

ZAKAY LAW GROUP, APLC
Shani O. Zakay (State Bar #277924)
shani@zakaylaw.com
Jackland K. Hom (State Bar #327243)
jackland@zakaylaw.com
Rachel Newman (State Bar #350826)
rachel@zakaylaw.com
Jennifer M. Gerstenzang (State Bar #279810)
jenny@zakaylaw.com
Jaclyn Joyce (State Bar #285124)
jaclyn@zakaylaw.com
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047

JCL LAW FIRM, APC
Jean-Claude Lapuyade (State Bar #248676)
jlapuyade@jcl-lawfirm.com
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292

Attorneys for Plaintiff FIDEL GOMEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF TULARE

FIDEL GOMEZ, an individual, on behalf of
himself, and on behalf of all persons similarly
situated,

Plaintiffs,

v.

KIRBY MANUFACTURING, INC., a
California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No: VCU308341

**DECLARATION OF JEAN-CLAUDE
LAPUYADE IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: June 16, 2025

Time: 8:30 a.m.

Judge: Hon. Gary Johnson

Dept.: 7

1 I, Jean-Claude Lapuyade, Esq., declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would
3 competently testify to the following facts from my own personal knowledge. I am an attorney-at-
4 law and the owner of the JCL LAW FIRM, APC (hereinafter "Class Counsel"). I am co-counsel
5 of record for Plaintiff FIDEL GOMEZ ("Plaintiff").

6 2. This declaration is being submitted in support of Plaintiff's Motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. Class Counsel in this matter has extensive class action experience in multiple fields
9 and has represented tens-of-thousands of persons in class actions. Counsel has previously litigated
10 similar wage and hour class actions involving similar regular rate violations and meal and rest
11 period violations. Class Counsel has been approved as class counsel in similar wage and hour
12 class actions throughout the State of California, including in the Superior Court for the County of
13 Tulare. As such, courts throughout California have deemed Class Counsel experienced and
14 knowledgeable in this area of law. Class Counsel has participated in every aspect of the settlement
15 discussions and has concluded the settlement is fair, adequate and reasonable and in the best
16 interests of the Class.

17 4. A class action is superior to a multitude of individual lawsuits. Given the size and
18 amount of each individual claim, the Class Members likely have little incentive to litigate their
19 claims on an individual basis because the out-of-pocket expense and personal commitment
20 necessary to litigate each claim outweighs any potential recovery. In sum, class treatment is
21 superior to individual, case-by-case adjudication.

22 5. Plaintiff, the Settlement Class Members, and the Aggrieved Employees are
23 represented by competent and experienced counsel to pursue their claims. I established the JCL
24 Law Firm, APC ("Firm") in 2010. The Firm is a boutique plaintiff firm representing aggrieved
25 employees and consumers throughout California in wage and hour class actions, PAGA Actions
26 and complex multi-party product liability matters. The Firm currently consists of myself, Jean-
27 Claude Lapuyade, Esq. (Partner/Owner), Sydney Castillo-Johnson, Esq. (Associate Attorney),
28 John L. Nitti, Esq. (Associate Attorney), Perssia Razma, Esq. (Associate Attorney), Tesla Stone

(Senior Paralegal and Office Manager), Jennifer Heming (Paralegal), Andrew Ward (Law Clerk), Madelyn Uchiyama (Law Clerk) Sara Chrestensen (Legal Assistant), Allysa Castillo (Legal Assistant), and Libia Ramirez (Secretary).

6. I am qualified to represent the Plaintiff, the State of California, and the Aggrieved Employees. I have extensive experience with wage and hour class and representative actions litigation like this matter, and employment matters in general. My credentials are reflected in the JCL Law Firm, APC, Firm Resume, a true and correct copy of which is attached hereto as **Exhibit “1.”** Some of the major cases the Firm has undertaken are also set forth in **Exhibit “1”**.

7. I have represented consumers and employees in California class actions, and complex multi-party product liability actions exclusively for more than 17 years. I have been in practice as a plaintiff’s civil litigation attorney since April 2007.

8. Finally, I have published appellate experience in *William Blanchette et al., v. The Superior Court of Imperial County, (GHA Enterprises)*, 8 Cal.App.5th 521, and *Duran v. EmployBridge Holding Co. LLC* (2023) 92 Cal.App.5th 59.

9. Consequently, I was named to the prestigious Thomson Reuters, Super Lawyers, Rising Star in 2015, 2016, 2017 and, again, in 2018. According to Thomson Reuters, the Super Lawyers, Rising Star list recognizes the top 2.5% of eligible attorneys. (see https://www.superlawyers.com/about/selection_process.html.) Additionally, I was named a 2025 Thompson Reuters Super Lawyer in Employment Law.

10. Finally, Class Counsel is not aware of any other pending matters or actions asserting claims that will be extinguished or adversely affected by the Settlement.

11. As of May 15, 2025, The JCL Law Firm, APC incurred a total lodestar of \$41,195.00 for 67.4 hours worked by attorneys and staff successfully litigating this matter. I have reviewed my firm’s lodestar in this matter and believe the charges are reasonable and were reasonably necessary to the conduct of the case. Detailed Time and Billing Journals for the JCL Law Firm, APC are attached hereto as **Exhibit “2.”**

12. In assessing the reasonableness of the billing rates for the attorneys and staff at the JCL Law Firm, APC, the firm refers to the “*Laffey Matrix*” to set our hourly billing rates. See

<http://www.laffeymatrix.com/>. The *Laffey* Matrix is a fee schedule used by many courts throughout the United States, including some California state courts and California Federal District Courts. The *Laffey* Matrix is a well-established objective source that California courts have relied on in assessing hourly rates since 2005. (see *In Re HPL Technologies, Inc. Securities Litigation*, 366 F.Supp.2d 912, 921 (N.D. Cal. 2005) (Confirming use of the *Laffey* Matrix adjusted to account for locality pay differentials); *Rubalcaba v. Albertson's, LLC*, No. BC528755, 2017 WL 4330597, at *4 (Cal. Super. Ct. May 25, 2017), reversed on other grounds.)

