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*Attorneys for Plaintiff and
Proposed Class Counsel*

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO**

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

Plaintiff,

v.

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

Defendant.

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

[E-FILE]

CLASS ACTION

**DECLARATION OF GENE J.
STONEBARGER 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, Gene J. Stonebarger, declare:

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

7 2. I have personally been involved in the prosecution of this Class Action.

8 3. My firm has spent over 131 hours in prosecuting this case to date. I (GJS) have spent 31
9 hours, at the rate of \$795 per hour, in prosecuting this case on behalf of the Class through the date of this
10 declaration. Richard D. Lambert (RDL), an attorney with Stonebarger Law, APC has spent 8.6 hours at
11 the rate of \$595, in prosecuting this case on behalf of the Class through the date of this declaration.
12 Crystal L. Matter (CLM), an attorney with Stonebarger Law, APC, has spent 92.1 hours at the rate of
13 \$495 per hour, in prosecuting this case on behalf of the Class through the date of this declaration. My
14 firm's current fee lodestar is \$75,351.50. My firm will expend an additional 15-20 hours to conclude
15 this action. Further, my firm has spent \$1,175.21 in unreimbursed expenses incurred in connection with
16 this case. My firm's current total lodestar is \$76,526.71. A general summary of my firm's billing time is
17 as follows:

No.	General Description	Hours	Rate	Lodestar
1.	General Case Management: Initial contacts and drafting client agreements; Draft Notice of Appearance; Attend Case Management Conference; Draft Joint Case Management Statement; Status meetings.	(GJS) 1.6 (RDL) .5 (CLM) 2.6	\$795 \$595 \$495	\$1,272.00 \$297.50 \$1,287.00
2.	Law and Motion: Review Demurrer; Draft Opposition to Demurrer; Research re Same; Attend Hearing on Demurrer	(GJS) 2.9 (RDL) 3.4 (CLM) 8.4	\$795 \$595 \$495	\$2,305.50 \$2,023.00 \$4,158.00
3.	Mediation: Telephone conference with counsel re Mediation; Review and Respond to correspondence from counsel re potential Mediators; Draft Mediation Brief; Attend Mediation; Settlement Discussions post Mediation.	(GJS) 16.3 (CLM) 18.2	\$795 \$495	\$12,958.50 \$9,009.00

4.	Settlement Agreement: Draft and revise Settlement Agreement; Notices; Additional revisions to Settlement Agreement; Correspond with counsel re Settlement Agreement.	(RDL) .3 (CLM) 15.9	\$595 \$495	\$178.50 \$7,870.50
5.	Motions for Settlement Approval: Draft and revise Motion for Preliminary Approval; Drafted supporting Declarations; Draft Stipulations to Extend Hearing on Motion for Preliminary Approval; Attend Hearing on Motion for Preliminary Approval; Draft Notice of Entry of Order Granting Preliminary Approval.	(GJS) 4.2 (RDL) 4.4 (CLM) 23.3	\$795 \$595 \$495	\$3,339.00 \$2,618.00 \$11,533.50
6.	Settlement Administration: Review potential Administrators; Correspondence with counsel re same; Review Notice materials; Review Settlement Statistics and Bi-weekly Administration Status Reports	(CLM) 2.5	\$495	\$1,237.50
7.	Motion for Attorneys' Fees: Draft and revise Motion for Attorneys' Fees; Research re same; Conference with co-counsel regarding same.	(GJS) 3.4 (CLM) 11	\$795 \$495	\$2,703.00 \$5,445.00
8.	Motion for Final Approval: Draft and revise Motion for Final Approval; Research re same.	(GJS) 2.6 (CLM) 10.2	\$795 \$495	\$2,067.00 \$5,049.00
		(GJS) 31 (RDL) 8.6 (CLM) 92.1	\$795 \$595 \$495	\$24,645.00 \$5,117.00 \$45,589.50
	Total:	Total: 131.7		\$75,351.50

4. Class Counsel seeks to recover costs expended on this litigation in the amount of \$1,175.21. These costs were directly related to the prosecution of this action, were reasonably and necessarily incurred, and are itemized as follows:

COSTS

No.	General Description	Cost:	
1.	Mediation	\$503.92	
2.	Court fees	\$621.20	
3.	Postage	\$50.09	
	Total:	\$1,175.21	

5. The work I conducted in this case includes case investigation, client correspondence, meeting and conferring with defense counsel, and preparing for and attending mediation.

