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12 Attorneys for Plaintiff DONALD CLEVINGER
13 on behalf of the State of California and all Aggrieved Employees

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **COUNTY OF SAN DIEGO**

16 YADIRA RODRIGUEZ ROMAN and
17 DONALD CLEVINGER, on behalf of the
18 State of California and all Aggrieved
19 Employees,

20 Plaintiffs,

21 v.

22 TC CALIFORNIA HOSPITALITY LLC, a
23 California Limited Liability Company; and
24 DOES 1-50, inclusive,

25 Defendants.

Case No.: 37-2024-00010785-CU-OE-CTL

[Assigned for all purposes to Hon. Richard S.
Whitney, Department C-68]

**CLASS AND PAGA REPRESENTATIVE
ACTION**

**DECLARATION OF RAYMOND
WENDELL**

Date: January 9, 2026

Time: 10:30 a.m.

Dept.: C-68

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I, RAYMOND WENDELL, declare as follows:

1. I am an attorney duly licensed to practice law in this Court and a member in good standing of the State Bar of California. I am a partner at Crosner Legal, PC and counsel for Plaintiff Donald Clevenger in the above-captioned matter. I have personal knowledge of the matters stated in this declaration and, if called upon, I could and would testify competently to them. I submit this declaration in support of Plaintiffs' motion for final approval of class and representative action settlement and request for an award of attorneys' fees and costs.

2. Plaintiffs' request for attorneys' fees is supported by Class Counsel's lodestar for work on this case, which exceeds the requested award and is based on reasonable hours and rates.

3. I am a partner at Crosner Legal, and my practice focuses primarily on representing employees in class and representative wage and hour actions. Prior to joining Crosner Legal, I was a partner at the law firm of Goldstein, Borgen, Dardarian & Ho (now called Dardarian, Ho, Kan & Lee) in Oakland, California, where I spent ten years representing plaintiffs in large employment, consumer, and disability class actions. From 2013 to 2014, I clerked for the Honorable Marilyn L. Huff in the Southern District of California. I am a 2013 cum laude graduate of Harvard Law School, where I was an editor of the Harvard Law Review and was recognized for excellence in research and writing. I have been selected by LawDragon as one of the 500 leading civil rights and plaintiff employment lawyers nationwide every year since 2023.

4. I have secured multimillion-dollar settlements on behalf of plaintiff classes including truck drivers, airline passengers, and people with mobility disabilities. My notable settlements include:

a. *Ayala v. U.S. Xpress Ents., Inc.* (C.D. Cal.): \$4.69 million wage and hour settlement on behalf of truck drivers reached after three days of a jury trial.

b. *Reni v. REACH Air Medical* (Alameda Super.): \$15 million settlement on behalf of flight nurses, flight paramedics, and pilots for overtime, off-the-clock time, and failure to provide meal and rest periods.

1 c. *Muehe v. City of Boston* (D. Mass.): Injunctive relief settlement on behalf of
2 people with mobility disabilities that requires Boston to install ADA-compliant
3 curb ramps at every intersection.

4 d. *Bazerman v. American Airlines* (D. Mass.): Settlement on behalf of a class
5 of airline passengers resulted in over \$7 million in refunded checked bag fees.

6 5. Brandon Brouillette is a 2009 graduate of Loyola Law School, Los Angeles. Prior
7 to attending law school, he attended the University of Southern California and received a
8 bachelors of science in Business Administration in 2006. He has been a Partner at Crosner Legal
9 since February 1, 2023. Prior to joining Crosner Legal, he was a Senior Associate and Team
10 Director of a Wage and Hour Litigation Team at Capstone Law APC, which he originally joined
11 as an associate attorney in May 2016. Since being admitted to the California State Bar in 2010,
12 his entire legal career has been dedicated to protecting employee and consumer rights through the
13 prosecution of class action and representative actions filed on behalf of plaintiffs in class actions
14 and statewide representative actions. He has managed or co-managed more than 100 class action
15 and PAGA representative cases, from initial filing of the complaint through final resolution. He
16 also was selected as a Super Lawyers 'Rising Star' every year from 2016 through 2022.

