

1 Raul Perez (SBN 174687)
Raul.Perez@capstonelawyers.com
2 Mark A. Ozzello (SBN 116595)
Mark.Ozzello@capstonelawyers.com
3 Brandon Brouillette (SBN 273156)
Brandon.Brouillette@capstonelawyers.com
4 Joseph Hakakian (SBN 323011)
Joseph.Hakakian@capstonelawyers.com
5 Capstone Law APC
1875 Century Park East, Suite 1000
6 Los Angeles, California 90067
Telephone: (310) 556-4811
7 Facsimile: (310) 943-0396

8 Attorneys for Plaintiff Dana Lowe

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 FOR THE COUNTY OF LOS ANGELES

11 DANIEL MARKO, JESUS CORONA, on
behalf of themselves and others similarly
12 situated and in their capacity as Private
Attorneys General Representatives,

13 Plaintiffs,

14 v.

15 DOORDASH, INC.,

16 Defendant.

Case No.: BC659841

Assignd to the Hon. Amy D. Hogue

**DECLARATION OF RAUL PEREZ IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: November 30, 2021

Time: 9:30 a.m.

Place: Department 7

1 right to seek public injunctive relief under the state’s consumer protection laws cannot be waived and
2 that consumers need not satisfy class certification requirements to enjoin unfair business practices on
3 behalf of the public. In *Nguyen v. Nissan N.A.*, 726 F.3d 811 (9th Cir. 2019), Capstone attorneys reversed
4 a denial of class certification, making law that clarified the use of “benefit of the bargain” damages
5 models in consumer class actions.

6 7. Capstone served as class counsel in a number of significant wage and hour settlements,
7 including \$12 million on behalf of a nationwide class of in *Hightower v. JPMorgan Chase Bank*, Case
8 No. 11-01802 (C.D. Cal.), over \$10 million on behalf of non-exempt hourly workers in *Zamora v.*
9 *Balboa Life & Casualty LLC*, Case No. BC360026 (L.A. Super. Ct.); and \$9 million on behalf of
10 pharmacists in *Dittmar v. Costco Wholesale Corp.*, No. 14-1156 (S.D. Cal.). In *Vorise v. 24 Hour*
11 *Fitness USA, Inc.*, No. C 15-02051 (Contra Costa Super. Ct.), Capstone and co-counsel negotiated an
12 \$11 million PAGA settlement on behalf of over 36,000 employees for Labor Code violations.

13 8. Capstone has an established practice in automotive defect class actions and is currently
14 appointed sole class counsel, following contested class certification, in *Victorino v. FCA US, LLC*, No.
15 16-1617-GPC, 2019 WL 5268670 (S.D. Cal. Oct. 17, 2019) and *Salas v. Toyota Motor Sales, U.S.A.,*
16 *Inc.*, No. 15-8629-FMO, 2019 WL 1940619 (C.D. Cal. Mar. 27, 2019).

17 9. Capstone has settled over 100 high-stakes class and representative actions. Capstone’s
18 settlements have directly compensated hundreds of thousands of California workers and consumers.
19 Capstone’s actions have also forced employers to modify their policies for the benefit of employees,
20 including changing the compensation structure for commissioned employees and changing practices to
21 ensure that workers will be able to take timely rest and meal breaks. A leader in prosecuting PAGA
22 enforcement actions, Capstone has secured millions of dollars in civil penalties for the State of
23 California.

24 10. The following is a representative sample of Capstone’s settlements:

- 25 a. *Hightower et al v. Washington Mutual Bank*, No. 2:11-cv-01802-PSG-
26 PLA (N.D. Cal.): gross settlement of \$12 million on behalf of
27 approximately 150,000 personal bankers, tellers, sales associates, and
28 assistant branch manager trainees for wage and hour violations;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- b. *Vargas v. Ford Motor Co.*, 12-08388-AB (C.D. Cal.): providing cash payments and unique buyback program for nearly 2 million consumers;
- c. *Moore v. Petsmart, Inc.*, No. 5:12-cv-03577-EJD (N.D. Cal.): gross settlement of \$10 million on behalf of over 19,000 non-exempt PetSmart employees for wage and hour violations;
- d. *Dittmar v. Costco Wholesale Corp.*, No. 14-1156 (S.D. Cal.): gross settlement of \$9 million on behalf of approximately 1,200 pharmacists for wage and hour violations;
- e. *Perrin v. Nabors Well Services Co.*, No. 56-2007-00288718 (Ventura Super. Ct.): gross settlement of over \$6.5 million on behalf of oil rig workers for sleep time and other wage violations;
- f. *Cook v. United Insurance Co.*, No. C 10-00425 (Contra Costa Super. Ct.): gross settlement of \$5.7 million on behalf of approximately 650 sales representatives;
- g. *Alvarez v. MAC Cosmetics, Inc.*, No. CIVDS1513177 (San Bernardino Super. Ct.): gross settlement of \$5.5 million for approximately 5,500 non-exempt employees.
- h. *Aceves v. AutoZone, Inc.*, No. 14-2032 (C.D. Cal.): gross settlement of \$5.4 million in a case alleging FCRA violations;
- i. *Berry v. Urban Outfitters Wholesale, Inc.*, No. 13-02628 (N.D. Cal.): gross settlement of \$5 million on behalf of over 12,000 nonexempt employees;
- j. *The Children's Place Retail Stores Wage & Hour Cases*, No. JCCP 4790: gross settlement of \$5 million on behalf of 15,000 non-exempt employees;
- k. *York v. Starbucks Corp.*, Case No. 08-07919 (C.D. Cal.): gross settlement of nearly \$5 million on behalf of over 100,000 non-exempt workers for meal break and wage statement claims;

1 for Associates (\$295 to \$445) and Senior Counsel/Partners (\$485 to \$775)); *Martinez v. Stumps Market,*
2 *Inc.*, No. 37-2018-00035669-CU-OE-CTL (San Diego County Superior Court Dec. 18, 2020)
3 (approving Capstone’s rates for Associates (\$295 to \$485) and Senior Counsel/Partners (\$485 to \$775));
4 *Pride v. Pride Industries*, No. STK-UOE-2017-7110 (San Joaquin County Superior Court Dec. 14,
5 2020) (approving Capstone’s rates for Associates (\$295 to \$485) and Senior Counsel/Partners (\$545 to
6 \$775)); *MV Transportation Wage and Hour Cases*, No. JCCP No. 4993 (San Joaquin County Superior
7 Court Oct. 20, 2020) (approving Capstone’s rates for Associates (\$485 to \$505) and Senior
8 Counsel/Partners (\$545 to \$775)); *Hayes v. Rent-A-Center West, Inc.*, No. 37-2018-00043861 (San
9 Diego County Superior Court Aug. 28, 2020) (approving Capstone’s rates for Associates (\$265 to \$485)
10 and Senior Counsel/Partners (\$545 to \$775)); *Vega v. JPMorgan Chase Bank, N.A.*, No. BC698750
11 (Los Angeles County Superior Court Aug. 20, 2020) (approving Capstone’s rates for Associates (\$265
12 to \$505) and Senior Counsel/Partners (\$545 to \$775)); *Wertz v. Dawn Food Products, Inc.*, No. CIV
13 DS1811446 (San Bernardino County Superior Court June 29, 2020) (approving Capstone’s rates for
14 Associates (\$295 to \$505) and Senior Counsel/Partners (\$545 to \$775)); *Reyes v. Verifi, Inc.*, No.
15 BC707889 (Los Angeles County Superior Court March 16, 2020) (approving Capstone’s rates for
16 Associates (\$345 to \$485) and Senior Counsel/Partners (\$545 to \$775)); *Vargas v. Ford Motor Co.*, No.
17 CV12-08388 AB (FFMx) (C.D. Cal. March 5, 2020) (approving Capstone’s rates for Associates (\$245
18 to \$445) and Senior Counsel/Partners (\$495 to \$775)); *Wylie v. Hyundai Motor America*, No. 8:16-cv-
19 02102-DOC-JCG (C.D. Cal. March 2, 2020) (approving Capstone’s rates for Associates (\$295 to \$445)
20 and Senior Counsel/Partners (\$545 to \$775)); *Campbell v. AEG Management Oakland, LLC*, No.
21 RG17859830 (Alameda County Superior Court Feb. 7, 2020) (approving Capstone’s rates for
22 Associates (\$345 to \$485) and Senior Counsel/Partners (\$545 to \$775)); *Scoggins v. Crossmark, Inc.*,
23 No. 56-2017-00492936-CU-OE-VTA (Ventura County Superior Court) (approving Capstone’s rates for
24 Associates (\$435) and Senior Counsel/Partners (\$495 to \$725)); *Brown v. Harris v. Mr. C Manager*
25 *LLC*, No. CIV DS1721484 (San Bernardino County Superior Court Aug. 21, 2019) (approving
26 Capstone’s rates for Associates (\$295 to \$434) and Senior Counsel/Partners (\$495 to \$725)); *Black v. T-*
27 *Mobile USA, Inc.*, No. 4:17-cv-04151-HSG (N.D. Cal. July 24, 2019) (approving Capstone’s rates for
28 Associates (\$295 to \$435) and Senior Counsel/Partners (\$495 to \$725)); *Rodas v. Petroleum Sales, Inc.*,

