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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

JOSE CHAVEZ, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

EQUIPMENT DEPOT CALIFORNIA, INC.,
a Delaware Corporation; and DOES 1 through
20, inclusive;

Defendants.

Case No.: CVRI2403491
*[Assigned to Hon. Harold Hopp, Dept 1, for
all purposes]*

**DECLARATION OF KRISTINA BUI
CARLSON, ESQ., IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

I, Kristina Bui Carlson, state and declare:

1. I am an attorney duly licensed to practice law in the State of California and am an Associate at Lauby, Mankin & Lauby LLP, attorneys for Plaintiff in the above-entitled action. I am fully familiar with the facts of this case. The matters set forth herein are based upon my personal knowledge. I submit this declaration in support of Plaintiff's Motion for Final Approval of this Class Action Settlement and, if called upon as a witness, I could and would give competent testimony with respect to the matters contained herein.

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1 **QUALIFICATION OF COUNSEL**

2 2. I graduated from the University of Oregon School of Law in May 2013 and have
3 been a member, in good standing, of the State Bar of California since December 2013. I am
4 licensed to practice before all courts of the State of California and am admitted to practice in the
5 United States District Court for the Central District of California and have litigated cases in
6 various courts and counties throughout California, including the Court of Appeal.

7 3. I began working at Fernandez & Lauby LLP (the predecessor of Lauby, Mankin
8 & Lauby LLP) in September 2015 and, my current practice consists solely of representing
9 employees. All of my current cases have been litigated as class actions, representative PAGA
10 actions, or a combination of the two.

11 4. I have been the handling attorney on nearly two dozen class action and/or
12 representative PAGA actions. And, on these cases, myself and/or my firm have been appointed
13 Class Counsel and have helped negotiate settlements totaling millions of dollars for our clients,
14 the employees, and the State of California.

15 5. I have yet to be involved in a contested class certification motion or trial
16 involving class claims as I have successfully resolved majority of my cases prior to a contested
17 motion for class certification.

18 **HOURS INCURRED**

19 6. I have spent 152.60 hours working on this matter and have kept contemporaneous
20 records of these billable hours. My time spent on this case reflects the time spent for tasks, such
21 as in-dept research into Defendant's corporate entity; docket searches to identify any pending or
22 related cases; drafting of the LWDA letter setting forth facts and claims on behalf of the
23 Aggrieved Employees; reviewing and analyzing the case file and all documents; legal research
24 into issues unique to this matter based on the facts presented by Plaintiff; meetings and
25 conference calls to discuss viability of claims and impacts of new information learned during
26 course of litigation; drafting of the original and later the first amended complaint; drafting and
27 revising various pleadings; review, evaluation, and analysis of thousands of pages of data and
28 documents produced by Defendant prior to mediation; drafting of settlement documents; drafting

1 of the motion for preliminary approval and class notice documents; additional post-settlement
2 work on various documents; and the review and editing of preliminary and final approval
3 documents

4 **HOURLY RATE**

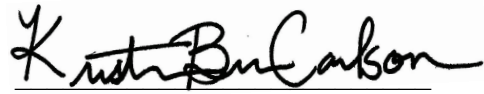
5 7. My billing rate is \$725 per hour, and this rate is usual and customary for class
6 action and/or PAGA practitioners with my level of expertise and experience.

7 8. This rate is consistent with Plaintiff and Defense attorneys who handle complex
8 class action litigation, if not somewhat lower. For instance, the Wolters Kluwer 2023 Real Rate
9 Report (“Real Rate Report”) states that the upper quartile rates for associates in Los Angeles is
10 \$880 per hour. The Real Rate Report also notes that the upper quartile rates for associates with 7
11 or more years of experience is \$888 per hour. Being that I have been in practice for over 10
12 years, my experience falls squarely within the confines of that range, at a rate lower than those in
13 the Real Rate Report.

14 9. Importantly, the Real Rate Report data is not based on self-reported numbers,
15 surveys, or sampling – instead, these figures are based on an analysis of the actual amounts billed
16 to clients based on millions of billing entries and million hours billed by over individual
17 timekeepers from law firms. And, specifically, the Los Angeles data is based on review of
18 thousands of partners and associates and the corresponding time and rates each billed to their
19 client. For this reason, the Real Rate Report is “a much better reflection of true market rates than
20 self-reported rates in all practice areas.” *Brown v. CVS Pharmacy, Inc.* (C.D. Cal. Apr. 24, 2017)
21 2017 U.S. Dist. LEXIS 182309, at *21; *see also PLCM Group, Inc. v. Drexler* (2000) 22 Cal.4th
22 1084, 1085 (holding that rates should be premised upon precisely this form of independent,
23 “objective” rate data that reflects “fair market” rates actually billed to clients “in the community
24 for similar work”).

25 10. My requested rate is also reasonable, consistent, and less than the rate found in the
26 Laffey Matrix (www.laffeymatrix.com), which indicates that the benchmark rate for an attorney
27 that graduated law school in 2013 is \$878 per hour.
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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on April 30, 2026, at Riverside, California.

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4 By: 
5 Kristina Bui Carlson, Esq.
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