

David P. Myers (SBN 206137)
dmyers@myerslawgroup.com
Jason Hatcher (SBN 285481)
jhatcher@myerslawgroup.com
Cassandra A. Castro (SBN 334238)
ccastro@myerslawgroup.com
Andriana N. Bravo (SBN 349191)
abravo@myerslawgroup.com
THE MYERS LAW GROUP, A.P.C.
9327 Fairway View Place, Suite 100
Rancho Cucamonga, CA 91730
Telephone: (909) 919-2027
Facsimile: (888) 375-2102

Attorneys for Plaintiff Silverio Perez
and all others similarly situated

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SILVERIO PEREZ, on behalf of
himself and all others similarly situated

PLAINTIFF,

V.

ECOLAB PRODUCTION LLC, a
Delaware Limited Liability Company;
and DOES 1 through 100, inclusive

DEFENDANTS.

Case No.: 5:24-cv-01954-SSS-SP

CLASS ACTION

**DECLARATION OF JASON
HATCHER IN SUPPORT OF
MOTION FOR APPROVAL OF
PAGA SETTLEMENT**

Date: September 11, 2026

Time: 2:00 p.m.

Courtroom: 2

[Honorable Sunshine S. Sykes]

Complaint Filed: July 24, 2024

FAC Filed: October 22, 2024

Date of Removal: September 12, 2024

**DECLARATION OF JASON HATCHER IN SUPPORT OF MOTION FOR APPROVAL
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DECLARATION OF JASON HATCHER:

I, Jason Hatcher, declare as follows:

1. I am an individual over 18 years of age. I am an attorney at The Myers Law Group, A.P.C. (“MLG”), counsel for the named Plaintiff Silverio Perez (“Plaintiff”), on behalf of himself and the PAGA aggrieved employees, in the above-entitled action. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I could and would competently do so.

2. I graduated from Southwestern Law School in 2012. I am an active member in good standing with the State Bar of California and State Bar of Nevada. I was admitted to the State Bar of California on or about December 3, 2012. I was admitted to the State Bar of Nevada on or about May 7, 2021. I am admitted to practice before the United States District Court – Northern, Central, Southern, and Eastern Districts of California; United States Ninth Circuit Court of Appeals; and all of California State Courts. During law school, I externed for the Honorable Stephen V. Wilson in the U.S. District Court in the Central District of California and for the Honorable Anthony J. Mohr in Los Angeles County Superior Court’s Complex Civil Department. I have been an attorney with The Myers Law Group, A.P.C. since March 2015. Prior to that, I was an attorney at the Law Office of Joseph Antonelli from December 2012 to January 2015. I have also achieved the honor of Southern California Rising Star by Super Lawyers for the years 2017 to 2022. I was selected as a Southern California Super Lawyer in 2023.

3. I have helped litigate numerous successful wage and hour class actions in California. I have also been successful in supporting efforts in obtaining favorable published opinions for employees in the state of California:

a. *Vazquez v. SaniSure, Inc.*, 101 Cal.App.5th 139 (2024);

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- 1 b. *Vasserman v. Henry Mayo Newhall Memorial Hospital*, 65
2 F.Supp.3d 932 (Central District 2014); and
3 c. *Falk v. Children's Hospital Los Angeles*, 237 Cal.App.4th 1454
4 (2015).

5 These cases were significant decisions related to wage and hour class actions,
6 as in *Vazquez* the Court of Appeal held that an employer and employee can agree to
7 arbitrate claims related to their employment relationship, but the termination of that
8 relationship revokes the arbitration agreement and when there is no evidence that the
9 parties agreed to arbitrate claims arising from a subsequent employment relationship,
10 any claims arising solely from that subsequent relationship are not subject to
11 arbitration (*Vazquez*); in *Vasserman* the Court held that no federal preemption or
12 federal question jurisdiction exists over claims that arise under state law, rather than
13 Collective Bargaining Agreements that govern employment of putative class
14 members, so long as the resolution of the state law claims will not substantially depend
15 on interpretation of those agreements (*Vasserman*); to the application of the tolling
16 doctrine as applied to subsequent class actions being filed when the previous action
17 was disposed of without a ruling on certification (*Falk*).