1 No. CIV1703590 (Marin County Superior Court July 19, 2019) (approving Capstone's rates for
2 Associates (\$395 to \$435) and Senior Counsel/Partners (\$495 to \$725)); *Aguilar v. Marriott Int'l., Inc.*,
3 No. BC513197 (Los Angeles County Superior Court Apr. 9, 2019) (approving Capstone's rates for
4 Associates (\$295 to \$435) and Senior Counsel/Partners (\$495 to \$725)); *Garrido v. J. C. Penney*
5 *Corporation, Inc.*, No. 5:18-cv-02051-JVS-SP (C.D. Cal. Jan. 25, 2019) (approving Capstone's rates for
6 Associates (\$435 to \$455) and Senior Counsel/Partners (\$495 to \$725)); *Boseman v. VXi Global*
7 *Solutions, LLC*, No. BC602442 (Los Angeles County Superior Court Jan. 3, 2019) (approving
8 Capstone's rates for Associates (\$295 to \$435) and Senior Counsel/Partners (\$495 to \$725)); *Mansilla v.*
9 *XPO Logistics Worldwide, Inc.*, No. RG17865271 (Alameda County Superior Court Nov. 16, 2018)
10 (approving Capstone's rates for Associates (\$295 to \$435) and Senior Counsel/Partners (\$495 to \$725));
11 *Carbajal v. Tom's Famous Family Restaurants*, No. CIVDS1601821 (San Bernardino County Superior
12 Court July 31, 2018) (approving Capstone's rates for Associates (\$295 to \$395) and Senior
13 Counsel/Partners (\$495 to \$725)); *Williams v. Marshalls of CA, LLC*, No. BC503806 (Los Angeles
14 County Superior Court Feb. 15, 2018) (approving Capstone's rates for Associates and Senior
15 Counsel/Partners (\$570 to \$725)); *Grove v. Halston Operating Co.*, No. 37-2016-00029271-CU-OE-
16 CTL (San Diego County Superior Court Feb. 9, 2018) (approving Capstone's rates for Associates and
17 Senior Counsel/Partners (\$470 to \$725)); *Lopez v. Kmart Corp.*, No. CIVMSC15-00134 (Contra Costa
18 County Superior Court Nov. 29, 2017) (approving Capstone's rates for Associates (\$395 to \$470) and
19 Senior Counsel/Partners (\$595 to \$725)); *Chambless v. Islands Restaurants, L.P.*, No. BC458426 (Los
20 Angeles County Superior Court Aug. 22, 2017) (approving Capstone's rates for Associates (\$245 to
21 \$470) and Senior Counsel/Partners (\$595 to \$725)); *Linares v. Ann Inc.*, No. BC605635 (Los Angeles
22 County Superior Court Aug. 22, 2017) (approving Capstone's rates for Associates (\$245 to \$470) and
23 Senior Counsel/Partners (\$570 to \$725)); *Grillo v. Key Energy Services, LLC*, No. 2:14-cv-00881-AB-
24 AGR (C.D. Cal. Oct. 13, 2017) (approving Capstone's rates for Associates (\$245 to \$470) and Senior
25 Counsel/Partners (\$595 to \$725)); *Carter v. GMRI, Inc.*, No. RIC1506085 (Riverside County Superior
26 Court Jan. 10, 2017) (approving Capstone's rates for Associates (\$345 to \$470) and Senior
27 Counsel/Partners (\$570 to \$695)); *Rodriguez v. Swissport North America, Inc.*, No. BC441173 (Los
28 Angeles County Superior Court April 17, 2017) (approving Capstone's rates for Associates (\$370 to

1 \$470) and Senior Counsel/Partners (\$520 to \$695)); *Emmons v. Quest Diagnostics Clinical*
2 *Laboratories, Inc.*, No. 1:13-cv-00474-DAD-BAM (E.D. Cal. Feb. 27, 2017) (approving Capstone's
3 rates for Associates (\$370 to \$495) and Senior Counsel/Partners (\$545 to \$695)); *Rickerd v. OneWest*
4 *Resources LLC*, No. BC562538 (Los Angeles County Superior Court Jan. 19, 2017) (approving
5 Capstone's rates for Associates (\$245 to \$470) and Senior Counsel/Partners (\$595 to \$695)); *Nunnally v.*
6 *Dave & Busters, Inc.*, No. 8:16-cv-00855-DOC-KES (C.D. Cal. Jan. 9, 2017) (approving Capstone's
7 rates for Associates (\$395 to \$495) and Senior Counsel/Partners (\$545 to \$695)); *Ford v. CEC*
8 *Entertainment, Inc.*, No. 3:14-cv-01420-RS (N.D. Cal. Nov. 18, 2016) (approving Capstone's rates for
9 Associates (\$420 to \$470) and Senior Counsel/Partners (\$545 to \$695)); *Lutin v. Lerner New York, Inc.*,
10 No. BC498443 (L.A. County Super. Ct. Sept. 20, 2016) (approving Capstone's rates for Associates
11 (\$370-470) and Senior Counsel/Partners); *The Children's Place Retail Stores Wage & Hour Cases*, No.
12 JCCP4790 (L.A. County Super. Ct. Sept. 1, 2016) (approving Capstone's rates for Associates (\$245 to
13 \$470) and Senior Counsel/Partners (\$520 to \$695)); *Coffey v. Beverages & More, Inc.*, No. BC477269
14 (L.A. County Super. Ct. July 26, 2016) (L.A. County Super. Ct. Sept. 1, 2016) (approving Capstone's
15 rates for Associates (\$370 to \$470) and Senior Counsel/Partners (\$545 to \$695)); *Guitar Center Stores*
16 *Wage and Hour Cases*, No. JCCP 4818 (San Francisco Superior Court June 7, 2016) (approving
17 Capstone's rates for Associates (\$370 to \$470) and Senior Counsel/Partners (\$545 to \$695)); *Berry v.*
18 *Urban Outfitters Wholesale, Inc.*, No. Case 4:13-cv-02628-JSW (N.D. Cal. April 7, 2016) (approving
19 Capstone's rates for Associates (\$370 to \$470) and Senior Counsel/Partners (\$545 to \$695)

20 15. Capstone's rates are comparable to those judicially approved for other plaintiff's firms,
21 such as Baron & Budd (rates ranging from \$775 for the requested partner to \$390-\$630 for non-
22 partners), Wasserman Comden Casselman & Essensten (rates ranging from \$670-750 for partners and
23 \$300-500 for associates), and Blood Hurst & Reardon (\$510-695 for partners). *See Aarons v. BMW of*
24 *North America*, No. 11-7667-PSG, 2014 U.S. Dist. LEXIS 118442, *40-41 (C.D. Cal. Apr. 29, 2014)
25 (also approving rates of Strategic and Capstone). Other courts have approved hourly rates in this range
26 for plaintiff's side law firms in the Southern California area. *See, e.g., Kearney v. Hyundai Motor Am.*,
27 2013 U.S. Dist. LEXIS 91636, *24 (C.D. Cal. June 28, 2013) (approving hourly rates of \$650-\$800 for
28 senior attorneys in consumer class action); *Parkinson v. Hyundai Motor America*, 796 F. Supp. 2d 1160,

1 1172 (C.D. Cal. 2010) (approving hourly rates between \$445 and \$675); *Faigman v. AT&T Mobility*
 2 *LLC*, 2011 U.S. Dist. LEXIS 15825, * 2 (N.D. Cal. Feb. 15, 2011) (approving hourly rates of \$650 an
 3 hour for partner services and \$500 an hour for associate attorney services); *Richard v. Ameri-Force*
 4 *Mgmt. Servs., Inc.*, No. 37-2008-00096019 (San Diego Super. Ct., Aug. 27, 2010) (\$695 to \$750 an hour
 5 for partners; \$495 an hour for associates); *Barrera v. Gamestop Corp.*, No. CV 09-1399 (C.D. Cal. Nov.
 6 29, 2010) (\$700 an hour for partners; \$475 an hour for associates); *Anderson v. Nextel Retail Stores,*
 7 *LLC*, No. CV 07-4480 (C.D. Cal. June 20, 2010) (\$655 to \$750 an hour for partners; \$300 to \$515 an
 8 hour for associates); *Luquetta v. Regents of Cal.*, CGC-05-443007 (San Francisco Super. Ct.) (approving
 9 2012 partner rates between \$550 and \$850 per hour); and *Holloway v. Best Buy Co.*, C-05-5056-PJH
 10 (MEJ) (N.D. Cal.) (approving 2011 partner rates of \$825 to \$700 an hour, associate rates between \$355
 11 and \$405 per hour).

12 16. As summarized in the table below, counsel has incurred a total of \$5,959.94 in costs and
 13 expenses to date.

