

1 ARTHUR R. SIEGEL SBN 72651
2 LAW OFFICES OF ARTHUR R. SIEGEL
3 351 California Street, Suite 700
4 San Francisco, CA 94104
5 Tel. (415) 395-9335
6 Fax (415) 395-9615

7 Attorneys for Plaintiffs Kevin Dickens, Pat Oppido, Spencer Stecz,
8 Chris Hern, and Philip Jones and the Proposed Class

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 IN AND FOR THE COUNTY OF ALAMEDA
11 UNLIMITED CIVIL JURISDICTION

12 ALEXANDER GUREVICH, et al.,
13 Plaintiff,
14 v.
15 ROYAL AMBULANCE, INC., et al.,
16 Defendants.

17 KEVIN DICKENS, et al.,
18 Plaintiffs,
19 v.
20 ROYAL AMBULANCE, INC., et al.,
21 Defendants.

Case Nos. RG12631895 (Lead Case)
RG12639791

[Assigned to Hon. Wynne Carvill,
Dept. 21]

CLASS ACTION

DECLARATION OF ARTHUR R.
SIEGEL IN SUPPORT OF MOTION
FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION COSTS, AND
FOR SERVICE PAYMENTS

Date: July 28, 2015
Time: 8:30 a.m.
Dept.: 21
Reference No. R-1648298
Complaints filed: May 24, 2012
July 18, 2012

24 I, Arthur R. Siegel, declare as follows:
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1 1. I am an attorney duly licensed to practice law in the State of California since
2 December, 1976. I am in private practice in San Francisco, California. Together with the law
3 firm of Jaret & Jaret (Robert S. Jaret and Phillip A. Jaret) in San Rafael, California, I am
4 counsel for Plaintiffs) Kevin Dickens, Patrick Oppido, Spencer Stecz, Chris Hern, and Philip
5 Jones (“Dickens Plaintiffs”) in this matter.

6 2. This Declaration is submitted in support of Plaintiffs’ Motion for an Award of
7 Attorneys’ Fees and Litigation Costs, and for Service Payments.

8 3. I obtained a B.A. degree from Miami University in Oxford, Ohio in 1973 and a
9 Juris Doctorate from the University Of San Francisco School Of Law in 1976. After an
10 internship at the United States Equal Employment Opportunity Commission regional litigation
11 center in San Francisco, I was admitted to practice in 1976. In 1977, I was retained through the
12 auspices of the ACLU to manage the litigation of numerous individual and class discrimination
13 claims against the trucking industry, its trade organizations and union entities. In 1978, I started a
14 private litigation practice in San Francisco specializing in employment matters. In the course of
15 that practice, I have handled court trials, jury trials, arbitrations, and administrative hearings, as
16 well as severance negotiations for his clients. I lecture to community and legal organizations in
17 the areas of mediation and employment law.

18 4. Since 1995, I have served as a mediator and neutral evaluator in over 200
19 employment disputes, both privately and for state and federal courts in the San Francisco Bay
20 Area, including the Alameda County Superior Court.

21 5. In the course of my legal practice, I have handled dozens of individual wage and
22 hour disputes and have been counsel to the plaintiffs and the class in three wage and hour class
23 actions. In the course of my mediation practice I have also served as a mediator in settling
24 dozens of wage and hour cases, including two wage and hour class actions.

1 6. I have reviewed my records of my time spent on the representation of my clients
2 and the Class in this matter. The following is a summary of that time:

3 May-June 2012: Legal research re issues in Complaint, Revision of Complaint, Client
4 Meetings, 10.5 hrs.

5 July-August 2012: Further research and conferences with co-counsel re competing class
6 actions and co-counsel agreements, 3 hrs.

7 September-October 2012: Conferences with co-counsel, defense counsel, legal research
8 and revision of Complaint, 13.3 hrs.

9 November, 2012-January, 2013: Prepare stipulations, research and review Answer,
10 prepare CMC statement, conferences with co-counsel, review class data, 5.3 hrs.

11 March-April, 2013: Analyze and process class data provided by defendant to prepare data
12 for first mediation with Mark Rudy, legal research for mediation brief, prepare for and attend
13 mediation, analyze data obtained from defendant at mediation, 29.5 hrs.

14 May-June, 2013: Review new data provided by Defendant, correspondence, conferences
15 and email re retention of CPA expert, 4.7 hrs.

16 July, 2013: Prepare for and attend meeting with defense accountant expert, CPA, defense
17 and all co-counsel, 10.5 hrs.

18 August, 2013: Conferences and analysis re second mediation session with Mark Rudy,
19 attend mediation session, 18.9 hrs.

20 September-November, 2013: Further conferences and email with mediator, all counsel,
21 re settlement., 12 hours.

22 January-March 2014: Review Answer to Consolidated Complaint, Review settlement
23 proposals, alternatives, telephone conferences with co-counsel, defense counsel, 6.3 hrs.

24 May-June, 2014: Further settlement negotiations, conferences with co-counsel, defense
25 counsel, 3.4 hrs.

1 October, 2014: Further settlement negotiations, further conference with Mark Rudy, 2.5
2 hrs.

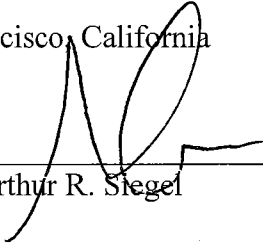
3 November, 2014- May, 2015: Final negotiations and hearing re settlement, conferences
4 re side agreement and situation re Plaintiff Gurevich, conferences and emails with co-counsel,
5 preparation of Motion for Preliminary Approval through multiple drafts and revisions by co-
6 counsel, and final production of motion. 47 hrs.

7 June, 2015, work on Final Approval motion, 4 hrs.

8 7. My total hours to date on this case are 170. At my ordinary hourly rate of \$650,
9 my full fee would be \$110,500. I have incurred costs for mediation, expert data analysis services
10 for liability calculations, retention of expert CPA for analysis of Defendant's financial records,
11 paralegal expenses and filing fees of \$6,753.68. Total costs and fees are presently \$116,853. I
12 am further obligated to work on the case following settlement and through the multi-year payout
13 period agreed to in the settlement of this case.

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

16 Executed on June 24, 2015, at San Francisco, California

17
18 
19 _____
20 Arthur R. Siegel
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