

WORRELL LAW FIRM, APC

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Attorneys for Plaintiff

ANDREA PUNGI, individually and on behalf of others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

RHAY TAYLOR in a Representative capacity
only, and on behalf of other members of the
general public similarly situated,

Plaintiff,

v.

ALTER MANAGEMENT LLC, a California
Limited Liability Company; ALTER
MENTAL HEAL TH LLC, a California
Limited Liability Company; ALTER
MENTAL HEALTH- DANA POINT, LLC,
a California Limited Liability Company;
ALTER WELLNESS CARE LLC, a
California Limited Liability Company;
ALTIGNIS CAMPUS LLC, a California
Limited Liability Company; ALTER
HEALTH GROUP, INC., a California
Corporation; CALIFORNIA REHAB
CAMPUS, LLC, an Arizona Limited
Liability Company; CAMBRIDGE MENTAL
HEALTH MANAGEMENT LLC dba
ALTER BEHAVIORAL HEALTH, a
California Limited Liability Company;
ALTIGNIS HEALTH, LLC, a California
Limited Liability Company; and DOES 1-10,
inclusive,

Defendants.

Case No. 37-2024-00007620-CU-OE-CTL

**SUPPLEMENTAL DECLARATION OF
KYLE C. WORRELL IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF (1) CLASS ACTION
SETTLEMENT, (2) ATTORNEYS'
FEES AND COSTS, AND (3) CLASS
REPRESENTATIVE AWARDS**

1 **SUPPLEMENTAL DECLARATION OF KYLE C. WORRELL**

2 I, Kyle C. Worrell, declare that:

3 1. I am an attorney duly licensed to practice law before all courts of the State of
4 California. I am the founding principal of Worrell Law Firm, APC. I am the attorney of record for
5 Plaintiff Andrea Pungi (“Plaintiff”) and Class Members in the related actions described below. I have
6 personal knowledge of the facts set forth below and if called to testify I could and would do so
7 competently.

8 **Information Regarding Case History**

9 2. In my declaration submitted with the motion for preliminary approval of the class
10 action and PAGA settlement, I detailed the litigation history related to my client’s class action and
11 PAGA wage and hour claims against the Alter defendants. This included filing the class action
12 complaint and PAGA-only complaints, and litigating the cases through the global settlement achieved
13 with all counsel of record in this matter.

14 **Plaintiff’s Counsel’s Lodestar**

15 3. In the declaration submitted with the motion for preliminary approval of the class
16 action settlement I also outlined my firm’s background and experience, including examples of results
17 obtained on behalf of clients in wage and hour matters. I also provided information about the firm’s
18 employees, showing that Worrell Law Firm is staffed with seasoned paralegals with decades of
19 experience in California employment law and wage and hour class action and PAGA cases.

20 4. Based on detailed contemporaneous time records, the lodestar of the Worrell Law
21 Firm, APC, for work performed in this action, including the time spent initially in the separately filed
22 Pungi Class Action (Orange County Superior Court, Case No. 30-2024-01429796-CU-OE-CXC) and
23 Pungi PAGA action (Los Angeles Superior Court, Case No 24STCV31655), and now in this action,
24 is \$201,467.00, which is the sum of Partner Kyle C. Worrell, Esq., 204.4 hours at \$905/hour; Sr.
25 Paralegal, Yvonne C. Montanez, 16.7 hours at \$350 per hour; and Sr. Paralegal, Mariah A. Velasco,
26 30.4 hours at \$350 per hour. Although our rates have increased for 2026, we calculated the lodestar
27 at our 2025 rates. Our 2025 rates have been approved in recent Arbitration Awards for clients,
28 including:

- 1 a. *K. Davis v. Amazon Logistics, Inc.*, AAA Case No. 01-20-0007-5215 (Aug. 8, 2025),
2 Final Award of \$524,915.22, for individual claimant asserting individual wage and
3 hour claims. The Arbitrator concluded that my (2025) hourly rate of \$905 is “below
4 the market rate for similarly situated attorneys [and] is reasonable considering [Mr.
5 Worrell’s] experience as counsel for both plaintiffs and defendants....” The Arbitrator
6 also concluded my paralegals’ (2025) hourly rates of \$350 “are reasonable.”
- 7 b. *H. Ferguson v. Amazon Logistics, Inc.*, AAA Case No. 01-20-0007-5655 (Sept. 4,
8 2025), Final Award of \$468,306.95, for individual claimant asserting individual wage
9 and hour claims. The Arbitrator in this case also expressly approved my firm’s 2025
10 hourly rates, including my (2025) hourly rate of \$905 and my paralegals’ (2025)
11 hourly rates of \$350 as reasonable.

12 5. My firm’s lodestar exceeds the total amount of attorneys’ fees requested in the class
13 action and PAGA settlement. When combined with the lodestar amounts from counsel for Rhay
14 Taylor, the total lodestar well exceeds the total requested amount of attorneys’ fees and costs
15 contemplated by the class action settlement in this matter.

