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KIERRE J. TOWNSEND

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES**

11 KIERRE J. TOWNSEND, on behalf of herself,
all others similarly situated,

12 *Plaintiff,*

13
14 vs.

15 G2 SECURE STAFF, L.L.C., a Texas limited
liability company; G2 SECURE STAFF CA,
16 L.P., a Texas limited partnership; and DOES 1
through 50, inclusive,

17 *Defendants.*

Case No. 18STCV04429

**DECLARATION OF THOMAS SEGAL
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND FOR AN AWARD
OF ATTORNEYS' FEES AND COSTS**

Hearing Information

Date: July 7, 2020
Time: 11:00 a.m.
Department: 10
Judge: Hon. William Highberger

DECLARATION OF THOMAS SEGAL

I, THOMAS SEGAL, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California, and an attorney of record for Plaintiff Kierre Townsend (“Plaintiff”) in her action against Defendants G2 SECURE STAFF, L.L.C. and G2 SECURE STAFF CA, L.P. (“G2” or “Defendants”). Except for those matters stated on information and belief, which I am informed and believe to be true and correct, I have personal knowledge of all matters set forth herein. If called as a witness, I could and would competently testify thereto under oath.
2. I graduated from UC Hastings College of Law in 2002 and have been practicing law since 2002. I have substantial litigation experience including two class action bench trials and arguing before the California Court of Appeal and Ninth Circuit. Since 2006 I have exclusively represented individuals and small businesses in class actions and other complex litigation. I have successfully obtained class certification against numerous corporate defendants including T-Mobile, First American Title Company, Fidelity National Title Company and Home Depot.
3. The Laffey Matrix provides that for attorneys with 11 to 19 years of experience an hourly rate of \$747 an hour is appropriate. Therefore, my rate of \$700 an hour is slightly lower than the recommended Laffey Matrix rate.
4. I have been involved in this case since it was filed. Work I have performed on this case includes communicating with outside counsel and in the firm internally, reviewing documents, drafting the mediation brief, revising the motion for preliminary approval and motion for final approval.

I declare under the penalty of perjury of the laws of California that the foregoing is true and correct to the best of my knowledge. Executed June 4, 2020 at Los Angeles, California.

DocuSigned by:

 THOMAS SEGAL
 Declarant

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PROOF OF SERVICE

I am a citizen of the United States and am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 315 South Beverly Drive, Suite 315 Beverly Hills, CA 90212.

On June 5, 2020, I served the foregoing documents described as:

DECLARATION OF THOMAS SEGAL IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND AWARD OF ATTORNEY FEES AND COSTS

in this action by transmitting a true copy thereof enclosed in a sealed envelope addressed as follows:

Robert Jon Hendricks
Rj.hendricks@morganlewis.com
Kathy H. Gao
Kathy.gao@morganlewis.com
Linda Shen
MORGAN, LEWIS & BOCKIUS LLP
300 South Grand Avenue, 22nd Floor
Los Angeles, California 90071

[X] (VIA CASE ANYWHERE)

A true and correct copy of said document was sent to the parties listed on the Electronic Service List maintained by Case Anywhere in the manner set forth in the Court's Order Authorizing Electronic Service.

[X] STATE I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 5, 2020 at Beverly Hills, California.



Lauren Farrington