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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

VALERIA RAMIREZ, individually, on a
representative basis, and on behalf of all
others similarly situated; ERIKA SIGALA,
individually, on a representative basis, and
on behalf of all others similarly situated;

Plaintiffs,

vs.

INLAND SOUTHERN CALIFORNIA
211, a California Nonprofit Corporation;
and DOES 1 through 20, inclusive;

Defendants.

Case No.: CVRI2305899
*[Assigned to Hon. Harold Hopp, Dept 1, for all
purposes]*

**DECLARATION OF MISTY M. LAUBY,
ESQ. IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS AND PAGA
REPRESENTATIVE ACTION
SETTLEMENT**

Hearing

Date: August 14, 2025

Time: 8:30 a.m.

Dept.: 1

I, Misty M. Lauby, state and declare:

1. I am an attorney licensed to practice before all of the courts of the State of California. I am a partner at Lauby, Mankin & Lauby LLP. I represent the Plaintiffs Valeria Ramirez and Erika Sigala in this action and I am thoroughly familiar with and have personal knowledge of all of the facts set forth herein. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement. If called as a witness, I could and would competently

1
2 testify thereto.

3 2. For the sake of brevity, this declaration does not discuss the settlement itself, the
4 procedural background of the litigation, the claims and investigation by my firm a, and why the
5 settlement is fair and reasonable. Those topics are covered in detail in the concurrently filed
6 Declaration of Brian Mankin. This declaration simply provides information requested by the
7 court as to why I am adequate class counsel.

8 **COUNSEL’S EXPERIENCE**

9 3. I have been a member, in good standing, of the State Bar of California since 2006.
10 I am licensed to practice before all courts of the State of California and am admitted to practice
11 in the United States District Court for the Central District of California and have litigated cases
12 in various courts and counties throughout California.

13 4. I began working as an attorney for Fernandez & Lauby, LLP (now Lauby,
14 Mankin & Lauby, LLP) in 2006. From 2006 through March 2018, I worked in the firm’s
15 insurance defense department as the handling attorney in approximately 250-350 complex
16 construction defect litigation matters that I successfully managed and settled on behalf of
17 multiple insurance carrier and contractor clients.

18 5. In or around March 2018, I transitioned to handling exclusively employee vs.
19 employer litigation matters.

20 6. The vast majority of my employment cases have been litigated as class actions,
21 representative PAGA actions or a combination of the two.

22 7. I have been the handling attorney on over 47 class action and/or representative
23 PAGA actions. And, on these cases, myself and/or my firm have been appointed Class Counsel
24 on over 27 cases, and have helped recover over \$21,000,000 for my clients, the employees, and
25 the State of California.

26 8. I have been involved in one contested class certification motion in a case that
27 settled just prior to the class certification hearing.
28

9. Attached as **Exhibit A** is a list of 28 resolved and/or settlement class actions, collective actions, and/or PAGA actions that I have handled in the last 5.5 years (note: this list excludes currently active cases and settlements pending approval).

HOURS INCURRED

10. I have spent 127.9 hours working on this action and have kept contemporaneous records of these billable hours. To that end, I performed substantial work on this case, including significant pre-filing work, legal research regarding nuanced and issues unique to this matter, review and analysis of voluminous records from Defendant to verify and value the claims herein, and work on the mediation session, preliminary and final approval processes.

HOURLY RATE

11. My billing rate is \$650 per hour, and this rate is usual and customary for class action and/or PAGA practitioners with my level of expertise and experience.

12. This rate is consistent with Plaintiff and Defense attorneys who handle complex class action litigation, if not somewhat lower. For instance, the 2023 Wolters Kluwer Real rate Report (“Real Rate Report”) states that the rates for partners in Los Angeles are between \$840 and \$1,159 for the middle and upper quartiles.

13. Importantly, the Real Rate Report data is not based on self-reported numbers, surveys, or sampling – instead, these figures are based on an analysis of the actual amounts billed to clients based on more than 160 billion in billing entries.

14. My requested rate is also reasonable, consistent and less than the rate found in the Laffey Matrix (www.laffeymatrix.com), which indicates that the benchmark rate for an attorney that graduated law school in 2006 is \$878.

15. My hourly rate has been approved by various courts in California, including the following non-exhaustive list of recent settlements for which I have been the handling attorney:

a. *Robertson v. All Care*, Los Angeles Superior Court, Case No 20STCV18318 (March 17, 2022) (\$1.4M wage-and-hour class and PAGA settlement approved with lodestar cross-check of \$650 rate).

1 b. *Morales v. VPET*, San Bernardino Superior Court, Case No. CIVSB2108161
2 (November 22, 2022) (\$250,000 wage-and-hour class and PAGA settlement approved with
3 lodestar cross-check of \$650 rate).

4 c. *Moreno v. JJ Kane*, Riverside Superior Court, Case No. CVRI2101236
5 (September 7, 2022) (\$235,000 wage-and-hour class and PAGA settlement approved with
6 lodestar cross-check of \$650 rate).

7 d. *Blanton v. CTDI*, San Joaquin Superior Court, Case No. STK-CV-UOE-2021-
8 0005136, (August 23, 2023) (\$2,000,000 wage-and-hour class and PAGA settlement approved
9 with lodestar cross-check of \$650 rate).