6. Plaintiff Seegert maintained continued involvement in the litigation, including reviewing initial pleadings and communicating with Class Counsel on the status of the action.

7. I agreed to accept Plaintiff Seegert's case on a pure contingency fee basis.

8. Class Counsel is experienced in class actions. Attached hereto as Exhibit 'A' is a true and correct copy of Stonebarger Law, APC's firm resume Stonebarger Law, APC has extensive experience in complex business litigation and class actions. My firm, Stonebarger Law, APC, substantially concentrates its practice in the prosecution of class actions and I have successfully served as Class Counsel or Co-Class Counsel prosecuting numerous Class Actions to Judgment against large corporations, recovering tens of millions of dollars in benefits for individuals across the country. The law firm of Stonebarger Law, APC has expended a substantial amount of time and effort in prosecuting this action and achieving substantial benefits for the Class. The requested fee is reasonable and appropriate based on the risks of the litigation, its complexity, Class Counsel's refusal of alternative employment opportunities with guaranteed payment, and the substantial benefit obtained for the Class and the general public.

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



GENE J. STONEBARGER

Exhibit “A”

STONEBARGER LAW, APC, is a law firm dedicated to representing the interests of individuals and small businesses throughout the Country in all aspects of civil litigation. The firm specializes in Class Action Litigation. Our Attorneys have successfully served as Lead or Co-Lead Class Counsel prosecuting numerous Class Actions to Judgment against large corporations for violations of California consumer protection statutes, recovering tens of millions of dollars in benefits for individuals across the Country. Our Attorneys have also successfully represented many small businesses as both plaintiffs and defendants in various litigation venues. Stonebarger Law prides itself on the ability of our Attorneys to achieve excellent results for our clients through aggressive, precise, efficient and honest representation.

GENE J. STONEBARGER, ESQ.

BIOGRAPHICAL INFORMATION

Gene J. Stonebarger is the founder of Stonebarger Law, APC. Mr. Stonebarger was selected as a Northern California Super Lawyer in each of the years 2014-2018.

In 2014, Mr. Stonebarger was the recipient of the Consumer Champion Award from the Consumer Federation of California. Mr. Stonebarger received a 2012 California Lawyer Attorney of the Year Award (the "CLAY Award") from California Lawyer magazine for the significant impact his legal work made in the area of Consumer Rights in 2011. Mr. Stonebarger argued the seminal privacy rights case entitled *Pineda v. Williams-Sonoma Stores, Inc.*, 51 Cal.4th 524 (2011), wherein the California Supreme Court issued a unanimous decision in favor of Plaintiff and Appellant protecting the privacy rights of California consumers, reversing the decisions of the two lower Courts and remanding the case for further proceedings. Mr. Stonebarger had the distinct honor of being the first attorney to present oral argument before Chief Justice Cantil-Sakauye as she began her tenure at the helm of the California Supreme Court and of California's vast judicial branch.

Mr. Stonebarger was awarded the Buck Scholarship in 1993 upon graduation from Linden High School and then went on to receive a Bachelor of Science Degree from U.C. Davis in 1997 and the Degree of Juris Doctor from the University of San Diego School of Law in 2000. Mr. Stonebarger began his legal career working at the prestigious Damrell law firm, where he handled complex civil litigation matters and Class Actions. In January, 2004, Mr. Stonebarger co-founded Lindsay & Stonebarger, APC. Mr. Stonebarger founded Stonebarger Law, APC in January, 2010. Mr. Stonebarger currently specializes his practice in the areas of Class Action and Complex Business Litigation. He is admitted to practice law before all courts of the State of California, the United States District Courts in the Northern, Eastern, Central and Southern Districts of California, as well as the United States Court of Appeals for the Fifth and Ninth Circuits, and the Supreme Court of the United States.

