

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
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ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

VIOLENA PEREZ MARTINEZ, an individual,
on behalf of herself, and on behalf of all other
aggrieved employees,

PLAINTIFFS,

vs.

OLLI SALUMERIA AMERICANA, LLC; and
Does 1 through 50, Inclusive,

DEFENDANTS.

Case No: 37-2022-00017063-CU-OE-CTL

Action Filed: May 5, 2022

**DECLARATION OF JEAN-CLAUDE
LAPUYADE, ESQ. IN SUPPORT OF
PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT
AND JUDGMENT**

Date: April 7, 2023

Time: 9:00 a.m.

Dept.: 75

Judge: Hon. James Mangione

I, JEAN-CLAUDE LAPUYADE, declare as follows:

1. I am the managing partner of JCL Law Firm, APC, and co-counsel of record for Plaintiff VIOLENA PEREZ MARTINEZ, on behalf of herself, and on behalf of all persons similarly situated, and in her representative capacity on behalf of the State of California and fellow Aggrieved Employees, in this matter. As such, I am fully familiar with the facts, pleadings and history of the matter.

2. I am submitting this declaration in support of Plaintiffs' Motion for Approval of PAGA Settlement.

3. Attached hereto as **Exhibit "A"** is a true and correct copy of the JCL Law Firm, APC's "Transaction Summary" detailing Plaintiff's Counsel's actually incurred litigation expenses for this matter as of March 13, 2023. As shown in detail in the attached transaction summary, Counsel has incurred a total of \$4,965.85 in litigation costs prosecuting this action. I anticipate incurring an additional \$150 - \$200 for the filing, service and appearance at this motion.

4. Attached hereto as **Exhibit "B"** is a true and correct copy of the Time and Billing Journal for the attorneys and staff at the JCL Law Firm, APC. To the best of my knowledge, each entry was made contemporaneously by the applicable attorney and/or staff members and in the ordinary course of their usual course of business. The attached Billing Journal shows that the JCL Law Firm, APC, billed a total of 71.5 hours for a total of \$35,430.00 successfully litigating this action at \$550 per hour for attorney Jean-Claude Lapuyade, Esq.

5. The JCL Law Firm's rates are comparable to those judicially approved for other plaintiff's 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 in consumer class action); *Parkinson v. Hyundai Motor America*, 796 F.Supp.2d 1160, 1172 (C.D. Cal. 2010)(approving hourly

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

11 6. Moreover, my billing rate has been approved multiple times within the last year by
12 California Superior Court judges. (*See generally Rodriguez v. RSI Home Products, Inc.*, San
13 Bernardino Superior Court Case No. CIVDS 2023354 (July 30, 2021 – Hon. David Cohn approved
14 \$550 billing rate and appointed Jean-Claude Lapuyade, Esq. as Counsel in a \$1,450,000 wage and hour
15 class action settlement); *Nunes v. Home Depot U.S.A., Inc.*, San Joaquin Superior Court Case No. STK-
16 CV-UOE-2020-0011011 (October 20, 2021 – Hon. Roger Ross approved \$550 billing rate and
17 appointed Jean-Claude Lapuyade, Esq. as Counsel in a \$1,500,000 wage and hour class action
18 settlement); *Pillsbury v. T&T Restaurants CA, Inc.*, Del Norte Superior Court Case No. CVUJ-20-
19 1214 (December 14, 2021 – Hon. Darren McElfresh approved \$550 billing rate and appointed Jean-
20 Claude Lapuyade, Esq. as Counsel in a wage and hour class action settlement); *Elias Kaser v. Aviation*
21 *Consultants, Inc.*, Orange County Superior Court Case No. 30-2021-01191204-CU-OE-CXC
22 (September 22, 2021 – Hon. Peter J. Wilson approved \$550 billing rate in a representative California
23 Labor Code Private Attorney General Act settlement).

24 7. Further, Counsel will be performing additional work, including finalizing the orders and
25 judgment and monitoring the completion of the settlement process over the course of the next coming
26 months.

8. All of 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; expert costs and travel expenses, which were all incurred during, and were necessary for the successful prosecution of, the litigation and, therefore, should be reimbursed.

9. Counsel now requests reimbursement for those incurred litigation expenses and costs as provided for in the Settlement Agreement and based upon Counsel's billing records.