13. The attorneys and staff at the JCL Law Firm, APC, have been providing extensive class action services throughout state and federal courts in California for more than seventeen years. Since its founding, the JCL Law Firm, APC, has recovered more than \$100 million dollars for its clients.

14. When comparing the billing rates for the staff and attorneys at the JCL Law Firm, APC with the *Laffey* Matrix, the attorneys and staff at the JCL Law Firm, APC, either bill at or below the rate for similarly skilled and tenured legal professionals:

Name	Laffey Matrix Fee	Actual Billing Rate
Jean-Claude Lapuyade, Esq. (Managing Attorney)	\$878	\$700
Sydney Castillo-Johnson, Esq. (Handling Attorney)	\$437	\$450
Tesla Stone (Managing Paralegal)	\$239	\$250
Jennifer Heming (Handling Paralegal)	\$239	\$250

15. The JCL Law Firm's rates are comparable to those judicially approved for other plaintiffs' firms, such as Baron & Budd (rates ranging from \$775 for the requested partner to \$390-\$630 for non-partners), Western Comden Casselman & Essensten (rates ranging from \$670-\$750 for partners and \$300-\$500 for associates), and Blood Hurst & Rearden (\$510-\$695 for partners). See *Aarons v. BMW of North America*, No. 11-7667-PSG, 2014 U.S. Dist. LEXIS 118442, *40-41 (C.D. Cal. Apr. 29, 2014). Other Southern California courts have approved hourly rates in the requested range. See e.g., *Kearney v. Hyundai Motor Am.*, 2013 U.S. Dist. LEXIS 91636, *24 (C.D. Cal. June 28, 2013) (approving hourly rates of \$650 -\$800 for senior attorneys

1 in consumer class action); *Parkinson v. Hyundai Motor America*, 796 F.Supp.2d 1160, 1172 (C.D.
2 Cal. 2010)(approving hourly rates between \$445 and \$675); *Faigman v. AT&T Mobility, LLC*,
3 2011 U.S. Dist. LEXIS 15825, *2 (N.D. Cal. Feb. 15, 2011)(Approving hourly rates of \$650 an
4 hour for partners and \$500 for associates); *Richard v. Ameri-Force Mgmt. Servs., Inc.*, No 37-
5 2008-00096019 (San Diego Superior Court, August 27, 2010)(\$695 to \$750 an hour for partners
6 and \$495 for associates); *Barrera v. Gamestop*, No. CV 09-1399 (C.D. Cal. Nov. 29, 2010)(\$700
7 for partners and \$475 for associates); *Anderson v. Nextel Retail Stores, LLC*, No. CV 07-4480
8 (C.D. Cal. June 20, 2010)(\$655- \$750 for partners and \$300 – 515 for associates); *Luquetta v.*
9 *Regents of Cal.*, CGC-05-443007 (San Francisco Sup. Ct.) (approving 2012 partner rates between
10 \$550 and \$850 per hour); and *Holoway v. Best Buy Co.*, C-05-5056-PJH (MEJ)(N.D.
11 Cal.)(approving 2011 partner rates between \$825 and \$700, and associates hourly rates between
12 \$355 and \$405 an hour).

13 16. Moreover, my billing rate has been approved within the last twelve months by
14 California Superior Court judges. (See generally *Klein v. RedZone Security, Inc.*, Riverside
15 Superior Court Case No. CVRI2202841 (August 15, 2024) Hon. Harold W. Hopp B. approved a
16 \$700 billing rate and appointed Jean Claude Lapuyade, Esq. of the JCL Law Firm, APC, as Class
17 Counsel; *Galindo v. PAQ, Inc., et al.*, San Joaquin Superior Court Case No: STK-CV-UOE-2022-
18 1799 (September 17, 2024) Hon. Blanca A. Banuelos approved a \$700 billing rate and appointed
19 Jean Claude Lapuyade, Esq. of the JCL Law Firm, APC, as Class Counsel; *Mariscal, et al. v.*
20 *Janco Industries, Inc., et al.*, San Joaquin Superior Court Case No. STK-CV-UOE-2022-7290
21 (December 4, 2024) Hon. George J. Abdallah approved a \$700 billing rate and appointed Jean
22 Claude Lapuyade, Esq. of the JCL Law Firm, APC, as Class Counsel; *Clarke, et al. v. St Annes*
23 *Maternity Home, et al.*, Los Angeles Superior Court Case No. 22STCV14674 (November 14,
24 2024) Hon. Stuart M. Rice approved a \$700 billing rate and appointed Jean Claude Lapuyade,
25 Esq. of the JCL Law Firm, APC, as Class Counsel; *Miller, et al. v Food Safety Net Services, Ltd,*
26 *et al.*, Los Angeles Superior Court Case No. 22STCV15337 (December 4, 2024) Hon. William F.
27 Highberger approved a \$700 billing rate and appointed Jean Claude Lapuyade, Esq. of the JCL
28 Law Firm, APC, as Class Counsel; *Lopez v. Behavior Frontiers, LLC*, Los Angeles Superior Court

Case No. 22STCV15331 (December 19, 2024) Hon. Elihu M. Berle approved a \$700 billing rate and appointed Jean Claude Lapuyade, Esq. of the JCL Law Firm, APC, as Class Counsel.

17. Further, Class Counsel will be performing additional work, including finalizing the motion for preliminary approval, attending the hearing on preliminary approval, drafting the motion for final approval, attending the hearing on final approval, finalizing the orders and judgment, and monitoring completion of the settlement process over the course of several years. I expect this additional work will result in an additional 20-30 hours of additional work and an additional lodestar between \$14,000 and \$21,000.

18. As of the filing of the Motion for Preliminary Approval of Class Action and PAGA Settlement, JCL Law Firm, APC expended \$9,534.66 prosecuting this action. The JCL Law Firm's costs are reflected in the attached **Exhibit "3."**

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 19th day of May 2025, at San Diego, California.

