JCL LAW FIRM, APC
Jean-Claude Lapuyade (State Bar #248676)
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ZAKAY LAW GROUP, APLC
Shani O. Zakay (State Bar #277924)
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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF TEHAMA

CHRISTOPHER VANDERBEEK, an individual, on behalf of himself, and on behalf of all persons similarly situated, Plaintiff, v. OUTBACK CONTRACTORS, INC., a California corporation; and DOES 1-50, Inclusive, Defendants.	Case No. 24CI-000225 **DECLARATION OF JEAN-CLAUDE LAPUYADE, ESQ. IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Date: December 15, 2026 Time: 8:30 a.m. Judge: Hon. Matthew C. McGlynn Dept.: 5

I, Jean Claude Lapuyade, declare as follows:

1. I am the managing partner of the law firm of JCL Law Firm, APC, and co-counsel of record for Plaintiff Christopher Vanderbeek ("Plaintiff"), an individual, on behalf of himself, and on behalf of all persons similarly situated. As such, I am fully familiar with the facts, pleadings, and history of the matter.

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

I. EXHIBITS

3. Attached hereto as **Exhibit "1"** is a true and correct copy of the JCL Law Firm, APC's "Transaction Summary" detailing the JCL Law Firm, APC's actually incurred litigation expenses for this matter as of November 16, 2026. As shown in detail in the attached transaction summary, the JCL Law Firm, APC, incurred a total of $11,004.23 in litigation costs prosecuting this action. These costs are exclusive of the costs incurred by co-counsel Zakay Law Group, APLC.

4. Attached hereto as **Exhibit "2"** is a true and correct copy of the JCL Law Firm, APC's "Firm Resume" detailing the credentials and a summary of cases on which Counsel has been appointed Class Counsel.

II. CLASS COUNSEL'S REQUEST FOR FEES AND COSTS

A. LODESTAR

5. As of November 16, 2026, 2026, the JCL Law Firm, APC incurred a total lodestar of $116,960.00 for 207.3 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. A detailed breakdown of the total fees and the services performed by the firm on this case will be made available for in camera review upon request from the Court.

6. 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.)

7. 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 in the last twenty-four months alone.

8. 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**	**Hours Billed**	**Lodestar**
Jean-Claude Lapuyade, Esq. (Managing Attorney)	$948	$850[1]	78.6	$61,965.00
Sydney Castillo-Johnson, Esq. (Handling Attorney)	$473	$500	63.2	$29,270.00
Perssia Razma, Esq. (Handling Attorney)	$473	$500	3.3	$1,425.00
Carolina Faccin, Esq. (Handling Attorney)	$581	$500	25.2	$12,600.00
John L. Nitti, Esq. (Former Handling Attorney)	$581	$500	9.8	$4,900.00
Jennifer Heming (Handling Paralegal)	$258	$250	27.2	$6,800.00
		Total	207.3	$116,960.00

[1] The hourly rates for attorneys Jean-Claude Lapuyade, Esq., Sydney Castillo-Johnson, Esq., and Perssia Razma, Esq., increased on or about June 1, 2025.

9. Additionally, the attorneys and staff at co-counsel Zakay Law Group, APLC worked a total of 9.5 hours successfully prosecuting this action for a lodestar of $7,600.00. If requested, Class Counsel will provide true and accurate copies of all billing journals supporting the above stated lodestar to the Court for its *in camera* review.

10. Collectively, Class Counsel spent a total of 216.8 hours successfully litigating this matter for a total combined lodestar of $124,560.00 and is summarized by firm below:

FIRM	**Hours**	**Total**
JCL Law Firm, APC	207.3	$116,960.00
Zakay Law Group, APLC	9.5	$7,600.00
Total	216.8	$124,560.00

11. Further, Class Counsel will be performing additional work, including finalizing the motion for final approval, attending the hearing on final approval, finalizing the orders and judgment, and monitoring the completion of the settlement distribution. I expect this additional work will result in 10-15 hours of additional work and an additional lodestar between $6,000 and $9,000.

B. COSTS

12. As of the filing of the Motion for Final Approval, the JCL Law Firm, APC, has expended $11,004.23 in prosecuting this action. *See* **Exhibit #1.**

13. All of Class Counsel's out-of-pocket expenses are the types of expenses normally charged to paying clients including the following: filing fees; copying; telephone; postage; factual and legal research charges; mediation fees; and expert costs, which were all incurred during, and were necessary for the successful prosecution of, the litigation and, therefore, should be reimbursed.

14. Class Counsel now requests that the Court finally approve reimbursement of litigation costs in the amount up to $30,000.00 as provided for in the Agreement and based upon Class Counsel's billing records.

