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11 Attorneys for Plaintiffs Nicholas Wylie,
12 Shawna Wylie, Timothy Ryan, and Gregory Perger

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA

15
16 NICHOLAS WYLIE, SHAWNA
WYLIE (fka BROWN), TIMOTHY
17 RYAN, and GREGORY PERGER,
individually, and on behalf of a class of
18 similarly situated individuals,

19 Plaintiffs,

20 v.

21 HYUNDAI MOTOR AMERICA, a
California corporation,

22 Defendant.
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Case No.: 8:16-cv-02102-DOC-JCG

Hon. David O. Carter

**DECLARATION OF TAREK H.
ZOHDY IN SUPPORT OF MOTION
FOR ATTORNEYS' FEES, COSTS,
AND CLASS REPRESENTATIVE
INCENTIVE AWARDS**

Date: March 2, 2020

Time: 8:30 a.m.

Place: Courtroom 9D

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DECLARATION OF TAREK H. ZOHDY

I, Tarek H. Zohdy, hereby declare:

1. I am an attorney at law duly licensed to practice before the courts of the State of California and the United States District Court, Central District of California. I am also a Senior Counsel at Capstone Law APC (“Capstone”), counsel of record for Plaintiffs in the above-captioned action. Unless the context indicates otherwise, I have personal knowledge of the facts stated in this declaration. I make this declaration in support of Plaintiffs’ Motion for Attorneys’ Fees, Costs, and Class Representative Incentive Awards.

OVERVIEW OF THE LITIGATION AND SETTLEMENT NEGOTIATIONS

2. Plaintiffs Nicholas and Shawna Wylie filed this action on November 22, 2016. As a result of several meetings regarding Defendant’s anticipated motion to dismiss and the prospect of amending the complaint, the Parties agreed to participate in an early mediation. On March 15, 2017, the Court issued an order staying proceedings pending mediation. On May 1, 2017, the Parties participated in a mediation with the Hon. Russell Bostrom (Ret.) of Judicate West. The Parties were unable to settle at mediation, but agreed to revisit their settlement negotiations as the litigation resumed.

3. Plaintiffs filed their First Amended Complaint on September 12, 2017, adding Timothy Ryan and Gregory Perger as additional named plaintiffs. On November 27, 2017, the Parties participated in another mediation with Judge Bostrom. Although the Parties were able to close the gap between their respective positions, they were still unable to settle.

4. On January 26, 2018, Hyundai filed its Answer to Plaintiffs’ First Amended Complaint. The Parties thereafter exchanged significant formal discovery and evidence, and eventually agreed to participate in a third mediation on May 30, 2018, this time before the Hon. Howard B. Wiener (Ret.). Although the Parties did not settle at the third mediation, with Justice Wiener’s continuing guidance and months of continued negotiations, the Parties were eventually able to negotiate a complete settlement of the

1 claims at issue. The settlement is set forth in complete and final form in the Settlement
2 Agreement.

3 **PLAINTIFFS THOROUGHLY INVESTIGATED THE CLAIMS AND DEFENSES AND**
4 **MADE CAREFUL USE OF DOCUMENTS AND EVIDENCE PRODUCED BY HYUNDAI**

5 5. Both before and after the action was filed, Plaintiffs thoroughly
6 investigated and researched their claims, which allowed Plaintiffs' Counsel to better
7 evaluate Hyundai's representations and omissions concerning the functionality of the
8 DCTs. Among other tasks, Plaintiffs fielded hundreds of inquiries from putative Class
9 Members and investigated many of their reported claims. They consulted and retained
10 expert Susan Thompson, PA/CFF Hemming Morse, LLP, Certified Public Accountants,
11 to assist them in quantifying the value of the benefits conferred by the settlement.

12 6. Plaintiffs also researched publicly available materials and information
13 provided by the National Highway Traffic Safety Administration ("NHTSA")
14 concerning consumer complaints about the DCTs. They reviewed and researched
15 consumer complaints and discussions of DCT-related problems in articles and forums
16 online, in addition to various manuals and technical service bulletins ("TSBs")
17 discussing the alleged defect. *Id.* Finally, they conducted research into the various causes
18 of actions and other similar automotive actions.

19 7. In response to Plaintiffs' written discovery efforts, Plaintiffs received over
20 **two hundred thousand pages of documents**, including spreadsheets with thousands of
21 rows of data, owners' manuals, maintenance and warranty manuals, internal Hyundai
22 investigation reports, TSBs, field reports, warranty data, etc. All of this information was
23 thoroughly and meticulously reviewed by Class Counsel.

24 8. In addition to written discovery, Plaintiffs took the depositions of
25 Hyundai's corporate representatives: Wayne Gates (Director of the Hyundai United
26 States Safety Office), Gregory Webster (Senior Group Manager of the Engineering
27 Design and Analysis Department), and Sandy Zielomski (Senior Group Manager for
28 Customer Claims).

1 9. In reviewing the above discovery, evidence, and testimony, Plaintiffs
2 identified information that was instrumental to the case and to Plaintiffs' efforts during
3 mediation. Finally, over the course of litigation, Plaintiffs responded to hundreds of
4 Class Members who contacted Plaintiffs' Counsel to report problems with their Class
5 Vehicles and seek relief. Plaintiffs' Counsel also conducted detailed interviews with
6 Class Members regarding their pre-purchase research, their purchasing decisions, and
7 their repair histories, and developed a plan for litigation and settlement based in part on
8 Class Members' reported experiences with their Class Vehicles and with Hyundai
9 dealers.

10 **QUALIFICATIONS TO SERVE AS CLASS COUNSEL**

11 10. Based on information and belief, Capstone is one of California's largest
12 plaintiff-only labor and consumer law firms. With over twenty seasoned attorneys,
13 Capstone has the experience, resources, and expertise to successfully prosecute complex
14 employment and consumer actions.

15 11. Short biographies summarizing my experience and that of other attorneys
16 at Capstone are set forth in the firm resume attached as Exhibit 1. Also set forth in the
17 firm resume are Capstone's accomplishments since its creation in 2012.

18 12. One of the largest California firms to prosecute aggregate actions on a
19 wholly contingent basis, Capstone, as lead or co-lead counsel, has obtained final
20 approval of scores of class actions valued at over \$200 million dollars. Recognized for
21 its active class action practice and cutting-edge appellate work, Capstone's recent
22 accomplishments have included three of its attorneys being honored as California
23 Lawyer's Attorneys of the Year ("CLAY") in the employment practice area for 2014 for
24 their work in the landmark case *Iskanian v. CLS Transportation Los Angeles*, 59 Cal. 4th
25 348 (2014).