JCL LAW FIRM, APC

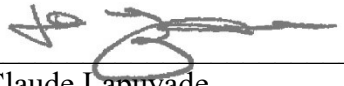
By: 
Jean-Claude Lapuyade
Attorneys for Plaintiffs

EXHIBIT 1

JCL LAW FIRM, APC
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Tel: (619) 599-8292
Fax: (619) 599-8291

FIRM RESUME

Areas of Practice: Employee Class Actions, Wage and Hour Class Actions, Civil Litigation, and Unlawful Housing Practices.

ATTORNEY BIOGRAPHIES

Jean-Claude Lapuyade, Esq.
California Bar Number 248676
Founding Partner

Biography:

Mr. Lapuyade is a San Diego based labor and employment attorney representing aggrieved California employees and the victims of unlawful housing practices throughout the State of California. Mr. Lapuyade's litigation practice focuses on representing California employees in wage and hour class actions for unpaid wages, missed meal and rest breaks, and misclassification, wrongful termination cases and tenants in unlawful housing class actions. Mr. Lapuyade prides himself on providing his clients with aggressive, attentive and result driven representation through the litigation process, trial and arbitration. Since 2007, Mr. Lapuyade successfully recovered in excess of \$200 million in monetary awards for his clients.

Mr. Lapuyade served as co-editor of the Insurance Column for Consumer Attorneys of San Diego from 2011 to 2014. As editor, Mr. Lapuyade was responsible for publishing monthly articles in the Trial Bar News periodical analyzing complex insurance coverage issues. Mr. Lapuyade is a four-time recipient of the Super Lawyers Rising Star by Thomson Reuters. To be eligible for inclusion in Rising Stars, a candidate must be either 40 years old or younger or in practice for 10 years or less. While up to 5 percent of the lawyers in a state are named to Super Lawyers, no more than 2.5 percent are named to Rising Stars.

Bar Admissions:

- California
- U.S. District Court Southern District of California
- U.S. District Court Central District of California
- U.S. District Court Eastern District of California
- U.S. District Court Northern District of California

Professional Associations:

- California Employment Lawyers Association, 2007 to Present
- Consumer Attorneys of San Diego, 2007 to 2020
- American Bar Association, Section of Litigation, Member, 2007 to 2020
- American Bar Association, Labor & Employment Section, Member, 2007 to 2020
- American Bar Association, Tort, Trial & Insurance Section, Member, 2007 to 2020
- California Bar Association, Labor & Employment Section, Member, 2007 to Present
- California Bar Association, Litigation Section, Member, 2007 to Present

Education:

- **California Western School of Law**
 - J.D. - 2006
 - Honors: Deans Merit Scholarship, California Western School of Law 2005 - 2006
- **University of Arizona**
 - B.A. - 2001
 - Major: History

Honors:

- Super Lawyers Rising Star, Thomson Reuters, 2015 - 2018
- Distinguished Advocate Award for Outstanding Oral Advocacy, 2005 – 2006

Perssia Razma, Esq.

California Bar Number 351398

Associate Attorney

Biography:

Ms. Razma is a San Diego based labor and employment attorney representing California employees throughout the state of California. Ms. Razma's litigation practice focuses on representing current and former employees in wage and hour class actions for unpaid wages, missed meal and rest breaks, misclassification, and wrongful termination.

Perssia was born and raised in Los Angeles, California. She earned a Bachelor of Arts in 2020 at San Diego State University in Psychology. In 2023, Perssia earned her Juris Doctor from the University of San Diego School of Law.

Education:

- **University of San Diego School of Law**
 - J.D. - 2023
- **San Diego State University**
 - B.A. – 2020
 - Major: Psychology

Sydney Castillo-Johnson, Esq.

California Bar Number 343881

Associate Attorney

Biography:

Ms. Castillo-Johnson is a San Diego based labor and employment attorney representing California employees throughout the state of California. Ms. Castillo-Johnson's litigation practice focuses on representing current and former employees in wage and hour class actions for unpaid wages, missed meal and rest breaks, misclassification, and wrongful termination.

Ms. Castillo-Johnson volunteered her time at California Western School of Law first as a student intern and later as a student manager with the Community Law Project which offers legal services to the low-income community of San Diego.

Education:

- **California Western School of Law**
 - J.D.- 2022
 - Honors:
 - Dean's Honor List: Spring 2021, Fall 2021
 - Public Service Honor Society Fall 2021
 - 3L Academic Merit Scholarship
 - Dean's Diversity, Service, and Leadership Scholarship
 - Activities: Community Law Project Student Manager
- **Azusa Pacific University**
 - B.A. – 2018
 - Major: Criminal Justice

JCL Law Firm, APC - REPORTED CASES

- *Blanchette et al., v. Superior Court (GHA Homes)*, 8 Cal.App.5th 521 (2017).
- *Duran v. Employbridge Holding Co.*, 92 Cal.App.5th 59 (2023).

