et al.*, Orange County Superior Court, Case
20 No. 07CC01347. Wage and Hour Class Action seeking past wages for overtime,
21 meal and rest break violations for production workers employed by defendant in the
22 State of California. Plaintiffs' counsel appointed lead counsel. Case settled, Final
23 Approval granted, no objections and funds fully distributed.

24 v. *Perez v. Naked Juice Company of Glendora, Inc.*, Los Angeles Superior Court, Case
25 No. BC387088. Wage and Hour Class Action seeking past wages for overtime, meal
26 and rest period violations for production employees employed by defendant in the
27 State of California. Plaintiffs' counsel appointed as lead counsel. Case settled. Final
28 Approval granted, no objections and funds fully distributed.

- 1 w. *Coordination Proceeding Special Title [Rule 1550(b)] Wackenhut Wage and Hour*
2 *Cases*, Los Angeles Superior Court, Case No. JCCP 4545. Wage and Hour Class
3 Action seeking past wages for overtime, meal and rest period violations for security
4 guards employed by defendant in the State of California. Certification granted.
5 Plaintiffs' counsel appointed as co-lead counsel. Writ taken. Court stays action
6 pending Appellate Court ruling. Court lifts stay.
- 7 x. *Placencia v. Amcor Packaging Distribution, Inc.*, Orange County Superior Court,
8 Case No. 30-2013-00694012-CU-OE-CXC. Wage and Hour Class Action seeking
9 past wages for overtime, meal and rest period violations, and penalties on behalf of
10 non-exempt production, maintenance, shipping, and receiving employees employed
11 by Defendant in California. Plaintiffs' counsel appointed as lead counsel. Case
12 settled. Final Approval granted, no objections and funds fully distributed.
- 13 y. *Trani v. Lisi Aerospace, et al.*, Los Angeles Superior Court, Case No. BC495527.
14 Wage and Hour Class Action seeking past wages for overtime, meal and rest period
15 violations, and penalties on behalf of non-exempt manufacturing employees
16 employed by Defendant in California. Plaintiffs' counsel appointed as lead counsel.
17 Case settled. Final Approval granted, no objections and funds fully distributed.
- 18 z. *Galvan v. Goodwin Co.*, Orange County Superior Court, Case No. 30-2013-
19 00637062-CU-OE-CXC, Wage and Hour Class Action seeking past wages for meal
20 period violations, and non-compliant wage statements on behalf of non-exempt
21 production employees employed by Defendant in California. Plaintiffs' counsel
22 appointed as lead counsel. Case settled. Final Approval granted, no objections and
23 funds fully distributed.
- 24 aa. *Reyes v. Bristol Fiberlite*, Orange County Superior Court, Case No. 30-2013-
25 00653425-CU-OE-CXC. Wage and Hour Class Action seeking past wages for
26 overtime, meal and rest period violations, inaccurate wage statements, and penalties
27 on behalf of non-exempt employees employed by Defendant in California.
28

1 Plaintiffs' counsel appointed as lead counsel. Case settled. Final Approval granted,
2 no objections and funds fully distributed.

3 bb. *Gutierrez v. HMT Tank*, USDC Central Dist., Case No. CV14-1967-CAS(MANx).

4 Wage and Hour Class Action seeking past wages for meal and rest period violations,
5 failure to indemnify necessary expenses, inaccurate wage statements, and penalties
6 on behalf of non-exempt employees working in positions related to servicing,
7 refabricating and repairing storage tanks employed by Defendant in California.
8 Plaintiffs' counsel appointed as lead counsel. Case settled. Final Approval granted,
9 no objections and funds fully distributed.

10 cc. *Williams v. Il Fornaio America Corp.*, Sacramento County, Case No. 34-2011-

11 0009616. Wage and Hour Class Action seeking past wages for overtime, meal and
12 rest period violations, reimbursements, and penalties on behalf of non-exempt
13 restaurant employees employed by Defendant in California. Plaintiffs' counsel
14 appointed as lead counsel. Case settled. Final Approval granted, and funds fully
15 distributed.

16 dd. *Aguilar v. 7-Eleven, Inc.*, Orange County, Case No. 30-2009-002687141-CU-OE-

17 CXC. Wage and Hour Class Action seeking past wages for overtime, meal and rest
18 period violations, and penalties on behalf of non-exempt retail clerks employed by
19 Defendant in California. Plaintiffs' counsel appointed as lead counsel. Case settled.
20 Final Approval granted, no objections and funds fully distributed.