10. Attached hereto as “**Exhibit C**” is a true and correct copy of the JCL Law Firm “Firm Resume” detailing some of the major cases the JCL Law Firm has undertaken.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 14th day of March 2023, at San Diego, California.

JCL LAW FIRM, APC

By: Jean-Claude Lapuyade
Jean-Claude Lapuyade
Attorneys for Plaintiff

EXHIBIT A

JCL Law Firm

Transaction Report

All Dates

DATE	TRANSACTION TYPE	NUM	NAME	MEMO/DESCRIPTION	ACCOUNT	SPLIT	AMOUNT	BALANCE
Martinez v. Ollie (002-299)								
02/28/2022	Journal Entry	Feb 2022 Postage		Copies for Feb 2022	Client costs deferred	-Split-	3.80	3.80
02/28/2022	Journal Entry	Feb 2022 Postage		Postage for Feb 2022	Client costs deferred	-Split-	21.99	25.79
03/31/2022	Journal Entry	Mar 2022 Postage		Copies for Mar 2022	Client costs deferred	-Split-	0.40	26.19
03/31/2022	Journal Entry	Mar 2022 Postage		Postage for Mar 2022	Client costs deferred	-Split-	14.66	40.85
05/06/2022	Expense		One Legal LLC	One Legal Order Number: 18161690 - Filing Fee Re: Complaint, Civil Case Cover Sheet, Original Summons	Client costs deferred	Chase Card 7349	1,490.20	1,531.05
05/31/2022	Journal Entry	May 2022 Postage		Copies for May 2022	Client costs deferred	-Split-	0.25	1,531.30
06/30/2022	Journal Entry	June 2022 Postage		Copies for June 2022	Client costs deferred	-Split-	5.10	1,536.40
08/10/2022	Check	2918	Judicate West	Invoice Number 572000 - re: Mediation	Client costs deferred	US Bank-Checking - 4270	2,662.50	4,198.90
08/31/2022	Journal Entry	August 2022 Postage		Copies for August 2022	Client costs deferred	-Split-	0.30	4,199.20
08/31/2022	Journal Entry	August 2022 Postage		Postage for August 2022	Client costs deferred	-Split-	0.57	4,199.77
09/30/2022	Journal Entry	Sept. 2022Postage		Postage for September 2022	Client costs deferred	-Split-	0.57	4,200.34
09/30/2022	Journal Entry	Sept. 2022Postage		Copies for September 2022	Client costs deferred	-Split-	0.30	4,200.64
10/05/2022	Check	2975	Berger Consulting Group	Inv. 6860	Client costs deferred	US Bank-Checking - 4270	750.00	4,950.64
10/31/2022	Journal Entry	Oct. 2022 Postage		Postage for October 2022	Client costs deferred	-Split-	0.57	4,951.21
10/31/2022	Journal Entry	Oct. 2022 Postage		Copies for October 2022	Client costs deferred	-Split-	0.10	4,951.31
12/19/2022	Expense		One Legal LLC	One Legal Order Number: 19497361 - Filing Fee Re: Case Management Statement, Proof of Service	Client costs deferred	Chase Card 7349	12.87	4,964.18
12/31/2022	Journal Entry	Dec 2022 Postage		Copies for December 2022	Client costs deferred	-Split-	1.10	4,965.28
12/31/2022	Journal Entry	Dec 2022 Postage		Postage for December 2022	Client costs deferred	-Split-	0.57	4,965.85
Total for Martinez v. Ollie (002-299)							\$4,965.85	