26 13. Capstone has an established practice in automotive defect class actions and
27 has negotiated numerous class action settlements providing relief to owners/lessees the
28 last several years. *See Granillo v. FCA US LLC*, No. 3:16-cv-00153-FLW-DEA (D.

1 N.J. Aug. 27, 2019) (finally approving class action settlement alleging transmission
 2 defects in class vehicles); *Falco v. Nissan N. Am. Inc.*, No. 13-00686-DDP (C.D. Cal.
 3 July 16, 2018), Dkt. No. 341 (finally approving settlement after certifying class alleging
 4 timing chain defect on contested motion); *Vargas v. Ford Motor Co.*, No. CV12-08388
 5 AB (FFMX), 2017 WL 4766677 (C.D. Cal. Oct. 18, 2017) (class action settlement
 6 involving transmission defects for 1.8 million class vehicles; final approval pending);
 7 *Batista v. Nissan N.Am., Inc.*, No. 14-24728-RNS (S.D. Fla. June 29, 2017), Dkt. 191
 8 (finally approving class action settlement alleging CVT defect); *Chan v. Porsche Cars*
 9 *N.A., Inc.*, No. No. 15-02106-CCC (D. N.J. Oct. 6, 2017), Dkt. 65 (finally approving
 10 class action settlement involving alleged windshield glare defect); *Klee v. Nissan N. Am.,*
 11 *Inc.*, No. 12-08238-AWT, 2015 WL 4538426, at *1 (C.D. Cal. July 7, 2015) (settlement
 12 involving allegations that Nissan Leaf’s driving range, based on the battery capacity, was
 13 lower than was represented by Nissan); *Asghari v. Volkswagen Group of America, Inc.*,
 14 Case No. 13-cv-02529-MMM-VBK, 2015 WL 12732462 (C.D. Cal. May 29, 2015)
 15 (class action settlement providing repairs and reimbursement for oil consumption
 16 problem in certain Audi vehicles); *Aarons v. BMW of N. Am., LLC*, No. CV 11-7667
 17 PSG, 2014 WL 4090564 (C.D. Cal. Apr. 29, 2014), objections overruled, No. CV 11-
 18 7667 PSG CWX, 2014 WL 4090512 (C.D. Cal. June 20, 2014) (C.D. Cal.) (class action
 19 settlement providing up to \$4,100 for repairs and reimbursement of transmission defect
 20 in certain BMW vehicles).

21 **CAPSTONE LAW APC’S LODESTAR**

22 14. In the exercise of billing judgment, Capstone wrote off approximately 300
 23 hours of this time so as to minimize billing inefficiencies (i.e., billing for administrative
 24 or ministerial tasks that might otherwise have been performed by staff) and
 25 redundancies. The table below summarizes the total hours contemporaneously billed by
 26 Capstone’s attorneys (as of December 9, 2019) following this write-off.

Name	Title	CA Bar Yr	Rate	Hours	Fees
Raul Perez	Partner	1994	\$775	61.4	\$47,585.00

Name	Title	CA Bar Yr	Rate	Hours	Fees
Ryan Wu	Partner	2002	\$675	146.0	\$98,550.00
Jordan Lurie	Fmr. Of Counsel	1987	\$775	176.9	\$137,097.50
Mark Ozzello	Senior Counsel	1984	\$775	52.8	\$40,920.00
Tarek Zohdy	Senior Counsel	2006	\$575	478.0	\$274,850.00
Theresa Carroll	Senior Counsel	1995	\$545	329.4	\$179,523.00
Eduardo Santos	Senior Counsel	2007	\$545	123.8	\$67,471.00
Karen Wallace	Fmr. Associate	2010	\$445	65.2	\$29,014.00
Cody Padgett	Associate	2011	\$420	242.4	\$101,808.00
Trisha Monesi	Associate	2015	\$345	136.5	\$47,092.50
Brooke Waldrop	Associate	2017	\$295	261.1	\$77,024.50
Michael Massmann	Fmr. Attorney	2016	\$295	99.8	\$29,441.00
Total				2173.3	\$1,130,376.50

15. To assist the Court in evaluating the reasonableness of the hours billed by Capstone's attorneys to this litigation, Capstone has prepared additional tables that summarize the work performed by each attorney and to correlate that time to the major tasks of the litigation. These tables are as follows:

Major Tasks	Hours	Fees
Pre-Litigation Investigation and Evaluation / Complaint Drafting	106.6	\$44,995.50
Pleadings / Case Management / Miscellaneous Court Filings	43.1	\$24,274.00
Discovery and Depositions	300.8	\$145,724.50
Legal and Factual Analysis of Claims and Defenses / Litigation Strategy	304.9	\$147,556.50
Communications with Class Members and Clients	660.2	\$294,225.00
Mediations and Settlement Negotiations	433.6	\$282,928.00
Settlement Drafting and Motion Practice / Supervising Administration of Settlement	324.1	\$190,673.00
Total	2173.3	\$1,130,376.50

Major Tasks / Billers	Hours	Fees
Pre-Litigation Investigation and Evaluation / Complaint Drafting	106.6	\$44,995.50
Jordan Lurie (\$775)	9.6	\$7,440.00
Tarek Zohdy (\$575)	7.6	\$4,370.00
Karen Wallace (\$445)	18.4	\$8,188.00
Cody Padgett (\$420)	6.7	\$2,814.00

