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14 Attorneys for Plaintiff Yulissa Medina

15 *[Additional Counsel on Following Page]*

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17
18 **FOR THE COUNTY OF ALAMEDA**

19 YULISSA MEDINA, on behalf of herself and
20 “aggrieved” employees pursuant to Labor
21 Code section 2698, et seq.,

22 Plaintiff,

23 vs.

24 24 HOUR FITNESS USA, LLC., a California
25 limited liability company; and DOES 1-10,
26 inclusive.

27 Defendants.

Case No. 24CV089740

Assigned to Hon. Mark Fickes, Dept. 518

**DECLARATION OF ROMAN
SHKODNIK IN SUPPORT OF
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND UNOPPOSED
APPLICATION FOR APPROVAL OF
ATTORNEYS’ FEES AND COSTS**

DATE: July 23, 2026

TIME: 2:30 p.m.

DEPT.: 518

Reservation ID: 238179068951

Action Filed: August 30, 2024

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9 Attorneys for Plaintiffs Desiree Cumpian and
Evelyn Pasquel-Herrera

10 Roman Shkodnik (SBN 285152)
11 Mason Doidge (SBN 352604)
12 **D.LAW, INC.**
250 N Madison Avenue, 2nd Floor
13 Pasadena, CA 91101-1639
Tel.: (818) 962-6465 / Fax: (818) 962-6469

14 Attorneys for Plaintiff Bruno Cruz
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1 I, ROMAN SHKODNIK, declare as follows:

2 1. I am an attorney duly admitted to the practice of law in the State of
3 California. I am a senior attorney with the law firm D.Law, Inc., counsel for Plaintiff
4 Bruno Cruz (“Plaintiff”) and Class Counsel in this action. I have personal knowledge of
5 the facts set forth herein and if called as a witness to testify to them, could and would do
6 so competently.

7 **Class Counsel’s Experience and Recommendation:**

8 2. My firm is well qualified because of our experience, knowledge, and
9 resources to act as counsel and represent Plaintiffs and the putative class in this action.
10 My practice is exclusively focused on employment matters, with a substantial percentage
11 devoted to litigating wage, hour, and working-conditions violations on a class-wide basis.

12 3. I received my Bachelor of Arts in history and political science from the
13 University of California, Los Angeles, in 2007. I then earned my Juris Doctorate from
14 Loyola Law School in May of 2011. Upon graduating from law school, I have
15 exclusively focused my practice on representing employees, including in wage-and-hour
16 class actions.

17 4. I am experienced in prosecuting employment matters, particularly class
18 actions. In addition to the present case, I am also class counsel for dozens of other
19 putative wage-and-hour class-action lawsuits pending in various state and federal
20 jurisdictions throughout California.

21 5. My extensive experience in litigating employment wage and hour matters
22 has been integral in identifying legal issues, evaluating the strengths and weaknesses of a
23 case, and generally negotiating fair and reasonable class action settlements. Practice in
24 the narrow field of wage and hour litigation requires skill and knowledge concerning the
25 constantly evolving substantive law (state and federal), as well as the procedural law of
26 class action litigation. In this action, I am fully equipped to use the skills and knowledge I
27 have developed through more than a decade of prosecuting and defending wage and hour
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1 class actions to fairly and adequately represent the interests of the Class. Therefore, on
2 the account of my resources, experience, and knowledge, I am well qualified to act as
3 Class Counsel and represent Plaintiffs and the putative Class Members in this action.

