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*Attorneys for Plaintiffs and the Putative Class*

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

CURTIS MARKSON, MARK  
MCGEORGE, CLOIS MCCLENDON,  
and ERIC CLARK, individually and on  
behalf of all others similarly situated,  
  
Plaintiffs,

vs.

CRST INTERNATIONAL, INC., CRST  
EXPEDITED, INC.; C.R. ENGLAND,  
INC., WESTERN EXPRESS, INC.,  
SCHNEIDER NATIONAL CARRIERS,  
INC., SOUTHERN REFRIGERATED  
TRANSPORT, INC., COVENANT  
TRANSPORT, INC., PASCHALL  
TRUCK LINES, INC., STEVENS  
TRANSPORT, INC., and DOES 1-10,  
inclusive,  
  
Defendants.

CASE NO.: 5:17-cv-01261-SB (SPx)

**DECLARATION OF JONATHAN  
MELMED IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES AND COSTS**

Date: July 29, 2022  
Time: 8:30 a.m.  
Location: Courtroom 6C  
Hon. Stanley Blumenfeld, Jr.

Discovery Cutoff Date: 7/2/2021  
Pretrial Conference Date: TBD  
Trial Date: TBD

1 I, Jonathan Melmed, Esq., declare as follows:

2 1. I am an attorney licensed to practice law before this Court and the federal  
3 and state courts of California. I am over 18 years of age. I have personal knowledge of  
4 the facts set forth in this declaration and could and would testify competently to them.

5 2. I am a shareholder in the law firm of Melmed Law Group, P.C., co-counsel  
6 of record (along with Susman Godfrey L.L.P., Ackermann & Tilajef, P.C., and Mayall  
7 Hurley P.C.) for Plaintiffs Curtis Markson, Mark McGeorge, Clois McClendon, and Eric  
8 Clark (“Plaintiffs” or “Class Representatives”) and the proposed settlement class (the  
9 “Class”) in the above-captioned matter. I submit this Declaration in support of Plaintiffs’  
10 Motions for Final Approval of Class Action Settlement (forthcoming) and Attorneys’  
11 Fees and Costs (filed herewith).

12 3. I have no knowledge of the existence of any conflicting interests between  
13 my firm and any of its attorneys and our co-counsel on the one hand, and Plaintiffs or any  
14 other Class Member, on the other.

15 4. The Court has preliminarily approved the class action settlements between  
16 Plaintiffs and Defendants PASCHALL TRUCK LINES, INC. (“PTL”), SCHNEIDER  
17 NATIONAL CARRIERS, INC. (“SNC”), COVENANT TRANSPORT, INC. (“CT”),  
18 SOUTHERN REFRIGERATED TRANSPORT, INC. (“SRT”), WESTERN EXPRESS,  
19 INC. (“WE”), and STEVENS TRANSPORT, INC. (“ST”) (the “Settling Defendants”)  
20 (collectively with Plaintiffs, the “Parties”). See Orders preliminarily approving the  
21 settlement (the “PA Orders”) (Docs. 562 and 590).

22 **Attorney Experience and Contributions**

23 5. As demonstrated by our numerous successes in class actions, Susman  
24 Godfrey L.L.P., Mayall Hurley P.C., Ackermann & Tilajef, P.C. and Melmed Law Group  
25 P.C. are experienced and skilled law firms with experience representing employees in  
26 California class actions.

27 6. Given the risks inherent in litigation and the defenses asserted, I believe that  
28 the Settlements before the Court for final approval are fair, adequate, reasonable, and are

1 in the best interest of the Class Members. Moreover, continued litigation would be costly,  
2 time consuming, and uncertain in outcome, particularly given this Court’s denial of class  
3 certification as to the non-Settling Defendants. By contrast, the Settlements ensure  
4 timely, meaningful relief to the Class.

5 7. Throughout my career, I have gained significant experience regarding the  
6 obligations and burdens of representing a class.

7 8. In 2007, I received a B.A. from New York University, in New York, New  
8 York. In 2012, I received a J.D. from Loyola Law School, Los Angeles. I became a  
9 member of the Bar of the State of California in June 2013.

10 9. From 2012 through 2014, I was an associate attorney at Von Behren &  
11 Hunter, LLP (“VBH”) in Manhattan Beach, California. At VBH, I litigated complex  
12 commercial litigation matters where I represented life and health insurers in in bad faith,  
13 ERISA, breach of contract, and related disputes. At VBH, I also represented and assisted  
14 in the representation of hotels, restaurants and real estate development groups in state and  
15 federal commercial litigation, including class action cases. (See, e.g., *Daniel Flannery v.*  
16 *Mccormick & Schmicks Seafood Restaurants*, Los Angeles County Superior Court, Case  
17 No. BC487942).

18 10. From February 2015 through the present, I have been a founding and  
19 managing shareholder in the firm of Melmed Law Group P.C. where I represent  
20 thousands of employees in employment-related class actions, and other employment-  
21 related litigations. Melmed Law Group P.C. has extensive experience in the litigation of  
22 complex cases, including California-wide class actions. I am also an active of member of  
23 the Plaintiffs’ employment bar association called the California Employment Lawyers  
24 Association (CELA).