EXAMPLES OF THE JCL LAW FIRM'S REPRESENTATIVE CLASS ACTION & REPRESENTATIVE CASES

- *Ware v. Shake Shack Enterprises, LLC*, Alameda Superior Court Case No. 21CV002063 (October 19, 2023) Hon. Brad Seligman approved a \$1,330,000.00 class action and PAGA action settlement for violations of California wage and hour laws. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Trinh v. Precision Metal Products, Inc., et al.*, San Diego Superior Court Case No. 37-2022-00000965-CU-OE-CTL (October 16, 2023) Hon. Matthew C. Braner approved a \$450,000.00 class action and PAGA action settlement for, *inter alia*, unpaid off the clock work. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Anderson v. Barton Myers Associates, Inc., et al.*, Los Angeles Superior Court Case No. 21STCV43314 (October 12, 2023) Hon. Elihu M. Berl approved a \$900,000.00 class action and PAGA action settlement for meal and rest period violations. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *DeSanctis v. Douglas Products and Packaging Company, LLC*, Contra Costa Superior Court Case No. C21-01874 (October 11, 2023) Hon. Charles S. Treat approved a \$372,500.00 class action and PAGA action settlement for, *inter alia*, failure to pay for all hours worked. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Jackson v. White Fir, LLC, et al.*, Sacramento Superior Court Case No. 34-2021-00301656 (October 6, 2023) Hon. Lauri A. Damrell approved a \$750,000.00 class action and PAGA action settlement for violations of California wage and hour laws. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Kneisly v. SR Machining, Inc., et al.*, Riverside Superior Court Case No. CVRI2201491 (October 5, 2023) Hon. Harold W. Hopp approved a \$220,000.00 class action and PAGA action settlement for meal and rest period violations. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Mendez v. Bondz, Inc., et al.*, San Joaquin Superior Court Case No. STK-CV-UOE-2020-0007486 (September 14, 2023) Hon. George J. Abdallah, Jr. approved a \$180,000.00 class action and PAGA action settlement for, *inter alia*, failure to comply with piece-rate laws. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Baray v. Curation Foods, Inc., et al.*, Santa Barbara Superior Court Case No. 21CV02834 (August 29, 2023) Hon. James F. Rigali approved a \$495,000.00 class action and PAGA action settlement for meal and rest period violations. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Rodriguez, et al. v. Ferma Greenbox, Inc., et al.*, Alameda Superior Court Case No. RG21101104 (August 23, 2023) Hon. Evelio Grillo approved a \$200,000.00 class action and PAGA action settlement for, *inter alia*, unpaid off-the-clock work. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *O'Quinn v. Laugh Factory, Inc.*, Los Angeles Superior Court Case No. 19STCV28155 (August 1, 2023) Hon. Carolyn B. Kuhl approved a \$144,000.00 class action and PAGA action settlement for, *inter alia*, unlawful tip pooling. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Toler v. Total Testing Solutions, LLC*, Los Angeles Superior Court Case No. 21STCV38452 (July 27, 2023) Hon. Elihu M. Berle approved a \$160,000.00 class action and PAGA action settlement for meal and rest period violations. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Rodriguez v. EAH, Inc.*, Santa Cruz Superior Court Case No. 21CV00884 (July 25, 2023) Hon. Marjorie Carter approved a \$1,450,000.00 class action and PAGA action settlement for, *inter alia*, failure to compensate overtime and redeemed sick pay at the regular rate of pay. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Neutall v. Urban Alchemy*, San Francisco Superior Court Case No. CGC-20-588622 (July 13, 2023) Hon. Richard B. Ulmer approved a \$980,000.00 class action settlement for violations of California wage and hour laws. The Court appointed JCL Law Firm, APC as Class Counsel.
- *Rodriguez v. RM Parks Place, Inc.*, San Joaquin Superior Court Case No. STK-CV-UOE-2021-6050 (June 7, 2023) Hon. Erin Guy Castillo approved a \$175,000.00 class action and PAGA action settlement for, *inter alia*, wage statement violations. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.

- *Chrestensen v. Northeastern Rural Health Clinics Lassen*, Superior Court Case No. 63703 (April 13, 2023) Hon. Leonard J. La Casse approved a \$270,000.00 class action and PAGA action settlement for, *inter alia*, unpaid overtime wages. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Hernandez, et al. v. Parenting Network, Inc.*, Tulare Superior Court Case No. VCU287027 (March 14, 2023) Hon. Bret Hilman approved a \$225,000.00 class action and PAGA action settlement for, *inter alia*, unpaid off-the-clock work. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Sarmiento v. Caduceus Healthcare Inc.*, San Diego Superior Court Case No. 37-2021-00002597 (March 10, 2023) Hon. Richard S. Whitney approved a \$315,000.00 class action and PAGA action settlement for, *inter alia*, unpaid off-the-clock work. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Garces, et al. v. DriverDo, LLC*, Los Angeles Superior Court Case No. 19STCV32773 (January 24, 2023) Hon. Carolyn B. Kuhl approved a \$700,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *De Jesus v. Guardian Angel Home Care, Inc.*, San Diego Superior Court Case No. 37-2020-00021049-CU-OE-CTL (July 29, 2022) Hon. Ronald F. Frazier approved a \$300,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Kaur v. Aces 2020 I, LLC, et al.*, Contra Costa Superior Court Case No. MSC20-02482 (December 22, 2022) Hon. Edward G. Weil approved a \$585,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Molina v. Hawaiian Airlines, Inc.*, Los Angeles Superior Court Case No. 20STCV28079 (November 23, 2022) Hon. Maren Nelson approved a \$250,000 class action settlement for meal and rest period violations. The JCL Law Firm, APC, represented the Plaintiff.
- *Lang Jr. v. Pathways Community Services LLC*, San Diego Superior Court Case No. 37-2019-00049969-CU-OE-CTL (September 9, 2022) Hon. James A. Mangione approved a \$160,000 class action and PAGA settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Martinello v. Century Wilshire, Inc.*, Los Angeles Superior Court Case No. 20STCV32613 (March 1, 2022) Hon. Carolyn Kuhl approved a \$550 billing rate and appointed Jean Claude Lapuyade, Esq. of the JCL Law Firm, APC, as Class Counsel.
- *Wilson v. Spreen Inc. (dba Spreen Honda)*, San Bernardino Superior Court Case No. CIVSB2119857 (April 6, 2022) Hon. David Cohn approved a \$300,000 PAGA action settlement for meal and rest period violations. The JCL Law Firm, APC, represented the plaintiff, the State of California, and the Aggrieved Employees.
- *Ledesma v. TVJ Sons I, Inc.; Porter and Howard, Inc.* Santa Barbara Superior Court Case No. 20CV03573 (November 10, 2021) Hon. Jed Beebe approved a \$350,000 PAGA action settlement for meal and rest period violations. The JCL Law Firm, APC represented the State of California and the Aggrieved Employees.
- *Jacobs v. Rush Media Company, LLC; XLT Management Services, Inc.*, Los Angeles Superior Court Case No. 20STCV32350 (May 2, 2022) Hon. Daniel J. Buckley appointed the JCL Law Firm, APC as Class Counsel and approved a \$330,000 class action settlement for, *inter alia*, independent contractor misclassification.
- *Chavez v. HTL Conrad Domestic, LLC; HTL Conrad Domestic Employer, LLC*, San Diego Superior Court Case No. 37-2020-00016193-CU-OE-CTL (June 9, 2022) Hon. John S. Meyer approved a \$850,000 PAGA action settlement for, *inter alia*, failure to compensate overtime at the regular rate of pay. The JCL Law Firm, APC acted as representative PAGA counsel for the State of California and the Aggrieved Employees.
- *Renteria v. Love's Country Stores of California*, San Bernardino Superior Court Case No. CIVDS20164481 (June 14, 2022) Hon. David Cohn approved a \$2.2 million dollar class action and PAGA action settlement for, *inter alia*, unpaid overtime and sick pay. The JCL Law Firm, APC acted as Class Counsel and as representative PAGA counsel for the State of California.
- *Lopez v. Adidas America, Inc.*, Ventura Superior Court Case No. 56-2021-005498444-CU-OE-VTA (April 4, 2022) Hon. Mark Borrell approved a \$1.5 million dollar class action and PAGA action settlement for, *inter alia*, inaccurate overtime calculations, and appointed the JCL Law Firm, APC as Class Counsel.
- *Felix v. TVI, Inc., d.b.a. Savers*, Santa Clara Superior Court Case No. 21CV376407 (February 18, 2022) Hon. Sunil R. Kulkarni approved a \$1.8 million dollar class action and PAGA action settlement for, *inter alia*, unpaid off-the-clock work. The Court appointed JCL Law Firm, APC as Class Counsel and as representative PAGA counsel for the State of California.
- *Munoz v. AMTCR*, San Bernardino Superior Court Case No. CIV-DS2001914 (August 24, 2021) Hon. David Cohn approved a \$1.8 million dollar class and PAGA settlement for, *inter alia*, inaccurate itemized wage statements. The JCL Law Firm, APC acted as class counsel for the settlement class and as representative PAGA counsel the State of California and the Aggrieved Employees.)