EXHIBIT B

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
Martinez v. Ollie (002-299)							
12/01/2021	No	Jean Claude Lapuyade	Fact Investigation - Client Intake	550.00	0:36	330.00	330.00
12/03/2021	No	Jean Claude Lapuyade	Fact Investigation - R&R Employee Documents	550.00	1:42	935.00	1,265.00
12/06/2021	No	Jean Claude Lapuyade	Legal Research - Employee File Demand Statutes	550.00	1:54	1,045.00	2,310.00
01/13/2022	No	Jean Claude Lapuyade	Case Management - Drafted Status Letter to Client Re Employee File Extension	550.00	0:54	495.00	2,805.00
01/13/2022	No	Jean Claude Lapuyade	Discovery - Drafted Second Employee File Demand	550.00	1:00	550.00	3,355.00
01/27/2022	No	Jean Claude Lapuyade	Legal Research - 2802, OTC Claim, Meal and Rest (Case Law)	550.00	3:48	2,090.00	5,445.00
02/23/2022	No	Jean Claude Lapuyade	Legal Research - LWDA Notice Requirements (Cases and Statutes)	550.00	1:06	605.00	6,050.00
02/28/2022	No	Jean Claude Lapuyade	Pleadings - Drafted, Revised and Edited LWDA Notice Letter	550.00	2:30	1,375.00	7,425.00
03/28/2022	No	Jean Claude Lapuyade	Discovery - R&R Employee File Production	550.00	3:24	1,870.00	9,295.00
03/29/2022	No	Jean Claude Lapuyade	Legal Research - Off the Clock for COVID Screening	550.00	2:48	1,540.00	10,835.00
04/04/2022	No	Jean Claude Lapuyade	Case Management - Drafted Client Status Letter Re Claim Analysis	550.00	2:12	1,210.00	12,045.00
04/06/2022	No	Jean Claude Lapuyade	Case Management - TCW Client Re Claims and Timeline	550.00	0:48	440.00	12,485.00
05/03/2022	No	Jean Claude Lapuyade	Pleadings - Drafted, Edited and Revised Complaint	550.00	3:00	1,650.00	14,135.00
06/02/2022	No	Jean Claude Lapuyade	Pleadings - R&R Defendant's Answer	550.00	1:30	825.00	14,960.00
06/09/2022	No	Jean Claude Lapuyade	Case Management - Drafted Status Letter to Client	550.00	1:12	660.00	15,620.00

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
06/23/2022	No	Jean Claude Lapuyade	Phone Call with client re status and developments in the law.	550.00	0:30	275.00	15,895.00
06/28/2022	No	Jean Claude Lapuyade	Emails to/from OPC Re MTC Extension	550.00	0:18	165.00	16,060.00
07/07/2022	No	Jean Claude Lapuyade	Discovery - Emails to/from OPC RE Extension	550.00	0:18	165.00	16,225.00
09/05/2022	No	Sydney Castillo-Johnson	Legal research - meal periods and regular rate of pay	300.00	1:52	560.00	16,785.00
09/08/2022	No	Sydney Castillo-Johnson	Draft mediation brief	300.00	4:15	1,275.00	18,060.00
09/14/2022	No	Jean Claude Lapuyade	Discovery - R&R Class Data	550.00	5:24	2,970.00	21,030.00
09/20/2022	No	Jean Claude Lapuyade	Discovery - Emails too/from OC RE Discovery Extension Pending MPA	550.00	0:24	220.00	21,250.00
09/22/2022	No	Sydney Castillo-Johnson	Draft supplemental mediation brief	300.00	1:03	315.00	21,565.00
09/23/2022	No	Jean Claude Lapuyade	Fact Investigation - Reviewed Client File	550.00	1:12	660.00	22,225.00
09/23/2022	No	Jean Claude Lapuyade	Law and Motion - R&R Defendant's Mediation Brief	550.00	2:12	1,210.00	23,435.00
09/26/2022	No	Jean Claude Lapuyade	Mediation - Attended Mediation	550.00	8:00	4,400.00	27,835.00
09/26/2022	No	Sydney Castillo-Johnson	Attend mediation	300.00	7:00	2,100.00	29,935.00
09/29/2022	No	Sydney Castillo-Johnson	Call with client re: MOU	300.00	0:15	75.00	30,010.00
09/29/2022	No	Jean Claude Lapuyade	Settlement - Emails to/from Admin Re Bids	550.00	0:24	220.00	30,230.00
10/20/2022	No	Jean Claude Lapuyade	Settlement - Emails to/from Co Counsel Re Long Form	550.00	0:24	220.00	30,450.00
11/13/2022	No	Jean	Settlement - Emails to/from Co Counsel Re Long	550.00	0:24	220.00	30,670.00