	Major Tasks / Billers	Hours	Fees
1	Trisha Monesi (\$345)	64.3	\$22,183.50
2	Pleadings / Case Management / Miscellaneous Court Filings	43.1	\$24,274.00
3	Jordan Lurie (\$775)	10.6	\$8,215.00
4	Tarek Zohdy (\$575)	13.8	\$7,935.00
5	Karen Wallace (\$445)	10.8	\$4,806.00
6	Cody Padgett (\$420)	7.9	\$3,318.00
7	Discovery and Depositions	300.8	\$145,724.50
8	Jordan Lurie (\$775)	17	\$13,175.00
9	Mark Ozzello (\$775)	6.5	\$5,037.50
10	Tarek Zohdy (\$575)	106.2	\$61,065.00
11	Cody Padgett (\$420)	98.9	\$41,538.00
12	Trisha Monesi (\$345)	72.2	\$24,909.00
13	Legal and Factual Analysis of Claims and Defenses / Litigation Strategy	304.9	\$147,556.50
14	Ryan Wu (\$675)	69.2	\$46,710.00
15	Tarek Zohdy (\$575)	8	\$4,600.00
16	Theresa Carroll (\$545)	110.6	\$60,277.00
17	Cody Padgett (\$420)	11.4	\$4,788.00
18	Brooke Waldrop (\$295)	5.9	\$1,740.50
19	Michael Massmann (\$295)	99.8	\$29,441.00
20	Communications with Class Members and Clients	660.2	\$294,225.00
21	Tarek Zohdy (\$575)	137.7	\$79,177.50
22	Theresa Carroll (\$545)	218.8	\$119,246.00
23	Karen Wallace (\$445)	5.9	\$2,625.50
24	Cody Padgett (\$420)	42.6	\$17,892.00
25	Brooke Waldrop (\$295)	255.2	\$75,284.00
26	Mediations and Settlement Negotiations	433.6	\$282,928.00
27	Raul Perez (\$775)	61.4	\$47,585.00
28	Ryan Wu (\$675)	40.9	\$27,607.50
29	Jordan Lurie (\$775)	139.7	\$108,267.50
30	Tarek Zohdy (\$575)	117.7	\$67,677.50
31	Karen Wallace (\$445)	30.1	\$13,394.50
32	Cody Padgett (\$420)	43.8	\$18,396.00
33	Settlement Drafting and Motion Practice / Supervising Administration of Settlement	324.1	\$190,673.00
34	Ryan Wu (\$675)	35.9	\$24,232.50
35	Mark Ozzello (\$775)	46.3	\$35,882.50
36	Tarek Zohdy (\$575)	87	\$50,025.00

Major Tasks / Billers	Hours	Fees
Eduardo Santos (\$545)	123.8	\$67,471.00
Cody Padgett (\$420)	31.1	\$13,062.00
Total	2173.3	\$1,130,376.50

Billers / Major Tasks	Hours	Fees
Raul Perez (\$775)	61.4	\$47,585.00
Mediations and Settlement Negotiations	61.4	\$47,585.00
Ryan Wu (\$675)	146	\$98,550.00
Legal and Factual Analysis of Claims and Defenses / Litigation Strategy	69.2	\$46,710.00
Mediations and Settlement Negotiations	40.9	\$27,607.50
Settlement Drafting and Motion Practice / Supervising Administration of Settlement	35.9	\$24,232.50
Jordan Lurie (\$775)	176.9	\$137,097.50
Pre-Litigation Investigation and Evaluation / Complaint Drafting	9.6	\$7,440.00
Pleadings / Case Management / Miscellaneous Court Filings	10.6	\$8,215.00
Discovery and Depositions	17	\$13,175.00
Mediations and Settlement Negotiations	139.7	\$108,267.50
Mark Ozzello (\$775)	52.8	\$40,920.00
Discovery and Depositions	6.5	\$5,037.50
Settlement Drafting and Motion Practice / Supervising Administration of Settlement	46.3	\$35,882.50
Tarek Zohdy (\$575)	478	\$274,850.00
Pre-Litigation Investigation and Evaluation / Complaint Drafting	7.6	\$4,370.00
Pleadings / Case Management / Miscellaneous Court Filings	13.8	\$7,935.00
Discovery and Depositions	106.2	\$61,065.00
Legal and Factual Analysis of Claims and Defenses / Litigation Strategy	8	\$4,600.00
Communications with Class Members and Clients	137.7	\$79,177.50
Mediations and Settlement Negotiations	117.7	\$67,677.50
Settlement Drafting and Motion Practice / Supervising Administration of Settlement	87	\$50,025.00
Theresa Carroll (\$545)	329.4	\$179,523.00
Legal and Factual Analysis of Claims and Defenses / Litigation Strategy	110.6	\$60,277.00
Communications with Class Members and Clients	218.8	\$119,246.00
Eduardo Santos (\$545)	123.8	\$67,471.00

Billers / Major Tasks	Hours	Fees
Settlement Drafting and Motion Practice / Supervising Administration of Settlement	123.8	\$67,471.00
Karen Wallace (\$445)	65.2	\$29,014.00
Pre-Litigation Investigation and Evaluation / Complaint Drafting	18.4	\$8,188.00
Pleadings / Case Management / Miscellaneous Court Filings	10.8	\$4,806.00
Communications with Class Members and Clients	5.9	\$2,625.50
Mediations and Settlement Negotiations	30.1	\$13,394.50
Cody Padgett (\$420)	242.4	\$101,808.00
Pre-Litigation Investigation and Evaluation / Complaint Drafting	6.7	\$2,814.00
Pleadings / Case Management / Miscellaneous Court Filings	7.9	\$3,318.00
Discovery and Depositions	98.9	\$41,538.00
Legal and Factual Analysis of Claims and Defenses / Litigation Strategy	11.4	\$4,788.00
Communications with Class Members and Clients	42.6	\$17,892.00
Mediations and Settlement Negotiations	43.8	\$18,396.00
Settlement Drafting and Motion Practice / Supervising Administration of Settlement	31.1	\$13,062.00
Trisha Monesi (\$345)	136.5	\$47,092.50
Pre-Litigation Investigation and Evaluation / Complaint Drafting	64.3	\$22,183.50
Discovery and Depositions	72.2	\$24,909.00
Brooke Waldrop (\$295)	261.1	\$77,024.50
Legal and Factual Analysis of Claims and Defenses / Litigation Strategy	5.9	\$1,740.50
Communications with Class Members and Clients	255.2	\$75,284.00
Michael Massmann (\$295)	99.8	\$29,441.00
Legal and Factual Analysis of Claims and Defenses / Litigation Strategy	99.8	\$29,441.00
Total	2173.3	\$1,130,376.50

16. To establish that the case was reasonably staffed, Capstone has prepared the following tables which show that an average of only approximately four attorneys billed on this case in any given week:

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Billers Per Week Key	
Billor	Letter
Raul Perez	A
Ryan Wu	B
Jordan Lurie	C
Mark Ozzello	D
Tarek Zohdy	E
Theresa Carroll	F
Eduardo Santos	G
Karen Wallace	H
Cody Padgett	I
Trisha Monesi	J
Brooke Waldrop	K
Michael Massmann	L

