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Attorneys for PLAINTIFFS

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

ALEXANDER PEGUES, JR. and MANOLO PEREZ, individuals, on behalf of themselves and on behalf of all persons similarly situated,

Plaintiffs,

v.

ELINK RECRUITING SOLUTIONS, INC., a Georgia Corporation; GLOBAL MAIL, INC., an Ohio Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No: 22STCV18259

**DECLARATION OF JEAN-CLAUDE LAPUYADE, ESQ. IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

Date: August 28, 2025

Time: 10:30 a.m.

Judge: Hon. Carolyn B. Kuhl

Dept.: 12

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

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

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

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

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

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

1 Tesla Stone (Senior Paralegal and Office Manager), Jennifer Heming (Paralegal), Andrew Ward  
2 (Law Clerk), Madelyn Uchiyama (Law Clerk), Hana McNally (Law Clerk), Alice Dupler (Law  
3 Clerk), Allysa Castillo (Legal Assistant), and Elsa Torres (Legal Assistant).

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

9 7. I have represented consumers and employees in California class actions, and  
10 complex multi-party product liability actions exclusively for more than 18 years. I have been in  
11 practice as a plaintiff’s civil litigation attorney since April 2007.

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

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

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

22 11. As of the filing of the Motion for Preliminary Approval of Class Action and PAGA  
23 Settlement, JCL Law Firm, APC incurred \$8,267,90 in costs prosecuting this action, exclusive of  
24 attorneys fees. The JCL Law Firm’s costs are reflected in the attached **Exhibit “2.”**  
25 I declare under the penalty of perjury under the laws of the State of California that the  
26 foregoing is true and correct. Executed this 23rd day of June 2025, at San Diego, California.

27 **JCL LAW FIRM, APC**

28 By:   
Jean-Claude Lapuyade  
Attorneys for Plaintiffs

# **EXHIBIT 1**

**JCL LAW FIRM, APC**  
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San Diego, CA 92121  
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**FIRM RESUME**

