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11 *Attorneys for Plaintiff and*  
11 *Proposed Class Counsel*

12  
13 **SUPERIOR COURT OF CALIFORNIA**  
14 **COUNTY OF SAN DIEGO**

15 HARLEY SEEGER, individually, on behalf of  
16 himself and all others similarly situated,

17 Plaintiff,

18 v.

19 P.F. CHANG'S CHINA BISTRO, INC., a  
20 Delaware Corporation; and DOES 1 through 20,  
inclusive,

21 Defendant.

Case No: 37-2017-00016131-CU-MC-CTL

[E-FILE]

**CLASS ACTION**

**DECLARATION OF BRITTANY C.  
CASOLA IN SUPPORT OF UNOPPOSED  
MOTION FOR ATTORNEYS' FEES,  
COSTS, AND INCENTIVE AWARD**

Date: July 12, 2019

Time: 1:30 p.m.

Dept.: C-69

Judge: Hon. Katherine Bacal

1 I, Brittany C. Casola, declare as follows:

2 1. I am an attorney duly admitted to practice law before all courts of the State of California,  
3 I am an associate attorney in the law firm of Carlson Lynch LLP, and I am one of the attorneys of record  
4 for Plaintiff and the Class herein. I make this declaration in support of Plaintiff's Unopposed Motion for  
5 Attorneys' Fees, Costs, and Incentive Award. If called as a witness, I could and would competently testify  
6 to the following:

7 2. I have personally been involved in the prosecution of this class action from its inception  
8 through to the present.

9 3. I have spent 148.3 hours in prosecuting this case at the rate of \$395 per hour, on behalf of  
10 the Class through the date of this declaration. I expect to spend another six (6) to eight (8) hours to  
11 conclude the action, including drafting the papers in support of the Final Fairness Hearing and preparing  
12 for oral argument.

13 4. The work I conducted in this case to date includes drafting, filing, and service of the  
14 original complaint and amended complaint; meeting and conferring with defense counsel regarding the  
15 initial case management topics and the impending demurrer; drafting written discovery; researching,  
16 drafting, and filing the opposition to the demurrer; preparing for, arguing, and attending the demurrer  
17 hearing; reviewing and editing the mediation brief; meeting and conferring with defense counsel and co-  
18 counsel regarding settlement agreement drafts; researching, drafting, and filing the motion for preliminary  
19 approval of class action settlement; preparing for and attending the hearing on the motion for preliminary  
20 approval; corresponding with the claims administrator regarding class notice and keeping updated on  
21 claims period; and researching and drafting the instant unopposed motion for attorneys' fees, costs, and  
22 incentive award.

23 5. A general summary of my firm's billing time is as follows:

No.	General Description	Hours	Rate	Lodestar
1	<b>Pleadings:</b> Research case law and review case database for previous filings regarding Song-Beverly Credit Card Act, Cal. Civ. Code section 1747.08; gather factual information for complaint; draft initial complaint and circulate for edits; incorporate revisions, revise, finalize,	18.9	\$395	\$7,465.50

1	and file; issue for service; draft first amended complaint; circulate for review and incorporate edits; finalize, file, and e-serve.			
2	2 <b>Discovery:</b> Draft written discovery requests including Requests for Production of Documents, Requests for Admissions, and Special Interrogatories; circulate to co-counsel and partner for review and comment; incorporate suggested revisions.	16.2	\$395	\$6,399.00
3	3			
4	4			
5	5			
6	6 <b>General Case Management Issues:</b> Telephonic meet and confer conferences regarding initial case management topics set forth in the California Rules of Court; draft joint case management statement and host telephonic meet and confer conferences with co-counsel and opposing counsel regarding the same; incorporate additions, finalize and file joint case management statement; draft ESI protocol; draft protective order; draft preservation protocol; correspondence with co-counsel regarding strategy, delegation of case management duties, and settlement; telephonic meet and confer regarding demurrer.	28.1	\$395	\$11,099.50
7	7			
8	8			
9	9			
10	10			
11	11			
12	12			
13	13			
14	14 <b>Law and Motion:</b> Conduct research regarding special purpose exception and draft the opposition to demurrer; circulate draft to partner and incorporate edits; prepare for and argue the demurrer hearing; research regarding motion in support of preliminary approval of class action settlement and draft the same; circulate to partner for review and incorporate edits; finalize, file, and serve; prepare for and attend preliminary approval hearing; research and draft instant fee motion; circulate to partner for review and incorporate edits; finalize, file, and serve.	57.9	\$395	\$22,870.50
15	15			
16	16			
17	17			
18	18			
19	19			
20	20			
21	21			
22	22 <b>Settlement Agreement:</b> Conduct several telephonic meet and confer conferences with opposing counsel and co-counsel regarding various drafts of settlement agreement and notices; correspondence with claims administrator regarding settlement notices, website, and dissemination of notice.	19.2	\$395	\$7,584.00
23	23			
24	24			
25	25			
26	26 <b>Prospective:</b> Research and draft motion in support of final approval of class action settlement; prepare for and attend hearing.	8	\$395	\$3,160.00
27	27			

**Total:** **148.3 hours x \$395 = \$ 58,578.50**

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
2 true and correct, and that this declaration was executed on June 19, 2019, in San Diego, California.

3  
4 Dated: June 19, 2019

**CARLSON LYNCH LLP**

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