- *Nunes v. Home Depot U.S.A., Inc.*, San Joaquin Superior Court Case No. STK-CV-UOE-2020-0011011 (October 20, 2021 – Hon. Roger Ross approved a \$1.5 million dollar class and PAGA settlement for, *inter alia*, miscalculated meal period premiums and appointed Jean-Claude Lapuyade, Esq. as Class Counsel.)
- *Pillsbury v. T&T Restaurants CA, Inc.*, Del Norte Superior Court Case No. CVUJ-20-1214 (December 14, 2021 – Hon. Darren McElfresh approved \$550 billing rate and appointed Jean-Claude Lapuyade, Esq. as Class Counsel in a wage and hour class action settlement.)
- *Latin v. OneMain General Service Corporation*, Stanislaus County Superior Court Case No. CV-20-002498 (October 22, 2021) Hon. Stacy Speiller approved a PAGA action settlement for \$700,000 wage statement violations. The JCL Law Firm, APC acted as counsel for the plaintiff, the State of California and the Aggrieved Employees.
- *Elias Kaser v. Aviation Consultants, Inc.*, Orange County Superior Court Case No. 30-2021-01191204-CU-OE-CXC (September 22, 2021 – Hon. Peter J. Wilson approved \$550 billing rate in a representative California Labor Code Private Attorney General Act settlement).
- *Rodriguez v. RSI Home Products, Inc.*, San Bernardino Superior Court Case No. CIVDS2023354 (July 30, 2021 – Hon. David Cohn approved a \$1.45 million class and PAGA settlement for, *inter alia*, failure to comply with piece-rate laws, and appointed the JCL Law Firm, APC as Class Counsel)
- *Jer Vang v. Bridge Property Management*, Alameda County Superior Court, Case No RG19047434 (January 8, 2021 – Hon. Winifred Smith approved a class and PAGA settlement for, *inter alia*, unpaid off the clock work. The JCL Law Firm, APC acted as class counsel for the settlement class and as representative PAGA counsel the State of California and the Aggrieved Employees.)
- *Johnson v. Volt Management Corp., Inc. et al.*, Los Angeles County Superior Court, Case No. 19STCV16466 (December 11, 2020 – Hon. Amy Hogue approved a PAGA Settlement negotiated on behalf of the State of California and the aggrieved employees by the JCL Law Firm, APC.)
- *Salazar v. Frontier Auto Sales Inc., dba Frontier Toyota*, Los Angeles Superior Court, Case No. 19STCV20382 (November 24, 2020 – Hon. John P. Doyle appointed the JCL Law Firm, APC as class counsel and approved a class and PAGA settlement for, *inter alia*, missed meal and rest periods.)
- *Villalobos v. Alterra Group, LLC et al.*, Los Angeles County Superior Court, Case No. 19STCV19448 (November 11, 2020 – Hon. Richard Fruin approved a PAGA Settlement for, *inter alia*, unreimbursed business expenses. The JCL Law Firm, APC acted as counsel for the plaintiff, the State of California and the Aggrieved Employees.)
- *Stevens et al., v. Bank of England*, San Diego County Superior Court Case No. 37-2019-00018662-CU-OE-CTL (October 16, 2020 – Hon. John Meyer appointed JCL Law Firm as Class Counsel and granted final approval of wage and hour class action for, *inter alia*, off-the-clock work.)
- *Frazier v. ASA Carlton, Inc.*, San Diego Superior Court Case No. 37-2019-00036147 (October 9, 2020 Hon. Kenneth Medel appointed the JCL Law Firm as Class Counsel and granted final approval of wage and hour class action for off-the-clock work.)
- *Krake et al., v. Central Valley Diner, Inc.*, Placer County Superior Court Case No. SCV0041645 (September 4, 2020 – Hon. Michael Jones appointed JCL Law Firm as class counsel and granted final approval of wage and hour class action for meal period violations.)
- *Conner v. Ascendant Marketing, LLC et al.*, San Diego Superior Court Case No. 37-2019-00026864-CU-OE-CTL (July 24, 2020 Hon. Joel Wohlfeil granted approval of PAGA Settlement for, among other things, off-the-clock work. JCL Law Firm, APC acted as lead counsel.)
- *Guerrero v. Estancia Operations, LLC.*, San Diego Superior Court Case No. 37-2019-00028963 (August 25, 2020 – Hon. Katherine Bacal approved PAGA Settlement for, *inter alia*, missed meal and rest periods. JCL Law Firm, APC, acted as lead counsel.)
- *Moreno v. Dash Lube, et al.*, United States District Court, Southern District of California, Case No. 18cv1922 DMS (AHG) (December 13, 2019 – Granted class certification of Labor Code Section 226 claim and appointed JCL Law Firm, APC, as Class Counsel.)
- *Perkins et al., v. Tahiti Enterprises, Inc., et al.*, Orange County Superior Court Case No. 30-2016-00863095 (October 22, 2019 – Hon. Peter Wilson appointed JCL Law Firm, APC, as Class Counsel and granted final approval for an unlawful housing class action settlement arising out of Civil Code Section 1940.1.)
- *Hill v. Stemak Holdings, Ltd.*, San Diego Superior Court Case No., 37-2018-00000747 (January 28, 2020 – Hon. Kenneth Medel appointed JCL Law Firm, APC as class counsel and granted final approval of wage and hour class action for unpaid overtime.)
- *Shachno et al., v. KT Hotels, LLC, et al.* San Diego Superior Court Case No Case No. 37-2018-00043601 (May 31, 2019 – Hon. Gregory Pollack appointed JCL Law Firm, APC, as Class Counsel and granted preliminary approval for the wage and hour class action settlement involving nearly 900 current and former employees. Final approval scheduled for October 4, 2019)
- *Almanza v. The Express Group, Inc.*, San Bernardino Superior Court Case No. CIVDS1722542 (April 19, 2019 – Hon. David Cohn appointed the JCL Law Firm, APC, as Class Counsel and granted final approval for a wage and hour class action settlement for *inter alia*, missed meal and rest periods and independent contractor misclassification.)