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

**ATTORNEY BIOGRAPHIES**

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

**Biography:**

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

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

**Bar Admissions:**

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

**Professional Associations:**

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

**Education:**

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

**Honors:**

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

**Perssia Razma, Esq.**

California Bar Number 351398

Associate Attorney

**Biography:**

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

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

**Education:**

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

**Sydney Castillo-Johnson, Esq.**

California Bar Number 343881

Associate Attorney

**Biography:**

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

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

**Education:**

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

## JCL Law Firm, APC - REPORTED CASES

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

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

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

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



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

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

# **EXHIBIT 2**

# JCL Law Firm

## Transaction Report

All Dates

| DATE                                 | TRANSACTION<br>TYPE | NUM                    | NAME          | MEMO/DESCRIPTION                                                                                                     | AMOUNT | BALANCE  |
|--------------------------------------|---------------------|------------------------|---------------|----------------------------------------------------------------------------------------------------------------------|--------|----------|
| Pegues v. ELINK Recruiting (002-310) |                     |                        |               |                                                                                                                      |        |          |
| 04/30/2022                           | Journal Entry       | April 2022<br>Postage  |               | Copies for April 2022                                                                                                | 12.40  | 12.40    |
| 04/30/2022                           | Journal Entry       | April 2022<br>Postage  |               | Postage for April 2022                                                                                               | 25.68  | 38.08    |
| 06/24/2022                           | Expense             |                        | One Legal LLC | One Legal Order Number: 18441834 - Filing Fee Re: Proof of Personal Service, Proof of Service by Substituted Service | 17.19  | 55.27    |
| 06/30/2022                           | Journal Entry       | June 2022<br>Postage   |               | Postage for June 2022                                                                                                | 1.46   | 56.73    |
| 06/30/2022                           | Journal Entry       | June 2022<br>Postage   |               | Copies for June 2022                                                                                                 | 5.00   | 61.73    |
| 07/31/2022                           | Journal Entry       | July 2022<br>Postage   |               | Copies for July 2022                                                                                                 | 0.50   | 62.23    |
| 08/31/2022                           | Journal Entry       | August 2022<br>Postage |               | Copies for August 2022                                                                                               | 0.40   | 62.63    |
| 09/15/2022                           | Expense             |                        | One Legal LLC | One Legal Order Number: 18923234 - Filing Fee Re: Joint Status Conference Report, Proof of Service                   | 17.19  | 79.82    |
| 09/30/2022                           | Journal Entry       | Sept.<br>2022Postage   |               | Copies for September 2022                                                                                            | 0.40   | 80.22    |
| 11/23/2022                           | Expense             |                        | One Legal LLC | One Legal Order Number: 19348951 - Filing Fee Re: Status Conference Statement, Proof of Service                      | 17.19  | 97.41    |
| 11/30/2022                           | Journal Entry       | Nov. 2022<br>Postage   |               | Copies for November 2022                                                                                             | 0.10   | 97.51    |
| 11/30/2022                           | Journal Entry       | Nov. 2022<br>Postage   |               | Postage for November 2022                                                                                            | 0.57   | 98.08    |
| 12/09/2022                           | Expense             |                        | Case Anywhere | Inv. 273189                                                                                                          | 150.75 | 248.83   |
| 12/31/2022                           | Journal Entry       | Dec 2022<br>Postage    |               | Copies for December 2022                                                                                             | 0.20   | 249.03   |
| 01/26/2023                           | Expense             |                        | One Legal LLC | One Legal Order no. 19713769 - Filing Fee Re: Status Conference Statement, Proof of Service                          | 17.66  | 266.69   |
| 01/31/2023                           | Journal Entry       | Jan 2023<br>Postage    |               | Copies for January 2023                                                                                              | 0.20   | 266.89   |
| 02/28/2023                           | Journal Entry       | Feb 2023<br>Postage    |               | Postage for February 2023                                                                                            | 0.60   | 267.49   |
| 02/28/2023                           | Journal Entry       | Feb 2023<br>Postage    |               | Copies for February 2023                                                                                             | 0.80   | 268.29   |
| 03/06/2023                           | Expense             |                        | Case Anywhere | Inv. 281800                                                                                                          | 159.00 | 427.29   |
| 03/31/2023                           | Journal Entry       | Mar 2023<br>Postage    |               | Copies for March 2023                                                                                                | 0.20   | 427.49   |
| 04/25/2023                           | Expense             |                        | One Legal LLC | One Legal Order no. 20281948 - Filing Fee Re: Notice of Posting of Jury Fees, Proof of Service                       | 172.08 | 599.57   |
| 04/28/2023                           | Expense             |                        | One Legal LLC | One Legal Order no. 20313539 - Filing Fee Re: Status Conference Statement, Proof of Service                          | 17.66  | 617.23   |
| 04/30/2023                           | Journal Entry       | April 2023<br>Postage  |               | Copies for April 2023                                                                                                | 0.20   | 617.43   |
| 06/06/2023                           | Expense             |                        | Case Anywhere | Inv. 290932                                                                                                          | 189.00 | 806.43   |
| 06/30/2023                           | Journal Entry       | June 2023<br>Postage   |               | Copies for June 2023                                                                                                 | 0.20   | 806.63   |
| 06/30/2023                           | Journal Entry       | June 2023<br>Postage   |               | Postage for June 2023                                                                                                | 8.10   | 814.73   |
| 07/28/2023                           | Expense             |                        | One Legal LLC | One Legal Order Number: 20887294 - Filing Fee Re: Joint Status Conference Report, Proof of Service                   | 17.66  | 832.39   |
| 07/31/2023                           | Journal Entry       | July 2023<br>Postage   |               | Copies for July 2023                                                                                                 | 0.50   | 832.89   |
| 07/31/2023                           | Journal Entry       | July 2023<br>Postage   |               | Postage for July 2023                                                                                                | 58.85  | 891.74   |
| 08/31/2023                           | Journal Entry       | August 2023<br>Postage |               | Copies for August 2023                                                                                               | 0.10   | 891.84   |
| 09/06/2023                           | Expense             |                        | Case Anywhere | Inv. 300307                                                                                                          | 285.00 | 1,176.84 |
| 09/27/2023                           | Expense             |                        | LWDA          |                                                                                                                      | 75.00  | 1,251.84 |
| 09/30/2023                           | Journal Entry       | Sept. 2023<br>Postage  |               | Copies for September 2023                                                                                            | 0.30   | 1,252.14 |
| 12/11/2023                           | Expense             |                        | Case Anywhere | Inv. 310196                                                                                                          | 135.00 | 1,387.14 |
| 12/12/2023                           | Check               | 3574                   | Creal & Creal | Inv. 181740                                                                                                          | 159.38 | 1,546.52 |
| 12/31/2023                           | Journal Entry       | Dec. 2023<br>Postage   |               | Postage for December 2023                                                                                            | 0.63   | 1,547.15 |
| 12/31/2023                           | Journal Entry       | Dec. 2023<br>Postage   |               | Copies for December 2023                                                                                             | 0.70   | 1,547.85 |
| 01/31/2024                           | Journal Entry       | Jan. 2024<br>Postage   |               | Copies for January 2024                                                                                              | 0.40   | 1,548.25 |