25 11. I have served as class counsel in a variety of wage and hour class actions. I,  
26 along with my co-counsel, have developed extensive litigation experience in complex  
27 employment litigation matters, particularly in California class actions representing  
28 employees, such as:

- 1 • Blan v. Button Transportation, Inc., Case No. FCS045949, Solano County  
2 Superior Court (final approval granted on December 8, 2016) (Hon. Michael Mattice);
- 3 • Plimpton et al. v. Gordon Trucking, Inc., Case No. CIVDS1511918, San  
4 Bernardino County Superior Court (final approval granted on February 16, 2017) (Hon.  
5 Donald Alvarez);
- 6 • Cleary v. Penske Truck Leasing Co., L.P., Case No. CIVDS1600144, San  
7 Bernardino County Superior Court (final approval granted on February 8, 2017) (Hon.  
8 Janet M. Frangie);
- 9 • Upton v. Coremark International, Inc., Case No. CGC 15-549348, San Francisco  
10 County Superior Court (final approval granted on May 10, 2017) (Hon. Curtis E.A.  
11 Karnow);
- 12 • Mark Broner v. Michael Dusi Trucking, Inc., Case No. 16CVP-0044, San Luis  
13 Obispo County Superior Court (final approval granted on March 15, 2017) (Hon. Donald  
14 G. Umhofer);
- 15 • Anthony Riley v. Pacific Tank Lines, Inc., Case No. CIVDS1603263, San  
16 Bernardino County Superior Court (final approval granted on March 28, 2017) (Hon.  
17 John M. Pacheco);
- 18 • Alex Pena v. Inner Valley Transport, Inc., Case No. BCV-100625-LHB, Kern  
19 County Superior Court (final approval granted on May 5, 2017) (Hon. Thomas S. Clark);
- 20 • William Haynes v. Reliable Trucking, Inc., Case No. C16-01237, Contra Costa  
21 County Superior Court (final approval granted on May 26, 2017) (Hon. Barry P. Goode);
- 22 • Ramirez v. Castlewood West, LLC, Case No. 16CV01137, Monterey County  
23 Superior Court (final approval granted on May 18, 2017) (Hon. Lydia Villarreal);
- 24 • Tami Long v. Covenant Transport, Inc., Case No. 1:15-cv-278, Eastern District of  
25 Tennessee, Chattanooga Division (final approval granted on April 28, 2017) (Hon. Travis  
26 R. McDonough);

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1 • Bruce Waddell v. Dalton Trucking, Inc., Case No. CIVDS1603262, San  
2 Bernardino County Superior Court (final approval granted on August 7, 2017) (Hon. John  
3 M. Pacheco);

4 • Nigel Davis v. Western Merchandise Express, Inc., Case No. BCV-16-101216,  
5 Kern County Superior Court (final approval granted on April 26, 2017) (Hon. Sidney P.  
6 Chapin);

7 • Nigel Davis v. Transforce, Inc., Case No. BCV-16-101393, Kern County Superior  
8 Court (final approval granted on June 5, 2017) (Hon. Thomas S. Clark);

9 • Elson et al v. Covey Auto Express, Inc., Case No. STK-CV-UOE-2016-0009114,  
10 San Joaquin County Superior Court, (final approval granted on September 18, 2017)  
11 (Hon. Linda L. Lofthus);

12 • Jarrod P. Asplund v. White Timber Industries, Inc., Case No. 16-2-00870-5,  
13 Cowlitz County Superior Court (Washington State) (final approval granted on September  
14 13, 2017) (Hon. Michael Evans);

15 • Ruben Campos v. Black Eagle Trucking, Inc., Case No. 37-2016-00023781-CU-  
16 OE-CTL, San Diego County Superior Court (final approval granted on August 25, 2017)  
17 (Hon. Timothy Taylor);

18 • John Powers v. Estenson Logistics, LLC, Case No. CIVDS1602295, San  
19 Bernardino County Superior Court (final approval granted on July 12, 2017) (Hon. David  
20 Cohn);

21 • Gerald W. Harris et al v. Jerry DeBriae Logging Co., Inc., Case No. 16-2-00402-  
22 5, Cowlitz County Superior Court (final approval granted on June 7, 2017) (Hon. Stephen  
23 M. Warning);

24 • Hugues v. The Morning Star Trucking Company, LLC, et al. Case No. CV16-1215,  
25 Yolo County Superior Court, (final approval granted on August 3, 2017) (Hon. W. Arvid  
26 Johnson);