Mr. Stonebarger has successfully represented clients in numerous litigation forums in both Federal and State Court, including but not limited to, the Judicial Council of California, the Judicial Panel on Multidistrict Litigation, The Department of Consumer Affairs, California Courts of Appeal, Trial Courts throughout the State of California and Federal District Courts across the country. Mr. Stonebarger is a member of the American Association for Justice, the State Bar of California, the Consumer Attorneys of California, the Sacramento County Bar Association and the Capitol City Trial Lawyers Association. Mr. Stonebarger is also a licensed Real Estate Broker through the California Department of Real Estate.

EDUCATION

2000 - University of San Diego School of Law (J.D.)

1997 - University of California, Davis (B.S.)

LEGAL EXPERIENCE

2010-Present: Stonebarger Law, APC (Folsom)

2004-2010: Lindsay & Stonebarger, APC (Sacramento, Folsom)

2000-2004: Damrell, Nelson, Schrimp, Pallios, Pacher & Silva (Modesto)

JURISDICTIONS ADMITTED TO PRACTICE

2011- United States Supreme Court

2000- U.S. Court of Appeals for the Ninth Circuit

2010- U.S. Court of Appeals for the Fifth Circuit

2008- U.S. District Court, Central District of California

2006- U.S. District Court, Southern District of California
2001- U.S. District Court, Eastern District of California
2001- U.S. District Court, Northern District of California
2000 - California Supreme Court

PROFESSIONAL MEMBERSHIPS

State Bar of California
Consumer Attorneys of California
Sacramento County Bar Association
Capitol City Trial Lawyers Association
American Association for Justice
Real Estate Broker through the California Department of Real Estate

LEGISLATIVE TESTIMONY

- Assembly Committee on Judiciary regarding AB 1219, May 10, 2011
- Assembly Committee on Banking regarding AB 1219, May 2, 2011

SPEAKING ACTIVITIES

- American Conference Institute, Data Privacy & Information Security, Dallas, Texas, June 3-4, 2010
- San Francisco Bar Association Song-Beverly Act Panel, August 23, 2011
- American Conference Institute, Privacy & Security of Consumer and Employee Information, Washington, D.C., February 1-2, 2012

PUBLISHED OPINIONS

- *Pineda v. Williams-Sonoma Stores, Inc.*, 51 Cal.4th 524 (2011)
- *Alvarez v. Brookstone Company, Inc.*, 202 Cal.App.4th 1023 (2011)
- *Folgelstrom v. Lamps Plus, Inc.*, 195 Cal.App.4th 986 (2011)
- *Powers v. Pottery Barn, Inc.*, 177 Cal.App.4th 1039 (2009)
- *Aquirre v. Amscan Holdings, Inc.*, 234 Cal.App.4th 1290 (2015)

RICHARD D. LAMBERT, ESQ.

BIOGRAPHICAL INFORMATION

Richard D. Lambert is a partner of the firm. Mr. Lambert was named a Rising Star by Super Lawyers magazine in each of the years 2014-2018.

Mr. Lambert graduated from Grace M. Davis High School in 2000. Mr. Lambert attended Occidental College earning his Bachelor of Arts degree in Economics in 2004. Mr. Lambert attended California Western School of Law, receiving his Juris Doctor *Magna Cum Laude* in 2007. While in law school, Mr. Lambert was an Associate Editor of the California Western Law Review & International Law Journal, an Academic Honors Instructor, and earned three Awards for Academic Achievement (Evidence, Alternative Dispute Resolution, & Trial Practice).

Mr. Lambert's Class Action practice is focused predominantly in the areas of labor and employment, consumer protection, and privacy rights litigation. In addition to his Class Action practice, Mr. Lambert also handles Complex Business Litigation matters. He is admitted to practice law before all courts of the State of California. Mr. Lambert is a member of the State Bar of California, the Consumer Attorneys of California, California Employment Lawyers Association, and the Sacramento County Bar Association.

