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Attorneys for Individual and Representative Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – DOWNTOWN

STEVEN BROUGH,

Plaintiff,

vs.

GLOBAL PARATRANSIT
INC., A California Corporation;
REZA NASROLLAHY, An
Individual; and DOES 1
through 10, inclusive,

Defendants.

) Case No:BC616177 with Related Case No.
) BC619163

) [CLASS ACTION PURSUANT TO CODE
) OF CIVIL PROCEDURE § 382]

) DECLARATION OF JOHN M. NORTON
) IN SUPPORT OF THE FINAL
) APPROVAL OF CLASS SETTLEMENT

) Date: November 12, 2019
) Time: 10:00 a.m.
) Dept: 12

Complaint filed: April 7, 2016
Consolidated Complaint filed: April 27,
2017

I, John Matthew Norton, swear and affirm as true the following:

1. I am an attorney at law, licensed to practice in the trial and appellate courts for the States of California and Arizona. I am a shareholder and principal in the law firm of Matthew Norton and Associates attorneys for Plaintiff Steven Brough in the above-captioned matter. If called on, I would and could testify truthfully and completely as to the following facts:
2. This Declaration is offered in support of Plaintiffs' Motion for Preliminary

Approval of the Class Action Settlement in the above-referenced case.

Our Work in This Matter

3. I initially met with Plaintiff, Steve Brough regarding his employment with Global Paratransit. Thereafter, I investigated Mr. Brough's employment including claims of failure to pay wages as required under the California **Labor Code**.
4. Following my initial investigation, I followed up with investigation into the applicability of the claims by Mr. Brough to the broad category of current and former employees.
5. In consultation with Mr. Brough, I drafted a Notice of Violation and filed it with the California Department of Industrial Relations, PAGA Administrator on February 13, 2016.
6. Thereafter, I contacted co-counsel, Matthew Archobold (of Deason & Archobold) to discuss the issues of wage and hour class action litigation against Global.
7. I researched the Labor Code civil penalties, and the application of those penalties to calculations of overall liability to the various corporate and individual penalties.
8. I thereafter worked with co-counsel to develop the various theories, drafted and edited pleadings and discovery.
9. In the months leading up to the instant settlement, I have actively been involved in all aspects of the litigation, including the development of the Complaint, the submission of this matter to the California Labor and Workforce Development Agency and the discovery.
10. After drafting the Notice of Violation, and Complaint, I also received discovery for Mr. Brough. I drafted Responses to Requests for Production, Special Interrogatories and Form Interrogatories-General, conferred with Mr. Brough, and finalized those responses.

11. Subsequently, I reviewed numerous documents provided by Mr. Brough and produced to the Defendants.

12. I also attended the initial mediation, and subsequently have been in constant contact with co-counsel regarding how the matter is proceeding, including the progress regarding settlement.

13. I then reviewed the subsequent settlement with my client, addressing his various questions and concerns.

Participation by Steve Brough

14. I first met with Steve Brough in January of 2016 and then spoke to Mr. Brough often thereafter.

15. After this initial meeting, Mr. Brough was requested and subsequently reviewed his files for documents related to his employment. Thereafter, he produced numerous documents.

16. Mr. Brough also strongly assisted in the discovery process, as follows:

- a. Defendant propounded Form Interrogatories, Interrogatories and Requests for Production. Mr. Brough spent many hours reviewing the written discovery. He also produced additional documents in response to the Request for Production.
- b. After assisting in drafting the responses for the written discovery, Mr. Brough also reviewed the final version, and thereafter executed the verification for the various discovery responses.
- c. Subsequently, Defendant noticed Mr. Brough's deposition. In preparation, Mr. Brough and I conferred.
- d. While settlement discussions were ongoing, Mr. Brough consistently asked for and received status reports.

Qualifications

17. On June 6, 1992 I was licensed to practice by the California Bar Association. In 2010, I was admitted to practice law by the State Bar of

1 Arizona.

2 18. I have focused my practice on employment matters, including but not
3 limited to wage and hour issues.

4 19. In 1998, I formed my own practice, Matthew Norton & Associates. As a
5 sole practitioner, I have litigated numerous matters in state and federal court.

6 20. I am a member of California Bar Association, Labor and Employment
7 Section since 2002.

8 21. To augment that focus, I have taken numerous classes in wage and hour and
9 employment issues, including but not limited to the following: The State Bar
10 of California's Fourth Annual Advanced Wage and Hour Conference –
11 Wage and Hour Update; The State Bar of California's Fourth Annual
12 Advanced Wage and Hour Conference – PAGA Perspectives; Litigating
13 Disability Discrimination Cases – Session Four: Trials and Settlement
14 Issues.

15 22. I have also been designated class counsel in the following cases: **Young v.**
16 **Nordstrom, Inc.** (Nordstrom Commission Cases), JCCP No. 4419;
17 **Samora v. Make It Work** OCSC Case No.: 30-2010-003379331-CU-OE-
18 CXC; **Gallardo v. KIPP Foundation**, U.S. District Court, Northern District
19 of California: Case No.: 4:12-cv-05017-YGR; **Hernandez and Morales v.**
20 **Sephora USA, Inc.** JCCP No.: 4911.

21 23. Attorneys at Matthew Norton and Associates record their time directly onto
22 a computer generated billing spreadsheet. The time sheets show the activity
23 and time spent on that activity for each case. Time is recorded to the closest
24 tenth of an hour. The total amount of fees is determined by multiplying the
25 number of hours worked by each hourly rate.

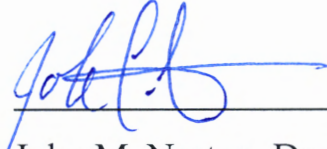
26 24. Over the course of the current litigation, Matthew Norton and Associates,
27 has billed \$500.00 per hour for attorney services. In my experience, the rate
28 is consistent with, or below, rates for attorneys performing similar litigation

1 is consistent with, or below, rates for attorneys performing similar litigation
2 in the County of Los Angeles.

3 25. As of October 7, 2019, I have billed 77.9 hours of attorney time on this
4 matter which equals \$38,950.00 in the prosecution of this action and were
5 necessary and integral to that prosecution.

6 26. In addition, to date I have incurred costs totaling \$5,603.63, which
7 represents filing fees, attorney service fees (including Case Anywhere),
8 copies of documents, and mediation costs.

9 I declare under penalty of perjury under the laws of the State of California
10 that the above is true and correct and was executed on October 9, 2019 at Long
11 Beach, California.

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13 _____
14 John M. Norton, Declarant
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