III. CLASS COUNSEL'S EXPERIENCE

15. Plaintiff, the Settlement Class Members, and the Aggrieved Employees are represented by competent and experienced counsel to pursue their claims. I established the JCL Law Firm, APC ("Firm") in 2010. The Firm is a boutique plaintiff firm representing aggrieved employees and

consumers throughout California in wage and hour class actions and complex multi-party product liability matters. The Firm currently consists of myself, Jean-Claude Lapuyade, Esq. (Partner/Owner), Sydney Castillo-Johnson, Esq. (Associate Attorney), Perssia Razma, Esq. (Associate Attorney), John L. Nitti, Esq. (Former Associate Attorney), Carolina Faccin, Esq. (Associate Attorney), Jennifer Heming (Paralegal), Natalia Michele (Paralegal), Andrew Ward (Law Clerk), Hana McAnally (Law Clerk), Elsa Torres (Legal Assistant), Reyna Garcia (Legal Assistant), Lizeth Ponce (Legal Assistant), and Sabrina Carle-Parra (Secretary).

16. 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 #2**. Some of the major cases the Firm has undertaken are also set forth in **Exhibit #2**.

17. I have represented consumers and employees in California class actions, and complex multi-party product liability actions exclusively for more than 19 years. I have been in practice as a Plaintiff's civil litigation attorney since April 2007.

18. Since 2010, I have successfully tried two (2) cases to conclusion, each resulting in a favorable verdict for the firm's clients.

19. Finally, I have published appellate experience in *William Blanchette et al., v. The Superior Court of Imperial County, (GHA Enterprises)* (2017) 8 Cal.App.5th 521, *Duran v. EmployBridge Holding Company, LLC* (2023) 92 Cal.App.5th 59, and *Phan v. Knight Sacramento SU, Inc. (2026) 121 Cal.App.5th 641*.

/ / /

20. Consequently, I have been 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 have been named a Super Lawyer for Employment Law consecutively in 2025, 2026, and 2027.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 16th day of November 2026, at San Diego, California.

JCL LAW FIRM, APC

By: _____
Jean-Claude Lapuyade
Attorney for PLAINTIFF

EXHIBIT 1

JCL Law Firm
Transaction Report
All Dates

	Date	Transaction Type	Num	Name	Memo/Description	Amount	Balance
VanDerBeek v. Outback (002-684)							
	08/30/2024	Expense		LWDA		75.00	75.00
	09/03/2024	Expense		One Legal LLC	One Legal Order No. 23639795 - Filing Fee Re: Complaint, Summons, Civil Case Cover Sheet	468.63	543.63
	09/30/2024	Journal Entry	Aug/Sept. 2024 Post.		Aug/Sept 2024 Postage	9.64	553.27
	09/30/2024	Journal Entry	Aug/Sept. 2024 Print.		Aug/Sept. 2024 Printing	1.40	554.67
	10/02/2024	Expense		One Legal LLC	One Legal Order No. 23850210 - Filing Fee Re: Proof of Service	20.86	575.53
	10/22/2024	Expense		One Legal LLC	One Legal Order No. 23982322 - Filing Fee Re: Proof of Service of Summons	15.44	590.97
	10/22/2024	Expense		One Legal LLC	One Legal Order No. 23985462 - Filing Fee Re: Proof of Service	20.86	611.83
	10/30/2024	Check	4006	Tehama County Superior Court	Filing Fee	1,000.00	1,611.83
	10/31/2024	Journal Entry	October 2024 Postage		October 2024 Postage	0.69	1,612.52
	10/31/2024	Journal Entry	October 2024 Printing		October 2024 Printing	0.50	1,613.02
	11/07/2024	Check	4016	Knox Attorney Services, Inc.	Inv. 4448783	186.15	1,799.17
	11/30/2024	Journal Entry	Nov 2024 Copies		November 2024 Copies	1.00	1,800.17
	12/17/2024	Expense		One Legal LLC	One Legal Order No. 24337146 - Filing Fee Re: Complaint, Summons, Civil Case Cover Sheet	471.03	2,271.20
	12/31/2024	Journal Entry	Dec 2024 Postage		December 2024 Postage	0.69	2,271.89
	12/31/2024	Journal Entry	Dec 2024 Copies		December 2024 Copies	1.20	2,273.09
	01/27/2025	Expense		One Legal LLC	One Legal Order No. 24588316 - Filing Fee Re: Notice and Acknowledgement of Receipt	22.87	2,295.96
	01/29/2025	Expense		One Legal LLC	One Legal Order No. 24603514 - Filing Fee Re: Other, Proof of Service	22.87	2,318.83
	01/31/2025	Journal Entry	Jan 2025 Printing		January 2025 Printing	1.20	2,320.03
	02/28/2025	Journal Entry	Feb 2025 Printing		Feb 2025 Printing	1.20	2,321.23
	03/12/2025	Expense		One Legal LLC	One Legal Order No. 24908422 - Filing Fee Re: Motion, Memorandum of Points & Authorities, Declaration, Proposed Order, Proof of Service	17.50	2,338.73
	03/13/2025	Expense		One Legal LLC	One Legal Order No. - Filing Fee Re:	85.85	2,424.58
	03/20/2025	Check	4183	Tehama County Superior Court	Filing Fee	0.50	2,425.08
	03/31/2025	Journal Entry	March 2025 Printing		Mar 2025 Printing	1.20	2,426.28
	04/22/2025	Expense		One Legal LLC	One Legal Order No. 25208680 - Filing Fee Re: Reply Filed, Declaration, Proof of Service	23.63	2,449.91
	05/02/2025	Expense		One Legal LLC	One Legal Order No. 25295088 - Filing Fee Re: Order after Hearing, Proof of Service	23.63	2,473.54
	05/08/2025	Expense		One Legal LLC	One Legal Order No. 25335745 - Filing Fee Re: Proposed Order, Proof of Service	17.50	2,491.04
	05/14/2025	Expense		One Legal LLC	One Legal Order No. 25379679 - Filing Fee Re: Statement of, Proof of Service	23.63	2,514.67
	06/04/2025	Expense		One Legal LLC	One Legal Order No. 25526225 - Filing Fee Re: Proposed Order, Proof of Service	23.63	2,538.30
	07/14/2025	Check	354	Tehama County Superior Court	Filing Fee	1.00	2,539.30
	07/31/2025	Journal Entry	July 2025 Postage		July 2025 Postage	0.79	2,540.09
	07/31/2025	Journal Entry	July 2025 Copies		July 2025 Copies	2.30	2,542.39
	09/25/2025	Expense		One Legal LLC	One Legal Order No. 26381175 - Filing Fee Re: Statement of, Proof of Service	23.63	2,566.02

