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Attorneys for Plaintiff
JOSE MARIO MENDOZA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSE MARIO MENDOZA,

Plaintiff,
vs.

TRANS VALLEY TRANSPORT et al,
Defendants.

And Related Cross-Action

Case No. 22-cv-07164 TLT

**DECLARATION OF SANTOS GOMEZ IN
SUPPORT OF PLAINTIFF'S MOTION FOR
AN AWARD OF ATTORNEYS' FEES, COSTS
AND ENHANCEMENT PAYMENT IN
CONNECTION WITH FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: October 8, 2024
Time: 2:00 p.m.
Ctm: 9

I, Santos Gomez, declare:

1. I am an attorney duly licensed to practice before all courts of the State of California. I am one of the attorneys of record for Jose Maria Mendoza ("Plaintiff") in the action against defendants Trans Valley Transport and FTU Labor Contractors, Inc. ("Defendants"). I have personal knowledge of the matters stated herein and if called and sworn as a witness, I could and would competently testify under oath thereto.

2. I received by Juris Doctor Degree from the University of California at Davis, King Hall, in 1993. I was admitted to practice law in California in 1994.

3. I speak, read and write English and Spanish. I have represented low wage workers in employment disputes since 1998. From 1998 through early 2006, I litigated wage and hour claims under California's unfair competition laws on behalf of agricultural workers. Since 2006, I have been litigating wage and hour class and collective actions on behalf of California low wage workers, including truck drivers.

4. I have reviewed the motion for attorney's fees, litigation costs and service enhancement papers, including the declaration of my colleague Gregory N. Karasik. I concur with his declaration and the papers in support of the motion for an award of attorney's fees, costs and an enhancement payment filed concurrently herewith.

5. As set forth in my expense records attached hereto as Exhibit 1, my office has incurred \$848.97 in litigation costs in this matter.

6. As set forth in my time records attached hereto as Exhibit 2, by the time the class settlement is fully administered, I will have spent 102.25 hours working on this case.

7. Federal courts have previously approved an \$850 hourly rate for the lodestar value of my time and I seek approval of an \$850 hourly rate in this matter. I am familiar with the market rate for attorneys of my level of skill and experience in the San Francisco Bay Area, and I believe that an \$850 hourly rate is equivalent to, or lower than, the market rate for attorneys with comparable level of experience, especially given my experience representing Spanish speaking low wage workers. Based on an \$850 hourly rate, the lodestar value of the time I will have devoted to this case through the final administration of the settlement is \$86,912.50 (102.25 hours x \$850 hourly rate).

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed in Watsonville, California on June 12, 2024.

Santos Gomez

Exhibit 1			
Jose Mario Mendoza v. Trans Valley Transport et al.			
Litigation Costs			
Date	Vendor	Item or Reason	Total Cost
6/22/2022	Veritext Legal Solutions	Certified Copy of Plaintiff's deposition transcript	\$ 802.85
1/13/2023	US Postal Service	Mail to Plaintiff	\$ 9.90
5/12/2023	Staff of Life	Lunch for Plaintiff--Settlement Conference	\$ 36.22
Total			\$ 848.97

Exhibit 2		
Jose Mario Mendoza v. Trans Valley Transport et al.		
Santos Gomez Time Records		
Date	Activity	Hours
5/14/2015	Initial client interview	1.50
5/16/2015	Second client interview	0.75
5/20/2015	Reviewed Plaintiff's time and payroll records	2.50
5/22/2015	Drafting complaint	2.25
6/9/2015	Call with Plaintiff	0.50
6/30/2015	Communications with class members	1.50
7/7/2015	Call with Plaintiff	0.25
9/2/2015	CM Statement	0.25
10/14/2015	Research Re Labor Code 226.2	0.50
11/5/2015	Initial class discovery	1.00
2/21/2016	Preparing Plaintiff's responses to discovery	2.50
7/15/2016	Reviewed arbitration agreement papers with Plaintiff	1.00
9/22/2016	Opposition to Motion to Compel Arbitration	3.50
11/29/2016	Opposition to Motion to Compel Arbitration	1.00
12/9/2016	Opposition to Motion to Compel Arbitration	0.50
5/23/2017	CM Statement	0.25
8/15/2018	Respondent's brief	2.50
1/31/2020	Reviewed letter brief to appeals court	1.75
3/22/2022	Call with Defense Counsel	1.00
6/5/2022	Meeting with Plaintiff to prepare for his deposition	3.50
6/6/2022	Call with co-counsel re dismissing meal and rest period claims	0.25
6/7/2022	Plaintiff's deposition	10.00
6/21/2022	Call with Greg re mediation options	0.50
9/6/2022	Mediation Brief	1.50
9/14/2022	Call with Plaintiff to prepare for mediation	1.00
9/19/2022	Worked on damage calculations	3.50
9/23/2022	Mediation with Klerman	8.00
10/15/2022	Discovery	1.75
10/26/2022	Discovery	1.00
2/13/2023	MSC and CMC Statements; reviewed Defendant's discovery responses	1.50
4/28/2023	MSC Statement	3.50
5/12/2023	MSC	8.50
5/17/2023	Second MSC	3.00
5/17/2023	Drafting settlement	1.00
5/24/2023	Drafting settlement and class notice	1.25
6/9/2023	Call with Plaintiff	0.50
6/16/2023	Reviewed SA with Plaintiff	1.50
6/16/2023	Preliminary Approval papers	2.50
6/20/2023	Preliminary Approval papers	1.50

6/11/2024	Motion for fees, costs and enhancement	5.50
TBD	Estimate: Calls from class members RE the class settlement and their rights during the administration of the class notice	7.50
TBD	Motion for final approval	5.50
TBD	Post final approval administration of class settlement	10.00
	Total	102.25