Cost & Expense Categories	Amount
Copying, Printing & Scanning and Facsimiles	\$128.00
Court Fees, Filings & Service of Process	\$1,710.20
Court Reporters, Transcripts & Depositions	\$9.60
Delivery & Messenger (UPS, FedEx, messenger, etc.)	\$188.69
Investigation Services (private investigators)	\$2,806.24
Postage & Mailings	\$0.50
Research Services (PACER, Westlaw, etc.)	\$1,116.71
Total	\$5,959.94

20
 21 I declare under penalty of perjury under the laws of the State of California that the foregoing is
 22 true and correct. Executed this 14th day of September, 2021, at Los Angeles, California.

23
 24 
 25 _____
 26 Raul Perez

Exhibit 1

FIRM PROFILE

Capstone Law APC is one of California's largest plaintiff-only labor and consumer law firms. With over twenty-five seasoned attorneys, many formerly with prominent class action or defense firms, Capstone has the experience, resources, and expertise to successfully prosecute complex employment and consumer actions.

Since its founding in 2012, Capstone has emerged as a major force in aggregate litigation, making law on cutting-edge issues and obtaining over a hundred million dollars in recovery for employees and consumers:

- In February, 2015, Capstone attorneys Raul Perez and Ryan H. Wu were honored with the *California Lawyer* Attorney of the Year (CLAY) award in labor and employment for their work in the landmark case *Iskanian v. CLS Transportation Los Angeles*, 59 Cal.4th 348 (2014), which preserved the right of California workers to bring representative actions under the Labor Code Private Attorneys General Act ("PAGA") notwithstanding a representative action waiver in an arbitration agreement.
- Recognized as a leading firm in the prosecution of PAGA enforcement actions, Capstone is responsible for some of the most important decisions in this area. In *Williams v. Superior Court (Marshall's of Calif.)*, 3 Cal.5th 531 (2017), Capstone attorneys achieved a watershed decision before the California Supreme Court as to the broad scope of discovery in PAGA actions. In *Baumann v. Chase Inv. Servs. Corp.*, 747 F.3d 1117 (9th Cir. 2014), a case of first impression, Capstone successfully argued that PAGA actions are state enforcement actions not covered by the Class Action Fairness Act.
- Capstone has made important contributions to consumer protection law. In *McGill v. Citibank N.A.*, 2 Cal. 5th 945 (2017), Capstone represented plaintiffs in a major decision holding that the right to seek public injunctive relief under the state's consumer protection laws cannot be waived and that consumers need not satisfy class certification requirements to enjoin unfair business practices on behalf of the public. In *Nguyen v. Nissan N.A.*, 726 F.3d 811 (9th Cir. 2019), Capstone attorneys reversed a denial of class certification, making law that clarified the use of "benefit of the bargain" damages models in consumer class actions.
- Capstone served as class counsel in a number of significant wage and hour settlements, including \$12 million on behalf of a nationwide class of in *Hightower v. JPMorgan Chase Bank*, Case No. 11-01802 (C.D. Cal.), over \$10 million on behalf of non-exempt hourly workers in *Zamora v. Balboa Life & Casualty LLC*, Case No. BC360026 (L.A. Super. Ct.); and \$9 million on behalf of pharmacists in *Dittmar v. Costco Wholesale Corp.*, No. 14-1156 (S.D. Cal.). In *Vorise v. 24 Hour Fitness USA, Inc.*, No. C 15-02051 (Contra Costa Super. Ct.), Capstone and co-counsel negotiated an \$11 million PAGA settlement on behalf of over 36,000 employees for Labor Code violations.
- Capstone has an established practice in automotive defect class actions and is currently appointed sole class counsel, following contested class certification, in *Victorino v. FCA US, LLC*, No. 16-1617-GPC, 2019 WL 5268670 (S.D. Cal. Oct. 17, 2019) and *Salas v. Toyota Motor Sales, U.S.A., Inc.*, No. 15-8629-FMO, 2019 WL 1940619 (C.D. Cal. Mar. 27, 2019).

SUMMARY OF SIGNIFICANT SETTLEMENTS

Since its founding, Capstone has settled over 100 high-stakes class and representative actions totaling well over \$200 million dollars. Capstone's settlements have directly compensated hundreds of thousands of California workers and consumers. Capstone's actions have also forced employers to modify their policies for the benefit of employees, including changing the compensation structure for commissioned employees and changing practices to ensure that workers will be able to take timely rest and meal breaks. A leader in prosecuting PAGA enforcement actions, Capstone has secured millions of dollars in civil penalties for the State of California.

The following is a representative sample of Capstone's settlements:

- *Hightower et al v. Washington Mutual Bank*, No. 2:11-cv-01802-PSG-PLA (N.D. Cal.): gross settlement of \$12 million on behalf of approximately 150,000 personal bankers, tellers, sales associates, and assistant branch manager trainees for wage and hour violations;
- *Vargas v. Ford Motor Co.*, 12-08388-AB (C.D. Cal.): providing cash payments and unique buyback program for nearly 2 million consumers;
- *Moore v. Petsmart, Inc.*, No. 5:12-cv-03577-EJD (N.D. Cal.): gross settlement of \$10 million on behalf of over 19,000 non-exempt PetSmart employees for wage and hour violations;
- *Dittmar v. Costco Wholesale Corp.*, No. 14-1156 (S.D. Cal.): gross settlement of \$9 million on behalf of approximately 1,200 pharmacists for wage and hour violations;
- *Perrin v. Nabors Well Services Co.*, No. 56-2007-00288718 (Ventura Super. Ct.): gross settlement of over \$6.5 million on behalf of oil rig workers for sleep time and other wage violations;
- *Cook v. United Insurance Co.*, No. C 10-00425 (Contra Costa Super. Ct.): gross settlement of \$5.7 million on behalf of approximately 650 sales representatives;
- *Alvarez v. MAC Cosmetics, Inc.*, No. CIVDS1513177 (San Bernardino Super. Ct.): gross settlement of \$5.5 million for approximately 5,500 non-exempt employees.
- *Aceves v. AutoZone, Inc.*, No. 14-2032 (C.D. Cal.): gross settlement of \$5.4 million in a case alleging FCRA violations;
- *Berry v. Urban Outfitters Wholesale, Inc.*, No. 13-02628 (N.D. Cal.): gross settlement of \$5 million on behalf of over 12,000 nonexempt employees;
- *The Children's Place Retail Stores Wage & Hour Cases*, No. JCCP 4790: gross settlement of \$5 million on behalf of 15,000 nonexempt employees;
- *York v. Starbucks Corp.*, Case No. 08-07919 (C.D. Cal.): gross settlement of nearly \$5 million on behalf of over 100,000 non-exempt workers for meal break and wage statement claims;
- *Rodriguez v. Swissport USA*, No. BC 441173 (Los Angeles Super. Ct.): gross settlement of nearly \$5 million on behalf of 2,700 non-exempt employees following contested certification;
- *Asghari v. Volkswagen Group of North America*, Case No. 13-02529 (C.D. Cal.): Settlement providing complementary repairs of oil consumption defect, reimbursement for repairs, and extended warranty coverage of certain Audi vehicles valued at over \$20 million;
- *Klee v. Nissan of North America*, Case No. 12-08238 (C.D. Cal.): Settlement providing complimentary electric vehicle charging cards and extending warranty coverage for the electric battery on the Nissan Leaf valued at over \$10 million.

PROFESSIONAL BIOGRAPHIES

Partners

Rebecca Labat. Rebecca Labat is co-managing partner of Capstone Law APC, supervising the litigation for all of the firm's cases. She also manages the firm's co-counsel relationships and assists the firm's other partners and senior counsel with case management and litigation strategy. Under Ms. Labat's leadership, Capstone has successfully settled over 100 cases, delivering hundreds millions of dollars to California employees and consumers while earning statewide recognition for its cutting-edge work in developing new law.

Ms. Labat's career accomplishments representing consumers and employees in class actions include the certification of a class of approximately 3,200 current and former automobile technicians and shop employees for the miscalculation of the regular rate for purposes of paying premiums for missed meal and rest breaks.

Before her work representing plaintiffs in class and representative actions, Ms. Labat was an attorney with Wilson Elser and represented life, health, and disability insurers in litigation throughout California in both state and federal courts. She graduated from the University of California, Hastings College of the Law in 2002, where she was a member of the Hastings Civil Justice Clinic, served as a mediator in Small Claims Court for the City and County of San Francisco, and received the CALI Award for Excellence in Alternative Dispute Resolution. She received her undergraduate degree from the University of California, Los Angeles. Ms. Labat is a member of the National Employment Lawyers Association (NELA), the Consumer Attorneys Association of Los Angeles (CAALA), and the Beverly Hills Bar Association.

Raul Perez. Raul Perez is co-managing partner at Capstone, and has focused exclusively on wage and hour and consumer class litigation since 2011. Mr. Perez is the lead negotiator on numerous large settlements that have resulted in hundreds of millions to low-wage workers across California, including many of the most valuable settlements reached by Capstone.