09/25/2025	Expense		One Legal LLC	One Legal Order No. 26381232 - Filing Fee Re: Statement of, Proof of Service	23.63	2,589.65
09/25/2025	Expense		One Legal LLC	One Legal Order No. 26381232 - Filing Fee Re: Statement of, Proof of Service	23.63	2,613.28
09/25/2025	Expense		One Legal LLC	One Legal Order No. 26381175 - Filing Fee Re: Statement of, Proof of Service	23.63	2,636.91
09/26/2025	Credit Card Credit		One Legal LLC		-23.63	2,613.28
09/26/2025	Credit Card Credit		One Legal LLC		-23.63	2,589.65
01/31/2026	Journal Entry	Jan. 2026 Copies		January 2026 Copies	1.20	2,590.85
03/31/2026	Journal Entry	March 2026 Copies		March 2026 Copies	0.20	2,591.05
04/13/2026	Expense		One Legal LLC	One Legal Order No. 27951194 - Filing Fee Re: Stipulation & Order Received ($20.00), Proof of Electronic Service	46.46	2,637.51
04/14/2026	Check	619	Signature Resolution	Inv. PR92611	4,875.00	7,512.51
04/30/2026	Journal Entry	April 2026 Postage		April 2026 Postage	0.74	7,513.25
05/06/2026	Expense		One Legal LLC	One Legal Order No. 28154589 - Filing Fee: Stipulation & Order Received ($20.00),Proof of Service	46.46	7,559.71
05/09/2026	Check	634	Knox Attorney Services, Inc.	Inv. 4500314	191.75	7,751.46
06/16/2026	Check		Berger Consulting Group	Inv. 12939-2	1,092.50	8,843.96
07/02/2026	Expense		One Legal LLC	One Legal Order No. 28661947 - Filing Fee: Stipulation & Order Received ($20.00),Proof of Electronic Service	46.46	8,890.42
07/07/2026	Expense		One Legal LLC	One Legal Order No. 28678950 - Filing Fee: Other, Proof of Service	24.73	8,915.15
07/14/2026	Expense		One Legal LLC	One Legal Order No. 28738009 - Filing Fee: Amended Complaint Filed - No Fee, Proof of Service	24.73	8,939.88
07/14/2026	Expense		One Legal LLC	One Legal Order No. 28744895 - Filing Fee: Request for Dismissal - Entire Action, Proof of Service	24.73	8,964.61
07/15/2026	Check	681	Knox Attorney Services, Inc.	Inv. 4502712	152.50	9,117.11
08/10/2026	Check	711	Knox Attorney Services, Inc.	Inv. 4507314	227.90	9,345.01
08/13/2026	Expense		One Legal LLC	One Legal Order No. 28996933 - Filing Fee: Motion/RFO - $60 Fe e, M e m o randum of Points & Authorities, Declaration	87.86	9,432.87
09/07/2026	Expense		Apex		1,003.36	10,436.23
10/13/2026	Check	754	Knox Attorney Services, Inc.	Inv. 4512603	218.00	10,654.23
				Anticipated Costs for Approval & Post-Approval	350.00	11,004.23
Total for VanDerBeek v. Outback (002-684)					**$ 11,004.23**	
TOTAL					**$ 11,004.23**	

EXHIBIT 2

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
- Super Lawyers 2025 - 2026
- 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 Wester 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);