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16 Attorneys for Plaintiff
17 and the Plaintiff Class

18 SUPERIOR COURT OF THE STATE OF CALIFORNIA
19 COUNTY OF ORANGE

20 RAYMOND STODDARD and
21 SANTIAGO MEDINA etc.,
22
23 Plaintiffs,
24
25 vs.
26 EQUILON ENTERPRISES, LLC, et
27 al.,
28 Defendants.

Case No. 30-2010-00395208-CU-0E-CXC

Hon. William Claster
Department CX 102

CLASS ACTION

DECLARATION OF SHANNON
LISS-RIORDAN RE MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT

Date: July 31, 2020
Time: 9:00 a.m.
Dept: CX 104
Complaint Filed: August 2, 2010
Trial Date: None Set

Reservation No. 73219881

1 I, Shannon Liss-Riordan, declare:

2 1. I am an attorney at law duly licensed to practice law in the State of
3 California and elsewhere. I know the contents of this declaration of my own
4 personal knowledge and could and would testify competently as to the truth of
5 the matters contained herein.

6 2. I am a founding member of Lichten & Liss-Riordan, P.C. I have
7 extensive experience in representing workers in wage and hour litigation.

8 3. I understand that the Court has inquired of the role of me and my
9 firm in connection with this Action, particularly as it involves the settlement
10 between Plaintiff Santiago Medina (“Median”) and Defendant R&M Pacific Rim,
11 Inc. (“R&M”). The purpose of this declaration is to explain that role.

12 4. I first became acquainted with Samuel T. Rees and Bleau Fox in May
13 2018 and shortly after the Court of Appeal decided *Curry v. Equilon Enterprises,*
14 *LLC* (2018) 23 Cal.App.5th 289. At that time, I agreed to join with Mr. Rees and
15 Bleau Fox to petition the California Supreme Court to review the *Curry* decision.
16 I became involved because of my extensive experience on the issue of joint
17 employer liability.

18 5. Thereafter, I again joined with Mr. Rees and Bleau Fox in appealing
19 the granting of summary judgment in *Henderson v. Equilon Enterprises, LLC et*
20 *al.*, Contra Costa Superior Court Case No. MSC 10-02259 both at the Court of
21 Appeal and later in petitioning the Supreme Court for review of the Court of
22 Appeal’s affirmance of summary judgment.

23 6. On September 19, 2019, Mr. Rees with my consent filed a Notice of
24 Association in this Action associated my firm with Bleau Fox to prosecute
25 Medina’s claims again against Equilon Enterprises, LLC (“Equilon”). In this
26 capacity, we joined with Mr. Rees and Bleau Fox in opposing Equilon’s motion
27 for summary judgment and we expect to continue in this role on the appeal of
28 this Court’s grant of summary judgment.

1 7. At the time that our substantive involvement in this Action, Medina
2 had already reached a tentative settlement of both his individual and the Class
3 claims against R&M as the result of mediation. We had no role in that
4 mediation which was entirely handled, I understand, by Mr. Rees.

5 8. Since that tentative settlement, I understand that Bleau Fox and
6 counsel for R&M have been involved in drafting settlement documents and
7 seeking preliminary approval of the class settlement. We have also had no role
8 in either drafting settlement documents or seeking preliminary approval of the
9 settlement.

10 9. While I and my firm have extensive experience in negotiating
11 settlements of wage and hour class actions, drafting settlement documentation,
12 seeking and securing court approval and serving as Class Counsel, I understand
13 that Mr. Rees and Bleau Fox also have substantial experience in providing the
14 same services and has previously served as approved Class Counsel in the Wales
15 and Johnson class action asserting similar claims to this Action. Neither Mr.
16 Rees nor Bleau Fox has sought our involvement in these tasks in connection
17 with the settlement with R&M.

18 10. I understand that Mr. Rees and Bleau Fox will be seeking an award
19 of attorneys' fees in connection with the settlement but limited to 1/3rd of the
20 Total Settlement Amount and will also be seeking an award of their fees and
21 expenses.

22 11. Neither I nor my Firm shall seek an award of attorneys' fees or costs
23 or expenses incurred in this action from this Court in connection with the
24 settlement with R&M. Should Medina prevail both on his appeal from the
25 summary judgment in favor of Equilon and on his and the class claims against
26 Equilon, we expect to seek attorneys' fees, costs and expenses from Equilon.

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I declare under penalty of perjury under the laws of the State of California
that the foregoing is true and correct.

Dated: July 20, 2020



Shannon Liss-Riordan

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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 580 West Empire Avenue, Burbank, California 91504.

On July 21, 2020, I served the foregoing document(s) described as **DECLARATION OF SHANNON LISS-RIORDAN RE MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** on the interested parties to this action who are listed on the attached Service List by electronically serving those persons at the electronic addresses noted therein.

STATE: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

FEDERAL: I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct of my own personal knowledge, and that I am employed in the office of a member of the Bar of this Court at whose discretion this service was made.

Executed on July 21, 2020, at Burbank, California.

_____/s/ Nathan Childress

Nathan Childress

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SERVICE LIST

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