EDUCATION

2007 - California Western School of Law (J.D.), *Magna Cum Laude*

2004 - Occidental College (B.A.), *Omicron Delta Epsilon Honors*

LEGAL EXPERIENCE

2010-Present: Stonebarger Law, APC (Folsom)

2007-2010: Lindsay & Stonebarger, APC (Folsom)

JURISDICTIONS ADMITTED TO PRACTICE

2011 - U.S. District Court, Southern District of California

2011 - U.S. District Court, Central District of California

2010 - U.S. District Court, Northern District of California

2009 - U.S. District Court, Eastern District of California

2007 - California Supreme Court

PROFESSIONAL MEMBERSHIPS

State Bar of California
Consumer Attorneys of California
Sacramento County Bar Association
California Employment Lawyers Association
Phi Alpha Delta, Sacramento State Chapter

PUBLISHED OPINIONS

- *Pineda v. Williams-Sonoma Stores, Inc.*, 51 Cal.4th 524 (2011)
- *Alvarez v. Brookstone Company, Inc.* 202 Cal.App.4th 1023 (2011)
- *Folgelstrom v. Lamps Plus, Inc.*, 195 Cal.App.4th 986 (2011)
- *Powers v. Pottery Barn, Inc.*, 177 Cal.App.4th 1039 (2009)
- *Aquirre v. Amscan Holdings, Inc.*, 234 Cal.App.4th 1290 (2015)

PRIVACY RIGHTS CLASS ACTION LITIGATION

Attorneys at Stonebarger Law have successfully served as Lead or Co-Lead Class Counsel prosecuting numerous Class Actions to Judgment against large corporations for violations of California Civil Code section 1747.08, protecting the privacy rights of consumers, recovering tens of millions of dollars in benefits for individuals across the country, including in the following cases:

- *Matsuo v. American Golf Corporation*, San Joaquin County Superior Court, Case No. CV024865
- *Buzby v. Best Buy Co., Inc.*, San Diego County Superior Court, Case No. GIN040241
- *Children's Place Cases*, Stanislaus County Superior Court, J.C.C.P. No. 4418
- *Castaneda v. Dillard's, Inc.*, San Joaquin County Superior Court, Case No. CV026899
- *Barajas v. The Container Store, Inc.*, San Diego County Superior Court, Case No. GIN 041129
- *Ben Bridge Jeweler Cases*, Sacramento County Superior Court, J.C.C.P. No. 4474
- *Mendez v. Carter's, Inc.*, Sacramento County Superior Court, Case No. 05AS005580
- *O'Keefe v. West Marine, Inc.*, San Diego County Superior Court, Case No. GIC 876869
- *Barajas v. Dixieline Lumber Co.*, San Diego County Superior Court, Case No. GIC 841991
- *Cost Plus Credit Card Cases*, Sacramento County Superior Court, J.C.C.P. No. 4507

- *Wood v. Coach, Inc.*, Contra Costa County Superior Court, Case No. C-07-01146
- *Bell v. Genesco, Inc.*, San Diego County Superior Court, Case No. 37-2008-00081672 CU-BT-CTL
- *Lautenlager v. Sam Ash Music Corporation*, San Diego County Superior Court, Case No. 37-2008-00088948-CU-BT-CLT
- *Andonia v. The TJX Companies, Inc.*, San Diego County Superior Court, Case No. GIC875253
- *Burger v. J.C. Penney Company, Inc.*, San Diego County Superior Court, Case No. 37-2008-00083751-CU-BT-CTL
- *Cole v. Sport Chalet, Inc.*, San Diego County Superior Court, Case No. 37-2008-00081675 CU-BT-CTL
- *Cole v. The Sports Authority, Inc.*, San Diego County Superior Court, Case No. 37-2008-00081686 CU-BT-CTL
- *Johnson v. Lerner New York*, San Diego County Superior Court, Case No. 37-2008-00080567-CU-BT-CTL
- *Anderson v. United Retail*, San Diego County Superior Court, Case No. 37-2008-00089685-CU-BT-CTL
- *Spangler v. Bass Pro Outdoor World, LLC*, San Bernardino County Superior Court, Case No. CIVSS 810285
- *Fogelstrom v. Everfast, Inc.*, San Diego County Superior Court, Case No. 37-2008-00086675-CU-BT-CTL
- *Korn v. Polo Ralph Lauren Corporation*, Eastern District of California, No. 07-CV-02745-FCD-JFM
- *Anderson v. Tuesday Morning Corporation*, San Diego County Superior Court, Case No. 37-2008-00088654-CU-BT-CTL
- *Miller v. Road Runner Sports, Inc.*, San Diego County Superior Court, Case No. 37-2008-00093271-CU-BT-CTL
- *Diebel v. BCBG MAX AZRIA GROUP, Inc.*, San Diego County Superior Court, Case No. 37-2008-00085129-CU-BT-CTL
- *Fogelstrom v. Tween Brands, Inc.*, San Diego County Superior Court, Case No. 37-2008-00060767-CU-BT-NC
- *In Re: Payless Shoesource, Inc. California Song-Beverly Credit Card Act Litigation*, Eastern District of California, Case No. 09-MD-02022 FCD (GGH)
- *Sturgeon v. Jones Retail Corporation*, Southern District of California, Case No. 09-CV-00507-WQH (WVG)