During his career, Mr. Perez has successfully certified by way of contested motion and/or been appointed Lead Counsel or Interim Lead Counsel in several cases, including: *Lopes v. Kohl's Department Stores, Inc.*, Case No. RG08380189 (Alameda Super. Ct.); *Hightower v. JPMorgan Chase Bank*, Case No. 11-01802 (C.D. Cal.); *Tameifuna v. Sunrise Senior Living Managements, Inc.*, Case No. 13-02171 (C.D. Cal.) (certified class of over 10,000 hourly-paid employees); and *Berry v. Urban Outfitters Wholesale, Inc.*, Case No. 13-02628 (N.D. Cal.) (appointed lead counsel in a class action involving over 10,000 non-exempt employees). As the lead trial attorney in *Iskanian v. CLS Transportation Los Angeles*, 59 Cal. 4th 348 (2014), Mr. Perez, along with Mr. Wu, received the 2015 CLAY Award in labor and employment.

Mr. Perez received both his undergraduate degree and his law degree from Harvard University and was admitted to the California Bar in December 1994. Earlier in his career, Mr. Perez handled a variety of complex litigation matters, including wrongful termination and other employment related actions, for corporate clients while employed by some of the more established law firms in the State of California, including Morgan, Lewis & Bockius; Manatt Phelps & Phillips; and Akin Gump Strauss Hauer & Feld. Before Capstone, Mr. Perez was a partner at another large plaintiff's firm, helping to deliver millions of dollars in relief to California workers.

Melissa Grant. Melissa Grant is a partner at Capstone. Ms. Grant is responsible for litigating many of the firm's most contentious and high-stakes class actions. The author of numerous successful motions for class certification, Ms. Grant is the lead or co-lead attorney on multiplied certified class actions currently on track for trial, representing over 140,000 California employees in pursuing their wage and hour claims. She is also at the forefront in developing the law on PAGA, including administrative exhaustion, standing, the nature of PAGA violations, the scope of discovery, and trials.

Prior to joining Capstone, Ms. Grant worked at the Securities and Exchange Commission as a staff attorney in the Enforcement Division, investigating ongoing violations of federal securities regulations and statutes and for Quinn Emanuel Urquhart & Sullivan, LLP, where she was an associate on the trial team that prosecuted the *Mattel v. Bratz* case. Ms. Grant began her legal career as a law clerk to the Honorable Harry Pregerson, Justice of the Ninth Circuit Court of Appeals before joining Sidley & Austin as an associate. She graduated from Southwestern Law School in 1999, where she served as editor-in-chief of the Law Review, and graduated *summa cum laude* and first in her class. Ms. Grant earned her undergraduate degree from Cornell University, where she received the JFK Public Service Award and the Outstanding Senior Award. Her published articles include: *Battling for ERISA Benefits in the Ninth Circuit: Overcoming Abuse of Discretion Review*, 28 Sw. U. L. Rev. 93 (1998), and CLE Class Actions Conference (SF) CAFA: *Early Decisions on Commencement and Removal of Actions* (2006).

Ryan H. Wu. Ryan H. Wu is a partner at Capstone and is primarily responsible for complex motion work and supervising court approval of class action settlements. Mr. Wu handles many of the most challenging legal issues facing Capstone's clients, including the scope and operation of PAGA, contested attorneys' fees motions, responding to objectors, and high-impact appeals. Mr. Wu is responsible for the merits briefing in *McGill v. Citibank, N.A.*, 2 Cal. 5th 945 (2017), where the California Supreme Court unanimously held that consumers' right to pursue public injunctive relief cannot be impeded by a contractual waiver or class certification requirements. He briefed the closely-watched *Williams v. Superior Court (Marshalls of CA LLC)*, 3 Cal.5th 531(2017), an important pro-employee ruling that broadened the scope of discovery in PAGA actions and resolved a longstanding conflict regarding third-party constitutional privacy rights. He also authored the briefs in *Baumann v. Chase Inv. Servs. Corp.*, 747 F.3d 1117 (9th Cir. 2014), where, on an issue of first impression, the Ninth Circuit sided with Plaintiffs in holding that PAGA actions are state enforcement actions not covered by the CAFA. In February 2015, Mr. Wu, along with Mr. Perez, received the prestigious CLAY award for his successful appellate work, including briefing to the California Supreme Court, in *Iskanian*. Mr. Wu recently achieved an important consumer victory in *Nguyen v. Nissan N.A.*, 932 F.3d 811 (9th Cir. 2019), which clarified the use of "benefit of the bargain" damages models in consumer class actions.

Mr. Wu graduated from the University of Michigan Law School in 2001, where he was an associate editor of the *Michigan Journal of Law Reform* and contributor to the law school newspaper. He received his undergraduate degree in political science with honors from the University of California, Berkeley. He began his career litigating international commercial disputes and commercial actions governed by the Uniform Commercial Code. Mr. Wu is co-author of "*Williams v. Superior Court: Employees' Perspective*" and "*Iskanian v. CLS Transportation: Employees' Perspective*," both published in the *California Labor & Employment Law Review*.

Robert Drexler. Robert Drexler is a partner with Capstone Law where he leads one of the firm's litigation teams prosecuting wage-and-hour class actions. He has more than 25 years of experience representing clients in wage-and-hour and consumer rights class actions and other complex litigation in state and federal courts. Over the course of his career, Mr. Drexler has successfully certified dozens of employee classes for claims

such as misclassification, meal and rest breaks, and off-the-clock work, ultimately resulting in multi-million dollar settlements. He has also arbitrated and tried wage-and-hour and complex insurance cases. Mr. Drexler has been selected as one of Southern California's "Super Lawyers" every year from 2009 through 2020.

Before joining Capstone, Mr. Drexler was head of the Class Action Work Group at Khorrami Boucher, LLP and led the class action team at The Quisenberry Law Firm. Mr. Drexler graduated from Case Western Reserve University School of Law, where he served as Managing Editor of the Case Western Reserve Law Review and authored *Defective Prosthetic Devices: Strict Tort Liability for the Hospital?* 32 CASE W. RES. L. REV. 929 (1982). He received his undergraduate degree in Finance at Ohio State University where he graduated *cum laude*. Mr. Drexler is a member of Consumer Attorneys of California (CAOC) and Consumer Attorneys of Los Angeles (CAALA). He has been a featured speaker at class action and employment litigation seminars, and has published articles in CAOC's Forum Magazine and The Daily Journal.

Jamie Greene. Jamie Greene is a partner with Capstone Law, where she leads the firm's business development and case generation team. Ms. Greene is responsible for evaluating all potential new cases and referrals, developing new claims, and managing the firm's client and cocounseling relationships. She also supervises the pre-litigation phase for all cases, including investigation, analysis, and client consultation.

Before joining Capstone, Ms. Greene began her legal career at Makarem & Associates representing clients in a wide array of cases ranging from wrongful death, insurance bad faith, employment, personal injury, construction defect, consumer protection, and privacy law. Ms. Greene is a graduate of the University of Southern California Gould School of Law and earned her bachelor's degree from Scripps College in Claremont, California.

Bevin Allen Pike. Bevin Allen Pike is a partner with Capstone Law, where she focuses primarily on wage-and-hour class actions. Ms. Pike has spent her entire legal career representing employees and consumers in wage-and-hour and consumer rights class actions. Over the course of her career, Ms. Pike has successfully certified dozens of employee and consumer classes for claims such as meal and rest breaks, unpaid overtime, off-the-clock work, and false advertising.

Before joining Capstone, Ms. Pike's experience included class and representative action work on behalf of employees and consumers at some of the leading plaintiffs' firms in California. Ms. Pike graduated from Loyola Law School, Los Angeles, where she was an Editor for the International and Comparative Law Review. She received her undergraduate degree from the University of Southern California. Ms. Pike has been selected as one of Southern California's "Super Lawyers – Rising Stars" every year from 2012 through 2015.

Senior Counsel

Brandon Brouillette. Brandon Brouillette is a senior counsel with Capstone Law, where his practice focuses on representing employees and consumers in complex litigation, primarily wage-and-hour class actions and PAGA representative actions. Mr. Brouillette's entire legal career has been devoted to representing individual and class representative plaintiffs against large corporate entities. Prior to joining Capstone, he served as an associate at Boucher LLP where he managed the firm's wage-and-hour class actions. He earned his Juris Doctor from Loyola Law School, Los Angeles, where he spent a summer interning for the legal clearance and corporate legal departments at Warner Bros. He received his undergraduate degree from the University of Southern California, where he majored in Business Administration and spent a semester abroad in Budapest, Hungary. In 2016, Brandon was selected as one of Super Lawyers' "Rising Stars" in Southern California.

Theresa Carroll. Theresa Carroll is a senior counsel at Capstone Law. Her practice is devoted to the Appeals & Complex Motions team, working on various settlement and approval projects.

Prior to joining Capstone, Ms. Carroll was an associate with Parker Stanbury, LLP, advising small business owners on various employment matters and worked as an associate attorney for O'Donnell & Mandell litigating employment discrimination and sexual harassment cases. In 1995, she graduated from Southwestern University School of Law where she was on the trial advocacy team and was awarded the prestigious Trial Advocate of the Year award sponsored by the American Board of Trial Advocates (ABOTA) for Southwestern University School of Law. Ms. Carroll received her Bachelor of Science degree in speech with an emphasis in theatre from Iowa State University.