21 ee. *Madrigal v. Huntington Beach Market Broiler, Inc.*, Orange County, Case No. 30-

22 2012-00611260. Wage and Hour Class Action seeking past wages for overtime,
23 meal and rest period violations, reimbursements, and penalties on behalf of non-
24 exempt employees employed by Defendant in California. Plaintiffs' counsel
25 appointed as lead counsel. Case settled. Final Approval granted, no objections and
26 funds fully distributed.

27 ff. *Vang v. Jazz Semiconductor, Inc.*, Orange County, Case no. 30-2011-00460278.

28 Wage and Hour Class Action seeking past wages for overtime, meal and rest period

1 violations, reimbursements, and penalties on behalf of non-exempt production
2 workers employed by Defendant in California. Plaintiffs' counsel appointed as lead
3 counsel. Case settled. Final Approval granted, no objections and funds fully
4 distributed.

5 gg. *Cano v. Financial Statement Services, Inc.*, Orange County, Case No. 30-2013-
6 00653349-CU-OE-CXC.

7 hh. *Gonzalez v. Quality Aluminum Force, LLC*, Orange County, Case No. 30-2015-
8 00817941-CU-OE-CXC.

9 ii. *Smith v. Space Exploration Technologies Corp.*, Los Angeles County Case No.
10 BC554258.

11 jj. *Madrigal v. Balda C Brewer, Inc.*, Orange County Case No. 30-2015-00820218-CU-
12 OE-CXC.

13 kk. *Mendez v. Liberty Glass Fabricators, Inc.*, Riverside County Case No. RIC 1800119.

14 ll. *Attia v. Neiman Marcus Group, Inc.*, United States District Court for the Central
15 District of California Case No. 8:16-cv-001504-DOC-FFM.

16 mm. *Vigueras v. Red Robin*, United States District Court for the Central District
17 of California Case No. 8:17-cv-1422-JVS-DFM.

18 nn. *Payne v. Marriott Ownership Resorts, Inc.*, San Diego County Case No. 37-2018-
19 00015175-CU-OE-CTL.

20 13. In sum, my firm has been lead or co-lead counsel in hundreds of cases since its
21 inception. We have recovered hundreds of millions of dollars for employees in the State of
22 California and millions for the State as well through PAGA.

23 14. Our firm has served as class counsel in a number of significant wage and hour
24 settlements. Of particular note, in 2019, our firm was co-lead counsel in securing the largest wage
25 and hour class action settlement in California history at \$130,000,000.00. During this case,
26 plaintiffs appealed a decertification order. This case involved several appeals. The appellate record
27 amassed an extensive appellate record comprising a 23-volume joint appendix, a three-volume
28 reporters' transcript, five briefs, four letter briefs, two motions for judicial notice, a motion to

1 augment the record, and several additional letters informing the appellate court of new legal
2 authority issued after *Dukes*. The matter was argued to and submitted by the Court of Appeal on
3 September 15, 2016, and on November 21, 2016, the decertification order was reversed and the case
4 was remanded for further proceedings. (*Lubin v. The Wackenhut Corporation* (“*Lubin*”), 5 Cal.
5 App. 5th 960 (2016)). Wackenhut filed a petition for review of the Court of Appeal decision to the
6 California Supreme Court. The Supreme Court denied Wackenhut’s petition for review of *Lubin*.
7 The Court of Appeal issued remittitur on April 10, 2017. Eventually through more litigation, the
8 parties were able to secure the \$130 million settlement that was approved on October 21, 2019 by
9 Judge Highberger in the Los Angeles Superior Court.

10 15. Additionally, in early 2020, our firm served as lead counsel in a class action jury
11 trial in the Central District of California involving the class and PAGA representative claims of
12 over 23,000 employees which successfully resolved in the midst of trial for \$8,500,000.00.

13 16. Our firm has settled many high-stakes class and representative actions. Hawkins’
14 settlements have directly compensated hundreds of thousands of California workers and consumers.
15 Hawkins’ actions have also forced employers to modify their policies for the benefit of employees
16 including changing the compensation structure for certain employees and changing practices to
17 ensure that workers will be able to take timely rest and meal breaks. A leader in prosecuting class
18 and PAGA enforcement actions, Hawkins has secured millions of dollars for workers and in civil
19 penalties for the State of California.