Billers Per Every Week of the Litigation / Average of ≈ 4													
Week	A	B	C	D	E	F	G	H	I	J	K	L	Total Billers
9/16/2016 - 9/22/2016			✓										1
9/30/2016 - 10/6/2016										✓			1
10/7/2016 - 10/13/2016										✓			1
10/14/2016 - 10/20/2016			✓						✓	✓			3
10/21/2016 - 10/27/2016								✓	✓	✓			3
10/28/2016 - 11/3/2016			✓		✓			✓	✓	✓			5
11/4/2016 - 11/10/2016			✓		✓			✓		✓			4
11/11/2016 - 11/17/2016			✓		✓			✓	✓	✓			5
11/18/2016 - 11/24/2016			✓		✓			✓	✓	✓			5
11/25/2016 - 12/1/2016					✓				✓				2
12/2/2016 - 12/8/2016					✓				✓				2
12/9/2016 - 12/15/2016			✓		✓								2
12/16/2016 - 12/22/2016					✓				✓				2
1/13/2017 - 1/19/2017					✓			✓	✓				3
1/20/2017 - 1/26/2017			✓		✓			✓	✓				4
1/27/2017 - 2/2/2017			✓		✓				✓				3
2/3/2017 - 2/9/2017			✓		✓			✓	✓				4

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Billers Per Every Week of the Litigation / Average of ≈ 4													
Week	A	B	C	D	E	F	G	H	I	J	K	L	Total Billers
2/10/2017 - 2/16/2017			✓		✓			✓	✓				4
2/17/2017 - 2/23/2017			✓		✓			✓	✓				4
2/24/2017 - 3/2/2017			✓		✓			✓	✓				4
3/3/2017 - 3/9/2017			✓		✓			✓	✓				4
3/10/2017 - 3/16/2017			✓		✓			✓	✓				4
3/17/2017 - 3/23/2017					✓			✓	✓				3
3/24/2017 - 3/30/2017			✓						✓				2
3/31/2017 - 4/6/2017			✓		✓			✓	✓				4
4/7/2017 - 4/13/2017					✓			✓	✓				3
4/14/2017 - 4/20/2017			✓		✓			✓	✓				4
4/21/2017 - 4/27/2017	✓		✓		✓			✓	✓				5
4/28/2017 - 5/4/2017	✓		✓		✓			✓	✓				5
5/5/2017 - 5/11/2017			✓					✓	✓				3
5/12/2017 - 5/18/2017			✓		✓			✓	✓				4
5/19/2017 - 5/25/2017									✓				1
5/26/2017 - 6/1/2017	✓		✓		✓				✓				4
6/2/2017 - 6/8/2017					✓				✓				2
6/9/2017 - 6/15/2017			✓		✓			✓	✓				4
6/16/2017 - 6/22/2017			✓		✓			✓	✓				4
6/23/2017 - 6/29/2017					✓			✓					2
6/30/2017 - 7/6/2017			✓		✓				✓				3
7/7/2017 - 7/13/2017			✓		✓			✓	✓				4
7/14/2017 - 7/20/2017		✓	✓		✓			✓	✓				5
7/21/2017 - 7/27/2017			✓		✓			✓	✓				4
7/28/2017 - 8/3/2017	✓	✓	✓		✓			✓	✓				6
8/4/2017 - 8/10/2017					✓			✓	✓				3
8/11/2017 - 8/17/2017			✓		✓			✓	✓				4
8/18/2017 - 8/24/2017			✓		✓			✓	✓				4
8/25/2017 - 8/31/2017								✓	✓				2
9/1/2017 - 9/7/2017					✓			✓	✓				3
9/8/2017 - 9/14/2017			✓		✓			✓	✓				4
9/15/2017 - 9/21/2017					✓			✓	✓				3
9/22/2017 - 9/28/2017			✓		✓			✓	✓				4
9/29/2017 - 10/5/2017			✓		✓			✓					3
10/6/2017 - 10/12/2017			✓		✓			✓					3
10/13/2017 - 10/19/2017	✓		✓		✓			✓	✓				5

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Billers Per Every Week of the Litigation / Average of ≈ 4													
Week	A	B	C	D	E	F	G	H	I	J	K	L	Total Billers
10/20/2017 - 10/26/2017	✓		✓		✓			✓	✓				5
10/27/2017 - 11/2/2017					✓				✓				2
11/3/2017 - 11/9/2017					✓				✓				2
11/10/2017 - 11/16/2017			✓		✓			✓	✓				4
11/17/2017 - 11/23/2017	✓		✓		✓			✓	✓				5
11/24/2017 - 11/30/2017	✓		✓		✓			✓	✓				5
12/1/2017 - 12/7/2017			✓						✓				2
12/8/2017 - 12/14/2017					✓				✓				2
12/15/2017 - 12/21/2017					✓				✓				2
12/22/2017 - 12/28/2017					✓				✓				2
12/29/2017 - 1/4/2018					✓				✓				2
1/5/2018 - 1/11/2018			✓		✓				✓				3
1/12/2018 - 1/18/2018					✓				✓				2
1/19/2018 - 1/25/2018		✓			✓				✓				3
1/26/2018 - 2/1/2018		✓			✓				✓				3
2/2/2018 - 2/8/2018		✓	✓		✓			✓	✓				5
2/9/2018 - 2/15/2018			✓		✓			✓	✓				4
2/16/2018 - 2/22/2018		✓			✓			✓	✓				4
2/23/2018 - 3/1/2018		✓			✓			✓	✓				4
3/2/2018 - 3/8/2018		✓			✓			✓	✓				4
3/9/2018 - 3/15/2018		✓	✓		✓			✓	✓		✓		6
3/16/2018 - 3/22/2018		✓	✓		✓			✓	✓		✓		6
3/23/2018 - 3/29/2018			✓		✓			✓	✓		✓		5
3/30/2018 - 4/5/2018			✓		✓				✓		✓		4
4/6/2018 - 4/12/2018			✓		✓			✓	✓		✓		5
4/13/2018 - 4/19/2018			✓		✓			✓	✓		✓		5
4/20/2018 - 4/26/2018					✓				✓		✓		3
4/27/2018 - 5/3/2018			✓		✓			✓	✓		✓		5
5/4/2018 - 5/10/2018					✓				✓		✓		3
5/11/2018 - 5/17/2018	✓		✓		✓				✓		✓		5
5/18/2018 - 5/24/2018	✓		✓		✓				✓		✓		5

