

Kane Moon (SBN 249834)
Allen Feghali (SBN 301080)
S. Phillip Song (SBN 326572)
Stanley J. Park (SBN 334747)
MOON LAW GROUP, PC
725 S. Figueroa St., Suite 3100
Los Angeles, California 90017
Telephone: (213) 232-3128
Facsimile: (213) 232-3125
kmoon@moonlawgroup.com
afeghali@moonlawgroup.com
psong@moonlawgroup.com
spark@moonlawgroup.com

Attorneys for Plaintiff

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

NEGIN BEJGI, individually, and on behalf of
all others similarly situated,

Plaintiff,

vs.

PK MANAGEMENT, LLC, a limited liability
company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 23CV013953

[Honorable Lauri A. Damrell, Dept. 22]

**DECLARATION OF KANE MOON IN
SUPPORT OF PLAINTIFF’S
MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT,
CLASS COUNSEL FEES PAYMENT,
CLASS COUNSEL LITIGATION
EXPENSES PAYMENT, AND CLASS
REPRESENTATIVE SERVICE
PAYMENT**

*[Filed concurrently with Notice of Motion
and Motion for Final Approval;
Declaration of Plaintiff Negin Bejgi;
Declaration of Administrator Lisa Pavlik;
and [Proposed] Order]*

Hearing Date: February 28, 2025
Hearing Time: 9:00 a.m.
Hearing Place: Department 22

Complaint Filed: December 21, 2023
FAC Filed: March 22, 2024

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I, **KANE MOON**, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California and founder of Moon Law Group, PC, attorneys of record for Plaintiff Negin Bejgi (“Plaintiff” or “Class Representative”). The facts set forth in this declaration are within my personal knowledge and if called as a witness, I could and would competently testify as follows.

ADEQUACY OF MOON LAW GROUP, PC

2. I received a B.A. in History in 1998 from UCLA, and my J.D. from Loyola Marymount Law School in 2006. I became an Active Member of the State Bar of California in June 2007 and have been an Active Member in good standing continuously since then. I am a current member of the California Employment Lawyers Association (“CELA”), and I have been selected to Super Lawyers each year from 2019 to 2023.

3. I co-founded Moon & Yang, APC, now known as Moon Law Group, PC, in March 2010. My practice is focused exclusively on advocating for the rights of employees in wage-and-hour litigation, almost entirely in class and representative actions.

4. For the past decade, I have built my practice to have an emphasis on employment and related civil litigation cases and have both prosecuted and defended employment-related litigation cases. I have been heavily, successfully, and continuously involved in active litigation and trial work, and have conducted bench and jury trials on behalf of both employees and employers in wage and hour cases. My current billing rate is \$900.00 per hour.

EXAMPLES OF CLASS ACTION RESULTS

5. I am experienced in prosecuting and defending employment matters, particularly class actions as well as PAGA representative actions. My firm has focused a substantial percentage of its practice on wage, hour, and working conditions violations. In addition to the present case, I am also class counsel for other wage and hour class action lawsuits pending in various counties throughout California, including in state and federal courts. The following is a list of some of our recent class action settlements that have received preliminary and final