4 6. Owing to my experience, I am well qualified to evaluate the class claims
5 in this action, to evaluate settlement v. trial and defenses raised. The following are
6 examples of some of my cases that have resulted in favorable settlements for the
7 employee Class Members and Aggrieved Employees I have represented: (a) *Bogues v.*
8 *Ikes place #6*, San Diego Superior Court, Case No. 37-2020-00023727-CU-OE-CTL
9 (Hon. Robert Longstreth); (b) *Garcia v. Statewide Traffic Safety And Signs, Inc.*, Orange
10 County Superior Court, Case No. 30-2018-01011814-CU-OE-CXC (Hon. Lon F.
11 Hurwitz); (c) *Brito v. Brothers International Desserts dba Brothers International*
12 *Desserts Inc.*, Orange County Superior Court, Case No. 30-2022-01242515-CU-OE-CXC
13 (Hon. William D. Claster); (d) *Valenzuela v. Best Express Foods, Inc.*, San Joaquin
14 County Superior Court, Case No. STK-CV-UOE-2021-4131 (Hon. Robert T. Waters); (e)
15 *Ruem v. EMTS, Inc. et al.*, Fresno County Superior Court, Case No. 18CECG04441
16 (Hon. Kimberly Gaab); (f) *Quizon v. CF Watsonville East, LLC.*, Santa Cruz County
17 Superior Court, Case No. 20CV01868 (Hon. Paul Marigonda); (g) *Cesena v. JYM*
18 *Enterprises, Inc.*, Los Angeles Superior Court, Case No. 21STCV27949 (Hon. Monica
19 Bachner); (h) *In re Mobileone Wage And Hour Cases*, San Mateo Superior Court, Case
20 No. JCCP 5039 (Hon. Marie S. Weiner); (i) *Ly v. Prime Comms Retail, LLC*, Sacramento
21 County Superior Court, Case No. 34-2020-00281668 (Hon. Christopher E. Krueger); (j)
22 *Savattieri et al.v. AMI Expeditionary Healthcare et al.*, Los Angeles County Superior
23 Court, Case No. 21STCV33372 (Hon. Kenneth R. Freeman).

24 7. Attorney Mason Doidge received his bachelor's degree from Eastern
25 Washington University in March 2019 and earned his Juris Doctorate from the University
26 of California, Irvine School of Law in May 2023. He has been practicing law at D.Law,
27 Inc. since August 2024, focusing exclusively in the area of employment law and has been
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involved in numerous cases in all aspects from pre-filing through settlement, including California and Federal wage and hour class actions.

8. Attorney Nelli Barsegyan was admitted to the California Bar in 2023. She received her J.D. from Loyola Law School and B.S. from the University of California, Irvine. Since her admission she has worked in criminal defense and civil litigation, focusing her career entirely to employment law as of March of 2025. Ms. Barsegyan joined D.Law, Inc. in 2025 as part of the Law and Motion team, where she focuses on substantive and procedural legal writing and analysis in support of the firm's litigation strategy.

Background and Procedural History

9. On November 4, 2024, Plaintiff filed a Class Action Complaint against Defendant 24 Hour Fitness USA, LLC in the California Superior Court, County of San Bernardino, captioned *Bruno Cruz v. 24 Hour Fitness, USA, LLC, San Bernardino County Superior Court*, Case No. CIVSB2433321 (the "*Cruz Action*"). The Class Action Complaint in *Cruz* alleges class claims on behalf of all of Defendant's current and former non-exempt employees in California based on: (1) failure to pay minimum wages; (2) failure to pay wages and overtime; (3) non-compliant meal-breaks; (4) non-compliant rest-breaks; (5) failure to pay vacation wages; (6) failure to provide paid sick time; (7) failure to reimburse for necessary expenditures; (8) failure to provide accurate itemized wage statements; (9) failure to keep required payroll records; (10) failure to pay final wages at termination; (11) and violation of Business and Professions Code.

10. Also, on November 4, 2024, Plaintiff served a PAGA notice letter to the LWDA and Defendant and thus exhausted the pre-filing requirements of the PAGA.

11. On January 8, 2025, Plaintiff filed a First Amended Class Action Complaint adding a cause of action for civil penalties pursuant to the PAGA on behalf of himself, the state of California, and Defendant's non-exempt employees in California based on the same underlying alleged Labor Code violations.

1 **The Settlement is Fair, Reasonable and Adequate:**

2 12. The Settlement is the result of extensive, arms-length negotiations. The
3 settlement for each Class Member is fair, reasonable and adequate, given the inherent
4 risk of litigation, the risk relative to class certification and the costs of pursuing such
5 litigation. The settlement shall finally resolve all claims of the Class Members as
6 alleged in the Action.

7 **Attorneys' Fees:**

8 13. Plaintiff has retained competent counsel by hiring D.Law, Inc. to represent
9 the Class. I am an experienced and established attorney with over 15 years' worth of
10 litigation experience.