- 1 • Oscar Torres et al v. Salinas Farm Labor Contractor, Inc., Case No. 2018173,  
2 Stanislaus County Superior Court (final approval granted on December 19, 2017) (Hon.  
3 Roger M. Beauchesne);
- 4 • Christopher P. Young v. First Class Service Trucking, Inc., Case No. STK-CV-  
5 UOE-2016-10381, San Joaquin County Superior Court (final approval granted January  
6 2, 2018) (Hon. Elizabeth Humphreys);
- 7 • Rocco Isabella v. Equinox Holdings, Inc., Case No. BC578960, Los Angeles  
8 Superior Court (final approval granted on January 4, 2018) (Hon. Ann I. Jones);
- 9 • Erick Grumm v. T.J.S. Leasing & Holding, Co., Inc., Case No. DR160492,  
10 Humboldt County Superior Court (final approval granted on February 6, 2018) (Hon.  
11 Kelly L. Neel);
- 12 • Robins, Jr., et al. v. Versa Logistics, LLC, Case No. BC644321, Los Angeles  
13 Superior Court, (final approval granted on March 26, 2018) (Hon. Carolyn B. Kuhl);
- 14 • Chavez v. Shamrock Foods Company, Case No. 5:17-cv-00731-SVW-AFM, US  
15 District Court, Central District of California, (final approval granted on April 11, 2018)  
16 (Hon. Stephen V. Wilson);
- 17 • Diaz, et al. v. Absolute West, LLC, Case No. BC647126, Los Angeles Superior  
18 Court (final approval granted on April 19, 2018) (Hon. Maren E. Nelson);
- 19 • Herman v. Andrus Transportation Services, Inc., Case No. EDCV 16-02365 AG  
20 (DTBx), US District Court, Central District of California, (final approval granted on May  
21 14, 2018) (Hon. Andrew J. Guilford);
- 22 • Hernandez v. J.V.C. Truck Lines, Inc., Case No. CIVDS1714857, San Bernardino  
23 Superior Court, (final approval granted on May 22, 2018) (Hon. Brian S. McCarville);
- 24 • Happell v. Hercules Forwarding, Inc., Case No. BC639636, Los Angeles Superior  
25 Court (final approval granted on June 14, 2018) (Hon. Carolyn B. Kuhl);
- 26 • Medina v. Timmerman Starlite Trucking, Inc., Case No. 2023292, Stanislaus  
27 County Superior Court, (final approval granted on June 15, 2018) (Hon. Roger M.  
28 Beauchesne);



- 1 • Jarel Brown v. Saks & Company, LLC, Case No. 2:17-cv-04210 (SJO), US District  
2 Court, Central District of California, (final approval granted on July 16, 2018) (Hon. S.  
3 James Otero);
- 4 • Myers v. LBC Limited Partnership, Case No. CIVDS1715068, San Bernardino  
5 Superior Court, (final approval granted on July 25, 2018) (Hon. Janet M. Frangie);
- 6 • Westphal v. New York Life Insurance Company, Case No. SCV0040562, Placer  
7 County Superior Court, (final approval granted on August 30, 2018) (Hon. Michael W.  
8 Jones);
- 9 • Hollis v. Union Pacific Railroad Company, Case No. 5:17-cv-02449-JGB, US  
10 District Court, Central District of California (final approval granted on September 17,  
11 2018) (Hon. Jesus G. Bernal);
- 12 • Cheifer v. WHGM, Inc., Case No. LC104900, Los Angeles Superior Court (final  
13 approval granted on September 21, 2018) (Hon. Rupert A. Byrdsong);
- 14 • Hernandez-Chulo v. E&R Trucking, Inc., et al., Case No. 18CV-00882, Merced  
15 County Superior Court, (final approval granted on October 29, 2018) (Hon. Brian  
16 McCabe);
- 17 • Freeman v. Redwood Wise Riders, Inc., et al., Case No. FCS050140, Solano  
18 County Superior Court, (approval granted on December 4, 2018) (Hon. Wendy G. Getty);
- 19 • Ricci v. HSS, Inc., Case No. CVCV17-00967, Yuba County Superior Court, (final  
20 approval granted on December 4, 2018) (Hon. Stephen W. Berrier);
- 21 • Antonov, et al. v. GL HHR, Inc., et al., Case No. CIVDS1724725, San Bernardino  
22 Superior Court, (final approval granted on December 11, 2018) (Hon. David Cohn);
- 23 • Pena v. Keystone Freight Corp., Case No. VCU269897, Tulare County Superior  
24 Court, (final approval granted on January 14, 2019) (Hon. Melinda M. Reed);
- 25 • Westbrook v. Winco Holdings, Inc., Case No. RIC171068, Riverside County  
26 Superior Court, (final approval granted on January 17, 2019) (Hon. Raquel A. Marquez);