16 **Reimbursement of Costs**

17 6. The Settlement Agreement permits a request for reimbursement of litigating costs.
18 The attached **Exhibit 1** is a true and correct accounting of the total litigation expenses incurred and
19 advanced by our law firm only, totaling **\$6,024.67**, and does not include the modest, but real, expenses
20 that will be incurred by our law firm in the future in this matter. All of these costs have been necessary
21 to the prosecution of this litigating and would normally have been billed to a client paying for
22 counsel’s services on a regular basis. These costs are reasonable.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct to the best of my personal knowledge.

25 Executed on March 4, 2026, in Santa Ana, California.

26 
27 _____
28 Kyle C. Worrell

EXHIBIT 1

PUNGI (CLASS ACTION + PAGA ACTION COSTS)			
CLIENT	DATE	AMOUNT	DESCRIPTION
Andrea Pungi	2024-09-30	\$75.00	LWDA filing fee
Andrea Pungi	2024-10-08	\$1,997.20	Filing fee re Complaint
Andrea Pungi	2024-10-29	\$223.95	Filing fee re Service of Summons on Alter Behavioral Health - Capo Beach
Andrea Pungi	2024-10-29	\$233.95	Filing fee re Service of Summons on Alter Mental Health LLC
Andrea Pungi	2024-10-29	\$223.95	Filing fee re Service of Summons on Altignis Campus LLC
Andrea Pungi	2024-10-29	\$223.95	Filing fee re Service of Summons on Cambridge Mental Health Management
Andrea Pungi	2024-11-14	\$223.95	Filing fee re Service of Summons on Altignis Health, LLC
Andrea Pungi	2024-11-18	\$223.95	Filing fee re Service of Summons on Alter Mental Health - Dana Point
Andrea Pungi	2024-11-18	\$223.95	Filing fee re Service of Summons on Alter Health Group, Inc.
Andrea Pungi	2024-11-18	\$223.95	Filing fee re Service of Summons on Alter Management, LLC
Andrea Pungi	2024-11-18	\$223.95	Filing fee re Service of Summons on Alter Wellness Care LLC
Andrea Pungi	2024-12-04	\$712.20	Filing fee re Complaint
Andrea Pungi	2024-12-06	\$37.52	Fed Ex re printing of Plaintiff's propounded discovery
Andrea Pungi	2024-12-06	\$35.55	Fed Ex postage re Plaintiff's propounded discovery
Andrea Pungi	2024-12-09	\$4.00	LASC fee for retrieval of Notice of CMC & OSC re Proof of Service
Andrea Pungi	2025-02-06	\$59.95	Filing fee re Proofs of Service for all Defendants
Andrea Pungi	2025-02-25	\$7.50	OCSC fee for retrieval of Court's Minutes on 11-5-2024
Andrea Pungi	2025-03-07	\$59.95	Filing fee re Notice of Related Case
Andrea Pungi	2025-03-11	\$86.95	Filing fee re Joint Stipulation and Proposed Order to Continue Case Management Conference
Andrea Pungi	2025-03-19	\$59.95	Filing fee re Plaintiff's Case Management Statement
Andrea Pungi	2025-05-01	\$15.00	OCSC fee for retrieval of Court's Order re Judge Reassignment
Andrea Pungi	2025-05-19	\$59.95	Filing fee re Plaintiff's Case Management Statement
Andrea Pungi	2025-06-09	\$99.95	Filing fee re Notice of Related Case
Andrea Pungi	2025-06-10	\$59.95	Filing fee re Plaintiff's Notice of Court's Orders re CMC
Andrea Pungi	2025-06-11	\$59.95	Filing fee for resubmission of Notice of Related Case
Andrea Pungi	2025-06-18	\$86.95	Filing fee re Joint Stipulation and Proposed Order to Continue Case Management Conference
Andrea Pungi	2025-06-26	\$59.95	Filing fee re Notice of Entry of Order re Continuance of Case Management Conference
Andrea Pungi	2025-06-26	\$2.00	LASC fee for retrieval of Order re Notice of Related Case
Andrea Pungi	2025-07-08	\$59.95	Filing fee re Notice of Entry of Order re Notice of Related Case
Andrea Pungi	2025-10-17	\$59.95	Filing fee re Notice of Remote Appearance re Hearing on Motion for Preliminary Approval of Settlement (Taylor Case)
Andrea Pungi	2025-10-17	\$59.95	Filing fee re Notice of Remote Appearance for All Future Hearings (Taylor Case)
Andrea Pungi	2025-10-17	\$59.95	Filing fee re Declaration of Kyle Worrell ISO Dismissal of Class Claims
Andrea Pungi	2025-10-21	\$59.95	Filing fee re Request for Dismissal
Andrea Pungi	2025-10-23	\$59.95	Filing fee re Notice of Court's Order re Dismissal of Class Claims
Andrea Pungi	2025-10-26	\$59.95	Filing fee re Notice of Entry of Dismissal and Proof of Service
TOTAL		\$6,024.67	
COSTS			