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Billers Per Every Week of the Litigation / Average of ≈ 4													
Week	A	B	C	D	E	F	G	H	I	J	K	L	Total Billers
5/25/2018 - 5/31/2018	✓		✓		✓				✓		✓		5
6/1/2018 - 6/7/2018	✓		✓		✓				✓		✓		5
6/8/2018 - 6/14/2018	✓		✓		✓				✓		✓		5
6/15/2018 - 6/21/2018			✓		✓				✓		✓		4
6/22/2018 - 6/28/2018	✓	✓	✓		✓				✓		✓		6
6/29/2018 - 7/5/2018	✓		✓		✓						✓		4
7/6/2018 - 7/12/2018		✓	✓		✓						✓		4
7/13/2018 - 7/19/2018	✓	✓	✓		✓				✓		✓		6
7/20/2018 - 7/26/2018			✓		✓						✓		3
7/27/2018 - 8/2/2018		✓	✓		✓				✓		✓	✓	6
8/3/2018 - 8/9/2018		✓	✓		✓				✓		✓	✓	6
8/10/2018 - 8/16/2018	✓		✓		✓				✓		✓	✓	6
8/17/2018 - 8/23/2018					✓				✓		✓	✓	4
8/24/2018 - 8/30/2018		✓			✓				✓		✓	✓	5
8/31/2018 - 9/6/2018		✓	✓		✓				✓		✓	✓	6
9/7/2018 - 9/13/2018		✓			✓				✓		✓	✓	5
9/14/2018 - 9/20/2018		✓	✓		✓				✓		✓	✓	6
9/21/2018 - 9/27/2018		✓	✓		✓				✓		✓	✓	6
9/28/2018 - 10/4/2018		✓	✓		✓				✓		✓	✓	6
10/5/2018 - 10/11/2018		✓	✓		✓				✓		✓	✓	6
10/12/2018 - 10/18/2018	✓		✓		✓						✓	✓	5
10/19/2018 - 10/25/2018			✓		✓				✓		✓		4
10/26/2018 - 11/1/2018			✓		✓				✓		✓		4
11/2/2018 - 11/8/2018					✓				✓		✓		3
11/9/2018 - 11/15/2018					✓				✓		✓		3
11/16/2018 - 11/22/2018					✓				✓	✓	✓		4
11/23/2018 - 11/29/2018		✓			✓				✓	✓	✓		5
11/30/2018 - 12/6/2018					✓				✓	✓	✓		4
12/7/2018 - 12/13/2018					✓				✓	✓	✓		4
12/14/2018 - 12/20/2018					✓				✓	✓	✓		4
12/21/2018 - 12/27/2018					✓		✓		✓		✓		4

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Billers Per Every Week of the Litigation / Average of ≈ 4													
Week	A	B	C	D	E	F	G	H	I	J	K	L	Total Billers
12/28/2018 - 1/3/2019					✓		✓		✓				3
1/4/2019 - 1/10/2019					✓				✓		✓		3
1/11/2019 - 1/17/2019					✓				✓		✓		3
1/18/2019 - 1/24/2019				✓	✓				✓		✓		4
1/25/2019 - 1/31/2019				✓	✓	✓			✓		✓		5
2/1/2019 - 2/7/2019				✓	✓						✓		3
2/8/2019 - 2/14/2019					✓	✓			✓		✓		4
2/15/2019 - 2/21/2019				✓	✓	✓			✓		✓		5
2/22/2019 - 2/28/2019				✓	✓	✓			✓		✓		5
3/1/2019 - 3/7/2019		✓		✓	✓	✓	✓		✓	✓	✓		8
3/8/2019 - 3/14/2019		✓		✓	✓	✓	✓		✓	✓	✓		8
3/15/2019 - 3/21/2019		✓		✓	✓	✓			✓	✓	✓		7
3/22/2019 - 3/28/2019					✓	✓	✓		✓		✓		5
3/29/2019 - 4/4/2019				✓	✓	✓	✓		✓		✓		6
4/5/2019 - 4/11/2019				✓	✓	✓					✓		4
4/12/2019 - 4/18/2019		✓		✓	✓	✓	✓		✓		✓		7
4/19/2019 - 4/25/2019				✓	✓		✓		✓		✓		5
4/26/2019 - 5/2/2019				✓	✓		✓		✓	✓	✓		6
5/3/2019 - 5/9/2019					✓		✓		✓		✓		4
5/10/2019 - 5/16/2019				✓	✓		✓		✓		✓		5
5/17/2019 - 5/23/2019		✓		✓	✓		✓				✓		5
5/24/2019 - 5/30/2019		✓		✓	✓		✓		✓		✓		6
5/31/2019 - 6/6/2019		✓		✓	✓		✓		✓		✓		6
6/7/2019 - 6/13/2019				✓	✓		✓		✓		✓		5
6/14/2019 - 6/20/2019				✓	✓	✓	✓		✓		✓		6
6/21/2019 - 6/27/2019		✓		✓	✓		✓		✓		✓		6
6/28/2019 - 7/4/2019				✓	✓				✓		✓		4
7/5/2019 - 7/11/2019					✓				✓		✓		3
7/12/2019 - 7/18/2019		✓		✓	✓		✓		✓		✓		6
7/19/2019 - 7/25/2019				✓	✓		✓		✓		✓		5
7/26/2019 - 8/1/2019				✓	✓		✓		✓		✓		5
8/2/2019 - 8/8/2019				✓	✓		✓				✓		4
8/9/2019 - 8/15/2019				✓	✓				✓		✓		4
8/16/2019 - 8/22/2019		✓		✓	✓		✓		✓				5
8/23/2019 - 8/29/2019		✓		✓	✓	✓	✓		✓				6
8/30/2019 - 9/5/2019				✓	✓	✓	✓		✓				5
9/6/2019 - 9/12/2019					✓	✓			✓		✓		4

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Billers Per Every Week of the Litigation / Average of ≈ 4													
Week	A	B	C	D	E	F	G	H	I	J	K	L	Total Billers
9/13/2019 - 9/19/2019					✓	✓					✓		3
9/20/2019 - 9/26/2019				✓	✓	✓			✓				4
9/27/2019 - 10/3/2019					✓	✓			✓		✓		4
10/4/2019 - 10/10/2019		✓			✓	✓			✓				4
10/11/2019 - 10/17/2019					✓	✓			✓		✓		4
10/18/2019 - 10/24/2019		✓			✓	✓	✓		✓		✓		6
10/25/2019 - 10/31/2019					✓	✓	✓		✓		✓		5
11/1/2019 - 11/7/2019					✓	✓	✓				✓		4
11/8/2019 - 11/14/2019		✓			✓	✓			✓		✓		5
11/15/2019 - 11/21/2019		✓			✓	✓	✓		✓				5
11/22/2019 - 11/28/2019					✓	✓	✓		✓				4
11/29/2019 - 12/5/2019				✓	✓	✓	✓						4
12/6/2019 - 12/10/2019					✓	✓	✓						3

17. Due to the amount of privileged information contained in the hourly billing records, those detailed records are not attached here, but can be provided *in camera* should this Court wish to review them.