18 4. I have previously supported, or am currently supporting, the litigation of
19 multiple wage and hour class actions and/or PAGA actions that resulted in class
20 certification and/or approved settlements. The following is a sample of those cases:

21 **Children's Hospital of Orange County**

22 (A) Declarant supported and helped litigate the class action matter of *De La*
23 *Pena v. Children's Hospital of Orange County*, Orange County Superior Court Case
24 No: 30-2018-01014749-CU-OE-CXC. On or about June 10, 2025, the Honorable
25 David A. Hoffer granted final approval of the class action and PAGA action settlement
26 for the total amount of \$10,000,000.00 and confirmed The Myers Law Group, A.P.C.
27 – David P. Myers, Jason Hatcher, and Andriana N. Bravo as co-class counsel.
28

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1 **US Bank**

2 (B) Declarant supported and helped litigate the class action matter of
3 *Rodriguez v. U.S. Bank National Association*, Los Angeles Superior Court Case No:
4 BC617356. On or about October 11, 2022, the Honorable Lawrence P. Riff granted
5 final approval of the class action settlement for the total amount of \$10,750,000.00
6 and confirmed The Myers Law Group, A.P.C. – David P. Myers, Robert M. Kitson,
7 and Jason Hatcher as co-class counsel.

8 **City of Oxnard**

9 (C) Declarant supported and helped litigate the certified class
10 and collective action of *Alvarez, et al. v. City of Oxnard*. See *Alvarez v. City of*
11 *Oxnard* (C.D. Cal. Dec. 17, 2020, No. CV 19-8044 PSG (JCx)) 2020 U.S.Dist.LEXIS
12 250524 (granting preliminary collective FLSA certification); *Alvarez v. City of*
13 *Oxnard* (C.D. Cal. Dec. 17, 2020, No. CV 19-8044 PSG (JCx)) 2020 U.S.Dist.LEXIS
14 250522 (granting class certification). On or about March 20, 2023, the Honorable
15 Philip S. Gutierrez granted final approval of the class action settlement for the total
16 amount of \$3,500,000.00. See US Central District Case No. 19-cv-08044 at Dkt. 100.

17 **Cox Communications Cal., LLC, et al.**

18 (D) Declarant supported and helped litigate the certified class action matter
19 of *Feltzs v. Cox Communications Cal., LLC, et al.* The U.S. District Court Central
20 District of California partially certified a class action on June 1, 2021. *Feltzs v. Cox*
21 *Communs. Cal., LLC* (C.D. Cal. June 1, 2021, No. SACV 19-2002 JVS (JDEx)) 2021
22 U.S.Dist.LEXIS 146447. On or about August 1, 2022, the Honorable James V. Selna
23 granted final approval of the class action settlement for the total amount of
24 \$1,850,000.00. See Central District Case No. 18-cv-02136 at Dkt. 126.

25 **HCA Healthcare**

26 (E) Declarant helped litigate the certified class action matter of *Rum v. HCA*
27 *Healthcare, Inc.*, Central District of California US District Court Case No: 23-cv-
28

1 5142-JFW (BFMx). On or about February 1, 2024, the Honorable John F. Walter.
2 granted certification of class action and appointed The Myers Law Group, A.P.C. –
3 David P. Myers, Jason Hatcher, and Andriana Bravo as class counsel. *Rum v. HCA*
4 *Healthcare, Inc.* (C.D.Cal. Feb. 1, 2024, No. CV 23-5142-JFW(BFMx)) 2024
5 U.S.Dist.LEXIS 53269.

6 **Seasons Hospice & Palliative Care**

7 (F) Declarant supported and helped litigate the class action matter of *Dunn*
8 *v. Seasons Hospice & Palliative Care of California, Inc., et al.*, San Bernardino
9 Superior Court Case No: CIVDS1824275. On or about July 21, 2022, the Honorable
10 David S. Cohn granted final approval of the class action settlement for the total
11 amount of \$800,000.00 and confirmed The Myers Law Group, A.P.C. – David P.
12 Myers, Jason Hatcher, and Cassandra A. Castro as class counsel.