11 14. Class Counsel have effectively represented the interest of the Class. For
12 example, Class Counsel expended significant time and resources exchanging informal
13 discovery, drafting a mediation statement, preparing a damages and penalties model, and
14 attending mediation. Class Counsel have also, at their own risk, expended costs to file
15 this instant action, effect service of process, and pay other litigation-related costs.

16 15. My office undertook this matter on a purely contingent basis and advanced
17 significant time and resources with no guarantee of payment.

18 16. To date, my firm has invested approximately 107.5 hours in connection
19 with the litigation of this lawsuit. My billing rate is \$1045.00 (14 years out of law school,
20 Laffey Matrix rate of \$1,019.00), and I spent approximately 27.5 hours on this matter.
21 *See Exhibit A* (Roman Shkodnik's Time and Task Summary). Mason Doidge's billing
22 rate is \$475.00 (3 years out of law school, Laffey Matrix rate of \$508.00), and he spent
23 approximately 63 hours on this matter. *See Exhibit B* (Mason Doidge's Time and Task
24 Summary). Nelli Barsegyan's billing rate is \$475.00 (3 years out of law school, Laffey
25 Matrix rate of \$508.00), and she spent approximately 17 hours on this matter. *See*
26 **Exhibit C** (Nelli Barsegyan's Time and Task Summary). Aside from being warranted
27 by our skill, experience and ability, Class Counsel rates that were used in application of
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1 the lodestar cross check in this case, are supported by the Laffey Matrix attached hereto
2 as **Exhibit D**. Rates for Class Counsel similar to those sought in this application have
3 also been recently approved as reasonable market rates in San Bernardino County. Class
4 Multipliers routinely range from 3 to 5, and it is not uncommon that multipliers of
5 between 5 and 10, or higher, are applied. *See, e.g., Wilson v. Bank of Am. Natl. Trust &*
6 *Savs. Assn.*, No. 643872 (Cal. Sup. Ct., Aug. 16, 1982) (multiplier of 10); *Glendora*
7 *Comm. Redev. Agency v. Demeter* (1984) 155 Cal.App.3d 456, 465 (affirming multiplier
8 of 12, and expressly rejecting argument that fee was either exorbitant or unconscionable).

9 17. In total, my firm's lodestar is \$66,737.50 ($27.5 \times \$1045.00 = \$28,737.50$
10 for me; $63 \times \$475.00 = \$29,925.00$ for Mr. Doidge; and $17 \times \$475.00 = \$8,075.00$ for
11 Ms. Barsegyan).

12 **Class Counsel's Costs:**

13 18. My firm's total costs to date total \$2,245.84 and include court fees and
14 service of process. A true and correct copy of an itemized list of costs incurred (and
15 expected to be incurred) by my firm in this action is attached hereto as **Exhibit E**.
16 These costs were reasonably incurred in litigating this matter.

17 I declare, under penalty of perjury under the laws of the State of California, that
18 the foregoing is true and correct. Executed on this 15th day of June, 2026 at Pasadena,
19 California.

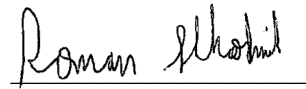
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21 ROMAN SHKODNIK
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EXHIBIT A

Detailed Time and Task Summary – Roman Shkodnik

Tasks Performed	Atty Hours Est.	Date range
<u>1. Review the Complaint and Prepare and Send the LWDA Letter Notice</u> - Review Class Action Complaint and allegations - Prepare LWDA Letter and correspondence to LWDA and Defendant re: PAGA Notice and claims and facts and theories and grounds for recovering civil penalties	5	November 2024
<u>2. Amend Complaint for PAGA Claim</u> Filing Complaint for PAGA Claim and service	1	January 2025
<u>3. Reviewing Opposition to Motion to Stay</u> - Speak with associate regarding Opposition - Review Opposition memorandum of points and authorities	5	April-May 2025
<u>4. Finalizing Settlement Agreement and Terms</u> - Multiple conferences with associate and correspondences Plaintiff's counsel from related case regarding settlement agreement - Review long form Settlement Agreement - Review Class Member's Notice and e-mails regarding same and finalizations after editing - Conduct multiple conferences with Plaintiff regarding Settlement and terms and responding to his questions and concerns	5	August-September 2025
<u>5. Motion for Preliminary Approval, Hearing, and Begin Administration:</u> - Review draft amended complaint, prepared according to the terms of the Settlement - Review draft of motion for preliminary approval of the Settlement, and supporting documents and declarations - Multiple conferences with associate regarding motion for preliminary approval of the Settlement, and supporting documents - Multiple conferences with client regarding motion for preliminary approval of the Settlement, and supporting documents - Review request for dismissal of <i>Cruz</i> Action.	5.5	September 2025-March 2026
<u>6. Motion for Final Approval of Settlement –</u> - Review all final approval motion documents, including declarations. - Confer and correspond with Plaintiff regarding declaration and enhancement. - Also anticipated hours responding to inquiries from Class Members regarding the settlement and checks, drafting declarations to comply with the Court's requirement for a compliance hearing, and attendance at any further hearing	6	June 2026-Present
TOTAL:	27.5 Hrs.	