approval: *Aparicio v. Lineage Logistics, LLC* (LASC No. BC722764) (class size approx. 155; lead counsel); *Black v. Mission Healthcare Servs., Inc.* (LASC No. 19STCV04602) (class size approx. 1,000; lead counsel); *Campa v. Bloomingdeals, Inc.* (LASC No. BC700366) (class size approx. 1,500; lead counsel); *Garcia v. Comfy U.S.A. Apparel, Inc.* (LASC No. BC709630) (class size approx. 210; lead counsel); *Gomez v. H Mart Cos., Inc.* (LASC No. BC671525) (class size approx. 2,500; co-counsel); *Jones v. Citiguard, Inc.* (LASC No. BC664890) (class size approx. 587; lead counsel); *Jones v. Fitness Alliance, LLC* (Riverside No. PSC1404079) (class size approx. 1,000; lead counsel); *Lagos v. ThyssenKrupp Elevator Corp.* (LASC No. BC682972) (\$750,000 for 79 class members; lead counsel); *Mark Brulee et al. v. DAL Global Servs., LLC* (C.D. Cal. Dec. 20, 2018, No. CV 17-6433 JVS(JCGx)) 2018 WL 6616659, at *10 (class size approx. 2,650; lead counsel) (in approving my \$650 hourly rate in that case, the Court found: “Class Counsel’s declarations show that the attorneys are experienced and successful litigators. Other courts have approved the attorneys’ current rates for the Moon & Yang, APC attorneys”); *Martinez v. Bail Hotline Bail Bonds, Inc.* (LASC No. BC700131) (class size approx. 173; lead counsel); *Montoya v. Golden 1 Credit Union* (Sacramento No. 34-2018-00228252) (class size approx. 1,900; lead counsel); *Onofre v. Caitac Garment Processing, Inc.* (LASC No. BC702283) (class size approx. 750; lead counsel); *Rodriguez v. Rossmoyne, Inc.* (LASC No. BC699137) (class size approx. 220; lead counsel); *Sison v. Cha Hollywood Med. Ctr., L.P.* (LASC No. BC6441 29) (class size approx. 2,100; co-counsel); *Slaughter v. ACA Sec. Stems, LP* (LASC No. BC699137) (class size approx. 300; lead counsel); *Taylor v. Sherman’s Delicatessen & Bakery, LLC* (LASC No. BC722765) (class size approx. 515; lead counsel); *Vargas v. AMS Paving, Inc.* (LASC No. BC722767) (case size approx. 260; lead counsel); *Vertti v. Bagcraft Papercon III, LLC* (LASC No. 19STCV12729) (class size approx. 260; lead counsel); and *Wallick v. Campbell Soup Supply Co., LLC* (San Joaquin No. STK-CV-UOE-2021-0000865) (class size 435; lead counsel).

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6. S. Phillip Song is a Senior Attorney at my office. He received his undergraduate degree in 2006 from the University of Houston, graduating cum laude with a Communications B.A. and minor in Accounting. Mr. Song earned his Juris Doctor degree in 2011 from the University of Houston Law Center. Mr. Song has been admitted to practice law since 2013 (Texas). Mr. Song is presently admitted to practice in all state courts of California (admitted in 2019), and before all federal district courts in California. The focus of Mr. Song's practice is currently on class actions, wage-and-hour law, and employment law. Mr. Song has worked on numerous class action cases and representative actions that have been granted final approval, including *Paez et al. v. C&R Restaurant Group, LP*, Kern County Superior Court, Case No. BCV-18-103181-SDS; *Baker v. Central Coast Home Health, Inc.*, San Luis Obispo County Superior Court, Case No. 17CV-0219; *Martinez v. Community Playgrounds, Inc.*, Solano County Superior Court, Case No. FCS53879; *Duval v. Pacific States Petroleum, Inc.*, Sacramento County Superior Court, Case No. 34-2018-00231934; *Flores v. Wilmar Oils & Fats (Stockton), LLC*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2018-0012758; *Garcia v. Continental Intermodal Group LP dba CIG Logistics*, Kern County Superior Court, Case No. BCV-19-102776; *Tourchette adv. Finelite, Inc.*, Alameda County Superior Court, Case No. RG19022885; *Touch v. Presidio Components, Inc.*, Kern County Superior Court, Case No. BCV-20-101005; *Johnston v. Environmental Logistics, Inc.*, Kern County Superior Court, Case No. BCV-18-100865-DRL; *Lewis v. Environmental Waste Minimization, Inc.*, Kern County Superior Court, Case No. BCV-19-102248-SDS; *Priess v. Fiore Management LLC dba CannDESCENT*, Kern County Superior Court, Case No. BCV-20-100930; *Alcantar v. Bay Equity LLC*, Marin County Superior Court, Case No. CIV1903376; *Spier v. Gibbs International, Inc.*, Kern County Superior Court, Case No. BCV-19-101774-DRL; *Borghi v. Goldco Direct LLC dba Goldco Precious Metals*, Ventura County Superior Court, Case No. 56-2019-00533053-CU-OE-VTA; *Williams v. Aetna, Inc., et al.*, Alameda County Superior Court, Case No. RG19004083; *Singh v. Ryzen*, Alameda County Superior Court, Case No. RG19039158; *Hoshaw v. Sutherland Healthcare*, Los Angeles County Superior Court, Case No. 19STCV33165; *Hart v. Zazzle, Inc.*,