13 **Penn Ridge Transportation, Inc.**

14 (G) Declarant supported and helped litigate the class action matter of
15 *Castellon v. Penn-Ridge Transp., Inc.*, Central District Court Case No: ED CV 18-
16 02136. On July 19, 2019, the Court certified The Myers Law Group, APC—David P.
17 Myers, Robert M. Kitson, and Jason Hatcher—as adequate class counsel for
18 settlement. *Castellon v. Penn-Ridge Transp.* (C.D. Cal. July 19, 2019, No. EDCV 18-
19 02136 AG (KKx)) 2019 U.S. Dist. LEXIS 237071. On November 3, 2020, the
20 Honorable John A. Kronstadt granted final approval of the class action settlement for
21 the total amount of \$1,962,157.27 *Castellon v. Penn-Ridge Transp., Inc.* (C.D. Cal.
22 Nov. 3, 2020, No. ED CV18-02136 JAK (KKx)) 2020 U.S. Dist. LEXIS 245742.

23 **Compass Group USA, Inc.**

24 (H) Declarant supported and helped litigate the class action matter
25 of *Gonzalo Romero, et al. v. Compass Group USA, Inc. dba Canteen Vending*
26 *Services*, San Bernardino Superior Court Case No. CIVDS1512026 as an attorney at
27 The Myers Law Group, APC. On or about October 3, 2017, the Honorable Thomas S.
28

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1 Garza granted final approval of the class action settlement in the *Compass* matter for
2 the amount of \$4,000,000.00 and confirmed David P. Myers, Robert M. Kitson and
3 Jason Hatcher as class counsel.

4 **Transtreme, LLC**

5 (I) Declarant supported and helped litigate the class action matter of *Jackie*
6 *Solgan v. Transtreme, LLC*. (“*Transtreme*”), San Bernardino Superior Court Case No.
7 CIVDS1919244, as an attorney at The Myers Law Group, APC. On or about October
8 5, 2020, the Honorable Janet M. Frangie granted final approval of the class action
9 settlement in the *Transtreme* matter for the amount of \$1,000,000.00 and confirmed
10 David P. Myers, Robert M. Kitson and Jason Hatcher of the Myers Law Group, A.P.C.
11 as Class Counsel.

12 **Refresco Beverages US, Inc.**

13 (J) Declarant supported and helped litigate the PAGA action matter of
14 *Francisco Garcia v. Refresco Beverages US Inc.*, San Bernardino Superior Court Case
15 No. CIVSB2313159, as an attorney at The Myers Law Group, APC. On or about June
16 23, 2026, the Honorable Kevin C. Lee entered the Order and Judgment Granting
17 Motion for Approval of PAGA Settlement for the amount of \$550,000.00.

18 **Professional Electrical Construction Services, Inc.**

19 (K) Declarant supported and helped litigate the class action matter of
20 *Salvador Ayon v. Professional Electrical Construction Services, Inc.* (“PECS”), San
21 Bernardino Superior Court Case No. CIVSB2203994, as an attorney at The Myers
22 Law Group, APC. On or about September 12, 2023, the Honorable Jessica Morgan
23 granted final approval of the class action settlement in the PECS matter for the amount
24 of \$770,000.00 and confirmed David P. Myers and Jason Hatcher of The Myers Law
25 Group, A.P.C. as Class and Collective Counsel.

26 **Air Methods Corporation**

27 (L) Declarant supported and helped litigate the class action matter of *Sanchez*
28

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1 *v. Air Methods Corporation, et al.*, San Bernardino Superior Court Case No:
2 CIVSB2208677. On or about April 7, 2025, the Honorable Christian Towns granted
3 final approval of the class action settlement for the total amount of \$550,000.00 and
4 confirmed The Myers Law Group, A.P.C. – Jason Hatcher and Andriana N. Bravo as
5 class counsel.

6 **Image International Manufacturing, LLC**

7 (M) Declarant supported and helped litigate the class action matter of *Lynn*
8 *Hodge v. Image International Manufacturing, LLC, et al.* (“Image”), U.S. District
9 Court Central District Case No. EDCV 18-925 JGB (SHKx) as an attorney at The
10 Myers Law Group, APC. On or about October 7, 2019, the Honorable Jesus G. Bernal
11 granted final approval of the class action settlement in the *Image* matter where the
12 Court had appointed The Myers Law Group, A.P.C., David P. Myers, Robert M.
13 Kitson and Jason Hatcher as counsel on behalf of the Settlement Class for purposes of
14 settlement only.

15 **D&R Glass, Inc.**

16 (N) Declarant supported and helped litigate the class action matter of *Aaron*
17 *Tellez-Giron v. D&R Glass, Inc.* (“D&R Glass, Inc.”), San Bernardino Superior Court
18 Case No. CIVDS1821562, as an attorney at The Myers Law Group, APC. On or about
19 February 2, 2021, the Honorable David Cohn granted final approval of the class action
20 settlement in the *D&R Glass, Inc.* matter for the amount of \$675,000.00 and confirmed
21 David P. Myers and Jason Hatcher of The Myers Law Group, A.P.C. as Class Counsel.

