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*Attorneys for Plaintiff and the Putative Class,
 and on behalf of the State of California and
 aggrieved employees*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LATOYA HONEY WALKER, individually
 and on behalf of all others similarly situated;

Plaintiff,

v.

NURSEFINDERS, LLC; AMN SERVICES,
 LLC; and DOES 1–100, inclusive.

Defendants.

Case No. 3:22-CV-04084-AGT

Assigned to the Honorable Alex G. Tse

**DECLARATION OF CAROLYN H.
 COTTRELL IN SUPPORT OF MOTION FOR
 FINAL APPROVAL OF CLASS ACTION AND
 PAGA SETTLEMENT**

Date: July 26, 2024

Time: 10:00 a.m.

Courtroom: A, 15th Floor

Complaint Filed: July 12, 2022

Trial Date: None Set

DECLARATION OF CAROLYN H. COTTRELL

I, Carolyn H. Cottrell, hereby declare as follows:

1. I am an attorney at law duly licensed and in good standing to practice law in the courts of California (SBN 166977) and am admitted to practice law before this Court, the United States District Court, Northern District of California.

2. I am a partner at the law firm of Schneider Wallace Cottrell Konecky LLP ("SWCK"). SWCK specializes in class, collective, and PAGA litigation in state and federal court.

3. I am counsel of record for Plaintiff LaToya Honey Walker, on behalf of herself and the Class members ("Plaintiff"), in the above-captioned case. I submit this declaration in support of Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement ("Motion"). I am familiar with the file, the documents, and the history related to the case. The following statements are based on my personal knowledge and review of the files. If called to do so, I could and would testify competently thereto.

4. The Settlement Notice mailed to the Class Members informed the Class Members of the Settlement terms; their expected Settlement Award; the deadline to submit objections, requests for exclusion, and workweek disputes; the July 26, 2024 final approval hearing; the names and contact information for Class Counsel and Defendant's Counsel; and that Plaintiff would seek attorneys' fees, costs, and a service award and the corresponding amounts.

5. Discovery, pre-mediation information production, and mediation were conducted at arm's length and with zealous advocacy in this action. Plaintiff is represented by experienced and respected litigators of representative wage-and-hour actions, and these attorneys feel strongly that based on the specific calculated risks associated with this case, the Settlement achieves an excellent result for the Class Members.

6. Plaintiff's initial estimate of the class size of 2,919 was based on Class Members through June of 2023. The increase to 3,141 represents the actual number of Class Members, of which 3,139 are Participating Class Members.

7. The monetary value of the Settlement represents a fair compromise given the specific risks and uncertainties posed by continued litigation of these claims. Resolving this case by means of

1 the proposed Settlement will yield a prompt, certain, and substantial recovery for the Class Members.
2 This result will redirect the expenditure of resources from draining the court system and Defendant's
3 resources to providing relief to the Class Members.

4 8. SWCK has spent 367.2 hours litigating this Action, for a current lodestar of
5 \$266,888.00. These numbers do not include all the work remaining to bring the Settlement to a close,
6 such as, communicating with Class Members regarding their settlement payments and the release and
7 how such payments were calculated, addressing remaining settlement administration matters with the
8 settlement administrator, and responding to Class Members' inquiries concerning tax forms and
9 withholdings. Attached hereto as **Exhibit A** is a true and correct copy of a summary of SWCK's billing
10 in this Action. Lawyers for Justice, PC initially developed the case and relationship with the
11 Plaintiff and then referred this action to SWCK. Pursuant to written agreement, fees are shared with
12 Lawyers for Justice, PC making their time expenditure recoverable. See Ghosh Declaration
13 filed concurrently herewith. Class Counsel's present combine lodestar figure of \$445,728.00
14 results in a multiplier of 3.37.

15 9. This multiplier is within a customary range for multipliers in class-action lawsuits and
16 it bears many other indicia of reasonableness. This excellent result was achieved through the
17 experienced efforts of Class Counsel to effectively develop the case and seek a timely resolution prior
18 to the expenditure of unnecessary time. Additionally, in an effort to ensure an appropriate fee request
19 Class Counsel has chosen to seek a lower award than the one third of the gross settlement amount
20 initially negotiated.

21 10. SWCK's current costs total \$8,990.63. Attached hereto as **Exhibit B** is a true and
22 correct copy of SWCK's billing summary in this action.

23 11. Class Counsel's costs include reasonable out-of-pocket expenditures and do not
24 account for additional filing or mailing fees that will accrue in the coming weeks as final settlement
25 administration occurs. The expenses incurred in this litigation to date are of the type typically billed
26 by attorneys to paying clients in the marketplace and include such costs as court costs, filing fees,
27 mediation fees, copying and printing costs, computerized research, and electronic document hosting.
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1 12. All of the incurred expenses were reasonable and necessary for the successful
2 prosecution of the Action, and pursuant to the terms of the Settlement, Defendant does not oppose the
3 request for costs.

4 13. Defendant's counsel confirmed via email that on March 15, 2024, they had mailed
5 CAFA Notices on behalf of Defendant to the appropriate government officials in the states in which
6 Class Members reside, based on the Class List.