20 17. Based on our experience, demonstrated competence, resources to prosecute the
21 claims at issue and reputation among our colleagues in the both the defense and plaintiffs’ bar, I
22 respectfully submit our firm’s experience in the field of wage and hour cases provides us the ability
23 to prosecute claims swiftly and often times without the need for protracted litigation. Although, as
24 demonstrated in the *Wackenhut* cases, we do not give up fighting for class members when
25 challenged and necessary.

26 **THE ATTORNEYS’ FEES AND LITIGATION COSTS CLASS COUNSEL SEEK**
27 **ARE REASONABLE, FAIR AND ADEQUATE**

28 18. In accordance with the terms of the Settlement Agreement, Class Counsel may seek

1 an award of attorneys' fees in the amount of one-third (1/3) of the Gross Settlement Amount in
2 attorneys' fees and up to \$40,000 reimbursement for actual and necessary costs. Defendant does
3 not oppose these amounts. In this case, the Class Notice specifically notified Class Members that
4 Class Counsel would be seeking up to \$650,000 in attorneys' fees. No Class Member objected to
5 the settlement. This strong favorable response also supports the requested fees.

6 19. In accordance with California Rules of Court, rule 3.769, I make the following
7 disclosure. The Class Counsel Fees Payment awarded shall be allocated as follows: 69.75%
8 to Blumenthal Nordrehaug Bhomwik De Blouw LLP, 20.25% to Centurion Trial Attorneys, APC,
9 and 10% to James Hawkins, APLC.

10 20. The attorney's fees and costs requests are respectfully believed to be reasonable.
11 Class Counsel represented Plaintiffs in this matter and have borne the entire risk and cost of this
12 litigation on a pure contingency basis. The legal issues raised in this case were complex and drew
13 significantly upon the experience of Class Counsel. The proposed attorneys' fees accurately reflect
14 the legal marketplace and are within the range of customarily approved fees by California courts.

15 21. Despite the complexity of the case, Class Counsel has, through our investment of
16 substantial effort and resources, secured an outstanding settlement on behalf of the Class Members.
17 The issues and arguments Class Counsel has encountered and overcome in arriving at the parties'
18 negotiated settlement terms were also many and complex and required skillful advocacy that can
19 arise only out of experience, professional perspective, and success. Plaintiffs would have faced
20 substantial legal and factual obstacles in demonstrating that Class certification was appropriate and
21 that they would prevail on the merits in light of Defendant's asserted defenses. Still, Class Counsel
22 has negotiated a substantial settlement on behalf of the Class for such claims. Defendant has
23 vigorously challenged the claims pled in the complaint, contested liability, the amount of claimed
24 damages, the propriety of the certification, and would have continued to do so through trial.
25 Accordingly, Class Counsel believe the Settlement to be fair, reasonable, and adequate and in the
26 best interest of the Class Members. The fairness and adequacy of the Settlement is confirmed by
27 all known facts and circumstances, including the risk of significant delay and uncertainty
28 associated with litigation, the various defenses asserted by Defendant, and numerous potential
appellate issues.

1 22. Plaintiffs and Class Counsel respectfully submit the fees and costs provision of the
2 Settlement is fair and reasonable both when cross-checked under the lodestar and common fund
3 method. The total billable hours that I and my firm have invested and will invest in prosecuting
4 this action, should the settlement be approved by this honorable Court, is substantial. Our fees and
5 costs request is fair and reasonable because we have expended substantial time and effort in
6 achieving the proposed Settlement.

7 23. I have personally devoted approximately 20.90 hours in prosecuting the Action.
8 Such hours were reasonable and necessary. My hourly rate is currently \$1,050 per hour. A
9 summary of tasks I completed in prosecuting this action include: new client intake, case strategy
10 and research, client communications, reviewing case documents, conducting due diligence on
11 related cases and financials, coordinating filings and motions, conferring on court proceedings,
12 and preparing for final accounting and case closure. The number of hours that I expended for work
13 performed and the corresponding attorney's fees of \$21,945.00 were reasonable and necessary in
14 obtaining the class-wide settlement that Plaintiffs now ask the Court to finally approve.