Liana Carter. Liana Carter is a senior counsel with Capstone Law APC, specializing in complex motions, writs, and appeals. Her work on recent appeals has included reversing a denial of class certification decision in *Brown v. Cinemark USA, Inc.*, No. 16-15377, 2017 WL 6047613 (9th Cir. Dec. 7, 2017), affirming a denial of a motion to compel arbitration in *Jacoby v. Islands Rests., L.P.*, 2014 Cal. App. Unpub. LEXIS 4366 (2014) and reversal of a dismissal of class claims in *Rivers v. Cedars-Sinai Med. Care Found.*, 2015 Cal. App. Unpub. LEXIS 287 (Jan. 13, 2015). Ms. Carter was responsible for drafting the successful petition for review in *McGill v. Citibank N.A.*, as well as the petition for review and briefing on the merits in *Williams v. Superior Court*, 2017 WL 2980258. Ms. Carter also has extensive prior experience in overseeing settlement negotiations and obtaining court approval of class action settlements.

Ms. Carter was admitted to the California bar in 1999 after graduating from the University of Southern California Gould School of Law, where she was an Articles Editor on the board of the *Southern California Law Review*. She received her undergraduate degree with honors from the University of California, Irvine.

Anthony Castillo. Anthony Castillo is a senior counsel with Capstone Law. His practice focuses on analyzing and developing pre-litigation wage-and-hour and consumer claims, including PAGA representative actions and class actions for failure to pay overtime and minimum wages, meal and rest period violations, and claims under the Fair Labor Standards Act and the Investigative Consumer Reporting Agency Act. Prior to joining Capstone, he was an associate at a California bankruptcy practice, where he represented individual and business debtors in liquidations and re-organizations as well as various debt and foreclosure defense-related issues.

Mr. Castillo graduated from Loyola Law School, Los Angeles in 2009, where he volunteered with the Disability Rights Legal Center. He attended Stanford University for his undergraduate degree, majoring in Political Science and minoring in History. Anthony is admitted to practice law in California and Washington and before the United States District Court for the Central and Southern Districts of California.

Molly DeSario. Molly DeSario is a senior counsel with Capstone Law, specializing in employment class action litigation. Ms. DeSario's practice focuses primarily on wage-and-hour class action and Private Attorneys General Act litigation on behalf of employees for failure to pay overtime and minimum wages, provide meal and rest breaks, and provide compensation for off-the-clock work. She has experience briefing and arguing a multitude of dispositive motions in state and federal court and has successfully certified and settled numerous classes for claims such as exempt misclassifications, unpaid wages, missed meal and rest breaks, and unreimbursed business expenses.

Ms. DeSario began her career as a general practice litigation associate with Sandler & Mercer in Rockville, Maryland, handling a wide range of civil and criminal matters. Since 2005, she has primarily litigated class action cases and, for the last seven years, has focused on representing employees and consumers in class and collective actions across California and the nation, helping them recover millions of dollars in unpaid wages, restitution, and penalties. Molly graduated from Northeastern University School of Law in 2002. During law school, she interned for the U.S. Attorney's Office in Boston, Massachusetts, and the Honorable Paul L. Friedman at the U.S. District Court for the District of Columbia. She received her undergraduate degree in Marketing and International Business from the University of Cincinnati, where she graduated summa cum laude.

Helga Hakimi. Helga Hakimi is a senior counsel at Capstone Law. Her practice primarily involves employment law class action litigation, namely wage-and-hour class actions and PAGA litigation on behalf of employees for failure to pay overtime and minimum wages, provide meal and rest breaks, and provide compensation for off-the-clock work, and related employer violations under the Fair Labor Standards Act and California Labor Code.

Prior to joining Capstone, Ms. Hakimi was a partner at a civil litigation firm in West Los Angeles, where she handled mainly real estate litigation, business litigation, and defense of some employment law matters; prior to that, she worked as a civil litigation attorney handling complex personal injury litigation. Ms. Hakimi's interest in advocating for employee rights began in law school, where she volunteered for the Workers' Rights Clinic and assisted low-income community members in Northern California's greater Bay Area region with employment-related legal issues. Upon graduating from law school, Ms. Hakimi worked as an associate for a municipal law firm, and thereafter at the local City Attorney's Office, where she advised municipalities and cities in civil matters involving land use, environmental law, development issues, Constitutional law, and First Amendment rights. Ms. Hakimi graduated from Berkeley Law (Boalt Hall School of Law), where she earned her Juris Doctorate and was awarded the Prosser Award in Remedies. Ms. Hakimi received her Bachelor of Arts degree in Political Science with a minor in Education Studies from the University of California, Los Angeles, and graduated summa cum laude and with Departmental Highest Honors.

Daniel Jonathan. Daniel Jonathan is a senior counsel at Capstone Law. His practice primarily involves wage-and-hour class actions and PAGA litigation on behalf of employees for the failure to pay overtime and minimum wages, failure to provide meal and rest breaks, claims under the Fair Labor Standards Act, and other California Labor Code violations.

Prior to joining Capstone, Mr. Jonathan began his career as an associate at Kirkland & Ellis representing Fortune 500 clients in high-stakes litigation in various matters, including class action defense and plaintiff's actions for accounting fraud. Following that, he was a senior counsel at a boutique litigation firm where he successfully first-chaired several trials. Mr. Jonathan graduated from the Northwestern University School of Law. He received his undergraduate degree in Accounting from the University of Southern California, where he graduated cum laude. He has passed the CPA examination and worked as an auditor at Deloitte before attending law school.

Jonathan Lee. A senior counsel with Capstone, Jonathan Lee primarily litigates employment class actions. At Capstone, Mr. Lee has worked on several major successful class certification motions, and his work has contributed to multi-million dollar class settlements against various employers, including restaurant chains, retail stores, airport staffing companies, and hospitals. Prior to joining Capstone, Mr. Lee defended employers and insurance companies in workers' compensation actions throughout California.

Mr. Lee graduated in 2009 from Pepperdine University School of Law, where he served as an editor for the Journal of Business, Entrepreneurship and the Law; he received his undergraduate degree from UCLA.

Mark A. Ozzello. Mark A. Ozzello is a senior counsel with Capstone Law, where he leads the firm's consumer team. He is a nationally recognized and respected consumer and employment attorney who has litigated those issues throughout the country. He has always been at the forefront of consumer rights, sitting on the Board of Governors for the Consumer Attorneys of California and regularly appearing as a featured speaker on consumer rights issues nationwide.

Mr. Ozzello is a former partner of Arias Ozzello & Gignac and, most recently, was Of Counsel to Markun Zusman Freniere & Compton, LLP. In his capacity as a litigator, he has obtained results for his clients in excess of \$200 million dollars. Mark has also achieved consistent success in the California Courts of Appeal, and several judicial opinions regularly cite to his matters as authority for class certification issues. He has also argued appellate issues in several Circuit Courts of Appeals with great success. Mr. Ozzello attended Pepperdine University School of Law where he was an Editor to the Law Review, publishing several articles during his tenure in that capacity. He received his undergraduate degree from Georgetown University.

Mr. Ozzello has always strived to be an integral part of local communities. He has established educational scholarship programs at several charitable organizations, including El Centro De Amistad in Los Angeles and St. Bonaventure Indian Mission and School in Thoreau, New Mexico, and presides over a legal clinic in Los Angeles which provides pro bono legal assistance to non-English speaking individuals.

Eduardo Santos. Eduardo Santos is a senior counsel at Capstone Law, and concentrates his practice on managing and obtaining court approval of many of Capstone's wage-and-hour, consumer, and PAGA settlements, from the initial contract drafting phase to motion practice, including contested motion practice on attorneys' fees. Over the course of his career, Mr. Santos has helped to secure court approval of over one hundred high-stakes class and representative action settlements totaling over \$100 million.

Before joining Capstone, Mr. Santos began his career at a prominent plaintiff's firm in Los Angeles specializing in mass torts litigation, with a focus on complex pharmaceutical cases. Most notably, he was involved in the national Vioxx settlement, which secured a total of \$4.85 billion for thousands of individuals with claims of injuries caused by taking Vioxx. Mr. Santos graduated from Loyola Law School, Los Angeles, where he was a recipient of a full-tuition scholarship awarded in recognition of academic excellence. While in law school, Mr. Santos served as an extern for the Honorable Thomas L. Willhite, Jr. of the California Court of Appeal. He graduated magna cum laude from UCLA and was a recipient of the Ralph J. Bunche Scholarship for academic achievement.

Mao Shiokura. Mao Shiokura is a senior counsel with Capstone. Her practice focuses on identifying, evaluating, and developing new claims, including PAGA representative actions and class actions for wage-and-hour violations and consumer actions under the Consumers Legal Remedies Act, False Advertising Law, Unfair Competition Law, and other consumer protection statutes. Prior to joining Capstone, Ms. Shiokura was an associate at a California lemon law firm, where she represented consumers in Song-Beverly, Magnuson-Moss, and fraud actions against automobile manufacturers and dealerships.