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- 1 • Jackie Thompson v. Cheema Freightlines, LLC, Case No. STK-CV-UOE-2017-  
2 01011658, San Joaquin Superior Court, (final approval granted on February 6, 2019)  
3 (Hon. Roger Ross);
- 4 • Pazo v. Incredible Adventures, Case No. CGC-16-555971, San Francisco Superior  
5 Court, (final approval granted on February 25, 2019) (Hon. Anne-Christine Massullo);
- 6 • Reboucas v. Trans International Trucking, Inc., Case No. BC644182, Los Angeles  
7 Superior Court, (final approval granted on May 9, 2019) (Hon. Maren E. Nelson);
- 8 • Myers v. Jerome's Furniture Warehouse, Case No. CIVDS1710569, San  
9 Bernardino Superior Court (final approval granted on June 11, 2019) (Hon. Janet M.  
10 Frangie);
- 11 • Juarez v. Magic Laundry Services, Inc., et al., Case No. BC713767, Los Angeles  
12 Superior Court (approval granted on June 14, 2019) (Hon. William F. Highberger);
- 13 • Rangel v. Guard-Systems, Inc., Case No. 19STCV19613, Los Angeles Superior  
14 Court, (approval granted on June 18, 2019) (Hon. Yolanda Orozco);
- 15 • Castaing, et al. v. East Bay Automotive Company, et al., Case No. RG17879115,  
16 Alameda County Superior Court, (final approval granted on June 24, 2019) (Hon. Brad  
17 Seligman);
- 18 • Lopez Juarez v. Mike Lowrie Trucking, Inc., Case No. BCV-18-100177TSC, Kern  
19 County Superior Court (final approval granted on August 8, 2019) (Hon. Thomas S.  
20 Clark);
- 21 • Pia v. 5G's Automotive, Inc., Case No. VCU274628, Tulare County Superior  
22 Court, (final approval granted on September 6, 2019) (Hon. Brett D. Hillman);
- 23 • Burnham v. DGDGI, et al., Case No. 2018-1-CV-331434, Santa Clara Superior  
24 Court, (final approval granted on January 17, 2020) (Hon. Thomas E. Kuhnle);
- 25 • Thomas v. Commercial Protective Services, Inc., Case No. CIVDS1821925, San  
26 Bernardino Superior Court, (final approval granted on September 16, 2019) (Hon. David  
27 Cohn);

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- 1 • Berbano, et al. v. Ingram Micro, Inc., Case No. CIVDS1826085, San Bernardino  
2 Superior Court, (final approval granted on September 17, 2019) (Hon. David Cohn);
- 3 • Guerra v. U.S. Polymers, Inc., Case No. CIVDS1829174, San Bernardino Superior  
4 Court, (approval granted on September 20, 2019) (Hon. David Cohn);
- 5 • Lopez-Urrutia v. Southwest V-Ditch Inc., Case No. CIVDS1833332, San  
6 Bernardino Superior Court, (final approval granted on October 16, 2019) (Hon. David  
7 Cohn);
- 8 • Guy v. California Lutheran University, Case No. 56-219-00524415-CU-OE-VTA,  
9 Ventura County Superior Court, (final approval granted on November 6, 2019) (Hon.  
10 Mark C. Borrell);
- 11 • Moseby v. Renzenberger, Inc., Case No. CIVDS1725125, San Bernardino  
12 Superior Court, (final approval granted on November 7, 2019) (Hon. Janet M. Frangie);
- 13 • Woodard v. AH 2005 Management, L.P., Case No. 18CV001986, Monterey  
14 County Superior Court, (approval granted on November 21, 2019) (Hon. Lydia M.  
15 Villarreal);
- 16 • Ramirez v. William J. Wickwire M.D., Case No. CIVDS1913102, San Bernardino  
17 Superior Court, (final approval granted on November 25, 2019) (Hon. David Cohn);
- 18 • Lyons v. SAIA Motor Freight Line, LLC, Case No. CIVDS1828225, San  
19 Bernardino Superior Court, (final approval granted on December 9, 2019) (Hon. David  
20 Cohn);
- 21 • Baker v. Vallejo CJD, LLC, Case No. VCU273830, Tulare County Superior Court,  
22 (final approval granted on December 16, 2019) (Hon. David C. Mathias);
- 23 • Tsao v. Giorgio Armani Corporation, Case No. 30-218-01000817-CU-OE-CXC,  
24 Orange County Superior Court, (final approval granted on December 20, 2019) (Hon.  
25 Peter J. Wilson);
- 26 • Martinez v. E&A Protective Services-Bravo, LLC, Case No. 1:18-cv-00658-BAM,  
27 US District Court, Eastern District of California (final approval granted on January 17,  
28 2020) (Hon. Barbara A. McAuliffe);

- 1 • Cardoso v. Rogers & Rogers, Inc., et al., Case No. ECU000637, Imperial County  
2 Superior Court, (final approval granted on January 27, 2020) (Hon. Brooks Anderholt);
- 3 • Cesario Mora v. The Complete Logistics Company, Case No. CIVDS1833922, San  
4 Bernardino Superior Court, (final approval granted on February 10, 2020) (Hon. David  
5 Cohn);
- 6 • Lopez v. Ruiz Food Products, Inc., Case No. VCU 275105, Tulare County Superior  
7 Court, (final approval granted on March 10, 2020) (Hon. Bret D. Hillman);
- 8 • Jaurigue v. Knights of Columbus, Case No. CIVDS1824508, San Bernardino  
9 Superior Court, (final approval granted on July 10, 2020) (Hon. David Cohn);
- 10 • Amalia Lopez v. Unitek College NCP, LLC, Case No. BCV-19-102146, Kern  
11 County Superior Court, (final approval granted on July 15, 2020) (Hon. Stephen D.  
12 Schuett);
- 13 • Martin Ashe v. Farmers Insurance Group, Case No. 18STCV00453, Los Angeles  
14 Superior Court, (final approval granted on July 20, 2020) (Hon. Steven J. Kleinfeld);
- 15 • Martin, et al. v. Break the Floor Productions LLC, Case No. 37-2019-00029711-  
16 CU-OE-CTL, San Diego Superior Court, (final approval granted on October 23, 2020)  
17 (Hon. Kenneth J. Medel);
- 18 • Jesus H. Robles v. Winsford II Corporation, et al., Case No. CIVDS1902903, San  
19 Bernardino Superior Court, (final approval granted on November 3, 2020) (Hon. David  
20 Cohn);
- 21 • Juan Cazares Lopez v. RTS Holdings, LLC et al., Case No. CIVDS1934904, San  
22 Bernardino Superior Court (final approval granted on November 24, 2020) (Hon. David  
23 Cohn);
- 24 • Romero v. Carl Zeiss Meditec Production, Case No. CIVDS1907556, San  
25 Bernardino Superior Court, (final approval on December 3, 2020) (Hon. David Cohn);
- 26 • Soto v. Britz Farming Corp., Case No. 19CV04182, Merced County Superior  
27 Court, (preliminary granted on June 17, 2020) (final approval granted on December 8,  
28 2020) (Hon. Brian L. McCabe);