EXHIBIT B

Detailed Time and Task Summary – Mason Doidge

Tasks Performed	Atty Hours Est.	Date range
<u>1. Pre-Filing and Investigation Tasks</u> – - Complaint research and research case law and other cases, and research Defendant and its operations and prior litigations - Confer with client and review documents with client - Set up file and documents, including atty-client agreement, responsibilities of a class rep. and wage statements and personnel file documents - Research California Secretary of State filings for Defendant - Conduct factual and legal research into the merits of Plaintiff's claims - Researching similar wage class actions - Conduct conferences discussing the facts and allegations with Plaintiff, addressing conduct of litigation, time frame for events and initial actions to commence litigation	19	October 2024-November 2024
<u>2. Filing the Complaint and Drafting and Sending the LWDA Letter Notice</u> - Conduct further research regarding Defendant and policies and practices and confer with client and draft detailed file notes; - Draft Class Action Complaint and allegations - Draft LWDA Letter and correspondence to LWDA and Defendant re: PAGA Notice and claims and facts and theories and grounds for recovering civil penalties - Confer and correspond with client regarding Complaint and review and approval of factual allegations and attend to filing	6	October 2024
<u>3. Amend Complaint for PAGA Claim</u> - Filing Complaint for PAGA Claim and service - Revise complaint	1	December 2024
<u>4. Initial conferences and correspondence with Defendant's counsel; case initiation requirements; drafting initial discovery</u> - Review case initiation documents and conformed copies, and review initial Case Management Conference order and draft notice of CMC - Speak with senior associate regarding status of pleadings and procedure - Confer and correspond with process server regarding service on Defendant and status and documents to provide - Conduct multiple conferences with Client and exchange e-mails regarding experiences as an employee of Defendant and evidencing claims - Continue compiling case documents from Plaintiff and case research regarding the applicable authorities and claims and Defendant's policies and operations	3	December 2024-February 2025

Detailed Time and Task Summary – Mason Doidge

• Conduct teleconferences and exchange correspondence regarding claims, cases with overlapping class definition, and Defendant's and its operations and the case and claims • Research into related cases • Draft initial discovery • Draft multiple correspondences to Defense counsel regarding case and conference and appearance and discovery • Conduct further investigation into the claims, and conferences with client regarding same and documents supporting allegations		
<u>5. Oppose to Demurrer</u> • Review Defendant's Demurrer • Discuss Demurrer with senior associate • Confer with Law and Motion Team • Prepare and revise Opposition to demurrer • Review Defendant's Reply in support of Demurrer • Appear for hearing on Demurrer	15	March 2024-May 2024
<u>6. Reviewing case with overlapping class definition; conferences and correspondence with counsel for Plaintiff in the overlapping case; conference with client regarding overlapping case</u> • Review complaint and LWDA letter for overlapping case • Speak with senior associate regarding overlapping case • Conduct teleconferences and exchange correspondence regarding claims, arbitration agreement, and Defendant's and its operations and the case • Discuss Joint Prosecution Agreement with client • Draft Joint Prosecution Agreement • Exchange correspondence regarding Joint Prosecution Agreement	2.5	June 2025-October 2025
<u>7. Review settlement agreements and amended complaint; prepare conference statements for Cruz Action and appear for conferences in Cruz Action</u> • Confer with Plaintiff regarding settlement terms • Confer with senior attorney regarding settlement terms throughout settlement drafting process • Confer with Plaintiffs' counsel regarding continued efforts to finalize settlement terms. Agree to and address general terms for settlement • Prepare, review, and revise conference statements in Cruz Action; confer with defense counsel regarding the same • Attend conferences in Cruz Action • Review settlement agreement • Review and revise amended complaint	6	November 2025-April 2026