San Mateo County Superior, Court Case No. 20-CIV-01321; *Stacy v. Branded Group, Inc.* Kern County Superior Court, Case No. BCV-21- 100443-BCB; *Angeles v. iKrusher, Inc.*, Los Angeles County Superior Court, Case No. MSC20-01312, *Zuniga v. Central Valley Concrete, Inc.*, Merced County Superior Court, Case No. 20CV-00490; *Gomez v. IHI Power Services Corp.*, Merced County Superior Court, Case No. 20CV-02657; *Martinez v. N.A.F.T.A Distributors*, San Bernardino County Superior Court, Case No. CIVDS1938970; *Bandril v. Plastikon Industries*, Alameda County Superior Court, Case No. RG19038227; *Williams v. National Construction Rentals, Inc.*, Alameda County Superior Court, Case No. RG20075904; *Pho v. Kruger Foods, Inc.*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2020-0002099; *Collins v. Mobile Medical Examination Services, LLC dba MEDXM*, Orange County Superior Court, Case No. 30-2020-01130693-CU-OE-CXC; *McNeil v. Kik International, LLC, et al.*, San Bernardino County Superior Court, Case No. CIVDS1915438 (Consolidated with Case No. CIVDS2023661); *Weber v. Sunrise Medical (US) LLC*, Merced County Superior Court, Case No. 20CV-01461 (Consolidated with Case No. 20CV-01707); *Flores v. Rivermaid Trading Company*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2020-0008623; *Guzman v. Bentley Mills, Inc.*, Los Angeles County Superior Court, Case No. 20PSCV00789; and *Ferrara v. South Coast Winery, Inc.*, Riverside County Superior Court, Case No. CVRI2101920 (Consolidated with Case Nos. CVRI2102449 and MCC2001498). Mr. Song is currently handling multiple class action and PAGA matters. Mr. Song’s current billing rate is \$650.00.

7. Stanley J. Park graduated from the University of California at Los Angeles in 2008 with a Bachelor of Arts in English. Mr. Park attended Southwestern Law School and graduated in 2017. Mr. Park was admitted to the California State Bar as an attorney in January 2021. Mr. Park began practicing Plaintiff-side wage and hour class and representative actions in April 2023 and joined Moon Law Group, PC in January 2024. Mr. Park has served as a handling attorney on the following matters that successfully settled and are in the process of obtaining or have obtained preliminary or final approval: *Wyatt-Williams v. Exceptional Children’s*