1 • Martinez v. Global Sales & Warehousing, LLC, Case No. 56-2019-00534178-CU-  
2 OE-VTA, Ventura County Superior Court, (final approval granted on December 18,  
3 2020), (Hon. Matthew P. Guasco);

4 • Gaxiola, et al. v. Lloyds Manufacturing Services, Inc. dba Calspas, Case No.  
5 CIVDS1939269, San Bernardino Superior Court, (final approval granted on February 2,  
6 2021) (Hon. David Cohn);

7 • Ancona, et al. v. Populus Financial Group, Inc., dba Ace Cash Express, Case No.  
8 19STCV41065, Los Angeles Superior Court, (approval granted on February 18, 2021)  
9 (Hon. Maurice A. Leiter);

10 • Elayda v. Physassist Scribes, Inc., Case No. CIVDS2002023, San Bernardino  
11 Superior Court, (final approval granted on March 1, 2021) (Hon. David Cohn);

12 • Lee, et al. v. Home Delivery Logistics, Inc., et al., Case No. RG18927149, Alameda  
13 County Superior Court, (final approval granted on March 2, 2021) (Hon. Winifred Y.  
14 Smith);

15 • Pagh v. Wyndham Vacation Ownership, Inc., Case No. 8:19-cv-00812-JWH-  
16 ADSx, US District Court, Central District of California, (final approval granted on March  
17 23, 2021) (Hon. John W. Holcomb);

18 • Robinson v. Paragon Systems, Inc., Case No. BC720142, (final approval granted  
19 on April 1, 2021) (Hon. Elihu Berle);

20 • Lachman, et al. v. Berlitz Languages, Inc., Case No. 19STCV01533, Los Angeles  
21 Superior Court, (final approval granted on April 1, 2021) (Hon. Carolyn Kohl);

22 • Murray v. Scelzi Enterprises, Inc., Case No. RIC2002545, Riverside County  
23 Superior Court, (final approval granted on April 13, 2021) (Hon. Sunshine Sykes);

24 • Ruiz v. SAIA Motor Freight Line, LLC, Case No. CIVDS2014796, San Bernardino  
25 Superior Court, (final approval granted on May 19, 2021) (Hon. David Cohn);

26 • Gallegos v. TST, Inc., Case No. CIVDS1933834, San Bernardino Superior Court,  
27 (final approval granted on May 20, 2021) (Hon. David Cohn);

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1 • Cornejo v. Weidner Property Management LLC, Case No. CIVDS2016465, San  
2 Bernardino Superior Court, (final approval granted on May 25, 2021) (Hon. David Cohn);

3 • Garcia v. Construction Innovations Group, LLC, Case No. 34-2020-00285239,  
4 Sacramento County Superior Court, (final granted on May 25, 2021) (Hon. Shama H.  
5 Mesiwala);

6 • Aguirre v. Swinerton Builders, et al., Case No. CIVDS 1925363, San Bernardino  
7 Superior Court, (final approval granted on May 26, 2021) (Hon. David Cohn);

8 • Garcia v. Construction Innovations Group, LLC, Case No. 34-2020-00285239,  
9 Sacramento County Superior Court, (final granted on May 27, 2021) (Hon. Shama H.  
10 Mesiwala);

11 • Pease v. Wattrans, Inc., Case No. CIVDS1919832, San Bernardino Superior  
12 Court, (final approval granted on June 3, 2021) (Hon. Thomas Garza);

13 • Moreira v. University of Redlands, Case No. CIVDS1913813, San Bernardino  
14 Superior Court, (final approval granted on June 8, 2021) (Hon. David Cohn);

15 • Garcia, et al. v. Cardenas Markets, LLC, et al., Case No. CIVDS1917380, San  
16 Bernardino Superior Court, (final granted on July 1, 2021) (Hon. David Cohn);

17 • Robinzine, et al. v. Mohawk ESV, Inc., et al., Case No. CIVDS1930033, San  
18 Bernardino Superior Court, (final approval granted on July 7, 2021) (Hon. David Cohn);

19 • Cuevas v. Action Embroidery Corp., Case No. CIVDS2012230, San Bernardino  
20 Superior Court, (final approval granted on July 29, 2021) (Hon. David Cohn);

21 • Urquizo v. Santos Montemayor FLC, Inc., et al., Case No BCV-20-101587, Kern  
22 County Superior Court, (final granted on July 30, 2021) (Hon. Thomas S. Clark);