22 **Investment Concepts, Inc.**

23 (O) Declarant supported and helped litigate the class action matter of *Lisa*
24 *Miller v. Investment Concepts, Inc.* (“ICI”), Santa Barbara Superior Court Case No.
25 19CV04672, as an attorney at The Myers Law Group, APC. On or about October 26,
26 2022, the Honorable James F. Rigali granted final approval of the class action
27 settlement in the *ICI* matter for the amount of \$546,677.68 and confirmed David P.
28

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Myers and Jason Hatcher of The Myers Law Group, A.P.C. as Class Counsel.

Children's Hospital Los Angeles

(P) Declarant supported and helped litigate the class action matter of *Denise Mays v. Children's Hospital Los Angeles* ("CHLA"), Los Angeles Superior Court Case No. BC477830 during the time Declarant was an associate attorney at the Law Office of Joseph Antonelli. In or about September 2016, the Honorable Ann I. Jones granted final approval of the class action settlement in the *CHLA* matter for the amount of \$27,000,000.00.

Micro World Corp. dba Barska

(Q) Declarant supported and helped litigate the class action matter of *Angelo Fabela and Jesse Ortiz v. Micro World Corp. dba Barska* ("Barska"), Los Angeles Superior Court Case No. BC509643 during the time Declarant was an associate attorney at the Law Office of Joseph Antonelli. In or about May 2014, the Honorable Elihu M. Berle granted final approval of the class action settlement in the *Barska* matter for the amount of \$1,050,000.00 and "appoint[ed], for settlement purposes only, Joseph Antonelli, Janelle Carney, and Jason Hatcher [Declarant] . . . as class counsel."

UniFirst Corporation

(R) Declarant supported and helped litigate the class action matter of *Evelia Mosqueda v. UniFirst Corporation* ("UniFirst"), United States District Court Central District of California Case No. CV 14-05324-AB (VBKx), during the time Declarant was an associate attorney at the Law Office of Joseph Antonelli. In or about December 2015, the Honorable Andre Birotte, Jr. granted final approval of the class action settlement in the *UniFirst* matter for the amount of \$2,600,000.00.

Iron Mountain

(S) Declarant supported and helped litigate the class action matter of *Marc Casanova, et al. v. Iron Mountain Information Management Services, Inc., et al.*

1 (“*Iron Mountain*”), Los Angeles Superior Court Case No. BC543256 during the time
2 Declarant was an associate attorney at the Law Office of Joseph Antonelli. In or about
3 January 2016, the Honorable Kenneth Freeman granted final approval of the class
4 action settlement in the *Iron Mountain* matter for the amount of \$2,800,000.00.

5 **Classic Residence Management, LP dba Vi at La Jolla**

6 (T) Declarant supported and helped litigate the class action matter of *Shiela*
7 *Victoriano v. Classic Residence Management, LP dba Vi at La Jolla* (“*Vi*”), San Diego
8 Superior Court Case No. 37-2014-00028031-CU-OE-CTL during the time Declarant
9 was an associate attorney at the Law Office of Joseph Antonelli. In or about May
10 2016, the Honorable Richard E.L. Strauss granted final approval of the class action
11 settlement in the *Vi* matter for the amount of \$3,000,000.00.

12 **Parkview Community Hospital Medical Center**

13 (U) Declarant supported and helped litigate the class action matter of *Amber*
14 *Bart v. Parkview Community Hospital Medical Center* (“*Parkview*”), Riverside
15 Superior Court Case No. RIC1406044 during the time Declarant was an associate
16 attorney at the Law Office of Joseph Antonelli. In or about September 2016, the
17 Honorable Sharon J. Waters granted final approval of the class action settlement in
18 the *Parkview* matter for the amount of \$2,550,000.00.

