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Electronically FILED by  
 Superior Court of California,  
 County of Los Angeles  
 9/28/2023 5:22 PM  
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16 *Attorneys for Plaintiff,*  
 17 Jennifer Goodwin

18 **SUPERIOR COURT OF CALIFORNIA**  
 19 **COUNTY OF LOS ANGELES – UNLIMITED CIVIL**

20 Jennifer Goodwin, individually and on  
 21 behalf of all others similarly situated,

22 Plaintiff,

23 v.

24 K M P Enterprises d/b/a Powell Electric,

25 Defendant.

Case No.: 20STCV18428

**DECLARATION OF GIL MELILI IN  
 SUPPORT OF PLAINTIFF’S MOTION  
 FOR ATTORNEY’S FEES, COSTS AND  
 SERVICE AWARD**

**Date:** January 16, 2024

**Time:** 10:00 a.m.

**Department:** 14

**Judge:** Hon. Kenneth R. Freeman

Complaint Filed: May 14, 2020

**DECLARATION OF GIL MELILI**

I, Gil Melili, declare:

1. I am one of the attorneys for the Plaintiff in this action, Jennifer Goodwin (“Plaintiff”) against Defendant K M P Enterprises d/b/a Powell Electric (“Powell Electric” or “Defendant”).
2. I was admitted to the State Bar of California in May of 2021 and have been a member in good standing ever since that time. I have litigated cases in both state and federal courts in California. I am admitted in every federal district court in California and also in the Northern District of Illinois.
3. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief, as to such matters, I am informed and believe that they are true and correct.
4. I am an associate at Kazerouni Law Group, APC, and my practice primarily involves consumer and employment wage-and-hour class action litigation.

**COUNSEL LODESTAR**

5. From August of 2021 to the September 26, 2023, I have incurred approximately 82.5 hours in the course of this litigation against Defendant. All hours were logged contemporaneously in the normal course of business. I have been involved in several important aspects of the case, including but not limited to taking the confirmatory PMQ deposition of Defendant and assisting with settlement papers, preliminary approval motion practice and the present fee petition. I have spent approximately 5.2 hours on Communications with co-counsel, approximately 2.6 hours on Communications with opposing counsel, approximately 3.5 hours on Communications (other), approximately 30.7 hours on Motion Practice, approximately 0.1 hours Communications with Client; approximately 1.7 hours on discovery, approximately 10.3 hours on Investigations, approximately 30.2 hours on Mediation/Settlement, approximately 0.6 hours on document

1 review, approximately 1.3 hours on administrative tasks, and approximately 6.6 hours on  
2 Miscellaneous tasks.

3 6. I anticipate incurring at least 14 hours of additional time to work on a motion for final  
4 approval of the class action settlement, preparing for the fairness hearing scheduled for  
5 January 16, 2024, and otherwise assisting Settlement Class Counsel, for a total of 96.5  
6 hours and a lodestar of \$32,725.

7 7. Based on my experience litigating consumer class actions as detailed below, I believe my  
8 proposed hourly rate of \$350 for this complex litigation is fair and reasonable.

9 8. In the case of *Bell v. Redfin*, No. 3:20-cv-02264-AJB-SBC (S.D. Cal.), which is an  
10 employment class actions settlement pending a ruling on a motion for final approval and  
11 for attorneys' fees and costs (hearing is set for November 2023), I have requested approval  
12 for an hourly rate of \$350.

13 9. I was previously approved for a requested hourly rate of \$275 in *Nese v. Scenario*  
14 *Cockram USA, Inc.*, No. 8:21-cv-00814-DOC-JDE (C.D. Cal.).

15 **EXPERIENCE**

16 10. I have been appointed as class counsel for an employment wage-and-hour class action by  
17 Judge David O. Carter of the U.S. District Court for the Central District of California in  
18 *Nese v. Scenario Cockram USA, Inc.*, No. 8:21-cv-00814-DOC-JDE (C.D. Cal.) (wage-  
19 and-hour class settlement finally approved for common fund of \$275,000).

20 11. I regularly assist partners and other seasoned associate attorneys at my firm with  
21 preparing for class certification hearings, class mediations, and class action settlements as  
22 well as preparing for and negotiating mass settlements. Some of the matters I have  
23 worked on in these regards include, but are not limited to, the following:

- 24 a. *Hooks v. Dignity Health et al.*, No. 23STCV02800 (Sup. Ct. Los Angeles) (on  
25 September 1, 2023, presented oral argument on demurrer in putative class  
26 action alleging violations of the UCL and for Unjust Enrichment);

- b. *Goodwin v. Whole Foods Market, Inc.*, No. 21STCV40456 (Sup. Ct. Los Angeles) (assisted with drafting motion for class certification, filed on June 26, 2023, in product false advertising case);
- c. *In re Ford Motor Co. DPS6 Powershift Transmission Products Liability Litigation*, MDL No. 2814 (C.D. Cal.) (assisted with drafting mediation brief for two-day mediation, which I attended and assisted co-counsel in negotiating settlement for several plaintiffs);
- d. *Anthony Barbano, et al. v. JP Morgan Chase Bank, N.A.*, No. 5:19-cv-01218-JGB-SP (C.D. Cal.) (assisted with drafting final approval motion and motion for attorneys’ fees, costs and service award in a class action involving claims under RESPA);
- e. *Franklin v. Ocwen Loan Servicing, LLC*, No. 3:18-cv-03333-SI (N.D. Cal.) (assisted with drafting class settlement approval motion papers in CIPA class action); and
- f. *Roy Lo v. Nutribullet LLC*, No. 21STCV12852 (Sup. Ct. Los Angeles) (assisted with drafting preliminary approval motion in a class action involving violations of the SBA, CLRA, and the UCL).

12. I have also assisted with drafting appellate briefs and preparing co-counsel for oral arguments before the Ninth Circuit and Eleventh Circuits in the following matters:

- a. *Sylvester v. Merchants Credit Corp.*, 2021 U.S. App. LEXIS 31528 (9th Cir. 2021);
- b. *Ami Dunn v. Global Trust, LLC, et al.*, No. 21-10120 (11th Cir. 2021).

13. I have federal trial experience, having litigated a case to trial in the U.S. District Court for the Central District of California in *Paul Richardson v. J. Pletting, et al.*, No. 5:18-cv-00961-KES (at the end of a four-day pro bono civil rights trial with a hung jury, Magistrate Judge Karen E. Scott thanked counsel for their “thorough preparation and . . . for . . . maintaining decorum and cordiality . . .”).

**RECOGNITIONS**

14. As a recipient of the State Bar of California’s Wiley W. Manuel Certificate for Pro Bono Legal Services, I have also been recognized by my peers for my work in voluntarily providing “legal services to the poor and disadvantaged, improving the law and the legal system and increasing access to justice.”

I declare under penalty of perjury that the foregoing is true and correct, executed on September 28, 2023, pursuant to the laws of the State of California at Los Angeles, California.

/s/ Gil Melili  
Gil Melili