18. Capstone’s hourly rates for work on automotive defect cases have been judicially approved by numerous federal district courts. *See, e.g., MacDonald v. Ford Motor Co.*, No. 13-02988-JST, 2016 WL 3055643 (N.D. Cal. May 31, 2016) (approving rates of \$370 to \$695 for the same attorneys working in this action in an automotive defect case on a contested fee motion); *Klee*, 2015 U.S. Dist. LEXIS 88270, *38 (approving rates of \$370 to \$695 for same attorneys at Capstone as here in an automotive defect case); *Asghari*, 2015 WL 12732462, at *43 (same); *Aarons*, 2014 WL 4090564, **17-18.

19. While adjusting our rates to track market increases, Capstone’s rates have steadily remained reasonable and competitive, and have been consistently approved by

1 many federal and state courts over the past several years, including this judicial district.
2 *See, e.g., Brown v. Harris v. Mr. C Manager LLC*, No. CIV DS1721484 (San
3 Bernardino County Superior Court Aug. 21, 2019) (approving Capstone’s rates for
4 Associates (\$295 to \$434) and Senior Counsel/Partners (\$495 to \$725)); *Black v. T-*
5 *Mobile USA, Inc.*, No. 4:17-cv-04151-HSG (N.D. Cal. July 24, 2019) (approving
6 Capstone’s rates for Associates (\$295 to \$435) and Senior Counsel/Partners (\$495 to
7 \$725)); *Rodas v. Petroleum Sales, Inc.*, No. CIV1703590 (Marin County Superior Court
8 July 19, 2019) (approving Capstone’s rates for Associates (\$395 to \$435) and Senior
9 Counsel/Partners (\$495 to \$725)); *Aguilar v. Marriott Int’l., Inc.*, No. BC513197 (Los
10 Angeles County Superior Court Apr. 9, 2019) (approving Capstone’s rates for
11 Associates (\$295 to \$435) and Senior Counsel/Partners (\$495 to \$725)); *Garrido v. J. C.*
12 *Penney Corporation, Inc.*, No. 5:18-cv-02051-JVS-SP (C.D. Cal. Jan. 25, 2019)
13 (approving Capstone’s rates for Associates (\$435 to \$455) and Senior Counsel/Partners
14 (\$495 to \$725)); *Boseman v. VXI Global Solutions, LLC*, No. BC602442 (Los Angeles
15 County Superior Court Jan. 3, 2019) (approving Capstone’s rates for Associates (\$295 to
16 \$435) and Senior Counsel/Partners (\$495 to \$725)); *Mansilla v. XPO Logistics*
17 *Worldwide, Inc.*, No. RG17865271 (Alameda County Superior Court Nov. 16, 2018)
18 (approving Capstone’s rates for Associates (\$295 to \$435) and Senior Counsel/Partners
19 (\$495 to \$725)); *Carbajal v. Tom’s Famous Family Restaurants*, No. CIVDS1601821
20 (San Bernardino County Superior Court July 31, 2018) (approving Capstone’s rates for
21 Associates (\$295 to \$395) and Senior Counsel/Partners (\$495 to \$725)); *Williams v.*
22 *Marshalls of CA, LLC*, No. BC503806 (Los Angeles County Superior Court Feb. 15,
23 2018) (approving Capstone’s rates for Associates and Senior Counsel/Partners (\$570 to
24 \$725)).

25 20. Moreover, Capstone’s hourly rates are also consistent with the judicially-
26 approved hourly rates of comparable plaintiffs’-side attorneys, such as Baron & Budd
27 (rates ranging from \$775 for the requested partner to \$390-\$630 for non-partners),
28 Wasserman, Comden, Casselman, & Essensten (rates ranging from \$670-750 for

1 partners and \$300-500 for associates), and Blood Hurst & O'Reardon (\$510-695 for
2 partners). *Aarons*, 2014 WL 4090564, **17-18 (also approving rates of Capstone); *see*
3 *also, Chambers v. Whirlpool Corp.*, 214 F.Supp.3d 877, 899 (C.D. Cal. 2016)
4 (approving rates of \$485 to \$750 for consumer class action attorneys on a contested fee
5 motion); *Etter v. Thetford Corporation*, No. 13-00081-JLS, 2017 WL 1433312 (C.D.
6 Cal. Apr. 14, 2017) (approving \$275 to \$775 for Southern California attorneys on a
7 contested fee motion); *Bravo v. Gale Triangle, Inc.*, No. 16-03347 BRO, 2017 WL
8 708766, *17 (C.D. Cal. Feb. 16, 2017) (approving rates between \$350 and \$700);
9 *Kearney v. Hyundai Motor Am.*, 2013 U.S. Dist. LEXIS 91636, *24 (C.D. Cal. June 28,
10 2013) (approving hourly rates of \$650-\$800 for senior attorneys in consumer class
11 action); *Parkinson v. Hyundai Motor America*, 796 F. Supp. 2d 1160, 1172 (C.D. Cal.
12 2010) (approving hourly rates between \$445 and \$675); *Barrera v. Gamestop Corp.*
13 (C.D. Cal. Nov. 29, 2010, No. CV 09-1399) (\$700 an hour for partners; \$475 an hour for
14 associates); *Magsafe Apple Power Adapter Litig.*, No. 09-1911-EJD, 2015 U.S. Dist.
15 LEXIS 11353, at *14 (N.D. Cal. Jan. 30, 2015) (finding reasonable rates for Bay Area
16 attorneys ranging from \$560 to \$800 for partners and \$285 to \$510 for associates); *Rose*
17 *v. Bank of Am. Corp.*, No. 5:11-CV-02390-EJD, 2014 U.S. Dist. LEXIS 121641, at *12
18 (N.D. Cal. Aug. 29, 2014) (finding reasonable partners rates between \$350 - \$775 per
19 hour; associates at \$325 - \$525 per hour; and paralegal rates between \$100 - \$305 per
20 hour); *Kim v. Space Pencil, Inc.*, No. C 11-03796 LB, 2012 WL 5948951, at *8 (N.D.
21 Cal. Nov. 28, 2012) (finding reasonable partner rates of \$725 - \$797 per hour; associates
22 and counsel at \$350 - \$580 per hour); *Faigman v. AT&T Mobility LLC*, 2011 U.S. Dist.
23 LEXIS 15825, * 2 (N.D. Cal. Feb. 15, 2011) (approving hourly rates of \$650 an hour for
24 partner services and \$500 an hour for associate attorney services).