17 6. Zach Crosner is a 2010 graduate of University San Diego School of Law, and has
18 some 14 years of experience as a practicing attorney, all of which have focused on litigation of
19 employment, labor law, consumer, and class action claims. Following graduation, he immediately
20 began working for a nationally recognized plaintiff's complex litigation firm, CaseyGerry, where
21 he had the fortune of working directly with past presidents of the consumer attorneys and
22 recipients of trial attorneys of the year awards. He also worked for former CAALA and CLAY
23 trial attorney of the year recipient, attorney Conal Doyle, as his sole associate attorney. During his
24 tenure at these firms, he focused on advocating for the rights of consumers and employees in class
25 action litigation, civil rights and employment litigation, catastrophic injuries, insurance bad faith
26 and appellate litigation.

27 7. In 2013, Mr. Crosner founded the law firm of Crosner Legal, P.C. which since its
28 inception has focused almost exclusively on wage and hour class actions and other labor and

1 employment law cases representing plaintiffs. Currently, over ninety percent (90%) of his practice
2 is dedicated exclusively to the prosecution of wage and hour class actions, and Crosner Legal is
3 currently responsible as lead counsel or co-lead counsel for prosecuting well over fifty (50) wage
4 and hour class actions and/or PAGA representative actions in both federal and state courts
5 throughout California.

6 8. Branden Hamilton obtained her undergraduate degree from UCLA in 2004, and her
7 law degree from George Washington University in 2007. She has been affiliated with my firm
8 since 2017 and became Of Counsel with Crosner Legal in 2019, and her practice focuses almost
9 exclusively on wage and hour class and representative actions. She has spent her entire career
10 representing plaintiffs in employment litigation, including several years as an associate at well-
11 known plaintiff's firm Carlin & Buchsbaum.

12 9. Based upon the qualifications and experience set forth above, I believe the
13 following hourly rates are reasonable: Zach Crosner \$850/hour; Raymond Wendell and Brandon
14 Brouillette \$800/hour, Branden Hamilton \$650/hour.

15 10. I request the Court apply the above hourly billing rates in this case, as it reasonable
16 in the California legal market for attorneys handling wage and hour class and PAGA actions. I
17 have personal knowledge of the hourly rates charged by a number of plaintiff-side wage and hour
18 class action firms in major California legal markets for partner-level attorneys with experience
19 comparable to mine. These rates have ranged from \$750 to \$900 per hour for calendar years
20 2018-2023. Some examples include attorney Ron Makarem of Makarem & Associates in Los
21 Angeles, with 28 years of experience, \$900/hour (2023), Matthew Matern of Matern Law Group
22 in Los Angeles, with approximately 26 years of experience \$850/hour (2018); Craig Ackermann
23 of Ackermann & Tilajef, PC in Los Angeles with approximately 25 years of experience \$850/hour
24 (2021), Michael Singer and Isam Khoury of Cohelan Khoury & Singer in San Diego, 35 years and
25 45 years of experience respectively, both \$825/hour (2018), and James Kawahito of Kawahito
26 Law Group in Los Angeles, with approximately 16 years of experience \$750/hour (2020).

27 11. The requested rates also comport with the adjusted Laffey Matrix, which provides
28 that reasonable hourly rates for attorneys with 10+ years of experience, such as myself, Mr.

1 Brouillette, and Mr. Crosner all are well over \$800/hour. The adjusted Laffey Matrix may be
2 found at <http://www.laffeymatrix.com/see.html>.

3 12. Crosner Legal expended a total of 105 attorney hours on this matter, and
4 accordingly the firm's lodestar totals approximately **\$81,570**, excluding time to be incurred at the
5 hearing on this motion and thereafter to implement and administer the settlement. Crosner Legal's
6 lodestar is summarized in Exhibit A hereto.

7 13. I also request reimbursement of Crosner Legal's actual out-of-pocket expenses
8 incurred to prosecute this action. These expenses were incidental and necessary to the effective
9 representation of Plaintiffs and the Class.

10 14. Crosner Legal's costs are **\$8,939.21**, including court filing/service of process fees,
11 mediation fees, and postage. The requested costs do not include any printing or research charges.
12 A true and correct itemization of the costs and expenses incurred is attached hereto as Exhibit B.

13 15. For the foregoing reasons, it is respectfully requested that the Court approve the
14 settlement in its entirety and grant Plaintiffs' request for an award of attorneys' fees and costs.

15
16 I declare under penalty of perjury under the laws of California that the foregoing is true
17 and correct. Executed on December 5, 2025, at San Pablo, California.