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
		Claude Lapuyade	Form				
11/14/2022	No	Monnett DeLaTorre	Strategy meeting with Attorneys Mr. Lapuyade and Mr. Zakay regarding discrepancy between MOU and Mediator's proposal.	500.00	0:12	100.00	30,770.00
11/14/2022	No	Monnett DeLaTorre	Prepare initial draft of 18 page joint stipulation of settlement of PAGA Action and Release of PAGA claims.	500.00	2:00	1,000.00	31,770.00
11/14/2022	No	Monnett DeLaTorre	Prepare individual settlement agreement as to Plaintiff's individual claims.	500.00	1:18	650.00	32,420.00
11/14/2022	No	Monnett DeLaTorre	Prepare Administrator Notice to be included with Joint Stipulation of Settlement of PAGA Action.	500.00	0:24	200.00	32,620.00
11/17/2022	No	Monnett DeLaTorre	Final review of settlement agreements and email to opposing counsel for review and edit.	500.00	0:12	100.00	32,720.00
11/17/2022	No	Monnett DeLaTorre	Strategy discussions with Attorney Mr. Zakay regarding terms within settlement agreements and finalize PAGA settlement Agreement and individual settlement agreement to be provided to opposing counsel.	500.00	0:48	400.00	33,120.00
11/18/2022	No	Jean Claude Lapuyade	Settlement - Revised and Revised Long Form	550.00	1:06	605.00	33,725.00
11/18/2022	No	Jean Claude Lapuyade	Settlement - Emails to/from OC RE Long Form	550.00	0:24	220.00	33,945.00
11/23/2022	No	Monnett DeLaTorre	Review materials and status of matter as to settlement and approval in preparation for meeting with the client.	500.00	0:18	150.00	34,095.00
11/23/2022	No	Monnett DeLaTorre	Review and respond to email from opposing counsel re confirmation of acceptance of settlement terms.	500.00	0:06	50.00	34,145.00
11/30/2022	No	Monnett DeLaTorre	Teleconference with client to provide status update.	500.00	0:12	100.00	34,245.00
12/01/2022	No	Jean Claude Lapuyade	Settlement - Drafted, Reviewed & Revised Long Form Agreement	550.00	1:06	605.00	34,850.00
12/18/2022	No	Jean Claude Lapuyade	Case Management - Drafted, Revise and Edited CMS	550.00	0:18	165.00	35,015.00
12/19/2022	No	Monnett DeLaTorre	Complete CMS statement.	500.00	0:24	200.00	35,215.00
12/19/2022	No	Monnett DeLaTorre	Follow up email to opposing counsel regarding status of settlement agreements.	500.00	0:06	50.00	35,265.00
01/07/2023	No	Jean Claude Lapuyade	Case management - Emails to/from OC Re MPA Hearing	550.00	0:18	165.00	35,430.00
Total for Martinez v. Ollie (002-299)					71:31	\$35,430.00	

EXHIBIT C

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 \$100 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

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. She now sits on the Advisory Council with the Community Law Project.

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

Monnett De La Torre, Esq.
California Bar Number 272884
Senior Associate

Biography:

Ms. De La Torre is a San Diego and Ventura County based labor and employment attorney representing aggrieved California employees throughout the State of California. Ms. De La Torre's litigation practice focuses on representing California employees in wage and hour class and representative actions for unpaid wages, missed meal and rest breaks, misclassification, penalties, and wrongful termination cases. Ms. De La Torre has extensive experience handling internal workplace investigations. Ms. De La Torre has handled matters before the Department of Fair Employment and Housing, Equal Employment Opportunity Commission and Department of Labor.

Ms. De La Torre is a two-time recipient of the Super Lawyers Rising Star by Thomas 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 five 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

Professional Associations:

- California Employment Lawyers Association, 2022 to Present
- Consumer Attorneys of San Diego, 2010-2015
- American Bar Association, Labor & Employment Section, Member, 2015 to Present
- California Bar Association, Labor & Employment Section, Member, 2015 to Present
- San Diego La Raza Lawyers Association, 2010-2015
- Ventura County Bar Association, 2015-Present
- Women Lawyers of Ventura County, 2015-Present

Education:

- **New England School of Law**
 - J.D.- 2010

- Honors:
 - Dean's List Consecutive years
- **University of California, San Diego**
 - B.A.- 2006
 - Major: Economics
 - Minor: Latin American Studies

Honors:

- Super Lawyers Rising Star, Thomson Reuters, 2021 and 2022
- Pacific Coast Business Times, "Top 40 under 40" Award
- Daily Transcripts "Top Young Attorney: nominee, consecutive years"

REPORTED CASES

- *Blanchette et al., v. Superior Court (GHA Homes)*, 8 Cal.App.5th 521, 2017
- *Chmurny v. State*, 392 Md. 159, 2006

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

- *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. Stetak 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);