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11 Attorneys for Plaintiffs

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 RODRIGO CAMILO, ALVARO CAMILO,
15 RICARDO SANCHEZ, JOSE MANUEL
16 LOPEZ AND PUTATIVE PLAINTIFFS,

17 Plaintiffs,

18 vs.

19 DON VITO OZUNA FOOD
20 CORPORATION AND SEVERO OZUNA
21 Defendants.

Case No. 18:CV-02842 VKD

**DECLARATION OF JAMES DAL BON IN
SUPPORT OF MOTION FOR ATTORNEY'
FEES**

DATE: MARCH 3, 2020

TIME: 10:00 AM

COURTROOM: 2 FIFTH FLOOR

DATE ACTION FILED: MAY 14, 20

1 My name is James Dal Bon and I swear under penalty of perjury by the law of the State of
2 California that the aforementioned is true to the best of my knowledge.

- 3 1) I am over the age of 18 years old and a citizen of the United States;
- 4 2) If called to testify under oath in a federal or state court in this case I would testify
5 truthfully to the following
- 6 3) I have been handling primarily wage and hour cases for low income wage earners
7 exclusively since at least the year 2006, before that I represented employees in a
8 variety of labor matters since 1992.
- 9 4) The majority of my clients, even to this day, speak only Spanish.
- 10 5) I speak fluent Spanish
- 11 6) I represent the Plaintiffs in this matter.
- 12 7) I graduated from the University of California Berkeley in 1982 with a BA in History and
13 then from the University of San Francisco Law School in 1991 with a JD.
- 14 8) My first year I graded onto Law Review.
- 15 9) Upon graduating from Law School I was employed by Mastagni, Holstedt and
16 Chuirazzi, Durard Mc Kenna and Jones and the Law Offices of Stanley Bell where I
17 represented employees in worker's compensation cases.
- 18 10) I went into my own law firm in about 2003. I have represented employees in sexual
19 harassment cases, state personnel board hearings, in front of the Office of
20 Administrative Hearings, and Worker's Compensation Cases. In 2006 I focused
21 primarily on individual wage and hour cases.
- 22 11) My clients are primarily working people earning minimum wage or close to minimum
23 wage.
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1 12) I have been awarded attorney's fees in the following class actions:: In Lopez vs Logistic
2 Delivery Solutions 113CV24931, a wage and hour class action, the court used a billing
3 rate of \$400 per hour. In Rodriguez vs Heavenly Greens 16 CV 295143 , a wage and
4 hour class action, the court used a billing rate of approximately \$437 an hour, in Ledo
5 vs Prado 17-CV-02393 LHK the court awarded \$563 per hour with a lodestar multiplier
6 of 1.4, In Martinez vs Letech 14-CV-02945, a wage and hour trial at Doc ## 46 and 51
7 the court awarded me \$54,939.37 in attorney's fees at \$577 per hour.
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10 13) In the last case I tried with co-counsel in the federal court Martinez vs Letech 14-CV-
11 02945 at Doc ## 46 and 51 Plaintiff won \$29,866.67 and the court awarded me
12 \$54,939.37 in attorney's fees at \$577 per hour.

13 14) I have handled approximately 175 cases in federal court and fifty in the local state
14 court.

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16 15) Ex A attached to this Motion is a true and correct copy the billing I performed in this
17 case.

18 November 29, 2019
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22 James Dal Bon

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