- *Moschetto v. Pillow Global, Inc.* San Diego Superior Court, Case No. 37-2017-00024031-CU-OE-CTL (April 5, 2019 – Hon. John S. Meyer appointed JCL LAW Firm, APC, as Class Counsel and granted final approval for a wage and hour wage class action settlement involving misclassified house cleaners.)
- *Burke v. Friendship Hotel, LLC*, San Diego County Superior Court Case No. 37-2017-00022517-CU-OE-CTL (March 10, 2019 – final approval granted on for an unlawful housing class action arising under Civil Code Section 1940.2)
- *Terrado et al., v. Accredited Debt Relief, LLC*, San Diego County Superior Court Case No. 37-2018-00014181-CU-OE-CTL (February 8, 2019 – Hon. Gregory W. Pollock appointed JCL Law Firm, APC as Class Counsel and granted final approval for a wage and hour class action settlement for meal and rest period violations);
- *Macaspac v. San Antonio Regional Hospital*, San Bernardino Superior Court Case No. CIVDS1512625, (July 27, 2018 – Hon. Thomas S. Garza appointed JCL Law Firm, APC, as Class Counsel and granted final approval for a wage and hour class action settlement involving claims for on duty meal and rest periods.);
- *Summerlin et al. v. Maplebear, Inc. dba Instacart*, Los Angeles Superior Court Case No. BC603030 (2018 - certified and settled wage and hour class action.)
- *Ortega v. Prime Healthcare*, San Diego Superior Court Case No. 37-2014-00011240-CU-OE-CTL (2018 – Approved PAGA only settlement for on duty meal and rest periods)
- *Engstrom v. Bender-Rosenthal, Inc.* San Diego Superior Court Case No. 37-2016-00012373-CU-OE-CTL (2017 - Certified and settled class action for employee misclassification);
- *Crawford v. Outlook Amusements, Inc.*, Los Angeles Superior Court Case No. BC617160 (2017 - Certified and settled wage and hour class action.);
- *Hernandez v. Sunglass Hut Trading, LLC*, San Bernardino Superior Court Case No. CIVDS1505181 (2016 - Certified and settled wage and hour class action);
- *Burns v. Shalom, LLC*, San Diego Superior Court, Case No., 37-2013-00058356-CU-BT-CTL (2015 - certified and settled class action for unlawful housing practices arising out of Civil Code Section 1940.1);