- *Nelson v. Destination Maternity Corporation*, San Francisco County Superior Court, Case No. CGC-11-508949
- *Giacometti v. True Religion Apparel, Inc.*, Placer County Superior Court, Case No. S-CV0027951
- *Vaughan, et al. v. Home Depot U.S.A., Inc.*, Eastern District of California, Case No. 2:11-cv-1041-GEB-CKD
- *Swaney v. Lowe's HIW, Inc.*, Northern District of California, Case No. CV-11-03231
- *Pabst v. Genesco, Inc.*, Northern District of California, Case No. CV-11-04881
- *Sunseri v. Maidenform Brands, Inc.*, Napa County Superior Court, Case No. 26-52359
- *Burdewick v. Leslie's Poolmart, Inc.*, Eastern District of California, Case No. 2:11-CV-01085-JAM-EFB
- *Nordstrom, Inc. Song-Beverly Act Cases*, Los Angeles County Superior Court, JCCP Case No. 4651
- *Vaughan, et al. v. Home Depot U.S.A., Inc.*, Eastern District of California, Case No. 2:11-CV-1041
- *Alvarez v. Brookstone Company, Inc.*, San Diego County Superior Court, Case No. 37-2008-00097745
- *O'Connor v. Euromarket Designs, Inc.*, Northern District of California, Case No. 3:11-CV-02140
- *Georgino v. Sur La Table, Inc.*, Central District of California, Case No. CV 11-03522
- *Seebrook v. The Children's Place Retail Stores, Inc.*, Northern District of California, Case No. 11-CV-00837
- *Krieger v. The Buckle, Inc.*, San Francisco County Superior Court, Case No. CGC-12-517304
- *Morey v. Louis Vuitton North America, Inc.*, Southern District of California, Case No. 11-cv-01517
- *Chaikin v. Lululemon USA Inc., et al.*, Southern District of California, Case No. 12-CV-02481
- *Michaels Stores Song-Beverly Cases*, San Diego County Superior Court, JCCP Case No. 4684
- *O'Leary v. Office Depot, Inc.*, Sacramento County Superior Court, Case No. 34-2012-00131227
- *Dardarian v. OfficeMax North America, Inc.*, Northern District of California, Case No. 4:11-cv-00947
- *Petersen v. Estee Lauder Companies, Inc.*, San Francisco County Superior Court, Case No. CGC-11-509129

- *Hernandez v. Restoration Hardware, Inc.*, San Diego County Superior Court, Case No. 37-2008-00094395-CU-BT-CTL
- *Big 5 Sporting Goods Song-Beverly Cases*, Los Angeles County Superior Court, JCCP Case No. 4667
- *Trader Joe's Song-Beverly Cases*, Los Angeles County Superior Court, JCCP Case No. 4670
- *Hernandez v. Old Navy, LLC*, San Francisco County Superior Court, Case No. CGC-09-484229
- *Zavis v. Swarovski North America LTD*, San Diego County Superior Court, Case No. 37-2015-00003586-CU-BT-CTL
- *Nicolucci v. Sephora USA, Inc.*, San Francisco County Superior Court, Case No. CGC-11-508450
- *Covell v. The Sleep Train, Inc.*, San Diego County Superior Court, Case No. 37-2014-00011275-CU-NP-CTL