19
20 5. Cassandra A. Castro graduated from Boston University School of Law
21 in 2020 and is an active member in good standing with the State Bar of California.
22 She was admitted to the State Bar of California on or about January 19, 2021. Ms.
23 Castro is admitted to practice before the United States District Court – Northern,
24 Central, Southern, and Eastern Districts of California; United States Ninth Circuit
25 Court of Appeals; and all of California State Courts. During law school, Ms. Castro
26 externed as a summer Law Clerk at MLG and later worked at MLG as part of the State
27 Bar of California’s Practical Training of Law Students (also known as Certified Law
28 Student) program under the supervision of me. In December 2020, Ms. Castro was

1 admitted to practice under Cal. Rule of Court, Rule 9.49, as a Provisionally Licensed
2 Lawyer under the supervision of David P. Myers. After being licensed on January 19,
3 2021, Ms. Castro worked as an associate attorney at MLG until December 16, 2022.
4 At MLG, Ms. Castro focused solely on plaintiff-side employment matters, including
5 wage and hour class actions and PAGA actions. Ms. Castro supported and helped
6 litigate the certified class and/or collective actions of:

- 7 • *Alvarez, et al. v. City of Oxnard. See Alvarez v. City of Oxnard* (C.D.
8 Cal. Dec. 17, 2020, No. CV 19-8044 PSG (JCx)) 2020 U.S.Dist.LEXIS
9 250524 (granting preliminary collective FLSA certification); *Alvarez v.*
10 *City of Oxnard* (C.D. Cal. Dec. 17, 2020, No. CV 19-8044 PSG (JCx))
11 2020 U.S.Dist.LEXIS 250522 (granting class certification);
- 12 • *Feltzs v. Cox Communications Cal., LLC, et al.* The U.S. District Court
13 Central District of California partially certified a class action on June 1,
14 2021. *Feltzs v. Cox Communs. Cal., LLC* (C.D. Cal. June 1, 2021, No.
15 SACV 19-2002 JVS (JDEx)) 2021 U.S.Dist.LEXIS 146447. On or
16 about August 1, 2022, the Honorable James V. Selna granted final
17 approval of the class action settlement for the total amount of
18 \$1,850,000.00. *See* Central District Case No. 18-cv-02136 at Dkt. 126.
- 19 • *Dunn v. Seasons Hospice & Palliative Care of California, Inc., et al.*,
20 San Bernardino Superior Court Case No: CIVDS1824275. On or about
21 July 21, 2022, the Honorable David S. Cohn granted final approval of
22 the class action settlement for the total amount of \$800,000.00 and
23 confirmed The Myers Law Group, A.P.C. – David P. Myers, Jason
24 Hatcher, and Cassandra A. Castro as class counsel.
- 25 • *Lisa Miller v. Investment Concepts, Inc. (“ICF”)*, Santa Barbara
26 Superior Court Case No. 19CV04672, as an attorney at The Myers Law
27 Group, APC. On or about October 26, 2022, the Honorable James F.
28

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1 Rigali granted final approval of the class action settlement in the *ICI*
2 matter for the amount of \$546,677.68 and confirmed David P. Myers,
3 Jason Hatcher, Mordan J. Good, and Cassandra A. Castro of The Myers
4 Law Group, A.P.C. as Class Counsel.

5 From August 2023 to August 2025, Ms. Castro was a Senior Associate Attorney at
6 Lavi & Ebrahimian, LLP, where her practice focused solely on wage and hour class
7 actions, PAGA actions, and individual wage and hour matters. While at Lavi &
8 Ebrahimian, Ms. Castro was confirmed as Class Counsel in several class and/or
9 PAGA actions, including but not limited to the following actions: *Nunez v. E & T*
10 *Foods, Inc.*, Los Angeles Superior Court Case No. 21STCV22410; *Raygoza v. Raven*
11 *Industries, Inc., et al.*, San Bernardino Superior Court Case No. CIVSB2211390;
12 *Stuart v. AIO Acquisition, Inc., et al.*, San Bernardino Superior Court Case No.
13 CIVSB2209113; *Minas et al. v. Panda Express, Inc. et al.*, Los Angeles Superior
14 Court Case No. 22STCV07753. Ms. Castro rejoined The Myers Law Group, A.P.C.
15 in September 2025.

