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Attorneys for Plaintiff Joseph Stevens,
on behalf of himself and all others similarly situated and aggrieved

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN BERNARDINO

JOSEPH STEVENS, on behalf of himself and all others similarly situated and aggrieved,

Plaintiff,

v.

GOSHARE INC., a Delaware Corporation; and DOES 1 Through 10, inclusive,

Defendants.

Case No. CIVSB2428568
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Wilfred J. Schneider Jr.
Department S32

CLASS AND REPRESENTATIVE ACTION

DECLARATION OF CHRISTOPHER J. HAMNER IN SUPPORT OF PLAINTIFF'S MOTION FOR ORDER GRANTING FINAL APPROVAL OF CLASS AND PAGA REPRESENTATIVE ACTION SETTLEMENT

Date:	December 2, 2026
Time:	8:30 a.m.
Dept.:	S32
Complaint filed:	October 3, 2024
Trial Date:	Not set

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I, Christopher J. Hamner, declare as follows:

1. I am co-counsel for Plaintiff Joseph Stevens in this action. I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiff's Motion for Order Granting Final Approval of Class and PAGA Representative Action Settlement. I make this Declaration based on my personal knowledge, and if called to testify I could and would competently testify to the matters contained in this Declaration.

2. I have been licensed to practice law in California since 1997. I have concentrated my practice on wage and hour class actions since 2005. I have been named class counsel in numerous significant wage and hour class actions in California.

3. I have been named lead or co-lead counsel in numerous class action settlements, including:

- *Sarkisian v. Symantec Corporation, et al*., LASC No. BC 423476 (Wage and Hour Class Action)
- *O'Flynn v. Golfsmith* OCSC, 30-2009-00180164-CU-OE-CXC (Alleging that the defendant failed to provide meal periods, rest periods, and overtime compensation)
- *Galavis v. Patina Group*, LASC BC3755225 (Alleged that the defendant failed to provide meal periods or compensation)
- *Karen Roberts v. Palm, Inc., et al*., SCSC No. 1-10 CV 161497 (Misclassification of test engineers alleging that the defendant misclassified test engineers as exempt)
- *Chan v. PayPal, Inc.,* 1-10-CV-168947 (Misclassification class action for software engineers and related positions in multiple job families alleging that the defendant misclassified software engineers as exempt)
- *Vu v. eBay, Inc.,* 1-10-CV-167040 (Misclassification class action for software engineers and related positions in multiple job families alleging that the defendant misclassified software engineers as exempt)
- *John Thomas v. Cognizant Technology Solutions U.S. Corporation*, United States District Court No. CV 11-1123 JST (Misclassification of tech workers)
- *Lewallen v. CVS*, Orange County Superior Court Case No. 30-2020-01152123-CU-OE-CXC (Misclassification of nurses)

4. Class action litigation is complex and involves significant risk. By taking on this matter my co-counsel and I were prevented from taking other possibly equally righteous cases for my firm which could have produced similar or greater attorney fees. To date, neither I nor my co-counsel have received any compensation on this matter. Upon retention, we made a commitment to litigate the case through trial. These types of cases can take years, involve hundreds of hours of work and cost an enormous amount of money. Further class action contingency cases are

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inherently risky. The risks involved coupled with the contingency basis of this case further support our request for attorneys' fees and costs. In the present case, as in many complex wage and hour class actions like it, the contingency risk was significant. We worked on a full contingency and advanced all costs, with no guarantee of repayment. In cases such as this, the plaintiff's lawyer agrees to advance every minute of their time and every penny of costs incurred on the chance that they can prove Plaintiff was wronged. An additional important contingent risk factor is the delay in payment for the attorney's efforts on settled wage and hour actions.

5. My co-counsel and I focus our practices on Plaintiff's wage and hour individual, class actions in the California courts. We and others like us who take on wage and hour class actions, can only focus on a certain number of complex cases. The very real risk of obtaining zero in attorneys' fees and costs is only part of the risk. There is also risk associated with focusing on a complex labor class action to the exclusion of others of equally or more significant labor class action matters. If such a risk were not taken, this and many cases like it would be less likely to be brought on behalf of California workers.

6. By the time this case is fully administered, I will have spent approximately 10 hours on this matter.

7. My hourly rate for class/PAGA action work is $700 per hour. The lodestar value of the time I will have devoted to this case by the time this case is fully administered is $7,000 (10 hours x $700).

8. My office has not incurred any costs in this matter.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on November 2, 2026 in Calabasas, California

/s/ Christopher J. Hamner

Christopher J. Hamner

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