CONSUMER CLASS ACTION LITIGATION

Attorneys at Stonebarger Law have successfully served as Class Counsel prosecuting numerous Class Actions to Judgment against large corporations for violations of California consumer protection statutes, recovering millions of dollars in benefits for individuals across the country, including in the following cases:

- *Christopher v. Baskin-Robbins, USA, LLC*, San Diego County Superior Court, Case No. 37-2007-00069556-CU-BT-CTL
- *Kedem v. Toys 'R' Us, Inc.*, Santa Clara County Superior Court, Case No. 1-09- CV-141570
- *In Re: Heartland Payment Systems, Inc. Data Security Breach Litigation*, Southern District of Texas, Case No. 4:09-MD-2046 (Mr. Stonebarger served as a member of the Executive Committee in the Consumer Track Actions in this MDL proceeding relating to a security breach whereby consumer credit card information was compromised)
- *Alcarion v. Charlotte Russe, Inc., et al.*, Southern District of California, Case No. 3:13-cv-01176-DMS-NLS

LENDER MISCONDUCT CLASS ACTION LITIGATION

Attorneys at Stonebarger Law have successfully served as Lead Class Counsel prosecuting Class Actions to Judgment against large lending institutions for violations of California and Federal statutes, including in the following case:

- *Shelton v. GMAC, LLC*, Placer County Sup. Ct., Case No. SCV21807 (Mr. Stonebarger served as Lead Class Counsel in this class action alleging that Defendant Sent 1099-C Cancellation Of Debt Forms To Debtors And Then Subsequently Attempted To Collect On The Canceled Debts)

Stonebarger Law serves as Counsel in pending Class Action lawsuits filed against large lending institutions for violations of California and Federal statutes, including the following cases:

- *In re Citibank HELOC Reduction Litigation*, Northern District of California, Case No. C 09-0350-MMC (Mr. Stonebarger serves as a member of the Executive Committee in this nationwide class action alleging illegal reductions of Home Equity Lines of Credit)

EMPLOYMENT CLASS ACTION LITIGATION

Stonebarger Law has successfully served as Co-Lead Class Counsel prosecuting Class Actions to Judgment against large companies for violations of California and Federal employment laws, including the following cases:

- *Kool v. Target Corporation*, Eastern District of California, Case No. 2:10-CV-02950-LKK-EFB (Wage and hour class action on behalf of pharmacists)
- *Martin v. Warehouse Demo Services, Inc.*, Northern District of California, Case No. CV-10-04539 MMC (Wage and hour class action on brought on behalf of hourly employees working demonstration tables at Costco's stores across the State)
- *La Masa v. IndyMac Resources, Inc.*, Stanislaus County Superior Court, Case No. 626836 (Wage and hour class action on behalf of former IndyMac employees)
- *Anderson v. Apple American Group, LLC*, Sacramento County Superior Court, Case No. 34-2010-00093705 (Class action brought on behalf of Applebee's employees for being required to purchase uniforms in violation of California Law)
- *Duke v. Adventist Health System/West, et al.*, Sacramento County Superior Court, Case No. 34-2010-00073533-CU-OE-GDS (Wage and hour class action on behalf of former nurses working at St. Helena Hospital Clearlake)
- *Delfierro v. White House Black Market, Inc.*, Sacramento County Superior Court, Case No. 34-2014-00159390
- *Chase, et al. v. Rite Aid Corp.*, Los Angeles County Superior Court, Case No. BC381055 (Coordinated wage and hour class action on behalf of pharmacists employed by Rite Aid)

Stonebarger Law serves as Counsel in numerous pending Class Action lawsuits filed against large companies for violations of California and Federal employment laws, including the following cases:

- *Duffer v. United Continental Holdings, Inc.*, Northern District of Illinois, Case No. 1:13-cv-03756 (Class action brought on behalf of Military Pilots who are/were United States Military Reservists for Continental's violations of USERRA)
- *Patel v. CVS Pharmacy, Inc., et al.*, Orange County Superior Court, Case No. 30-2015-0076552 (Wage and hour class action on behalf of pharmacists employed by CVS)

CRYSTAL L. MATTER, ESQ.