23 • San Juan, et al. v. San Marcos Growers, Case No. 56-2020-00542257-CU-OE-  
24 VTA, Ventura County Superior Court (final approval granted on August 13, 2021) (Hon.  
25 Matthew P. Guasco);

26 • Garcia, et al. v. Cardenas Markets, LLC, et al., Case No. CIVDS1917380, San  
27 Bernardino Superior Court, (final approval granted on July 1, 2021) (Hon. David Cohn).  
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1 • Robinzine v. Mohawk ESV, Inc., et al., Case no. CVIDS1930033, San Bernardino  
2 Superior Court, (final approval granted on July 7, 2021) (Hon. David Cohn);

3 • Cuevas v. Action Embroidery Corp., Case No. CIVDS2012230, San Bernardino  
4 Superior Court, (final approval granted on July 29, 2021) (Hon. David Cohn);

5 • San Juan v. San Marcos Growers, Case No. 56-2020-00542257-CU-OE-VTA,  
6 Ventura County Superior Court, (final approval granted on August 13, 2021) (Hon,  
7 Matthew P. Guasco);

8 • Cartagena v. Impact Healthcare, et al., Case No. VCU283955, Tulare County  
9 Superior Court, (approval granted on August 30, 2021) (Hon. David C. Mathias);

10 • Gonzalez v. Lief Organics, LLC, et al., Case No. 20STCV19371, Los Angeles  
11 Superior Court, (preliminary approval granted on September 30, 2021) (final approval  
12 set to be heard on March 16, 2022) (Hon. David S. Cunningham);

13 • Revels v. Certis U.S.A. L.L.C., Case No. BCV-20-102315, Kern County Superior  
14 Court, (final approval granted on October 4, 2021) (Hon. Bernard C. Barmann Jr.);

15 • Sotelo v. Cosmetix West, Case No. 19STCV28580, Los Angeles Superior Court,  
16 (final approval granted on October 8, 2021) (Hon. Kenneth R. Freeman);

17 • Rico v. Western Mesquite Mines, Inc., et al., Case No. ECU000873, Imperial  
18 County Superior Court, (final approval granted on October 14, 2021) (Hon. Jeffrey B.  
19 Jones);

20 • Correa v. Newell Brands, Inc., et al., Case No. CIVDS1901381, San Bernardino  
21 Superior Court, (final approval granted on October 29, 2021) (Hon. David Cohn);

22 • Gonzalez v. Frank Carson Landscape & Maintenance, Inc., Case No. 34-2020-  
23 00289370, Sacramento Superior Court, (final approval granted on November 4, 2021)  
24 (Hon. Christopher E. Krueger);

25 • Dulay v. Center for Social Dynamics, Case No. RG20055934, Alameda County  
26 Superior Court, (preliminary approval granted on November 4, 2021) (final approval set  
27 to be heard on April 7, 2022) (Hon. Frank Roesch);

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1 • Nelson v. Hardwoods Specialty Products US LP, Case No. RG19046262,  
2 Alameda County Superior Court, (final approval granted on November 18, 2021) (Hon.  
3 Evelio Grillo);

4 • Guerrero v. Advanced Vision Science, Inc., Case No. 18CV05341, Santa Barbara  
5 Superior Court, (granted on May 6, 2022) (Hon. Donna Geck);

6 • Lopez v. KLX Inc., et al., Case No. VCU275330, Tulare County Superior Court,  
7 (final approval granted on November 30, 2021) (Hon. Bret Hillman);

8 • Golightly v. AMDA, Inc., Case No. 20STCV13173, Los Angeles Superior Court,  
9 (final approval granted on December 1, 2021) (Hon. Amy D. Hogue);

10 • Avina v. Ravco Construction, Inc., Case No. 30-2020-01146748-CU-OE-CXC,  
11 Orange County Superior Court, (preliminary approval granted on December 10, 2021),  
12 (final approval set to be heard on July 8, 2022) (Hon. Randall J. Sherman);

13 • Velasco v. Jasmine Vineyards, Inc., Case No. BCV-19-101405, Kern County  
14 Superior Court, (preliminary approval granted on January 5, 2022); (final approval  
15 granted on May 18, 2022) (Hon. Bernard C. Barmann, Jr.);

16 • Santacruz, et al. v. Golden Labor Services, LLC, Case No. BCV-20-102729, Kern  
17 County Superior Court, (preliminary approval granted on January 6, 2022), (final  
18 approval set to be heard on July 26, 2022) (Hon. J. Eric Bradshaw);

19 • Martinez v. Victorian Care Homes of the Monterey Peninsula, Inc., et al., Case  
20 No. 20CV002456, Monterey County Superior Court, (preliminary approval granted on  
21 January 14, 2022), (final approval set to be heard on June 17, 2022) (Hon. Thomas W.  
22 Wills);

23 • Bollinger-Felt, et all. v. Pacific Bells, LLC, Case No. CV-20-000680, Stanislaus  
24 County Superior Court, (final approval granted on January 27, 2022) (Hon. Stacy P.  
25 Speiller);