Ms. Shiokura graduated from Loyola Law School, Los Angeles in 2009, where she served as a staff member of Loyola of Los Angeles Law Review. She earned her undergraduate degree from the University of Southern

California, where she was a Presidential Scholar and majored in Business Administration, with an emphasis in Cinema-Television and Finance.

Roxanna Tabatabaepour. Roxanna Tabatabaepour is a senior counsel with Capstone Law. Her practice primarily involves representing employees in class actions and representative actions for various violations of the California Labor Code.

Before joining Capstone, Ms. Tabatabaepour's experience included representing workers in single-plaintiff and class/representative action lawsuits regarding wage-and-hour violations, as well as individual claims for discrimination, retaliation, failure to accommodate, harassment, and wrongful termination, under both California and federal laws. Ms. Tabatabaepour received her undergraduate degrees from the University of California San Diego. She subsequently graduated from the American University, Washington College of Law, where she was a Marshall-Brennan Constitutional Literacy Fellow and taught Constitutional Literacy to teens in marginalized communities.

Orlando Villalba. Orlando Villalba is a senior counsel at Capstone Law. His practice primarily involves wage-and-hour class actions and PAGA litigation on behalf of employees for the failure to pay overtime and minimum wages, failure to provide meal and rest breaks, claims under the Fair Labor Standards Act, and other California Labor Code violations.

Mr. Villalba began his career at Kirkland & Ellis where he handled a wide range of business litigation matters, including transnational contract disputes, insurance-related tort claims, developer litigation, and civil rights actions. He also has extensive plaintiff-side experience representing government agencies and note-holders in the pursuit of mortgage and other fraud losses. Mr. Villalba graduated from Stanford Law School, where he served as an articles editor on the Stanford Journal of Law, Business & Finance. After law school, he clerked for the Honorable Warren Matthews of the Alaska Supreme Court. Orlando received his bachelor's degree in International Business from the University of Southern California.

Tarek Zohdy. A senior counsel with Capstone Law, Tarek Zohdy develops, investigates and litigates automotive defect class actions, along with other consumer class actions for breach of warranty and consumer fraud. At Capstone, he has worked on several large-scale automotive class actions from investigation through settlements that have provided significant relief to millions of defrauded car owners. Before joining Capstone, Mr. Zohdy spent several years representing individual consumers in their actions against automobile manufacturers and dealerships for breaches of express and implied warranties pursuant to the Song-Beverly Consumer Warranty Act and the Magnuson-Moss Warranty Act, commonly referred to together as "Lemon Law." He also handled fraudulent misrepresentation and omission cases pursuant to the Consumers Legal Remedies Act. Mr. Zohdy graduated from Louisiana State University *magna cum laude* in 2003, and Boston University School of Law in 2006, where he was a member of the criminal clinic representing underprivileged criminal defendants.

Associates

Tyler Anderson. Tyler Anderson is an associate with Capstone Law. His practice focuses on complex motions, writs, and appeals. Before joining Capstone, Mr. Anderson was Co-Director of the Los Angeles Center for Community Law and Action ("LACCLA"), a nonprofit law firm that represents tenant unions and union organizers. While there, Mr. Anderson tried a disparate impact federal Fair Housing Act case that resulted in a jury verdict of over \$1,000,000. He also frequently used California Anti-SLAPP laws to block

attempts to silence tenant union organizers. Prior to working at LACCLA, Mr. Anderson clerked for the Honorable Martha Vazquez, a federal district court judge for the District of New Mexico who, at the time, sat on the Executive Committee of the Federal Judiciary. Before that, Mr. Anderson was a litigation associate at the international law firm Jenner & Block LLP. Mr. Anderson graduated from Harvard Law School, where he was the Executive Articles Editor of the Harvard Journal on Legislation as well as President of one of the largest student-run pro bono organizations at Harvard University, Project No One Leaves. He graduated with several “Dean’s Scholar” prizes for receiving top grades in his constitutional law courses.

Laura Goolsby. Laura Goolsby is an associate with Capstone Law. Her practice focuses on prosecuting automotive defect and other consumer class action cases in state and federal court. Prior to joining Capstone Law, Ms. Goolsby was an associate at a California civil litigation practice representing individuals in toxic tort disputes. Previous to that, Ms. Goolsby was a trial attorney in a California lemon law firm, trying cases against automobile manufacturers in state and federal court.

Ms. Goolsby is published in the University of Pennsylvania Journal of Law and Change law review and served as a judicial intern to the U.S. Department of Justice Immigration Court while in law school. Ms. Goolsby graduated from California Western School of Law, where she was a member of the award-winning Philip C. Jessup International Moot Court team and spent multiple trimesters on the Dean’s List. She graduated with several Academic Excellence Awards for receiving top grades in various international law, civil rights law, and legal skills courses.

Joseph Hakakian. Joseph Hakakian is an associate with Capstone Law. His practice focuses on prosecuting wage-and-hour class and representative actions in state and federal court. Prior to joining Capstone Law, Mr. Hakakian served as a summer clerk for Mark Ozzello at Markun Zusman Freniere & Compton, LLP, working on various actions including wage-and-hour claims, unpaid overtime, false advertising, and unfair competition. He graduated from UCLA School of Law, with a business law specialization, where he served as a staff editor for the Journal of Environmental Law and Policy and worked as a law clerk with the Consumer Protection Division of the Los Angeles District Attorney’s Office. Prior to attending law school, Mr. Hakakian received his undergraduate degree from University of California, Los Angeles, in 2013, where he graduated summa cum laude, Dean’s Honor List, and College Honors, and received scholastic achievement awards from Golden Key Honor Society and Phi Alpha Theta Honor Society. Joseph is an active member of the Consumer Attorneys Association of Los Angeles (CAALA), Consumer Attorneys of California (CAOC), and Beverly Hills, Los Angeles County, and Santa Monica Bar Associations.

Trisha Monesi. Trisha Monesi is an associate with Capstone. Her practice focuses on prosecuting consumer class actions in state and federal court. Ms. Monesi graduated from Loyola Law School, Los Angeles in 2014, where she served as an editor of the Loyola of Los Angeles Entertainment Law Review and was a certified law clerk at the Center for Juvenile Law and Policy. She earned her undergraduate degree from Boston University in 2011, where she majored in Political Science and International Relations. She is an active member of the Women Lawyers Association of Los Angeles, and the Los Angeles County and Beverly Hills Bar Associations.

Cody Padgett. An associate with Capstone, Cody Padgett’s practice focuses on prosecuting automotive defect and other consumer class action cases in state and federal court. He handles consumer cases at all stages of litigation, and has contributed to major settlements of automobile defect actions valued in the tens of millions. Prior to joining Capstone Law, Mr. Padgett was a certified legal intern with the San Diego County Public Defender’s Office. During law school, Mr. Padgett served as a judicial extern to the Honorable C.

Leroy Hansen, United States District Court for the District of New Mexico. He graduated from California Western School of Law in the top 10% of his class and received his undergraduate degree from the University of Southern California, where he graduated *cum laude*.

Julian Quattlebaum. Julian Quattlebaum is an associate with Capstone. His practice focuses on analyzing pre-litigation wage-and-hour and consumer claims, including claims for overtime wages, meal and rest periods, and off-the-clock work violations. He began his career at an entertainment law firm, handling intellectual property matters, copyright infringement disputes, and contract litigation. During his time at the firm, he authored an amicus brief that was quoted in oral argument before the Ninth Circuit Court of Appeals during en banc review. Later, he helped author an appellate brief regarding the rights to the storyline of a successful Disney film franchise. Mr. Quattlebaum graduated from Emory University School of Law in 2019. While there, he was a member of the Moot Court Society, representing the school at the NYU Immigration Law competition in his second year, and the National Competition in his third year. He was given the Society's Award for Excellence in Oral Advocacy and was inducted into the Order of Emory Advocates. He earned his undergraduate degree from the University of Colorado Boulder in 2015, where he majored in Evolutionary Biology.

OUTREACH AND EDUCATION

To increase public awareness about the issues affecting class action and other representative litigation in the consumer and employment areas, Capstone publishes the Impact Litigation Journal (www.impactlitigation.com). Readers have access to news bulletins, op-ed pieces, and legal resources. By taking advantage of social media, Capstone hopes to spread the word about consumer protection and employee rights to a larger audience than has typically been reached by traditional print sources, and to thereby contribute to the enforcement of California's consumer and workplace protection laws.

