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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 COUNTY OF ALAMEDA

13 ALEXANDER GUREVICH, et al.,	)	<b>CASE NOS.</b>	<b>RG12631895 (Lead Case)</b>
	)		<b>RG12639791</b>
14 Plaintiff,	)		
	)		
15 v.	)		<i>[Assigned to the Hon. Wynne Carvill, Dept. 21]</i>
16 ROYAL AMBULANCE, INC., et al.,	)	<b>CLASS ACTION</b>	
	)		
17 Defendants.	)	<b>DECLARATION OF ROBERT S. JARET</b>	
	)	<b>IN SUPPORT OF MOTION FOR FINAL</b>	
18	)	<b>APPROVAL OF CLASS ACTION</b>	
19 KEVIN DICKENS, et al.,	)	<b>SETTLEMENT</b>	
	)		
20 Plaintiff,	)	<b>Complaints filed: May 24, 2012</b>	
	)	<b>July 18, 2012</b>	
21 v.	)	<b>Trial Date: Not set</b>	
22 ROYAL AMBULANCE, INC., et al.,	)		
	)	<b>Reference No. R-1648298</b>	
23 Defendants.	)		

24  
25 I, Robert S. Jaret, declare as follows:

- 26 1. I am licensed to practice law before all courts in the State of California, and am  
27 attorney of record for the KEVIN DICKENS Plaintiffs.
- 28 2. The law firm of Jaret & Jaret has maintained contemporaneous billing records with

1 respect to this case. The initial time entry reflected in the billing statements is May 18, 2012.  
2 Through May 31, 2015, our firm has incurred 249.50 hours at a billing rate of \$425 per hour,  
3 totaling \$106,037.50 in attorney fees. In addition, our firm has expended \$5,061.26 in costs. The  
4 total of the fees and costs incurred by our firm is \$111,098.76.

5 3. Our firm also set up the web page (Exhibit "A" attached hereto) on our website  
6 which included the Consolidated Master Complaint, Order for Preliminary Approval of Class  
7 Action Settlement and Certification of Settlement Class, Joint Stipulation and Settlement  
8 Agreement, Unopposed Notice of Motion and Motion For Preliminary Approval of Class Action  
9 Settlement Class, Memorandum of Points and Authorities in Support Thereof and Notice of Class  
10 Action Settlement. The link to the settlement went online on May 8, 2015, the address of the web  
11 page is <http://www.sanfranciscolitigators.com/royalambulanceclassaction.html>, and the cost was  
12 \$390.

13 4. At the beginning of this case starting in May 2012, I interviewed numerous  
14 employees of the Defendant, including the named Plaintiffs in the DICKENS case. I spent 9.8 hours  
15 in May 2012 interviewing the clients and beginning the preparation of the Complaint. I also  
16 researched the claims regarding unpaid overtime and related claims. In June 2012, I spent 24.90  
17 hours continuing to meet with and interview clients and research issues related to the Complaint.  
18 I interviewed numerous employees in addition to those who were named in the Complaint. In July  
19 2012 I expended 25.20 hours continuing research, meeting with and interviewing clients, and  
20 drafting the Complaint. The letter to the LWDA was also prepared. By September 2012 the  
21 Complaint had been served and we were communicating with defense counsel and preparing the  
22 Joint Case Management Conference Statement, as well as preparing a discovery plan, and  
23 negotiating over a protective order so that certain information can be shared. During this month we  
24 also investigated the assets of the Defendant. During the month of October 2012, we coordinated  
25 with Plaintiff's counsel in the GUREVICH case. During the month of January 2013 we negotiated  
26 over discovery issues with defense counsel, and obtained expert consultants. During the month of  
27 April 2013 we incurred 45.20 hours in preparation of, and attending a mediation on April 29, 2013.  
28 We continued to work with the mediator and thereafter a settlement in principle was reached.

1 Thereafter, I assisted co-counsel Arthur Siegel in the preparation of the settlement documents, and  
2 with communicating with the class representatives.

3 5. All of the attorney fees incurred were initially memorialized in handwritten billing  
4 statements, and then submitted to a billing service which generates computerized statements. All  
5 of the attorney fees and costs incurred were reasonably necessary in the prosecution of this action.

6 I declare under penalty of perjury under the laws of the State of California that the  
7 foregoing is true and correct, and if called upon, I could competently testify thereto.

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Executed this 23<sup>rd</sup> day of June 2015 at San Rafael, California.

  
\_\_\_\_\_  
ROBERT S. JARET

## **Royal Ambulance, Inc.**

***Alexander Gurevitch, et al., v. Royal Ambulance, Case No. RG12639791, California Superior Court, County of Alameda.***

***Kevin Dickens, et al., v. Royal Ambulance, Case No. RG12631895, California Superior Court, County of Alameda.***

On May 24, 2012, Smoger & Associates, with co-counsel Arbogast Bowen LLP, filed a proposed class action complaint against Royal Ambulance Inc. on behalf of Alexander Gurevich for violations of various provisions of the California Labor Code, Wage Orders and the California Business and Professions Code by allegedly failing to pay overtime compensation, failing to provide meal and rest breaks, failing to provide proper wage statements, and failing to pay all wages due at the time of termination.

In July 18, 2012, Jaret & Jaret, together with co-counsel Arthur R. Siegel, filed a proposed class action complaint against Royal Ambulance on behalf of Kevin Dickens, Patrick Oppido, Spencer Stecz, Chris Hern, and Philip Jones for violations of various provisions of the California Labor Code, Wage Orders and the California Business and Professions Code by allegedly failing to pay overtime compensation, failing to provide meal and rest breaks, failing to provide proper wage statements, and failing to pay all wages due at the time of termination.

On November 12, 2013, the cases were joined and a Master Consolidated Complaint was filed with the Court.

After conducting discovery and investigation, the parties participated in two mediation sessions presided over by a professional mediator and eventually reached an agreement to settle all the claims in the case for a total payment of \$650,000 by Royal Ambulance Inc., including attorney's fees and costs (subject to court approval). The class for settlement purposes is comprised of residents of California who are currently and were formerly employed by Defendant as Emergency Medical Technicians – Ambulance Drivers, from May 24, 2008, through the date of preliminary approval (April 10, 2015) of this Class Action Settlement Agreement, including Representative Plaintiffs.

Because this is a class action settlement, the proposed settlement had to be and was approved by the Court in order to be effective. On April 10, 2015, the Court signed an order that preliminarily approved the proposed settlement, including approving the case to proceed as a class action for settlement purposes only. The Court approved a form of notice to be mailed to class members that informs them about the case and the proposed settlement.

*On July 10, 2015 at 8:30 a.m., the Court will hear a motion for final approval of the settlement.*

### **Key Documents in this case:**

Consolidated Master Complaint

Order for Preliminary Approval of Class Action Settlement and Certification of Settlement Class

Joint Stipulation and Settlement Agreement

Unopposed Notice of Motion and Motion For Preliminary Approval of Class Action Settlement

Class; Memorandum of Points and Authorities in Support Thereof

Notice of Class Action Settlement

*All the documents in the case can be accessed at the Alameda County Superior Court website:*

*<https://publicrecords.alameda.courts.ca.gov/PRS/Case/CaseDetails/RG12631895?DeptListCase=Civil>*

The attorneys for the class and their contact information is as follows:

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**EXHIBIT** A

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