16 6. Andriana N. Bravo, Esq. was admitted to practice in California on May
17 9, 2023. Ms. Bravo completed her undergraduate studies at the University of San
18 Francisco with Bachelor of Arts degrees in both Economics and International Studies,
19 while also completing minors in Legal Studies and African Studies. Ms. Bravo
20 graduated from the University of the Pacific, McGeorge School of Law, in May 2022.
21 As a law student, Ms. Bravo was a law clerk with Legal Services of Northern
22 California and the California Attorney General's Office, Employment Administrative
23 Mandate Section as well as a certified law student with McGeorge Community Legal
24 Services. Upon graduating from law school Ms. Bravo worked as a law clerk with
25 Cal-Lawyer PLC, and upon becoming a member of the State Bar of California, Ms.
26 Bravo joined The Myers Law Group, A.P.C. as an attorney focusing primarily on
27 wage and hour class action litigation cases. Ms. Bravo supported and helped litigate
28

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1 the following proposed and/or approved class action cases: *Madison v. ECMD, Inc.*,
2 US District Court, Central District, Case No. 2:24-cv-07887-MWC-MAA; *Johnson v.*
3 *North Coast Property Group, Inc.*, San Bernardino Superior Court, Case No.
4 CIVSB2400231; *Rum v. HCA Healthcare, Inc.*, US District Court, Central District of
5 California, Case No: 2:23-cv-05142-JFW-BFM; *De La Pena v. Children's Hospital*
6 *of Orange County*, Orange County Superior Court, Case No. 30-2018-0104749-
7 CUOE- CXC; *Sanchez v. Air Methods Corporation*, San Bernardino Superior Court,
8 Case No. CIVSB2208677. Ms. Bravo also supported efforts in obtaining *Vazquez v.*
9 *SaniSure, Inc.*, 101 Cal.App.5th 139 (2024), a favorable published opinion for
10 employees in the state of California.

11 7. Alvin Ferrara is an attorney for MLG and was admitted to practice in
12 California in December 2017. For MLG, Mr. Ferrara worked on intake for MLG and
13 works employment civil litigation matters representing employees.

14 8. MLG's lodestar includes paralegal time for Yvonne Medina, a certified
15 paralegal, with a previously approved hourly rate of \$195.00. (*Alvarez v. City of*
16 *Oxnard* (C.D.Cal. Mar. 20, 2023, No. CV 19-8044 PSG (JCx)) 2023 U.S.Dist.LEXIS
17 242920, at *29). Ms. Medina joined MLG in 2012 after receiving her paralegal
18 certificate from the UC Riverside paralegal program and has been one of the primary
19 paralegals assigned to support this litigation since its inception.

20 9. MLG's lodestar also includes paralegal time for Kelvin Chavez who is
21 fluent in English and Spanish. Mr. Chavez successfully completed the requirements
22 for the Professional Certificate in Paralegal Studies from University of California
23 Riverside in March 2023. Since May 2023, Mr. Chavez has been a duly qualified
24 member of the NALA The Paralegal Association. Mr. Chavez obtained his Bachelor
25 of Arts in Political Science with a Minor in Pre-Law from California State University
26 of San Bernardino in June 2020. Mr. Chavez joined MLG in May 2026 and has been
27 one of the primary paralegals assigned to support this litigation. "Administrative"
28

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labor even short of “paralegal” status has been held compensable. *See Ellis v. Toshiba America Information Systems, Inc.* (2013) 218 Cal.App.4th 853, 888-890. “In applying the ‘lodestar method,’ courts consider non-attorney fees, such as paralegal, secretarial, and technician services, as part of the attorney’s fees calculation.” *Castellon v. Penn-Ridge Transp., Inc.* (C.D. Cal. Nov. 3, 2020, No. ED CV18-02136 JAK (KKx) 2020 U.S.Dist.LEXIS 245742, at *30.

10. Attached to this filing as **Exhibit A** is a spreadsheet of time recorded for MLG attorneys (“Class Counsel”) for this case. **Exhibit A** provides the total lodestar by attorneys and paralegal as well as a breakdown by task: (1) Task – Motions covering work related to meeting and conferring regarding the intended motion, drafting, filing, and serving motion work in the case; (2) Task – Mediation & Settlement covering work related to the mediation and settlement of the case (including informal mediation discovery, drafting mediation brief, attending mediation, and drafting/finalizing settlement documents); (3) Task – Case Dev/Mgt/Correspondence/Intake covering work related to general correspondence in the case, case review, case meetings, case planning, case calendaring, case task assignments, client intake; (4) Task – Pleadings covering work related to drafting and reviewing pleadings, case initiation, complaint filing, and service; (5) Task – Status Conference covering work related to drafting, filing, and service of status conference statements, attending status conference hearings; (6) Task – Arbitration covering work related to arbitration; and (7) Task – Discovery covering work related to drafting, reviewing, and serving initial disclosures, etc.. MLG’s attorney times are recorded using common law firm billing software (“Merus”), in increments of 1/10th of an hour. The MLG billing entries are intended to convey the substance of what time was spent on in working up this case, and by whom, without requiring substantial redactions to conceal attorney-client privileged information in fee motions. Attorneys are instructed to record their time at or near the time of the event being recorded. The