Exhibit 2

Capstone Law APC
Billing Records - Doordash

Lawyer	Date	Explanation	Hours	Rate	Total
Mao Shiokura	7/9/2018	Draft and revise complaint.	1.3	\$485.00	\$630.50
Mao Shiokura	7/12/2018	Review and analyze research results on Defendant.	0.7	\$485.00	\$339.50
Mao Shiokura	7/18/2018	Draft and revise correspondence to client re approval of complaint.	0.2	\$485.00	\$97.00
Mao Shiokura	7/19/2018	Review and analyze Marciano settlement documents.	0.4	\$485.00	\$194.00
Mao Shiokura	7/19/2018	Draft and revise amended PAGA letter.	0.7	\$485.00	\$339.50
Mao Shiokura	7/19/2018	Draft and revise complaint.	1.7	\$485.00	\$824.50
Mao Shiokura	7/20/2018	Review and revise amended PAGA letter.	0.7	\$485.00	\$339.50
Mao Shiokura	7/20/2018	Draft and revise complaint.	1.9	\$485.00	\$921.50
Mao Shiokura	7/23/2018	Communicate with client re complaint approval.	0.2	\$485.00	\$97.00
Mao Shiokura	7/25/2018	Attention to correspondence from opposing counsel re notice of arbitration.	0.2	\$485.00	\$97.00
Mao Shiokura	7/26/2018	Review and revise complaint.	0.5	\$485.00	\$242.50
Arnab Banerjee	7/30/2018	Review and analyze demand for arbitration.	1	\$545.00	\$545.00
Arnab Banerjee	7/30/2018	Review and revise complaint; legal research re 2802 damages and 558.	2.5	\$545.00	\$1,362.50
Brandon Brouillette	7/30/2018	Evidentiary research re collecting 2802 penalties in a PAGA action.	4.2	\$485.00	\$2,037.00
John Stobart	9/14/2018	Review and analyze motion to compel arbitration.	1.5	\$545.00	\$817.50
Liana Carter	9/17/2018	Review and analyze motion to compel arbitration.	2.5	\$720.00	\$1,800.00
Liana Carter	9/18/2018	Review and analyze arbitration agreement and case law interpreting similar arbitration agreements.	4.5	\$720.00	\$3,240.00
Liana Carter	9/21/2018	Review and analyze new case law impacting PAGA actions, including case law interpreting arbitration agreement provisions.	6.5	\$720.00	\$4,680.00
Mao Shiokura	9/25/2018	Attention to submitting conformed complaint to LWDA.	0.2	\$485.00	\$97.00
Liana Carter	10/19/2018	Review and analyze motion to compel arbitration and supporting papers; review current arbitration law.	3	\$720.00	\$2,160.00
Liana Carter	10/22/2018	Legal research re arbitration of PAGA actions.	4	\$720.00	\$2,880.00
Liana Carter	10/23/2018	Legal research re FAA, Section 1 exemption.	3.5	\$720.00	\$2,520.00
Liana Carter	12/14/2018	Attention to strategy re opposing arbitration.	0.5	\$720.00	\$360.00
John Stobart	12/14/2018	Legal research re cases cited in motion to compel arbitration.	2.1	\$545.00	\$1,144.50
John Stobart	12/14/2018	Review and analyze motion to compel arbitration, supporting documents, arbitration agreement.	3.7	\$545.00	\$2,016.50
John Stobart	12/17/2018	Legal research re cases cited by defendant in motion to compel arbitration.	2.8	\$545.00	\$1,526.00
John Stobart	12/17/2018	Review and analyze motion to compel arbitration and stay case.	3.2	\$545.00	\$1,744.00
John Stobart	12/18/2018	Draft and revise outline of opposition to motion to compel arbitration.	2.3	\$545.00	\$1,253.50
John Stobart	12/18/2018	Draft and revise opposition to motion to compel arbitration -PAGA waiver argument.	6.1	\$545.00	\$3,324.50
John Stobart	12/19/2018	Legal research re PAGA waivers.	1.2	\$545.00	\$654.00
John Stobart	12/19/2018	Draft and revise opposition to motion to compel arbitration -PAGA waiver section.	5.2	\$545.00	\$2,834.00
John Stobart	12/20/2018	Draft and revise opposition to motion to compel arbitration -facts and procedure.	2.2	\$545.00	\$1,199.00
John Stobart	12/20/2018	Draft and revise opposition to motion to compel arbitration -FAA preemption.	4.8	\$545.00	\$2,616.00

Capstone Law APC
Billing Records - Doordash

Lawyer	Date	Explanation	Hours	Rate	Total
John Stobart	12/21/2018	Legal research re FAA and Epic Systems.	2.2	\$545.00	\$1,199.00
John Stobart	12/21/2018	Draft and revise opposition to motion to compel arbitration -FAA section.	4.8	\$545.00	\$2,616.00
John Stobart	12/24/2018	Draft and revise opposition to motion to compel arbitraiton -PAGA waiver and FAA sections.	5	\$545.00	\$2,725.00
John Stobart	12/26/2018	Draft and revise opposition to motion to compel arbitration -no individual damages section.	4.2	\$545.00	\$2,289.00
John Stobart	12/27/2018	Draft and revise opposition for motion to compel arbitration - no individualized damages alleged.	5.6	\$545.00	\$3,052.00
Arnab Banerjee	12/28/2018	Prepare for and attend meet and confer with opposing counsel re CMC.	1	\$545.00	\$545.00
Arnab Banerjee	12/28/2018	Review and revise CMC statement.	1.1	\$545.00	\$599.50
John Stobart	12/28/2018	Legal research re automatic stay.	3.5	\$545.00	\$1,907.50
John Stobart	1/8/2019	Legal research re automatic stay.	1.6	\$545.00	\$872.00
Arnab Banerjee	1/8/2019	Legal research re motion to abate PAGA case pending individual arbitration.	2.7	\$545.00	\$1,471.50
John Stobart	1/8/2019	Draft and revise opposition to motion to compel arbitration -overall edits.	4.8	\$545.00	\$2,616.00
John Stobart	1/9/2019	Draft and revise opposition to motion to compel arbitration.	3.9	\$545.00	\$2,125.50
John Stobart	1/10/2019	Draft and revise opposition to motion to compel arbitration automatic stay.	3.4	\$545.00	\$1,853.00
John Stobart	1/10/2019	Legal research re automatic stay.	3.8	\$545.00	\$2,071.00
Arnab Banerjee	1/11/2019	Legal research re opposition to motion to compel arbitration and motion to abate.	2.1	\$545.00	\$1,144.50
John Stobart	1/11/2019	Draft and revise opposition to motion to compel arbitration -automatic stay.	4.1	\$545.00	\$2,234.50
Ryan Wu	1/14/2019	Review and analyze motion to compel arbitration and provide analysis of same.	1.8	\$675.00	\$1,215.00
John Stobart	1/14/2019	Legal research re transportation exception to FAA.	2.9	\$545.00	\$1,580.50
John Stobart	1/14/2019	Draft and revise opposition to motion to compel arbitration -FAA transportation exception.	3.1	\$545.00	\$1,689.50
Ryan Wu	1/15/2019	Communicate with colleague on strategy for defeating request for stay.	0.5	\$675.00	\$337.50
John Stobart	1/15/2019	Draft and revise opposition to motion to compel arbitration -overall edits.	6.2	\$545.00	\$3,379.00
John Stobart	1/16/2019	Draft and revise opposition - argument against stay.	5.4	\$545.00	\$2,943.00
Ryan Wu	1/16/2019	Draft and revise opposition to motion to compel arbitration.	5.9	\$675.00	\$3,982.50
Ryan Wu	1/17/2019	Draft and revise opposition to motion to compel arbitration.	2.5	\$675.00	\$1,687.50
Arnab Banerjee	1/17/2019	Review and revise opposition to motion to compel arbitration.	2.9	\$545.00	\$1,580.50
John Stobart	1/17/2019	Draft and revise and finalize opposition - full edits and proofread.	2.9	\$545.00	\$1,580.50
John Stobart	1/28/2019	Review and analyze reply - prepare outline of counter-points.	4.8	\$545.00	\$2,616.00
John Stobart	1/29/2019	Draft and revise outline of reply analysis.	2.2	\$545.00	\$1,199.00
Arnab Banerjee	1/30/2019	Plan and prepare for hearing re motion to compel arbitration and stay case.	1.1	\$545.00	\$599.50
Ryan Wu	1/30/2019	Review and analyze materials in preparation for motion to compel arbitration.	3.2	\$675.00	\$2,160.00
John Stobart	1/30/2019	Legal research re transportation exemption.	4.2	\$545.00	\$2,289.00
John Stobart	1/31/2019	Draft and revise analysis of transportation exemption.	4.3	\$545.00	\$2,343.50
Ryan Wu	4/17/2019	Draft and revise notice of new authority.	1.1	\$675.00	\$742.50