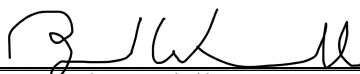
18
19 
20 Raymond Wendell

Exhibit A

Donald Clevenger v. TC California Hospitality LLC
Crosner Legal Time Report

Tasks	Zachary Crosner	Brandon Brouillette	Raymond Wendell	Branden Hamilton
Pre-filing Case Investigation	3.1	0	0	5.8
Pleadings and Law and Motion	4.4	1.3	9.7	11.7
Discovery and Post-Filing Investigation	1.5	2.2	8.5	0
Court Appearances	0	0	2.3	0
Case Management; Litigation Strategy & Analysis	5.8	5.6	12.6	0
Mediation and Settlement	5.1	5.2	20.2	0
Total Hours	19.9	14.3	53.3	17.5
Hourly Rate	\$850	\$800	\$800	\$650
Lodestar	\$16,915	\$11,440	\$41,840	\$11,375

Total Hours: 105

Total Lodestar: \$81,570

Exhibit B

Matter	Expense Detail	Expense Amount	Expense Date
Clevenger v. TC California	Postage and Delivery Fees (Letterstream)	\$6.78	6/5/2024
Clevenger v. TC California	PAGA Notice Filing Fee (LWDA)	\$75.00	6/7/2024
Clevenger v. TC California	Postage and Delivery Fees (Letterstream)	\$41.58	6/7/2024
Clevenger v. TC California	First Legal Fees	\$1,507.35	6/12/2024
Clevenger v. TC California	First Legal Fees	\$60.05	6/13/2024
Clevenger v. TC California	First Legal Fees	\$99.80	6/13/2024
Clevenger v. TC California	First Legal Fees	\$14.95	6/17/2024
Clevenger v. TC California	First Legal Fees	\$1,508.10	8/22/2024
Clevenger v. TC California	First Legal Fees	\$15.70	9/3/2024
Clevenger v. TC California	First Legal Fees	\$15.70	9/4/2024
Clevenger v. TC California	Copies (of Court Documents)☐	\$8.20	9/16/2024
Clevenger v. TC California	First Legal Fees	\$119.80	9/17/2024
Clevenger v. TC California	First Legal Fees	\$80.05	9/17/2024
Clevenger v. TC California	First Legal Fees	\$15.70	9/18/2024
Clevenger v. TC California	First Legal Fees	\$15.70	9/20/2024
Clevenger v. TC California	First Legal Fees	\$87.00	9/20/2024
Clevenger v. TC California	First Legal Fees	\$47.25	9/20/2024
Clevenger v. TC California	Copies (of Court Documents)☐	\$21.40	10/24/2024
Clevenger v. TC California	First Legal Fees	\$12.95	10/31/2024
Clevenger v. TC California	First Legal Fees	\$15.70	10/31/2024
Clevenger v. TC California	First Legal Fees	\$16.70	1/23/2025
Clevenger v. TC California	Mediation Fee	\$5,000.00	2/12/2025
Clevenger v. TC California	First Legal Fees	\$18.90	7/10/2025
Clevenger v. TC California	First Legal Fees	\$97.05	7/10/2025
Clevenger v. TC California	First Legal Fees	\$18.90	7/15/2025
Clevenger v. TC California	First Legal Fees	\$18.90	7/15/2025
	TOTAL	\$8,939.21	

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 535 N Brand Blvd. Suite 285, Glendale, California 91203.

6 On the date indicated below, I served the document described as: **DECLARATION OF**
7 **RAYMOND WENDELL** on the interested parties in this action by sending a true copy thereof to interested parties as follows and as stated on the attached service list:

8 Claudia Kozłowska
9 Claudia.Kozłowska@jacksonlewis.com

10 Mia Faber
11 mia.farber@jacksonlewis.com

12 Adam Y Siegel
13 adam.siegel@jacksonlewis.com

14 Klodya Casas
15 Klodya.Casas@jacksonlewis.com

16 Stephanie Klinko
17 Stephanie.Klinko@jacksonlewis.com

18 Ruth Perez-Pico
19 Ruth.Perez-Pico@jacksonlewis.com

20 **JACKSON LEWIS P.C.**
21 225 Broadway, Suite 1800
22 San Diego, CA 92101
23 Direct: (619) 881 4484
24 Main: (619) 573 4900

25 *Attorneys for Defendant TC CALIFORNIA HOSPITALITY LLC*

26 [✓] **BY E-MAIL:** I hereby certify that this document was served from Glendale, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

27 [✓] **BY ELECTRONIC SERVICE:** Based on an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via electronic mail. I did not receive an error message.

28 I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 11, 2025, at Glendale, California.

Natalia Zevallos

Name



Signature