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10 Attorneys for Plaintiff and the Proposed Class

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13 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
14  
15 FOR THE COUNTY OF SAN FRANCISCO

16 LUIS MORENO, an individual, on  
17 behalf of and others similarly situated,

18 Plaintiff,

19 v.

20 HATHAWY DINWIDDIE  
21 CONSTRUCTION COMPANY; DOES  
22 1 to 50, inclusive,

23 Defendants.

24 Case No. CGC-16-554443

25 **DECLARATION OF STEPHEN GOMEZ**  
26 **ON BEHALF OF CPT GROUP INC. WITH**  
27 **RESPECT TO SETTLEMENT**  
28 **DISBURSEMENT**

Judge: Honorable Anne-Christine Massullo

1 I, Stephen Gomez, declare as follows:

2 1. I am a Case Manager for CPT Group, Inc. ("CPT"), the Settlement Administrator  
3 jointly agreed upon by the Parties and approved by the Court, for *Luis Moreno, et al. v. Hathaway*  
4 *Dinwiddie Construction, Co.* I have personal knowledge of the facts set forth in this declaration and,  
5 if called upon to testify, I could and would testify competently to such facts.

6 2. On February 26, 2020, CPT received a wire transfer in the amount of \$658,642.50.

7 3. On March 12, 2020, CPT issued checks to eight thousand five hundred thirteen (513)  
8 Class Members. The gross amount paid to Claimants was \$410,730.00.

9 4. In addition to the Class Members, CPT issued payment to the following parties below  
10 as set forth below:

11	<b><u>Amount Funded:</u></b>	<b><u>\$658,642.50</u></b>
12	<b>Attorneys' Fees</b>	<b>-\$181,412.50</b>
13	<b>Attorneys' Costs</b>	<b>-\$15,000.00</b>
14	<b>Plaintiff Enhancement Award</b>	<b>-\$3,000.00</b>
15	<b>LWDA PAGA Payment</b>	<b>-\$37,500.00</b>
16	<b>Settlement Administration Payment</b>	<b>-\$11,000.00</b>
17	<b><u>Class Member Payments</u></b>	<b><u>-\$410,730.00</u></b>
18	<b>Balance:</b>	<b>\$0.00</b>

19  
20 5. The deadline for Claimants to cash their checks is September 8, 2020, 180 days from  
21 issuance. Upon expiration of the check cashing deadline, the funds from uncashed checks will be  
22 allocated as follows. If funds are over \$7,350.00 the funds shall be redistributed to Class Members  
23 who cashed their check; if less than \$7,350.00 it will be allocated to the Homeless Advocacy Project.

24 6. As of the date of this declaration, there are sixty-three (63) outstanding checks  
25 totaling **\$35,638.58**.

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1 I declare under penalty of perjury under the laws of the State of California that the foregoing  
2 is true and correct. Executed on this 10<sup>th</sup> day of August, 2020 at Irvine, California.

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7 Stephen Gomez  
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