15 24. Christina Lucio is Of Counsel to James Hawkins, APLC and has devoted
16 approximately 7.1 hours in prosecuting the Action. Such hours were reasonable and necessary. Ms.
17 Lucio graduated from the University of California, Riverside in 2003 and received her law degree
18 from the University of Southern California in 2007. She has been a member of the State Bar of
19 California since 2007. Her practice focuses primarily on employment law including wrongful
20 termination, discrimination, retaliation, wage and hour violations (individual and class action), and
21 sexual harassment claims. In recent years, a substantial part of her practice has been focused on
22 class actions, including wage and hour litigation. A summary of tasks completed by Ms. Lucio
23 include: reviewing and revising complaint; participating in regular status conferences with co-
24 counsel regarding case developments, stipulations, and settlement strategy; reviewing court orders
25 and Case Management Conference statements; and monitoring case progression throughout
26 litigation. Ms. Lucio's hourly rate is currently \$775 per hour. The number of hours Ms. Lucio
27 expended for work performed and the corresponding attorney's fees of \$5,502.50 were reasonable
28 and necessary.

 25. Nicholas Schieffelin is Of Counsel to James Hawkins, APLC. Mr. Schieffelin is a

2002 graduate of the Cornell University, New York and 2007 graduate of Suffolk University Law School, Boston. He was admitted to the State Bars of Rhode Island and Massachusetts in 2007 and California in 2015. Mr. Schieffelin's legal career has been centered on various aspects of employment law, including representing national banks and Fortune 100 corporations in defending against employment-related and general legal matters, such as class actions. Since October 2023, he has shifted his focus to prosecuting wage and hour class actions as well as individual employment cases. The following is a summary of Mr. Schieffelin's tasks and activities in prosecuting this matter: draft Complaint, draft joint status conference statements, draft select moving papers for preliminary and final approval motions, prepare CMC statements, attend status conferences, calls with client, correspondence and conferences with defense counsel, correspondence with client. Mr. Schieffelin has dedicated 39.50 hours in prosecuting this action on behalf of Plaintiffs and the Class. Such hours are reasonable and necessary. Mr. Schieffelin's hourly rate is \$775.00 per hour. The number of hours expended by Mr. Schieffelin for work performed and the corresponding attorney's fees of \$30,612.50 are reasonable and necessary.

26. In sum, I submit that the requested attorneys' fees are fair and reasonable, as are the hourly rates at which our attorneys bill.

James Hawkins, APLC Lodestar Summary				
Timekeeper	Years	Hours	Rate	Total
James R. Hawkins	29	20.90	\$1,050	\$21,945.00
Christina Lucio	19	7.1	\$775	\$5,502.50
Nicholas Schieffelin	19	39.50	\$775	\$30,612.50
TOTALS				\$58,060.00

27. We respectfully submit that our hourly rates are reasonable in light of the hourly rates charged in the marketplace for comparable skill, years of experience and services.

28. The Settlement that Class Counsel has negotiated on behalf of the Class confronts very difficult and potentially individualized issues which make certification and proof of merits challenging and work intensive. I and our firm's attorneys and paralegals, along with co-counsel, engaged in persistent advocacy of the class claims in order to secure this Settlement, and through our legal expertise and experienced negotiation techniques, we have achieved a very favorable

1 result for the Class Members. Other attorneys without our experience and comprehensive
2 knowledge and perspective in connection with complex employment litigation may not have been
3 able to achieve such superior settlement terms on behalf of the Class. I believe the requested
4 amount of attorneys' fees under the Settlement is a reasonable allocation given the excellent result
5 we have secured for the Class Members. I, therefore, respectfully request the Court approve the
6 allocated attorneys' fees under the Parties' Settlement.

7 29. In serving as Plaintiffs' counsel and Class Counsel in this matter, my firm will also
8 seek reimbursement for the out-of-pocket costs of \$1,789.45. The costs were all directly incurred
9 in the prosecution of this action, including but not limited to, filing fees and service of process
10 costs. A summary of the costs incurred by our firm in this action is attached herewith as **Exhibit**
11 **1**. I believe that all of these fees and costs are reasonable and necessarily incurred in litigating this
12 matter and in pursuit of the settlement.

13 **THE CLASS REPRESENTATIVE ENHANCEMENT AWARDS ARE REASONABLE**

14 30. The Settlement Agreement provides that Plaintiffs may request an Enhancement
15 Awards in addition to any payment that Plaintiffs are entitled to as Class Members and PAGA
16 Group Members. The amount of the Enhancement Awards were disclosed to the members of the
17 Class in the Class Notice.