BIOGRAPHICAL INFORMATION

Crystal L. Matter is a partner with the firm. Mrs. Matter was named a Rising Star by Super Lawyers magazine in at least each of the years 2016-2018.

Mrs. Matter graduated from Loretto High School in 2000. Mrs. Matter attended Saint Mary's College of California earning her Bachelor of Arts degree in 2004. Mrs. Matter attended University of the Pacific, McGeorge, receiving her Juris Doctor in 2011. While in law school, Mrs. Matter was an extern for the United States District Court for the Eastern District Bankruptcy Court, and was a law clerk for Green & Hall, APC.

Mrs. Matter's Class Action practice is focused predominantly in the areas of consumer protection/privacy class actions as well as USERRA class action litigation. Mrs. Matter also handles Complex Business Litigation and estate planning matters. She is admitted to practice law before all courts of the State of California. Mrs. Matter is a member of the State Bar of California.

EDUCATION

2011 – University of the Pacific, McGeorge School of Law
2000 – Saint Mary's College of California

LEGAL EXPERIENCE

2008-2011: Green & Hall, APC
2011-2018: Matter Law, APC
2016-Present: Stonebarger Law, APC

JURISDICTIONS ADMITTED TO PRACTICE

2016 - U.S. District Court, Northern District of California
2011 - U.S. District Court, Eastern District of California
2017 - U.S. District Court of Arizona
2017 - U.S. District Court, Northern District of Georgia
2017 - U.S. District Court, Northern District of Illinois
2018 - U.S. District Court, Northern District of Texas
2018 - U.S. District Court, Western District of Washington
2011 - California Supreme Court

PROFESSIONAL MEMBERSHIPS

State Bar of California

PRIVACY RIGHTS AND CONSUMER CLASS ACTION LITIGATION

As an attorney with Stonebarger Law, Crystal Matter has successfully served as Lead or Co-Lead Class Counsel prosecuting numerous Class Actions against large corporations for violations of California Civil Code section 1747.08, protecting the privacy rights of consumers, recovering tens of millions of dollars in benefits for individuals across the country, including in the following cases:

- *Buffalo Wild Wings Credit Cases*, San Diego County Superior Court, Judicial Council Coordinated Proceeding Case No. 4933 (Class Action brought on behalf of an ascertainable statewide class consisting of all persons in California who entered into a credit card purchase transaction with Defendant, wherein a credit card form was utilized which contained preprinted space(s) specifically designated for filling in the personal identification information of the cardholder.
- *Harley Seegert v. P.F. Chang's China Bistro, Inc.*, San Diego County Superior Court, Case No. 37-2017-00016131-CU-MC-CTL (Class Action brought on behalf of Plaintiff against Defendant P.F. Chang's China Bistro, Inc. ("Defendant") for its failure to comply with the Song-Beverly Credit Card Act, Civil Code section 1747.08, *et seq.*

USERRA CLASS ACTION LITIGATION

Stonebarger Law served and serves as Co-Lead Class Counsel in numerous pending Class Action lawsuits filed against large companies for violations of California and Federal employment laws, including the following cases:

- *Duffer v. United Continental Holdings, Inc.*, Northern District of Illinois, Case No. 1:13-cv-03756 (Class action brought on behalf of Military Pilots were United States Military Reservists for United and Continental's violations of USERRA)
- *Moss v. United Airlines, Inc., et al.*, Northern District of Illinois, Case No. 1:16-cv-08496 (Class action brought on behalf of Military Pilots were United States Military Reservists for United and Continental's violations of USERRA)
- *Hoefert v. American Airlines, Inc.*, U.S. District Court, District of Arizona, Case No. 2:17-cv-02996 (Class action brought on behalf of Military Pilots were United States Military Reservists for United and Continental's violations of USERRA)
- *Sorenson, et al. v. Delta Air Lines, Inc.*, Northern District of Georgia, Case No. 1:17-cv-00541 (Class action brought on behalf of Military Pilots were United States Military Reservists for United and Continental's violations of USERRA)
- *Synoracki v. Alaska Airlines, Inc., et al.*, Western District of Washington, Case No. 2:18-cv-01784 (Class action brought on behalf of Military Pilots were United States Military Reservists for United and Continental's violations of USERRA)