10 e. *Zuniga v. Desert AIDS Project*, Riverside Superior Court, Case No. RIC2003219,
11 (August 25, 2023) (\$400,000 wage-and-hour class and PAGA settlement approved with lodestar
12 cross-check of \$650 rate).

13 f. *Northrup v Guyou*, Riverside Superior Court Case No. CVRI2105858 (December
14 15, 2023) (\$300,000 wage-and-hour class and PAGA settlement approved with lodestar cross-
15 check of \$650 rate).

16 g. *Rodarte v. Wright Business Graphics*, San Bernardino Superior Court Case No.
17 CIVSB2206705, (December 6, 2023)(\$310,000 wage-and-hour class and PAGA settlement
18 approved with lodestar cross-check of \$650 rate).

19 h. *Zubia v. Procter & Gamble*, Los Angeles Superior Court Case No.
20 20STCV44506, (January 17, 2024) (\$3,750,000 wage-and-hour class and PAGA settlement
21 approved with lodestar cross-check of \$650 rate).

22 i. *Lopez v. Martinez Concrete*, San Bernardino Superior Court Case No.
23 20STCV44506, (February 27, 2024)(\$350,977.22 wage-and-hour class and PAGA settlement
24 approved with lodestar cross-check of \$650 rate).

25 j. *Valenzuela v. Clarkwestern*, Sacramento Superior Court Case No. 34-2021-
26 00307823, (April 12, 2024)(\$2,5000,000 wage-and-hour class and PAGA settlement approved
27 with lodestar cross-check of \$650 rate).

1 k. *Calderon v. Prudential*, Los Angeles Superior Court Case No. 22STCV13172
2 (July 3, 2024) (\$438,361 wage-an-hour class and PAGA settlement approved with lodestar cross-
3 check of \$650 rate).

4 l. *Hagon v. Transport America*, San Bernardino Superior Court Case No.
5 CIVSB2203409 (August 27, 2024) (\$515,000 wage-an-hour class and PAGA settlement
6 approved with lodestar cross-check of \$650 rate).

7 m. *Ramos v. White Lines*, San Bernardino Superior Court Case No. CIVSB2216314
8 (August 22, 2024) (\$825,000 wage-an-hour class and PAGA settlement approved with lodestar
9 cross-check of \$650 rate).

10 n. *Nava v. Temecula Valley Drywall, Inc.*, Riverside Superior Court Case No.
11 CVRI2400423 (July 15, 2025) (\$475,000 wage-and-hour class and PAGA settlement approved
12 with lodestar cross-check of \$650 rate).

13 **CONCLUSION**

14 16. As set forth above, I have litigated over 47 class and representative actions, and
15 have successfully resolved at least 28 of those cases, with many others still pending that will
16 resolve in the future.

17 17. For these reasons, as well as the facts and information presented in the
18 concurrently filed Declaration of Brian J. Mankin, it is respectfully requested that the Court: (1)
19 grant final approval of the settlement as being fair, reasonable, and in the best interests of the
20 class, (2) appoint Plaintiffs as the Class Representatives, and (3) appoint Brian J. Mankin and
21 Misty M. Lauby of Lauby, Mankin & Lauby LLP as Class Counsel,

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct. Executed on July 21, 2025, at Claremont, California.

24
25
26 By: 
27 Misty M. Lauby
28

EXHIBIT “A”

Completed Class/Collective/PAGA Cases		
Case Name	Venue	Case Number
Calderon v. Prudential	Los Angeles	22STCV13172
Castelo v. Millemiaaero	San Bernardino	CIVDS1825783
Constante v. Eddie's Trucking	San Bernardino	CIVDS1902466
Blanton v. CTDI	San Joaquin	2021-0005136
Diaz v. Shamrock Foods	Riverside	RIC2004126
Gallardo v. Tee For 2	San Bernardino	CIVDS1719564
Garcia v. Coach	USDC	5:18-cv-01537
Garcia v. Harkins	USDC	5:18-cv-02314
Hagon v. Transport America	San Bernardino	CIVSB2203409
Johnson v. JG Wentworth	San Diego	37-2022-00048277
Legorreta v. Paradise	Riverside	RIC1723591
Lepe v. Big Lots	San Bernardino	CIVDS1825693
Lopez v. Martinez Concrete	San Bernardino	CIVSB2208282
Lupercio v. Access Exterminator	San Bernardino	CIVDS1921036
McCulloch v. The Gill	Los Angeles	BC722742
Morales v. VPET	San Bernardino	CIVSB2108161
Moreno v. JJ Kane	Riverside	CVRI2101236
Northrup v. Guyou	Riverside	CVRI2105858
Palmer v. Charter	San Bernardino	CIVDS2013037
Ramos v. White Lines	San Bernardino	CIVSB2216314
Redman v. Zenith	San Bernardino	CIVDS1826759
Robertson v. All Care	Los Angeles	20STCV18318
Rodarte v. Wright Business	San Bernardino	CIVSB2206705
Rueda/Valenzuela v. Clarkwestern	Sacramento	34-2021-00307823
Ruiz v. Unity Courier Service	Los Angeles	BC724435
Zubia v. P&G	Los Angeles	20STCV44506
Zuniga v. Desert AIDS	Riverside	RIC2003219