18 31. Based on my experience, it is my opinion that the requested Enhancement Awards
19 to Plaintiffs are reasonable and warranted in light of the time and effort they spent working on this
20 case and the benefit their efforts conferred upon the Class. Plaintiffs spent a significant amount of
21 time over the past couple years assisting class counsel with its investigation. Plaintiffs kept in
22 regular contact with my and my co-counsel's office, provided relevant and helpful information
23 throughout this litigation, and timely responded to all communications. The requested \$15,000
24 Class Representative Enhancement Awards are fair and reasonable when compared to the
25 payments approved in similar cases with which I am familiar.

26 32. My and my co-counsel's firms spent a considerable amount of time communicating
27 and working with Plaintiffs who provided factual information and documentation that was critical
28 to our understanding of the case, which helped my firm prepare the complaint and pleadings in this
litigation. Plaintiffs took the time to explain Defendants' policies and practices related to the claims

1 raised in the lawsuit, which were instrumental in understanding the claims and defenses asserted
2 in the litigation. All of this was used in solidifying arguments used to negotiate a fair and
3 reasonable settlement.

4 33. Plaintiffs have been involved in all stages of the litigation, have worked diligently
5 to represent the members of the Settlement Class and have put the interest of the Class above their
6 own self-interest. At all times, they have remained cognizant of their obligations and duties to the
7 other Class Members.

8 34. Plaintiffs also assumed the risk of an adverse judgment and the financial
9 responsibility of such a judgment by bringing and maintaining this litigation. By stepping forward
10 and attaching their names to this litigation, Plaintiffs jeopardized, and continue to jeopardize, the
11 availability of prospective employment because their name is now associated with employment
12 litigation, particularly in the internet age, where prospective employers may easily discover such
13 information.

14 35. Furthermore, under the terms of the settlement, Plaintiffs signed a general release
15 as to all potential claims they may have against Defendants, an expansive release that is not
16 required of other Class Members.

17 36. In my experience, there are few individuals who are willing to come forward to
18 serve as a named representative and to provide the hard work, diligence and personal financial risk
19 that may come with undertaking such role. Plaintiffs' refusal to waiver in their decision to
20 prosecute this case demonstrates that they, at all times, have acted in the best interest of the
21 members of the Class.

22 37. The requested \$15,000 Enhancement Awards to Plaintiffs are fair and reasonable
23 in light of the time and effort they spent working on this case and the benefit their efforts conferred
24 upon the Class.

25 I declare under penalty of perjury under the laws of the State of California that the foregoing
26 is true and correct this 3rd day of June, 2026, at Irvine, California.

27 
28 James R. Hawkins

EXHIBIT 1

Matter Billing Detail

JAMES HAWKINS APLC

Date Range: 01/01/1900 to 05/19/2026
Client: UNIVERSITY H - Marlisha Latina James
Matter: UNIVERSITY HEAL - University HealthCare Alliance / Stanford Health Care (Marlisha L James)

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Balance Forward:									
10/14/2024	LDS	Legal Document Server - E-Filing - Complaint, Civil Case Cover Sheet, Summons IN# 10559780	\$0.00 \$1,453.45		Unbilled				
10/24/2024	LDS	Legal Document Server - E-Filing - Order IN# 10640708	\$33.50		Unbilled				
11/22/2024	LDS	Legal Document Server - Process Serve - Complaint, Notice of Case Management Conference, Summons, Notice of Case Reassignment, Peremptory Challenge, Proposed Order, Civil Case Cover Sheet IN# 10807727	\$120.00		Unbilled				
12/03/2024	LDS	Legal Document Server - E-Filing - Proof of Service by Substituted Service IN# 10871581	\$33.50		Unbilled				
12/03/2024	LDS	Legal Document Server - E-Filing - Notice IN# 10866832	\$33.50		Unbilled				
01/27/2025	LDS	Legal Document Server - E-Filing - CM Statement IN# 11205329	\$33.50		Unbilled				
02/10/2025	CRT	Court Documents - Order	\$3.00		Unbilled				
08/06/2025	LDS	Legal Document Server - EFiling - CM Statement IN# 12586862	\$38.50		Unbilled				
08/11/2025	CRT	Court Documents- Order	\$2.00		Unbilled				
10/30/2025	LDS	Legal Document Server - EFiling - CM Statement IN# 13223569	\$38.50		Unbilled				
Total:			\$1,789.45	\$0.00					
Balance:			\$1,789.45						

Matter Billing Detail

JAMES HAWKINS APLC

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 :		-----	\$1,789.45						
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						