1 *Foundation*, Los Angeles County Superior Court Case No. 22STCV34952; *Stanley v. Orchard*
2 *Post Acute*, Fresno County Superior Court Case No. 23CECG01075; *Hearrell v. D.G. Smith*
3 *Enterprises, Inc.*, Sacramento County Case No. 34-2021-00306690; *Quintero v. Kan Can USA,*
4 *Inc.*, Los Angeles County Case No. 23STCV06932; *Trejo v. Lencioni Farm Services, Inc.*, Kern
5 County Superior Court Case No. BCV-21-101136; *Bejgi v. PK Management, LLC*, Sacramento
6 County Case No. 23CV013953; *Chavez v. RBA Builders, Inc.*, Orange County Superior Court
7 Case No. 30-2022-01259829-CU-OE-CXC; *Garcia v. Richard Lopez Construction, Inc.*,
8 Riverside County Superior Court Case No. CVRI2301590; *Vazquez v. TSC Auto ID Technology*
9 *America, Inc.*, Orange County Superior Court Case No. 30-2023-01316485-CU-OE-CXC;
10 *Villasenor v. J.P. Lamborn Co.*, Fresno County Superior Court Case No. 22CECG02065; *Garcia*
11 *v. United Payment Center, Inc.*, Los Angeles County Superior Court Case No. 23STCV13141;
12 *Rocha v. Peahi Bay, LLC*, Stanislaus County Superior Court Case No. CV-24-001444;
13 *Fernandez v. DigitalPro, Inc.*, San Diego County Superior Court Case No. 37-2023-00055446-
14 CU-OE-CTL; *Robinson v. Behavioral Learning Network, LLC*, Los Angeles County Superior
15 Court Case No. 23STCV31856; *Ruiz v. Bright Sky Home Health Care*, San Bernardino County
16 Case No. CIVSB2217911. Mr. Park's current billing rate is \$450.00.

17 8. As demonstrated by the foregoing, my office is qualified to handle this litigation
18 because we are experienced in litigating Labor Code and Wage Order violations in individual,
19 class, and representative actions. The attorneys at my office have been appointed as lead or co-
20 lead counsel in numerous wage and hour class and/or PAGA actions in state and federal courts
21 by way of motion for settlement approval. Including myself, Moon Law Group, PC is comprised
22 of thirty attorneys, all of whom are actively and continuously practicing employment litigation,
23 representing almost entirely employee-plaintiffs, in both individual and class and/or PAGA
24 actions, in this Superior Court and other Superior Courts throughout the State, in the Courts of
25 Appeal, and in various federal courts. The attorneys at my firm have a high level of knowledge
26 and experience in areas of wage and hour class and PAGA actions, and labor and employment
27 law generally.

1 9. Moon Law Group, PC has been engaged in the practice of employment and labor
2 law for over a decade, and presently focuses exclusively on plaintiffs' employment law. The firm
3 and its lawyers have tried both bench and jury trials (representing both plaintiffs and defendants)
4 relating to employment matters. As noted above, Moon Law Group, PC has been appointed lead
5 or co-lead class counsel in federal and state courts in California. Also, the firm and its lawyers
6 have successfully settled hundreds of cases during that time, including wage and hour class
7 and/or PAGA actions.

8 10. The foregoing experience of myself and other attorneys of Moon Law Group, PC
9 is helpful in assessing the reasonableness of settlements, such as the one at issue here, and from
10 this experience Plaintiff's Counsel concluded that this litigation could not have been settled on
11 better terms than provided under the proposed Settlement Agreement.

12 11. I do not believe that I or any other attorneys of Moon Law Group, PC have any
13 conflicts of interest with the named Plaintiff, other Class Members, or the proposed
14 Administrator. I am not related to Plaintiff. I respectfully submit that Moon Law Group, PC is
15 competent and well suited to act as Counsel in this action, and we have and will continue to
16 vigorously represent Class interests.

17 12. A true and correct copy of the Summary of Costs is attached hereto as **Exhibit 1**.