Detailed Time and Task Summary – Mason Doidge

<u>8. Motion for Preliminary Approval, Hearing, and initiate and complete administration; prepare request for dismissal of Cruz Action</u> • Review and revise draft of motion for preliminary approval of the Settlement, draft supporting documents and declarations • Conferences with senior attorney regarding motion for preliminary approval of the Settlement, and supporting documents • Confer with Plaintiff regarding declaration in support of MPA • Prepare and file request for dismissal of Cruz Action • Conferred with defense counsel about request for dismissal of Cruz Action	3.5	February 2026-April 2026
<u>6. Motion for Final Approval of Settlement</u> – • Review all final approval motion documents, including declarations. • Confer and correspond with Plaintiff's counsel regarding final approval motion documents, including declarations • Also anticipated hours responding to inquiries from Class Members regarding the settlement and checks, drafting declarations to comply with the Court's requirement for a compliance hearing, and attendance at any further hearing	7	June 2026-Present
TOTAL:	63Hrs.	

EXHIBIT C

Medina v. 24 Hour Fitness USA, LLC
Alameda County Case No. 24CV089740
Detailed Time and Task Summary – Nelli Barsegyan

Tasks Performed	Atty Hours Est.	Date range
<u>1. Oppose Demurrer</u> • Review Defendant's Demurrer • Research into merits of Demurrer • Discuss Demurrer with associates • Draft Opposition to Demurrer • Review associates' revisions to Opposition to Demurrer • Revise Opposition to Demurrer	17	April 2025-May 2025
TOTAL:	17 Hrs.	

EXHIBIT D

LAFFEY MATRIX

[History](#)
[Case Law](#)
[See the Matrix](#)
[Contact us](#)
[Home](#)

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/25- 5/31/26	1.075336	\$277	\$508	\$625	\$902	\$1,019	\$1,227
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1,141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1,057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406

6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $\frac{1}{2}$ Years Out of Law School $\frac{1}{2}$ is calculated from June 1 of each year, when most law students graduate. $\frac{1}{2}$ 1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $\frac{1}{2}$ 4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $\frac{1}{2}$ 1-3" from June 1, 1996 until May 31, 1999, would move into tier $\frac{1}{2}$ 4-7" on June 1, 1999, and tier $\frac{1}{2}$ 8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT E

Cruz v. 24 Hour Fitness USA, LLC

Litigation Costs

DATE	DETAILS	PROVIDER	AMOUNT
11/4/2024	PAGA Letter	Labor Workforce Development Agency	\$75.00
11/4/2024	PAGA Letter Postage	United States Postal Service	\$32.70
11/21/2024	Summons & Complaint	Proceed	\$1,494.79
11/27/2024	Process of Service - 24 Hour Fitness	Proceed	\$123.60
12/2/2024	Process of Service - 24 Hour Fitness USA, LLC	Proceed	\$51.50
12/26/2024	POS of Summons - 24 Hour Fitness USA, LLC	Proceed	\$16.74
12/26/2024	POS of Summons 24 Hour Fitness	Proceed	\$16.74
2/6/2025	First Amended Complaint	Proceed	\$16.69
3/21/2025	Notice of Case Management Conference (6.24.25)	Proceed	\$16.69
5/1/2025	Opposition to Ntc of Demurrer to FAC	Proceed	\$17.46
5/6/2025	CourtCall - Demurrer (5.14.25)	Courtcall	\$72.00
11/5/2025	CourtCall Appearance for Status Conference (11.10.25)	Courtcall	\$72.00
11/18/2025	Notice of Posting Jury Fees; Joint Status Conference Report (11.10.25)	Proceed	\$172.78
12/29/2025	Notice of Unavailability 2025	Proceed	\$11.39
3/25/2026	Notice of Change of Address & Notice of Disassociation of Counsel	Proceed	\$17.53
4/9/2026	Request for Dismissal; Declaration in Support and Proposed Order	Proceed	\$38.23

TOTAL \$2,245.84