25 21. The work performed in this case was reasonable and necessary to the
26 prosecution and settlement of this case. Capstone conducted a significant factual
27 investigation during the prosecution of this action. Because of Capstone's
28 comprehensive evaluation of the facts and law, Plaintiffs were able to settle this case for

1 substantial relief. Plaintiffs provided Class Members with substantive and certain relief
2 much sooner than if litigation of this matter had continued.

3 22. As settlement administration is ongoing, and based on my experience in
4 previous consumer protection class actions, the lodestar figures reported herein will
5 meaningfully increase by the time the settlement is completely and finally administered.

6 **CAPSTONE LAW APC’S COSTS AND EXPENSES**

7 23. This litigation required Capstone to advance costs. Where corporate
8 defendants and their attorneys are well funded, as was true here and in most national
9 consumer protection cases, this type of litigation can prove to be expensive and risky.
10 Because the risk of advancing costs in this type of litigation is significant, doing so is
11 often cost prohibitive to many attorneys.

12 24. As summarized in the table below, Capstone has incurred a total of
13 \$29,744.61 in costs and expenses as of December 4, 2019. Capstone anticipates that it
14 will incur additional filing costs and travel-related costs.

Cost & Expense Categories	Amount
Copying, Printing & Scanning and Facsimiles	\$570.25
Court Fees, Filings & Service of Process	\$1,049.75
Court Reporters, Transcripts & Depositions	\$1,943.25
Delivery & Messenger (UPS, FedEx, messenger, etc.)	\$114.90
Document Management and Production Services	\$80.84
Expert & Consulting Services	\$5,251.24
Mediation Fees	\$13,790.00
Postage & Mailings	\$21.98
Research Services (PACER, Lexis, etc.)	\$5,580.52
Telephone (Long distance, conference calls, etc.)	\$22.57
Travel & Lodging (Airfare, Mileage, Parking, Hotel, etc.)	\$1,319.31
Total	\$29,744.61

25 25. On behalf of Plaintiffs and Class Counsel, I respectfully request that the
26 Court award the requested attorneys’ fees and costs.

27 **PLAINTIFFS’ INCENTIVE AWARDS**

28 26. Plaintiffs are entitled to incentive awards for their time and effort to

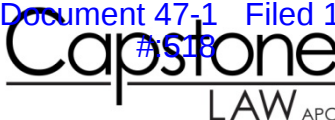
1 support a case in which they had a modest personal interest but which provided
2 considerable benefits to Class Members—a commitment undertaken without any
3 guarantee of recompense. Each Plaintiff provided documents to, and consulted with,
4 Counsel about the claims in this case and assisted throughout the course of the litigation.
5 Plaintiffs reviewed the allegations, kept in constant contact with Class Counsel regarding
6 the status of the case, and responded to inquiries regarding Hyundai’s efforts to remedy
7 the problems Plaintiffs experienced. Plaintiffs have also stayed abreast of Settlement
8 negotiations, reviewed the Settlement terms, and approved the Settlement on behalf of
9 the Class.

10
11 I declare under penalty of perjury under the laws of the United States of America
12 that the foregoing is true and correct. Executed this 12th day of December, 2019, at Los
13 Angeles, California.

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16 Tarek H. Zohdy

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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 April 2017, Capstone achieved a major victory for consumers in *McGill v. Citibank N.A.*, 2 Cal. 5th 945 (2017), where the California Supreme Court held that: (1) the 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 behalf of the public.
- 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 an established practice in automotive defect class actions and has negotiated numerous class action settlements providing relief to owners/lessees the last five years. See *Granillo v. FCA US LLC*, No. 16-00153-FLW (D. N.J. Feb. 12, 2019); *Morishige v. Mazda Motor of Am., Inc.*, No. BC595280 (Los Angeles Sup. Ct. Aug. 20, 2019); *Falco v. Nissan N. Am. Inc.*, No. 13-00686-DDP (C.D. Cal. July 16, 2018), Dkt. No. 341 (finally approving settlement after certifying class alleging timing chain defect on contested motion); *Vargas v. Ford Motor Co.*, No. CV12-08388 AB (FFMX), 2017 WL 4766677 (C.D. Cal. Oct. 18, 2017) (class action settlement involving transmission defects for 1.8 million class vehicles; final approval pending); *Batista v. Nissan N. Am., Inc.*, No. 14-24728-RNS (S.D. Fla. June 29, 2017), Dkt. 191 (finally approving class action settlement alleging CVT defect); *Chan v. Porsche Cars N.A., Inc.*, No. No. 15-02106-CCC (D. N.J. Oct. 6, 2017), Dkt. 65 (finally approving class action settlement involving alleged windshield glare defect); *Klee v. Nissan N. Am., Inc.*, No. 12-08238-AWI, 2015 WL 4538426, at *1 (C.D. Cal. July 7, 2015) (settlement involving allegations that Nissan Leaf's driving range, based on the battery capacity, was lower than was represented by Nissan); *Ayghari v. Volkswagen Group of America, Inc.*, Case No. 13-cv-02529-MMM-VBK, 2015 WL 12732462 (C.D. Cal. May 29, 2015) (class action settlement providing repairs and reimbursement for oil consumption problem in certain Audi vehicles); *Aarons v. BMW of N. Am., LLC*, No. CV 11-7667 PSG, 2014 WL 4090564 (C.D. Cal. Apr. 29, 2014), objections overruled, No. CV 11-7667 PSG CWX, 2014 WL 4090512 (C.D. Cal. June 20, 2014) (C.D. Cal.) (class action



settlement providing up to \$4,100 for repairs and reimbursement of transmission defect in certain BMW vehicles).