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8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct.

10 Executed this 12th day of July 2024 at Auburn, California.

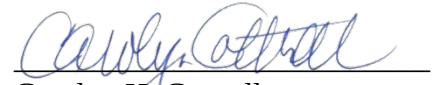
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12 Carolyn H. Cottrell
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EXHIBIT A

Billing Summary by Matter for 'Walker, LaToya Honey v. Nursefinders, LLC, et al.' from Inception to 07/12/2024 that includes Lead Lawyer, Other Lawyers, Paralegals / Law Clerks, Of Counsel / Associates, Partners

Billing Summary by Matter for 'Walker, LaToya Honey v. Nursefinders, LLC, et al.' from Inception to 07/12/2024

Timekeeper	Title	License Date	Hourly Rate (\$)	Hours	Amount (\$)
Justin Quin (JPQ)	Legal Brief Writer	05/01/2017	850	45.7	\$38,845.00
Laurel Holmes (LNH)	Associate	01/16/2016	850	14	\$11,900.00
Michelle Lim (MSL)	Associate	06/01/2017	850	95.8	\$81,430.00
Moises Jade (MXJ)	Staff Attorney	05/10/1996	1045	5.7	\$5,956.50
Rebecca Sheehan (RHS)	Legal Brief Writer	11/13/2018	825	13.3	\$10,972.50
Ryan Bonner (RAB)	E-Discovery Manager	07/01/2015	900	7.4	\$6,660.00
Bradley Kopp (BJK)	Paralegal		450	41.8	\$18,810.00
Collin Hoover (CEH)	Paralegal		450	16.2	\$7,290.00
Eugene Huffman (ENH)	Paralegal		450	22.8	\$10,260.00
Jolonda Greene (JTG)	Outreach Specialist (Law Clerk)		400	10	\$4,000.00
Lonnie Christopher (LRC)	Docketing Specialist		325	4.3	\$1,397.50
Maria Alvarez (MTA)	Legal Assistant		325	1.1	\$357.50
Michael Garcia (MEG)	Docketing Specialist		325	13.6	\$4,420.00
Michaela Stewart (MLS)	Docketing Specialist		325	1.6	\$520.00
Nina Quintero (NSQ)	Outreach Specialist		350	8.6	\$3,010.00
Rocio Espinoza (RDE)	Paralegal		450	1.1	\$495.00
Thomas Barnett (TRB)	Outreach Supervisor		350	20.2	\$7,070.00
Carolyn Cottrell (CMH)	Partner	12/13/1993	1295	19.1	\$24,734.50
Ori Edelstein (OXE)	Partner	12/01/2009	1155	24.9	\$28,759.50
Totals:				367.2	\$266,888.00

EXHIBIT B



CASE COSTS

Walker, Latoya Honey v. Nurse Finders, LLC, et al.

Matter No. 102793

Date: 07/09/2024

DATE	VENDOR	DESCRIPTION	AMOUNT
04/26/2022	Superior Court of California	Document Download	\$ 26.20
05/03/2022	Superior Court of California	Document Download	\$ 23.60
05/31/2022	RELX Inc DBA LexisNexis	Document Retrieval - Period: 05/01/22 - 05/31/22	\$ 40.17
06/09/2022	Command Investigations	Investigation Latoya Walker	\$ 445.00
07/12/2022	USDC California	Filing Fee	\$ 402.00
07/14/2022	ABC Legal Services, LLC	Process Service - Web Upload	\$ 150.00
07/31/2022	RELX Inc DBA LexisNexis	Document Retrieval - Period: 07/01/22 - 07/31/22	\$ 2.98
08/31/2022	RELX Inc DBA LexisNexis	Document Retrieval - Period: 08/01/22 - 08/31/22	\$ 30.71
10/01/2022	Pacer	Pacer - Document Retrieval - QTR 3 2022	\$ 1.50
01/01/2023	Pacer	Pacer - Document Retrieval - QTR 4 2022	\$ 4.60
02/27/2023	Steve Pearl Mediation P.C.	6/26/23 - Mediation Fees 100% of Plaintiff's Half	\$ 7,500.00
02/27/2023	Steve Pearl Mediation P.C.	Processing Fee	\$ 225.00
04/01/2023	Pacer	Pacer - Document Retrieval - QTR 1 2023	\$ 2.40
10/01/2023	Pacer	Pacer - Document Retrieval - QTR 3 2023	\$ 0.30
11/06/2023	LWDA	Filing Fee - Initial PAGA Claim Notice for LaToya Honey Walker	\$ 75.00
11/30/2023	SWCK	Copies and Printing from Shared Printing (2021-2023)	\$ 23.75
12/31/2023	Pacer	Pacer - Document Retrieval - QTR 4 2023	\$ 0.20
02/03/2024	RELX Inc DBA LexisNexis	Document Retrieval - Period: 01/01/24 - 01/31/24	\$ 37.02
03/31/2024	Pacer	Pacer - Document Retrieval - QTR 1 2024	\$ 0.20
			\$ 8,990.63