EXHIBIT 2

JCL Law Firm
Unbilled Time
Activity: All Dates

Activity Date		Posting	Employee	Memo/Description	Rate	Duration	Amount	Balance
Gomez v. Kirby (002-647)								
09/06/2023	No		Jean Claude Lapuyade	Case Management - Emails to/from OC Re Service	700.00	0.2	140.00	140.00
04/12/2024	No		Jean Claude Lapuyade	Fact Investigation - R&R Client Employee File and Drafted Claims Analysis Memo to Staff	700.00	4.9	3,430.00	3,570.00
04/24/2024	No		Jean Claude Lapuyade	Pleadings - Drafted, Revised and Edited LWDA Notice	700.00	3.8	2,660.00	6,230.00
08/08/2024	No		Jean Claude Lapuyade	Case Management - Drafted CMS and Emails to/from OC Re Same	700.00	0.7	490.00	6,720.00
10/01/2024	No		Jennifer Heming	File maintenance.	250.00	0.3	75.00	6,795.00
10/09/2024	No		Jean Claude Lapuyade	Discovery - Revise and Edited SI (Set 1), RFP (Set 1) and Initial Disclosures	700.00	3.3	2,310.00	9,105.00
10/09/2024	No		Jennifer Heming	Review, finalize, and serve discovery. Calendaring.	250.00	0.9	225.00	9,330.00
10/31/2024	No		Jennifer Heming	Email corres. with OC re M&C on CMS	250.00	0.3	75.00	9,405.00
11/07/2024	No		Jean Claude Lapuyade	Case Management - R&R Defense CMS	700.00	0.4	280.00	9,685.00
11/07/2024	No		Jennifer Heming	Review, finalize, file, and serve CMS.	250.00	0.7	175.00	9,860.00
11/15/2024	No		Jean Claude Lapuyade	Case Management - Emails to/from OC Re Mediation	700.00	0.2	140.00	10,000.00
11/23/2024	No		Jennifer Heming	Review CCP. Calendaring trial dates and deadlines.	250.00	1.3	325.00	10,325.00
12/02/2024	No		Jennifer Heming	Email corres. with OC re mediation	250.00	0.2	50.00	10,375.00
12/04/2024	No		Jennifer Heming	Email corres. with OC re mediation	250.00	0.2	50.00	10,425.00
12/05/2024	No		Jennifer Heming	Review, finalize, file, and serve CMS.	250.00	0.7	175.00	10,600.00
12/05/2024	No		Jennifer Heming	Client update.	250.00	0.3	75.00	10,675.00
12/06/2024	No		Jennifer Heming	Review file. Combine, redact, and bates stamp documents. Review, finalize, and serve initial disclosures.	250.00	1.3	325.00	11,000.00
12/08/2024	No		Jean Claude Lapuyade	Discovery - R&R Defendant's Initial Disclosures	700.00	2.9	2,030.00	13,030.00
12/10/2024	No		Jennifer Heming	Review and save Defendant's initial disclosures. Email corres. with OC.	250.00	0.2	50.00	13,080.00
12/12/2024	No		Jean Claude Lapuyade	Discovery - Emails to/from OC Re Discovery Extension	700.00	0.3	210.00	13,290.00
12/18/2024	No		Jennifer Heming	Email corres. with OC re mediators	250.00	0.2	50.00	13,340.00
12/18/2024	No		Jennifer Heming	Schedule call with OC.	250.00	0.3	75.00	13,415.00
12/19/2024	No		Jean Claude Lapuyade	Case Management - Emails to/from OC Re Mediation	700.00	0.3	210.00	13,625.00
12/20/2024	No		Jean Claude Lapuyade	Discovery - Emails to/from OC Re Discovery Extension and Mediation Data	700.00	0.5	350.00	13,975.00
12/20/2024	No		Jennifer Heming	Email corres. with mediators and OC re mediator availability	250.00	0.4	100.00	14,075.00
12/22/2024	No		Jean Claude Lapuyade	Discovery - Revised and Edited Stip to Stay and Mediation Data Demand	700.00	0.8	560.00	14,635.00
12/23/2024	No		Jean Claude Lapuyade	Discovery - Emails to/from OC Re Mediation Data	700.00	0.2	140.00	14,775.00
12/23/2024	No		Jennifer Heming	Review LRs. Review, finalize, file, and serve stip to vacate trial.	250.00	0.8	200.00	14,975.00
12/24/2024	No		Jennifer Heming	Review and save conformed Joint CMS. Serve on OC.	250.00	0.3	75.00	15,050.00
12/30/2024	No		Jean Claude Lapuyade	Case Management - Emails to/from OC Re Mediation	700.00	0.3	210.00	15,260.00
01/06/2025	No		Jennifer Heming	Email corres. with OC re mediation	250.00	0.2	50.00	15,310.00
01/07/2025	No		Jean Claude Lapuyade	Discovery - Revise and edited SI (Set 1) and RFP (Set 1)	700.00	2.2	1,540.00	16,850.00
01/08/2025	No		Jennifer Heming	Review, finalize, and serve SI (Set 2) & RFP (Set 2). Calendaring.	250.00	1	250.00	17,100.00
01/10/2025	No		Jean Claude Lapuyade	Case management - emails to/from OC Re Mediation	700.00	0.4	280.00	17,380.00
01/10/2025	No		Jennifer Heming	File maintenance.	250.00	0.3	75.00	17,455.00
01/11/2025	No		Jennifer Heming	Email corres. with mediators' offices re availability to reschedule mediation.	250.00	0.6	150.00	17,605.00