Capstone Law APC
Billing Records - Doordash

Lawyer	Date	Explanation	Hours	Rate	Total
John Stobart	4/18/2019	Review and analyze court's tentative and strategy for further briefing.	2.2	\$545.00	\$1,199.00
Ryan Wu	4/18/2019	Prepare for and attend hearing on motion to compel arbitration.	5.1	\$675.00	\$3,442.50
Ryan Wu	4/18/2019	Review and analyze motion in preparation for hearing on motion to compel arbitration.	5.2	\$675.00	\$3,510.00
John Stobart	6/14/2019	Review and analyze file regarding notice of appeal.	3.7	\$545.00	\$2,016.50
John Stobart	6/17/2019	Draft and revise memo re notice of appeal.	1.6	\$545.00	\$872.00
John Stobart	6/17/2019	Legal research re motion to dismiss.	3.1	\$545.00	\$1,689.50
John Stobart	6/18/2019	Legal research re cross-appeal.	3.2	\$545.00	\$1,744.00
John Stobart	6/24/2019	Review and analyze designation of record.	1.2	\$545.00	\$654.00
John Stobart	6/24/2019	Legal research re cross-appeal.	2.6	\$545.00	\$1,417.00
John Stobart	6/25/2019	Legal research re cross-appeal.	2.2	\$545.00	\$1,199.00
John Stobart	6/25/2019	Draft and revise memo re cross-appeal.	3.6	\$545.00	\$1,962.00
John Stobart	6/26/2019	Review and analyze appellant's designation of record.	0.8	\$545.00	\$436.00
Ryan Wu	6/26/2019	Review and analyze strategy for cross-appeal and confer with team re same.	1.5	\$675.00	\$1,012.50
John Stobart	6/26/2019	Legal research re cross-appeal - draft and revise memo.	3.2	\$545.00	\$1,744.00
Ryan Wu	6/27/2019	Review and analyze strategy for cross-appeal and provide written feedback.	0.5	\$675.00	\$337.50
John Stobart	6/27/2019	Draft and revise cross-appeal research memo.	3.8	\$545.00	\$2,071.00
John Stobart	6/28/2019	Review and analyze excerpts of record.	2.2	\$545.00	\$1,199.00
John Stobart	6/28/2019	Draft and revise AOB - procedural history.	3.2	\$545.00	\$1,744.00
John Stobart	6/28/2019	Draft and revise AOB - facts.	4.8	\$545.00	\$2,616.00
John Stobart	7/1/2019	Legal research re stay issue.	1.2	\$545.00	\$654.00
John Stobart	7/1/2019	Draft and revise memo regarding stay.	2.2	\$545.00	\$1,199.00
John Stobart	7/1/2019	Draft and revise respondent's brief - procedural facts and history.	4.3	\$545.00	\$2,343.50
Arnab Banerjee	7/10/2019	Communicate with opposing counsel re appeal and motion to stay.	1	\$545.00	\$545.00
John Stobart	7/24/2019	Draft and revise motion for preference.	1.2	\$545.00	\$654.00
Ryan Wu	7/25/2019	Draft and revise motion for preference.	0.5	\$675.00	\$337.50
Arnab Banerjee	7/31/2019	Attention to stipulation re motion to stay; communicate with opposing counsel re same.	0.5	\$545.00	\$272.50
Mao Shiokura	8/28/2019	Review and revise case site content.	0.2	\$485.00	\$97.00
Mao Shiokura	10/9/2019	Review and revise FAC.	0.6	\$485.00	\$291.00
John Stobart	10/15/2019	Draft and revise motion for sanctions.	4.4	\$545.00	\$2,398.00
John Stobart	10/15/2019	Review and analyze record on appeal.	5.6	\$545.00	\$3,052.00
John Stobart	10/16/2019	Draft and revise notice of representation.	0.4	\$545.00	\$218.00
John Stobart	10/16/2019	Review and analyze record on appeal.	2.2	\$545.00	\$1,199.00
John Stobart	10/17/2019	Review and analyze appendix.	2.2	\$545.00	\$1,199.00
John Stobart	10/17/2019	Legal research re motion for sanctions.	4	\$545.00	\$2,180.00
John Stobart	10/24/2019	Draft and revise motion for sanctions.	5.8	\$545.00	\$3,161.00
John Stobart	10/25/2019	Draft and revise motion for sanctions.	3.8	\$545.00	\$2,071.00
Ryan Wu	10/30/2019	Review and analyze issues for motion for consolidation.	1.1	\$675.00	\$742.50

Capstone Law APC
Billing Records - Doordash

Lawyer	Date	Explanation	Hours	Rate	Total
Ryan Wu	12/5/2019	Review and analyze settlement agreement purportedly subsuming our case.	1.5	\$675.00	\$1,012.50
John Stobart	12/5/2019	Review and analyze motion for stay and research cases for opposition.	2.1	\$545.00	\$1,144.50
John Stobart	12/6/2019	Review and analyze emails and stipulation for arbitrator.	1.2	\$545.00	\$654.00
John Stobart	12/17/2019	Review and analyze motion for stay and draft and revise strategy memo.	1.2	\$545.00	\$654.00
John Stobart	12/17/2019	Draft and revise strategy memo re stay.	2.8	\$545.00	\$1,526.00
Ryan Wu	12/20/2019	Review and analyze response to motion to stay.	0.3	\$675.00	\$202.50
John Stobart	12/20/2019	Draft and revise opposition to motion for stay.	2.2	\$545.00	\$1,199.00
Anthony Castillo	12/26/2019	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	12/27/2019	Review and analyze inquiries from potential class members.	0.2	\$485.00	\$97.00
Anthony Castillo	12/30/2019	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	12/31/2019	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
		Communicate with A. Bacon re settlement; draft and revise memo to R. Perez re call			
Brandon Brouillette	1/9/2020	summary.	1	\$485.00	\$485.00
Anthony Castillo	2/18/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	2/20/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	2/24/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	3/13/2020	Review and analyze inquiries from potential class members.	0.4	\$485.00	\$194.00
Anthony Castillo	3/19/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	3/25/2020	Review and analyze inquiry from putative class member.	0.1	\$485.00	\$48.50
Anthony Castillo	3/26/2020	Review and analyze inquiries from potential class members.	0.2	\$485.00	\$97.00
Anthony Castillo	3/27/2020	Review and analyze inquiries from potential class members.	0.3	\$485.00	\$145.50
Anthony Castillo	3/30/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
		Review and analyze settlement agreement; approval of previous settlement; confer with client			
Brandon Brouillette	4/2/2020	re JPA.	3.5	\$485.00	\$1,697.50
Anthony Castillo	4/3/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	4/7/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	4/20/2020	Review and analyze inquiries from potential class members.	0.2	\$485.00	\$97.00
Raul Perez	4/22/2020	Review and analyze status of long form negotiations.	0.4	\$775.00	\$310.00
Brandon Brouillette	4/22/2020	Draft and revise memo to Raul Perez re status update.	0.8	\$485.00	\$388.00
Anthony Castillo	4/23/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	4/27/2020	Review and analyze inquiries from potential class members.	0.3	\$485.00	\$145.50
Anthony Castillo	4/28/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	4/29/2020	Review and analyze inquiries from potential class members.	0.5	\$485.00	\$242.50
Anthony Castillo	5/18/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	5/21/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	6/2/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50

Capstone Law APC
Billing Records - Doordash

Lawyer	Date	Explanation	Hours	Rate	Total
Brandon Brouillette	6/4/2020	Draft and revise client declaration in support of motion for preliminary approval; communicate with client re same.	2	\$485.00	\$970.00
Anthony Castillo	6/5/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Brandon Brouillette	6/5/2020	Review and revise client declaration in support of motion for preliminary approval.	0.5	\$485.00	\$242.50
Brandon Brouillette	6/5/2020	Attention to finalizing settlement agreement.	1	\$485.00	\$485.00
Anthony Castillo	6/8/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	8/18/2020	Review and analyze inquiries from potential class members.	0.2	\$485.00	\$97.00
Anthony Castillo	8/31/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	9/18/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	9/23/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Anthony Castillo	10/2/2020	Review and analyze inquiries from potential class members.	0.2	\$485.00	\$97.00
Anthony Castillo	10/19/2020	Review and analyze inquiry from potential class member.	0.1	\$485.00	\$48.50
Brandon Brouillette	10/29/2020	Review and analyze amended settlement; call with client re same.	2	\$485.00	\$970.00
Raul Perez	11/1/2020	Review and revise MOU.	0.7	\$775.00	\$542.50
Brandon Brouillette	11/2/2020	Review and analyze marciano settlement agreement.	1.5	\$485.00	\$727.50
Brandon Brouillette	1/7/2021	Communicate with client re status of case and settlement.	1	\$485.00	\$485.00
Brandon Brouillette	3/2/2021	Draft and revise email to M. Ozzello re case status.	0.2	\$485.00	\$97.00
Brandon Brouillette	3/2/2021	Review and analyze docket re status conference; email Matt.	0.3	\$485.00	\$145.50
Raul Perez	3/4/2021	Review and analyze status of pending approval.	0.4	\$775.00	\$310.00
Brandon Brouillette	3/29/2021	Review and analyze docket; call client for case update.	1	\$485.00	\$485.00
Brandon Brouillette	4/2/2021	Communicate with client re approval.	0.5	\$485.00	\$242.50
Raul Perez	5/25/2021	Review and revise declaration in support of approval motion.	0.3	\$775.00	\$232.50
Raul Perez	7/12/2021	Prepare for and attend approval hearing.	0.5	\$775.00	\$387.50
			313.3		\$177,534.00