- Capstone has served as class counsel in a number of significant consumer class actions, providing relief and protection to consumers from deceptive and unlawful business practices, data breaches, and deceptive and false advertising by large corporations and manufacturers. These cases include *Aceves v. AutoZone, Inc.*, No. 14-2032 (C.D. Cal.); *Fernandez v. Home Depot U.S.A.*, No. 13-648 (C.D. Cal.); *Livingston v. MiTAC*, No. 18-05993 (N.D. Cal.).
- 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.

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 valued at well over \$30 million;
- *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 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*.

Senior Counsel

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 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.

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.

Robert Drexler. Robert Drexler is senior counsel 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 2015.

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. Mr. Drexler was named a "Super Lawyer" in 2017.

Robert Friedl. Robert Friedl is senior counsel at Capstone, where he devotes most of his time to the briefing and litigation strategy of consumer protection cases. Mr. Friedl has over 20 years of experience representing plaintiffs and defendants in consumer class actions, insurance coverage and defense, employment law, and personal injury. His lengthy service as an appellate attorney has yielded several published cases, including successful outcomes in *Goldstein v. Ralphs*, 122 Cal. App. 4th 229 (2004), *Morgan v. AT&T*, 177 Cal. App. 4th 1235 (2009), and *Hecimovich v. Encinal School Parent Teacher Organization*, 203 Cal. App. 4th 450 (2012). At Capstone, Mr. Friedl was responsible for the appellate win in *Grant v. Unifund CCR, LLC*, 577 Fed. Appx. 693 (9th Cir. 2014).

Prior to joining Capstone, Mr. Friedl was a partner at civil litigation boutique, where he handled the firm's most complex briefing. He is a graduate of the University of Connecticut, and received his law degree from Southwestern School of Law, where he earned an American Jurisprudence Book Award.

Jamie Greene. Jamie Greene is senior counsel at Capstone where she evaluates potential new cases, develops new claims, and manages client relations. Well-versed in wage and hour law and federal and state



consumer protection statutes, Ms. Greene supervises the pre-litigation phase for all cases, including investigation, analysis, and client consultation. 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. She 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. She is an active member of the Consumer Attorneys Association of Los Angeles (CAALA), and the Beverly Hills, Los Angeles County, and Santa Monica Bar Associations.

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.

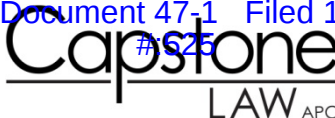
Mr. Ozzello is a former partner of Arias Ozzello & Gignac and, most recently, was Of Counsel to Markun Zusman Freniere & Compton, LLP. In his capacity as a litigator, he has obtained results for his clients in excess of \$200 million dollars. Mark has also achieved consistent success in the California 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.

Bevin Allen Pike. Bevin Allen Pike is a senior counsel 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.

Eduardo Santos. Eduardo Santos is a senior counsel at Capstone Law, concentrating 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.

John Stobart. John Stobart is a senior counsel with Capstone Law. He focuses on appellate issues in state and federal courts and contributes to the firm's amicus curiae efforts to protect and expand the legal rights of California employees and consumers. Mr. Stobart has significant appellate experience having drafted over two dozen writs, appeals and petitions, and having argued before the Second, Fourth, and Fifth Districts of the California Court of Appeal.

Prior to joining Capstone, Mr. Stobart was a law and motion attorney who defended against civil liability in catastrophic injury and wrongful death cases brought against his clients, which included the railroad, public schools, small businesses, and commercial and residential landowners. He has drafted and argued scores of dispositive motions at the trial court level and had success in upholding judgments and verdicts on appeal. He graduated cum laude from Thomas Jefferson School of Law where he was on the mock trial competition team and earned his undergraduate degree from the Ohio State University.

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. An associate with Capstone, Tarek Zohdy 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 action settlements that have provided significant relief to thousands 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



Brandon Brouillette. Brandon Brouillette is an associate 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.

Anthony Castillo. Anthony Castillo is an associate with Capstone Law. 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. 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.

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.

Michelle Kennedy. Michelle Kennedy is an associate with Capstone Law. Her 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. She began her career as a contract attorney in the Utah Attorney General’s Civil Litigation Division handling torts, civil rights, and employment law matters. She later founded her own firm handling business and intellectual property matters, where she settled a copyright infringement suit. Prior to moving to Southern California, Ms. Kennedy was recognized by Super Lawyers as a Mountain States Rising Star in 2017 and 2018. She also served as President of the Utah Minority Bar Association and as an Ex-Officio Member of the Utah State Bar Commission. Michelle graduated from the University of Utah S.J. Quinney College of Law in 2013, where she served as President of the Art Law Alliance and Vice President of the Minority Law Caucus. She earned her undergraduate degree from Brigham Young University in 2010, where she majored in Philosophy. Ms. Kennedy is an active member of the Consumer Attorneys Association of Los Angeles (CAALA) and the Los Angeles County Bar Association. Michelle is admitted to practice law in Utah and California.



Jonathan Lee. An associate 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.

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*.

Mao Shiokura. Mao Shiokura is an associate with Capstone. Her practice focuses on identifying, analyzing, and developing new wage-and-hour and consumer claims, including violations of the Fair Credit Reporting Act, Consumers Legal Remedies Act, False Advertising Law, and Unfair Competition Law. 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.

Brooke Waldrop. Brooke Waldrop is an associate with Capstone Law. Her practice focuses on the pre-litigation analysis of wage-and-hour and consumer claims, including claims for overtime wages, meal and rest periods, and off-the-clock work. Ms. Waldrop graduated from University of Utah S.J. Quinney College of Law in 2008, where she was a member of Extra Muros, an international law journal and think tank. During law school, she volunteered and clerked for the Disability Law Center, International Rights Advocates in Washington, D.C., the Utah Crime Victims Legal Center, and the Utah Council for Victims of Crime. After law school, Brooke obtained an MFA at USC's School of Cinematic Arts Writing for Screen and Television program where she was also awarded the prestigious Annenberg Fellowship. Before joining Capstone as an associate, she worked at Capstone as a contract attorney and settled a copyright infringement suit for a commercially-successful property. She earned her undergraduate degree from Westminster College of Salt



Lake, majoring in Political Studies with an emphasis in Philosophy, and minoring in Theater, where she graduated summa cum laude.

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.