01/14/2025	No	Jean Claude Lapuyade	Case management - emails to/from OC Re mediation and discovery	700.00	0.5	350.00	17,955.00
01/15/2025	No	Jean Claude Lapuyade	Discovery - Drafted, Revised and Edited Discovery Plan for internal use in drafting discovery	700.00	2.4	1,680.00	19,635.00
01/21/2025	No	Jean Claude Lapuyade	Case Management - emails to/from OC Re mediation	700.00	0.5	350.00	19,985.00
01/22/2025	No	Jean Claude Lapuyade	Discovery - R&R Draft PO and emails to/from OC Re Same	700.00	2.1	1,470.00	21,455.00
01/22/2025	No	Jennifer Heming	Email corres. with OC & mediator's office re dates available for mediation.	250.00	0.3	75.00	21,530.00
01/23/2025	No	Jennifer Heming	Email corres. with mediator's office confirming mediation. Calendaring.	250.00	0.4	100.00	21,630.00
01/24/2025	No	Jean Claude Lapuyade	Discovery - emails to/from OC Re data demand and stip to stay	700.00	0.3	210.00	21,840.00
01/24/2025	No	Jennifer Heming	Email corres. with mediator's office re confirming mediation.	250.00	0.3	75.00	21,915.00
01/27/2025	No	Jennifer Heming	Email corres. with mediator's office.	250.00	0.3	75.00	21,990.00
01/28/2025	No	Jean Claude Lapuyade	Case Management - Drafted Client Status Update	700.00	1	700.00	22,690.00
01/29/2025	No	Jean Claude Lapuyade	Case Management - emails to/from OC Re mediation	700.00	0.5	350.00	23,040.00
01/29/2025	No	Jean Claude Lapuyade	Discovery - randomized employee list for random data sample and emails to/from OC Re same	700.00	0.7	490.00	23,530.00
01/29/2025	No	Jennifer Heming	Email corres. with OC re stip to stay, data demand, and random sample selection. Review and save redacted class list. Select sample of employee IDs.	250.00	0.7	175.00	23,705.00
01/29/2025	No	Jennifer Heming	Email corres. with mediator's office. Review and save mediation confirmation. Calendaring.	250.00	0.5	125.00	23,830.00
02/03/2025	No	Jennifer Heming	Review and save RTS. Calendaring.	250.00	0.3	75.00	23,905.00
02/18/2025	No	Jean Claude Lapuyade	Discovery - emails to/from Expert re data analysis and R&R Expert report	700.00	1.3	910.00	24,815.00
02/21/2025	No	Jean Claude Lapuyade	Law and Motion - revised and edited mediation brief	700.00	2.4	1,680.00	26,495.00
02/21/2025	No	Jean Claude Lapuyade	Law and Motion - revised and edited mediation brief	700.00	3.1	2,170.00	28,665.00
02/26/2025	No	Jean Claude Lapuyade	Mediation - Attended mediation	700.00	5.2	3,640.00	32,305.00
03/05/2025	No	Jean Claude Lapuyade	Discovery - R&R defendant's FR-G (Set 1), FR-E (Set 1), and RFA (Set 1)	700.00	2.5	1,750.00	34,055.00
03/14/2025	No	Jean Claude Lapuyade	Mediation - emails to/from mediator re continued discussions	700.00	0.5	350.00	34,405.00
03/19/2025	No	Jean Claude Lapuyade	Discovery - emails to/from OC Re mediation data	700.00	0.4	280.00	34,685.00
03/20/2025	No	Jean Claude Lapuyade	Case Management/Mediation - TCW Mediator re proposal	700.00	0.6	420.00	35,105.00
03/21/2025	No	Jean Claude Lapuyade	Settlement - emails to/from OC Re MOU	700.00	0.3	210.00	35,315.00
03/26/2025	No	Jean Claude Lapuyade	Settlement - emails to/from OC Re MOU	700.00	0.3	210.00	35,525.00
04/01/2025	No	Jean Claude Lapuyade	Settlement - emails to/from OC RE MOU and R&R revisions thereto	700.00	0.9	630.00	36,155.00
04/01/2025	No	Jean Claude Lapuyade	Settlement - emails to/from OC Re MOU	700.00	0.3	210.00	36,365.00
04/03/2025	No	Jean Claude Lapuyade	Settlement - emails to/from OC Re MOU	700.00	0.1	70.00	36,435.00
04/03/2025	No	Jean Claude Lapuyade	Settlement - emails to/from OC Re MOU	700.00	0.3	210.00	36,645.00
04/14/2025	No	Jean Claude Lapuyade	Settlement - emails to/from OC Re MOU	700.00	0.2	140.00	36,785.00
04/21/2025	No	Jean Claude Lapuyade	Settlement - Revised and edited long form settlement agreement and emails to/from co counsel re edits	700.00	1.3	910.00	37,695.00
04/22/2025	No	Jean Claude Lapuyade	Settlement - emails to/from OC re long form SAR	700.00	0.2	140.00	37,835.00
04/28/2025	No	Jean Claude Lapuyade	Settlement - emails to/from OC Re Admin selection	700.00	0.4	280.00	38,115.00
05/07/2025	No	Jean Claude Lapuyade	Settlement - Revised added edited SAR	700.00	2.1	1,470.00	39,585.00
05/09/2025	No	Jean Claude Lapuyade	Settlement - emails to/from OC Re SAR	700.00	0.3	210.00	39,795.00
05/12/2025	No	Jean Claude Lapuyade	Settlement - emails to/from co counsel re edits to SAR and status of MPA	700.00	0.5	350.00	40,145.00
05/14/2025	No	Jean Claude Lapuyade	Law and Motion - drafted, revised and edited JCL dec. ISO MPA	700.00	1	700.00	40,845.00
05/15/2025	No	Jean Claude Lapuyade	Law and motion - TCW expert re dec. ISO MPA	700.00	0.5	350.00	41,195.00

Total for Gomez v. Kirby (002-647)

67.4 \$ 41,195.00

EXHIBIT 3

JCL Law Firm

Transaction Report

All Dates

DATE	TRANSACTION TYPE	NUM	NAME	MEMO/DESCRIPTION	AMOUNT	BALANCE
Gomez v. Kirby (002-647)						
04/30/2024	Journal Entry	April 2024 Postage		Copies for April 2024	8.50	8.50
04/30/2024	Journal Entry	April 2024 Postage		Postage for April 2024	17.38	25.88
05/31/2024	Journal Entry	May 2024 Postage		Copies for May 2024	8.50	34.38
05/31/2024	Journal Entry	May 2024 Postage		Postage for May 2024	17.38	51.76
06/30/2024	Journal Entry	June 2024 Copies		June 2024 Copies	1.10	52.86
11/30/2024	Journal Entry	Nov 2024 Copies		November 2024 Copies	0.20	53.06
12/31/2024	Journal Entry	Dec 2024 Copies		December 2024 Copies	0.20	53.26
01/23/2025	Expense		Mediation Offices of Steven G. Mehta	Inv. 19905	5,375.00	5,428.26
01/31/2025	Journal Entry	Jan 2025 Printing		January 2025 Printing	0.70	5,428.96
02/28/2025	Journal Entry	Feb 2025 Printing		Feb 2025 Printing	0.70	5,429.66
03/04/2025	Check		Berger Consulting Group	Inv. 12217-2	2,942.50	8,372.16
03/20/2025	Check	4180	Creal & Creal	Inv. 183770	375.00	8,747.16
03/24/2025	Expense		Mediation Offices of Steven G. Mehta	Inv. 19994	787.50	9,534.66
Total for Gomez v. Kirby (002-647)					\$9,534.66	
TOTAL					\$9,534.66	