26 • Mahdian v. AG Laguna Hills, LLC dba Laguna Hills and Health Rehabilitation,  
27 et al., Case No. 30-2019-01098085-CU-OE-CJC, Orange County Superior Court,  
28 (approval granted on February 4, 2022) (Hon. Randall J. Sherman);



1 • Matus v. Flory Industries, Case No. CV-20-003117, Stanislaus County Superior  
2 Court, (preliminary approval granted on February 23, 2022), (final approval set to be  
3 heard on August 10, 2022) (Hon. John D. Freeland);

4 • Martinez, et al. v. East Coast/West Coast Logistics, LLC, et al., Case No.  
5 CIVDS1932745, San Bernardino Superior Court, (final approval granted on March 2,  
6 2022) (Hon. David Cohn);

7 • Lujano v. General Production Service of California, Inc., Case No. BCV-20-  
8 102705, Kern County Superior Court, (preliminary approval granted on March 8, 2022),  
9 (final approval set to be heard on July 6, 2022) (Hon. Bernard C. Barmann Jr.);

10 • Aguilera v. Salmex Pizza, Inc., Case No. CIVDS2014336, San Bernardino  
11 Superior Court, (approval granted on March 10, 2022) (Hon. David Cohn)

12 • Garcia v. The Golden 1 Credit Union, Case No. 34-2021-00293831, Sacramento  
13 County Superior Court, (preliminary approval granted on April 5, 2022) (final approval  
14 set to be heard on August 26, 2022) (Hon. Lauri A. Damrell).

15 • Pena v. Canyon Plastics, Inc., Case No. 20STCV34161, Los Angeles Superior  
16 Court, (final granted on April 13, 2022) (Hon. Amy D. Hogue);

17 • Ramos v. Cambridge College, Case No. CIVSB2112109, San Bernardino  
18 Superior Court, (preliminary approval granted on April 28, 2022), (final approval set to  
19 be heard on August 2, 2022) (Hon. David Cohn);

20 • Sampson v. Diversified Conveyors International, LLC, Case No. CIVDS2018610,  
21 San Bernardino Superior Court, (final approval granted on June 3, 2022) (Hon. David  
22 Cohn).

23 **Attorneys' Fees**

24 12. Plaintiffs now seek final approval of the Settlement, including Class  
25 Counsel's award of attorneys' fees in the amount of 25% of the Settlement amount (i.e.  
26 \$2,437,500) to be shared amongst the law firms representing the Class. The Settlement  
27 Agreements provide for attorneys' fees of up to 25% of the value of the settlement,  
28 including non-cash relief. Accordingly, Class Counsel is actually seeking less than 25%

1 of the value of the settlement when taking into account the non-monetary relief.

2 13. In standard, single-plaintiff wage-and-hour cases, Melmed Law Group, P.C.  
3 routinely charges a contingent fee at or above 25% of the gross recovery. Therefore, had  
4 we negotiated individual retainer agreements with the Class Members in this action, we  
5 would have expected equal to or more than we are presently requesting attorneys' fees.

6 14. Work performed on this matter necessarily required Melmed Law Group  
7 P.C. to forego other profitable work.

8 15. At all times during the pendency of this action, Melmed Law Group, P.C.  
9 has operated under a computerized billing system. Each billing entry is identified by the  
10 timekeeper performing the work, the date the work was performed, a description of the  
11 work performed, the time worked, the assigned hourly rate for the timekeeper, and the  
12 total value of the work performed. These records accurately reflect the hours our attorneys  
13 and paralegal have worked on this case, during which we sought to efficiently manage,  
14 staff, assign, and divide the work between our respective attorneys and to avoid  
15 duplication of effort. All of these hours worked were reasonably and necessarily  
16 expended on this litigation.

17 16. The following table summarizes the time each timekeeper at our firm  
18 expended on this case, their respective years of experience, and hourly billing rates, which  
19 have been approved by California state and federal Courts in other wage and hour class  
20 actions:

21

<b>Melmed Law Group P.C. Lodestar Summary</b>					
	<b>Title</b>	<b>Yrs.</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Jonathan Melmed	Attorney	9	67.0	\$700.00	\$46,900.00
Lorie Gutierrez	Paralegal	6	49.70	\$208.00	\$13,270.40
<b>TOTAL</b>					<b>\$60,170.40</b>

22  
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24  
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26

27 17. We anticipate spending some additional time between now and the  
28 conclusion of this matter in connection with, inter alia, corresponding with, and

1 communicating with the settlement administrator and opposing counsel throughout the  
2 remainder of the settlement administration process, and a number of other tasks.

3 18. Our paralegal Lorie Gutierrez received her paralegal certificate through the  
4 ABA Approved Paralegal Studies Program at West Los Angeles College. Pursuant to  
5 California Business and Professions Code 6450, Ms. Gutierrez (1) maintains a certificate  
6 of completion of a paralegal program approved by the American Bar Association; (2)  
7 maintains a bachelor's degree (B.S. in Communication from California State University,  
8 Northridge); (3) has over six years of law-related experience under the supervision of an  
9 attorney who has been an active member of the State Bar of California for at least the  
10 preceding five years (exclusively working on complex litigation and labor & employment  
11 matters (class actions and PAGA cases); and (4) has successfully completed all required  
12 hours of mandatory continuing legal education in legal ethics and mandatory required  
13 hours of mandatory continuing legal education in either general law or in an area of  
14 specialized law. All continuing legal education courses meet the requirements of Section  
15 6070 of the B&P Code. She assisted with gathering, documenting, and maintaining the  
16 various data and document productions and assisting with the drafting of various  
17 documents. She expended 49.7 hours at the billable rate of \$208.00 for services  
18 completed by a verified ABA Certificated Paralegal who meets the requirements of  
19 Business and Professions Code § 6450.