18 13. As of the date of this filing, I have devoted 28.4 hours to this case, which includes
19 the time I anticipate spending for the remainder of the litigation. My hourly rate is \$900. Based
20 on my hourly rate and hours expended, my fee is \$25,560.00, which is reasonable and necessary
21 to the successful litigation of this matter. The following is a summary of my tasks and activities I
22 performed: (a) performing pre-filing investigation; (b) communicating with Plaintiff on several
23 occasions; (b) helping with locating and communicating with several putative class members to
24 corroborate the allegations; (c) researching and investigating California's evolving wage-and-
25 hour laws regarding compensation, overtime, meal and rest breaks, itemized wage statements,
26 waiting time penalties, and California's Unfair Competition Law; (d) investigating PK
27 Management, LLC's ("Defendant") pay-structures, procedures, and policies; (e) helping with
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1 drafting and filing various pleadings; (f) participating in numerous conferences with Defendant's
2 counsel regarding a variety of issues throughout the litigation, mediation, and settlement process;
3 (g) analyzing records produced by Defendant relating to its policies, pay-structures, and
4 timekeeping; (h) assisting with drafting a mediation brief, mediation damage, and exposure
5 model; (i) preparing for and attending a full day of mediation and engaging in several negotiation
6 sessions; (j) analyzing records produced by Plaintiff and Class Members; (k) reviewing,
7 negotiating, and revising the Class Action and PAGA Settlement Agreement and Class Notice
8 ("Settlement Agreement," "Settlement," or "Agreement") and Notice of Proposed Class Action
9 Settlement (collectively, the "Class Notice"); (l) engaging in several discussions with the
10 Administrator regarding its duties; (m) helping with reviewing and editing the preliminary
11 approval motion; (n) reviewing, revising, and proofing the Class Notice from the Administrator;
12 (o) looking over the weekly status reports sent by the Administrator; (p) reviewing and updating
13 the Administrator's declaration; (q) drafting, redrafting, and finalizing the final approval motion;
14 and (r) appearing at the preliminary and final approval hearings.

15 14. As of the date of this filing, S. Phillip Song devoted 25.6 hours to this case. Mr.
16 Song's hourly rate is \$650.00. Based on Mr. Song's hourly rate and hours expended, his fee is
17 \$16,640.00, which is reasonable and necessary for the successful litigation of this matter. The
18 following is a summary of Mr. Song's tasks and activities performed: (a) analyzing records
19 produced by Defendant relating to its policies, pay-structures, and time-keeping; (b) assisting
20 with analyzing records produced by Plaintiff and Class Members; (c) helping with drafting
21 notice letters sent to the California Labor and Workforce Development Agency ("LWDA") and
22 Defendant; (d) participating in several conferences with Defendant's counsel regarding variety of
23 issues throughout the litigation, mediation, and settlement process; (e) engaging in numerous
24 interoffice discussions regarding documents produced; (f) engaging in several interoffice
25 discussions about case theories and case plan; (g) locating and communicating with several
26 putative class members to gather support for the allegations; (h) requesting Class Members'
27 records from Defendant for further review and analysis in preparation for mediation; (i) assisting
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1 with reviewing Defendant's answers to the operative complaints; (j) preparing for and attending
2 a full day of mediation and engaging in several negotiation sessions; (k) aiding with reviewing,
3 updating, and proofing the Settlement Agreement and Class Notices; (l) assisting with reviewing
4 and editing the preliminary approval motion; (m) looking over the weekly status reports sent by
5 the Administrator; and (n) helping with reviewing and editing the final approval motion.

6 15. As of the date of this filing, Stanley J. Park devoted 21.3 hours to this case. Mr.
7 Park's hourly rate is \$450.00. Based on Mr. Park's hourly rate and hours expended, his fee is
8 \$9,585.00, which is reasonable and necessary for the successful litigation of this matter. The
9 following is a summary of Mr. Park's tasks and activities performed: (a) communicating with
10 Plaintiff multiple times; (b) engaging in various interoffice discussions regarding documents
11 produced and gathered; (c) reviewing data production; (d) preparing for and attending mediation;
12 (e) assisting with reviewing and editing the preliminary approval motion; (f) appearing at the
13 preliminary approval hearing; (g) looking over the weekly status reports sent by the
14 Administrator; (h) working with the Administrator and Defendant's Counsel throughout the
15 Class Notice process to resolve any issues; (i) helping with drafting and editing the final
16 approval motion; and (j) preparing for and appearing at the final approval hearing.