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1 spreadsheet entries contain standard abbreviations such as “OC” for opposing counsel.
2 Individuals are usually referred to by initials. Far less reliable methods have been
3 accepted to establish the amount of time a law firm spent working on a given matter.
4 *See Mardirossian & Associates, Inc. v. Ersoff* (2007) 62 Cal.Rptr.3d 665 (2007)
5 (finding after-the-fact declarations and testimony of counsel estimating percentage of
6 total work time spent on a given matter to be competent and sufficient to establish
7 entitlement to fees for the time claimed.)

8 11. MLG attorneys’ hourly rates are between \$475 and \$775 and are in line
9 with rates typically approved in wage and hour class action litigation. The hourly rate
10 for myself is \$775.00. The hourly rate for Ms. Castro is \$675.00, for Ms. Bravo is
11 \$475.00, and for Mr. Ferrara is \$675.00. These rates reflect the current value of hourly
12 rate applied to these attorneys for a lodestar cross-check, as applied in the *Garcia v.*
13 *Refresco Beverages US, Inc.* matter (SBSC Case No.: CIVSB2313159) and/or are
14 consistent with market rates for a lodestar cross-check based on the skill and
15 experience of these attorneys or as previously approved. (See **Exhibit C**). A true and
16 correct copy of the Laffey Matrix, pdf printed on January 30, 2026, is attached as
17 **Exhibit C**. MLG’s practice is dedicated to litigation with a significant focus on the
18 representation of employees in wage and hour class action matters as well as
19 employees for actions involving unlawful employment practices, and have been
20 appointed class counsel or co-class counsel in multiple wage and hour class actions.

22 12. Based on MLG’s time entries for this matter through August 13, 2026,
23 there are no less than 268.1 reasonable hours recorded for MLG attorneys and
24 paralegals.¹ MLG’s base lodestar is \$151,031.50, based on the applicable market
25 hourly rates for MLG attorneys and paralegals. Class Counsel only seek an attorney’s
26

27 ¹ This does not account for additional hours that MLG will put into this case finalizing, serving and
28 filing the Motion for Approval of PAGA Settlement on August 14 or through the hearing and
distribution process.

1 fee award of \$183,333.33 (equal to one-third of the common fund gross settlement
2 amount of \$550,000.00), which represents a multiplier of only 1.21. The work
3 performed by MLG was particularly justified, reasonable and necessary in light of the
4 extraordinary result achieved.

5 13. Plaintiff's Counsel's one-third fee request of the common fund is fair and
6 reasonable given the time and labor required, the novelty and difficulty of the wage
7 and hour claims at-issue in this matter; the skill required to properly litigate a wage
8 and hour PAGA action of this type; a one-third percentage of the common fund is the
9 customary fee; the fact that MLG took this matter on under a contingency agreement;
10 the significant recovery obtained based on the claims alleged; the experience,
11 reputation and ability of the plaintiff's attorneys working on this case, and awards in
12 similar cases.

13 14. Plaintiff's counsel only seek reimbursement of actual litigation costs and
14 expenses for an unreimbursed amount of \$22,398.52. Attached to this filing as **Exhibit**
15 **B** is a table itemizing these litigation costs and expenses ("Litigation Expenses").
16

17 15. These costs were all reasonable and necessary to the prosecution of this
18 case and the results achieved and are fair, reasonable, and unopposed by Defendant
19 pursuant to the Settlement Agreement.

20 16. I believe that the proposed Settlement is fair, reasonable, and adequate
21 given the known facts and circumstances.

22 I declare under penalty of perjury under the laws of the State of California and
23 the United States of America that the foregoing is true and correct.

24 Date: 8/14/2026

25 /s/Jason Hatcher

26 Jason Hatcher, Esq.

27
28
**DECLARATION OF JASON HATCHER IN SUPPORT OF MOTION FOR APPROVAL
OF PAGA SETTLEMENT**