20 **The Litigation Costs Sought by Class Counsel are Reasonable**

21 19. Plaintiffs also seeks reimbursement for their litigation costs in an amount up  
22 to \$2.8 million.

23 20. To date, my office has incurred actual costs of \$464,225.99. These costs  
24 include including filing fees, process server fees, court reporter fees, postage,  
25 computerized legal research charges, mediators' fees and expert fees, etc. All of these  
26 costs were necessarily incurred in the efficient but diligent prosecution of this action.  
27 **(Exhibit 1)**. These entries were contemporaneously entered by staff members responsible  
28 for recording the same.

1 Plaintiffs' Service Awards

2 21. The Settlements contemplate a service/enhancement award to each of the  
3 Plaintiffs in an amount of \$25,000.00, to recognize the time and effort they expended on  
4 behalf of the Class, including time spent in meetings with Class Counsel, in efforts in  
5 gathering and providing documents, being available during the full-day mediations, the  
6 acceptance of the financial risk in pursuing this litigation, and the fact that they entered  
7 into releases that are broader than the Class releases. The Class would have received no  
8 benefit from this action had it not been for the contributions of Plaintiffs.

9 22. Plaintiffs, who have worked diligently with Class Counsel throughout this  
10 entire litigation, including taking countless calls with Class Counsel, being deposed  
11 (twice in the case of Markson and McGeorge), participating actively in formal discovery,  
12 and participating in the mediations and settlement negotiations that lead to the  
13 Settlements with the Settling Defendants, should be rewarded for taking the initiative to  
14 pursue these claims on behalf of their coworkers, and for their role in reaching a  
15 substantial settlement providing for valuable monetary and non-monetary relief to the  
16 Class. Further, in contrast to the more limited class release, Plaintiffs also agreed to a  
17 more robust general release of their claims.

18 23. Finally, it is well established that plaintiffs in the employment context “face[]  
19 the risk that new employers would learn that they were class representatives in a lawsuit  
20 against their former employer and take adverse action against them. Moreover, each time  
21 they change jobs, they will risk retaliation in the hiring process.” *Asare v. Change Grp.*  
22 *of N.Y., Inc.* (S.D.N.Y. Nov. 18, 2013) No. 12 Civ. 3371(CM), 2013 WL 6144764, at \*15.

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

25 Executed on June 14, 2022, in Los Angeles, California.

26  
27  
28 

Jonathan Melmed

# EXHIBIT 1

# Expense List

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Date	Client Name	Project	Type	Description	Quantity	Unit Amount	Amount
11/29/2018	193 CRST Trucking School		Legal Work	Wiring Fee Joint Expense Fund	1.00	1,666.670	\$1,666.67
1/7/2019	193 CRST Trucking School		Legal Work	Wire Transfer Expert Witness Fund	1.00	1,666.670	\$1,666.67
3/11/2019	193 CRST Trucking School		Legal Work	Joint Expense Fund	1.00	10,000.000	\$10,000.00
1/24/2020	193 CRST Trucking School		Legal Work	Joint Expense Fund	1.00	13,333.330	\$13,333.33
3/16/2020	193 CRST Trucking School		Legal Work	Joint Expense Fund	1.00	16,667.670	\$16,667.67
9/15/2020	193 CRST Trucking School		Legal Work	Joint Expense Fund	1.00	25,000.000	\$25,000.00
12/22/2020	193 CRST Trucking School		Legal Work	Joint Expense Fund	1.00	25,000.000	\$25,000.00
4/13/2021	193 CRST		Legal Work	Joint Expense Fund	1.00	41,666.670	\$41,666.67



#:15169

	Trucking School					
6/10/2021	193 CRST Trucking School	Legal Work	Joint Expense Fund	1.00	41,666.670	\$41,666.67
7/16/2021	193 CRST Trucking School	Legal Work	Joint Expense Fund	1.00	41,666.670	\$41,666.67
8/26/2021	193 CRST Trucking School	Legal Work	Joint Expense Fund	1.00	58,333.330	\$58,333.33
9/29/2021	193 CRST Trucking School	Legal Work	Joint Expense Fund	1.00	50,000.000	\$50,000.00
11/4/2021	193 CRST Trucking School	Legal Work	Joint Expense Fund	1.00	54,166.670	\$54,166.67
12/30/2021	193 CRST Trucking School	Legal Work	Joint Expense Fund	1.00	50,000.000	\$50,000.00
2/18/2022	193 CRST Trucking School	Legal Work	Joint Expense Fund	1.00	33,333.330	\$33,333.33
3/3/2022	193 CRST Trucking School	Purchased Documents	Keystone Document Invoice Copies of files	1.00	58.310	\$58.31

**TOTALS**

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**464,225.99**