17 16. Class Counsel apply for Class Counsel Fees Payment of \$35,000.00 (33 1/3% of
18 the Gross Settlement Amount) and Class Counsel Litigation Expenses Payment of \$11,000.00.
19 The Class Counsel Fees Payment is in line with awards in similar cases in California and
20 nationwide and demonstrates the attorneys' fees requested is consistent with market rates and is
21 reasonable. Class Counsel have been routinely awarded a thirty-five percent (33 1/3%) fee
22 request or more in similar class and representative actions throughout California. (See *Mark*
23 *Brulee, et al. v. DAL Global Services, LLC* (C.D. Cal. Dec. 20,2018) No. CV 17-6433 JVS(JCGx),
24 2018 WL 6616659 (class size approx. 2,650; lead counsel) (In approving my \$650 hourly rate, the
25 Court found: "Class Counsel's declarations show that the attorneys are experienced and successful
26 litigators. Other courts have approved the attorneys' current rates for the Moon & Yang, APC
27 attorneys." (*Id.* at *10.); *Sison v. Cha Hollywood Medical Center, L.P.*, LASC BC6441 29 (class
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size approx. 2,100; co-counsel); *Jones v. Fitness Alliance, LLC*, Riverside Superior Court PSC1404079 (class size approx. 1,000; lead counsel); *Gomez v. H Mart Companies, Inc.*, LASC BC671525 (class size approx. 2,500; co-counsel); *Montoya v. Golden 1 Credit Union*, Sacramento Superior Court 34-2018-00228252 (class size approx. 1,900; lead counsel); *Campa v. Bloomingdeals, Inc.*, LASC BC700366 (class size approx. 1,500; lead counsel); *Black v. Mission Healthcare Services, Inc.*, LASC 19STCV04602 (class size approx. 1,000; lead counsel); *Onofre v. Caitac Garment Processing, Inc.*, LASC BC702283 (class size approx. 750; lead counsel); *Martinez v. Bail Hotline Bail Bonds, Inc.*, LASC BC700131 (class size approx. 173; lead counsel); *Jones v. Citiguard, Inc.*, LASC BC664890 (class size approx. 587; lead counsel); *Slaughter v. ACA Security Stems, LP*, LASC BC699137 (class size approx. 300; lead counsel); *Taylor v. Sherman's Delicatessen & Bakery, LLC*, LASC BC722765 (class size approx. 515; lead counsel); *Vertti v. Bagcraft Papercon III, LLC*, LASC 19STCV12729 (class size approx. 260; lead counsel); *Rodriguez v. Rossmoyne, Inc.*, LASC BC699137 (class size approx. 220; lead counsel); *Vargas v. AMS Paving, Inc.*, LASC BC722767 (case size approx. 260; lead counsel); *Garcia v. Comfy U.S.A. Apparel, Inc.*, LASC BC709630 (class size approx. 210; lead counsel); *Lagos v. ThyssenKrupp Elevator Corporation*, LASC BC682972 (\$750,000 for 79 Class Members; lead counsel); *Aparicio v. Lineage Logistics, LLC*, LASC BC722764 (class size approx. 155; lead counsel). This experience is and has been invaluable in assessing the reasonableness of settlements such as the one at issue here. From this experience, our firm, as Class Counsel, concluded that this lawsuit could not have been settled on terms better than those under the present Settlement.

17. Class Counsel worked 75.3 hours on this matter. Class Counsel also calculated the base lodestar fees on those hours at \$51,785.00. These hourly rates are commensurate with our individual backgrounds, background of our firm, and our training and experience in litigating representative matters. All the work and tasks performed by Class Counsel were reasonable and necessary to the prosecution of this case and are reflected in the result achieved.

