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10 *Attorneys for Plaintiffs Frederick Schulz, Brandon Warren*  
 11 *And Matthew Warren, on Behalf of*  
 12 *Themselves and Those Similarly Situated*

13 **UNITED STATES DISTRICT COURT**  
 14 **NORTHERN DISTRICT OF CALIFORNIA**

15 FREDERICK SCHULZ, BRANDON  
 16 WARREN AND MATTHEW WARREN  
 17 on behalf of himself and all those similarly  
 18 situated,

19 Plaintiffs,

20 v.

21 DHL EXPRESS (USA), INC., Defendant.

22 Defendant.

Case No. 3:20-cv-04490-RS

**DECLARATION OF JAMES A. QUADRA  
 IN SUPPORT OF MOTION FOR AWARD  
 OF ATTORNEYS' FEES AND  
 ENHANCEMENT PAYMENTS**

Hearing Date: June 30, 2022  
 Hearing Time: 1:30 p.m.  
 Courtroom: 3, SF Courthouse, 17th Flr.  
 Judge: Hon. Richard Seeborg

1 I, JAMES A. QUADRA, declare:

2 1. I am a member in good standing of the bar of the State of California and  
3 admitted to practice before this Court. I have been a member of bar of the State of California  
4 since 1987.

5 2. I am a founding partner at Quadra & Coll, LLP.

6 3. Before forming Quadra & Coll, LLP in 2012, I was the managing partner of  
7 the San Francisco office of Calvo, Fisher & Jacob, LLP. Before joining Calvo, I was a name  
8 partner in the San Francisco law firm of Moscone, Emblidge & Quadra, LLP for 12 years,  
9 where I litigated multiple civil litigation and class action cases through trial.

10 4. Before founding Moscone, Emblidge & Quadra, I was a deputy city attorney  
11 with the San Francisco City Attorney's Office for 8 years in the 1990s. I was the Chief of  
12 General Litigation, supervising approximately 30 deputy city attorneys involved in a range of  
13 litigation on behalf of San Francisco. While at the San Francisco City Attorney's Office I  
14 tried multiple civil cases through trial and was the lead deputy in several class action matters  
15 filed against San Francisco. Before becoming a deputy city attorney, I was an associate at the  
16 law firms of Severson & Werson and Gray, Cary, Ames & Frye, where I concentrated on  
17 commercial litigation and class action work.

18 5. I graduated from U.C. Berkeley's School of Law in 1987, where I was a  
19 National Hispanic Scholarship Fund recipient. I have spent more than thirty years litigating  
20 cases in state and federal courts.

21 6. I am AV® rated by Martindale Hubell. In addition, I have been named a  
22 Northern California Super Lawyer as published in San Francisco Magazine and Northern  
23 California Super Lawyer Magazine for seventeen consecutive years (2005-2021) for my  
24 work in class actions. Since 2012, I have also been included in The Best Lawyers in  
25 America. I was named the Best Lawyers' 2014 San Francisco Mass Tort Litigation/Class  
26 Actions - Plaintiffs "Lawyer of the Year." Avvo, an online service that rates legal  
27 professionals, has rated me as "Superb," its highest rating. I am a member of the Million  
28 Dollar Advocates Forum and the Multi-Million Dollar Advocates Forum, which limit

1 membership to those attorneys who have won million and multimillion dollar verdicts and  
2 settlements. I am also a member of Litigation Counsel of America, a peer-selected honorary  
3 society of trial attorneys.

4 7. I have handled cases that have drawn national attention. I have been  
5 interviewed by and quoted in the National Law Journal, the Recorder, the SF Chronicle, the  
6 Washington Post and the New York Post, among other publications. I have also appeared on  
7 Larry King Live, On the Record with Greta Van Susteren, The Glen Beck Program, KGO-7  
8 (ABC) and KDTV-14 (Univision).

9 8. At the requests of the California County Counsel's Association, the Consumer  
10 Attorneys of California, the San Francisco City Attorney's Office, the San Mateo County Bar  
11 Association, and CEB, I have made presentations on various topics including topics related  
12 to litigation in California.

13 9. I am also a private mediator and served as mediator for the San Francisco Bar  
14 Association Early Settlement.

15 10. My current hourly rate is \$1,000 per hour.

16 11. In 2013, eight years ago, Judge Claudia Wilken of the United States District  
17 Court for the Northern District of California awarded me \$725 per hour for my work on a class  
18 action case in *LaBriola v. Bank of America*, Case No. 4:12-cv-00079-CW, stating, "The Court  
19 finds further that Class Counsel's hourly rates are reasonable in light of their experience (as  
20 reflected in their declarations), and the rates charged are comparable to other attorneys in this  
21 field." Judge Wilken also approved Rebecca Coll's rates at that time at \$650 per hour. In 2015,  
22 Judge Curtis Karnow of the San Francisco Superior Court acknowledged the reasonableness of  
23 my rates at \$750 per hour (and Ms. Coll's rates at \$675 per hour) in the matter of *Jones v. Wells*  
24 *Fargo Advisors, LLC*, Case No. CGC 13-531846. My rates have increased to \$1,000 per hour in  
25 the six and a half years since Judge Karnow's ruling.

26 12. I have served as class counsel in multiple matters, and have litigated class  
27 actions through trial, including a wage class action. Samples of class actions I have litigated  
28 including the following:

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- a. *Ashby Jones v. Wells Fargo Advisors, LLC*, San Francisco Superior Court Case No. CGC-13-531846 – Wage and Hour Class Action.
- b. *John LaBriola v. Bank of America, N.A. et al.*, No. 12-0079 (CW) (U.S.D.C., N.D. Cal.) – Wage and Hour Class Action.
- c. *Neil Franklin v. Brown & Brown of California*, Orange County Sup. Ct. No. 30-00502219-CU-BT-CXC – Consumer Class Action.
- d. *Ruelas v. Top Productions*, S.F. Sup. Ct. No. CGC-10-496879 – Wage and Hour Class Action.
- e. *In re Sony PS3 “Other OS” Litigation*, No. 10-1811 (RS) (U.S.D.C., N.D. Cal.) – Consumer Class Action.
- f. *In Re Complete® Cases*, J.C.C.P. 4521 (*Lazar et al vs. AMO, Inc. et al.*, O.C.S.C. No. 07-CC-01296) – Consumer Class Action.
- g. *Create-A-Card v. Intuit*, No. 07-6452 (WHA) (U.S.D.C., N.D. Cal).
- h. *Vienna Hall, et al., v. Cinema 7, Inc., et al.*, S.F. Sup. Ct. No. 02- 3409105 – Wage and Hour Class Action.
- i. *Doe v. Gold Club*, S.F. Sup. Ct. No. 04-431683 – Wage and Hour Class Action.
- j. *Electrical Carbon Product Cases*, J.C.C.P. 4294 (*City and County of San Francisco v. Morganite, Inc., et al.* ) – Consumer Class Action.
- k. *Doe v. Darkside Productions, Inc.*, S.F. Sup. Ct. No. 05-439667) – Consumer Class Action.
- l. *In re Mercedes-Benz Tele Aid Contract Litigation*, No. 07-2720 (DRD) (U.S.D.C., D.N.J.) ) – Consumer Class Action.

13. I have also served as defense counsel in multiple class action cases.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 6, 2022 By:           /s/ James A. Quadra            
James A. Quadra