| DATE                                           | TRANSACTION<br>TYPE | NUM                      | NAME                       | MEMO/DESCRIPTION                                                        | AMOUNT     | BALANCE  |
|------------------------------------------------|---------------------|--------------------------|----------------------------|-------------------------------------------------------------------------|------------|----------|
| 03/12/2024                                     | Expense             |                          | Case Anywhere              | Inv. 319982                                                             | 135.00     | 1,683.25 |
| 04/08/2024                                     | Check               | 3762                     | Signature<br>Resolution    | Inv. 56740                                                              | 4,087.50   | 5,770.75 |
| 04/30/2024                                     | Journal Entry       | April 2024<br>Postage    |                            | Copies for April 2024                                                   | 0.20       | 5,770.95 |
| 04/30/2024                                     | Journal Entry       | April 2024<br>Postage    |                            | Postage for April 2024                                                  | 0.64       | 5,771.59 |
| 05/16/2024                                     | Check               | 3822                     | Berger Consulting<br>Group | Inv. 11425                                                              | 1,860.00   | 7,631.59 |
| 05/31/2024                                     | Journal Entry       | May 2024<br>Postage      |                            | Copies for May 2024                                                     | 0.20       | 7,631.79 |
| 05/31/2024                                     | Journal Entry       | May 2024<br>Postage      |                            | Postage for May 2024                                                    | 0.64       | 7,632.43 |
| 06/07/2024                                     | Expense             |                          | Case Anywhere              | Inv. 330578                                                             | 135.00     | 7,767.43 |
| 06/30/2024                                     | Journal Entry       | June 2024<br>Copies      |                            | June 2024 Copies                                                        | 0.70       | 7,768.13 |
| 09/09/2024                                     | Expense             |                          | Case Anywhere              | Inv. 341817                                                             | 135.00     | 7,903.13 |
| 09/30/2024                                     | Journal Entry       | Aug/Sept. 2024<br>Print. |                            | Aug/Sept. 2024 Printing                                                 | 0.60       | 7,903.73 |
| 10/31/2024                                     | Journal Entry       | October 2024<br>Postage  |                            | October 2024 Postage                                                    | 10.33      | 7,914.06 |
| 10/31/2024                                     | Journal Entry       | October 2024<br>Printing |                            | October 2024 Printing                                                   | 0.40       | 7,914.46 |
| 12/10/2024                                     | Expense             |                          | Case Anywhere              | Inv. 353175                                                             | 171.00     | 8,085.46 |
| 02/04/2025                                     | Expense             |                          | One Legal LLC              | One Legal Order No. 24647917 - Filing Fee Re: Case Management Statement | 23.44      | 8,108.90 |
| 03/05/2025                                     | Expense             |                          | Case Anywhere              | Inv. 373998                                                             | 159.00     | 8,267.90 |
| Total for Pegues v. ELINK Recruiting (002-310) |                     |                          |                            |                                                                         | \$8,267.90 |          |
| TOTAL                                          |                     |                          |                            |                                                                         | \$8,267.90 |          |