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Attorney	Hours	Rate	Lodestar
Kane Moon	28.4	\$900.00	\$25,560.00
S. Phillip Song	25.6	\$650.00	\$16,640.00
Stanley J. Park	21.3	\$450.00	\$9,585.00
Total:	75.3 hours		\$51,785.00

18. When the base lodestar fees calculation is cross-checked with the Class Counsel Fees Payment, it results in a negative multiplier of 1.47. Class Counsel displayed skill in resolving this litigation as opposed to protracted litigation that could have lasted for several more months or years. Class Counsel accepted this case on a contingent-fee basis, risked no payment, and were required to advance all costs. By taking on this matter, Class Counsel had to forego other cases.

19. The contingent-fee agreement entered by Plaintiff and Class Counsel also authorizes a percentage fee award of at least thirty-three and one-third (33 1/3%). Thus, Class Counsel believe the percentage of the funds requested is reasonable and fair.

20. Class Counsel's hourly rates are between \$450 and \$900 and are in line with rates typically approved in wage-and-hour class action litigation. Furthermore, Class Counsel's rates have been approved by courts throughout California, such as Los Angeles County, Sacramento County, Alameda County, Orange County, Kern County, San Bernardino County, San Diego County, and Riverside County Superior Courts.

21. This case involves all current and former hourly-paid or non-exempt employees who were employed by Defendant within the State of California at any time during the period from December 19, 2019 to July 17, 2024 ("Class," "Class Members," and "Class Period").

22. On December 16, 2023, Plaintiff provided written notice to the LWDA and Defendant. On December 21, 2023, Plaintiff filed a wage and-hour class action lawsuit in the Superior Court of California, County of Sacramento, alleging eight (8) causes of action. On

1 March 22, 2024, Plaintiff filed an amended her Complaint adding an additional cause of action
2 pursuant to Labor Code section 2698, *et seq.* (Private Attorneys General Act of 2004
3 (“PAGA”)).

4 23. The Parties engaged in discovery, investigations, and negotiations. Defendant
5 produced a large volume of documents pursuant to discovery (*i.e.*, personnel records, employee
6 handbooks, policy documents, relevant email correspondence, sampling of time and pay records,
7 etc.). These documents related to Defendant’s policies, practices, and procedures regarding
8 reimbursement of business expenses, paying non-exempt employees for all hours worked, meal
9 and rest breaks, and payroll and operational policies. Class Counsel also reviewed time records,
10 pay records, and information relating to the size and scope of the Class, as well as data
11 permitting Class Counsel to understand the number of workweeks and pay periods within the
12 Class Period.

13 24. Following a successful mediation, the Parties drafted the terms of the long-form
14 agreement memorialized in the Settlement Agreement that the Court preliminarily approved on
15 October 3, 2024. The Parties now seek final approval of the Settlement Agreement.

16 **CLASS REPRESENTATIVE SERVICE PAYMENT**

17 25. The Settlement provides for the Class Representative Service Payment of
18 \$7,500.00 for the time and effort serving as the Class Representative. Plaintiff spent
19 approximately 25 hours assisting with prosecution of the case, including but not limited to
20 producing relevant documents and past employment records, as well as providing the facts and
21 evidence necessary to prove the allegations (*i.e.*, description of work experience and work
22 environment). Plaintiff was accessible whenever needed by Class Counsel and actively tried to
23 obtain and provide as much information as possible to benefit the Class (*i.e.*, giving the names
24 and contact information of putative Class Members, discussing applicable legal theories,
25 gathering information from putative Class Members). Plaintiff even assisted Class Counsel with
26 reviewing the documents provided by Defendant, developing a strategy to obtain additional
27 documents, determining the importance of the documents produced, discussing the relative
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1 strengths of the allegations, and reviewing the operative complaints, Defendant's answer to the
2 operative complaint, and formal discovery requests. Furthermore, Plaintiff prepared for and
3 made herself available to provide her input on the negotiations and reviewed and approved the
4 Settlement Agreement (and exhibits). Plaintiff was also made aware of and accepted the risks
5 and sacrifices associated with serving as the Class Representative (*i.e.*, providing a broader
6 release, risking an adverse judgment for attorneys' fees and costs). Overall, Plaintiff's
7 contributions were instrumental to the eventual settlement of this matter. Thus, it is appropriate
8 and just for Plaintiff to receive the Class Representative Service Payment, in addition to the
9 Individual Settlement Payment, for the services on behalf of the Class.

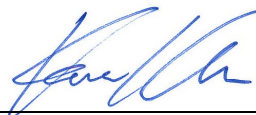
10 **CLASS COUNSEL LITIGATION EXPENSES INCURRED**

11 **BY MOON LAW GROUP, PC**

12 26. The Settlement Agreement allows up to \$11,000.00 for the reimbursement of
13 Class Counsel Litigation Expenses Payment. Class Counsel incurred \$11,997.55 in litigation
14 costs and expenses as reflected in **Exhibit 1**. These costs were all reasonable and necessary for
15 the prosecution of this case, and the results achieved are fair, reasonable, and unopposed.

16 27. I submit the Settlement reached herein is fair, reasonable, and adequate. The
17 Settlement is in the best interest of Plaintiff and other Class Members.

18 I declare that under the penalty of perjury under the laws of California the foregoing is
19 true and correct. Executed on February 4, 2025 at Los Angeles, California.

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21 _____
22 Kane Moon
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EXHIBIT 1

Activities Export

02/04/2025

11:29 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/30/2024	\$	One Legal - Decl ● Unbilled	02244-Bejgi Bejgi v. PK Management, LLC (ED)	Support Account	1.00	\$16.74	-	\$16.74
09/05/2024	\$	One Legal - CMS ● Unbilled	02244-Bejgi Bejgi v. PK Management, LLC (ED)	Support Account	1.00	\$16.69	-	\$16.69
08/20/2024	\$	Journal - MPA ● Unbilled	02244-Bejgi Bejgi v. PK Management, LLC (ED)	Support Account	1.00	\$71.10	-	\$71.10
06/05/2024	\$	Journal ● Unbilled	02244-Bejgi Bejgi v. PK Management, LLC (ED)	Support Account	1.00	\$5.95	-	\$5.95
04/24/2024	\$	Berger Consulting Group ● Unbilled	02244-Bejgi Bejgi v. PK Management, LLC (ED)	Andrea Marin	7.80	\$500.00	-	\$3,900.00
03/22/2024	\$	Journal Sacramento Superior Court ● Unbilled	02244-Bejgi Bejgi v. PK Management, LLC (ED)	Andrea Marin	1.00	\$5.95	-	\$5.95
03/06/2024	\$	Kevin T Barnes Mediation Paid from MLG Wire # ● Unbilled	02244-Bejgi Bejgi v. PK Management, LLC (ED)	Andrea Marin	1.00	\$6,250.00	-	\$6,250.00
02/09/2024	\$	Ace ● Unbilled	02244-Bejgi Bejgi v. PK Management, LLC (ED)	Andrea Marin	1.00	\$44.25	-	\$44.25
02/06/2024	\$	One Legal ● Unbilled	02244-Bejgi Bejgi v. PK Management, LLC (ED)	Andrea Marin	1.00	\$16.12	-	\$16.12
							\$0.00 0.00h	\$11,997.55 0.00h

Activities Export

02/04/2025
11:29 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/23/2024	\$	Ace ● Unbilled	02244-Bejgi Bejgi v. PK Management, LLC (ED)	Andrea Marin	1.00	\$85.25	-	\$85.25
01/10/2024	\$	Ace ● Unbilled	02244-Bejgi Bejgi v. PK Management, LLC (ED)	Andrea Marin	1.00	\$1,585.50	-	\$1,585.50
							\$0.00 0.00h	\$11,997.55 0.00h