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8 *Attorneys for Plaintiffs Norma Santizo*
and Mimi Lee, individually and on behalf
 9 *of all others similarly situated*

10
 11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 12 IN AND FOR THE COUNTY OF SAN MATEO

14 NORMA SANTIZO and MIMI LEE,
 15 individually and on behalf of all others
 16 similarly situated,

16 Plaintiffs,

17 vs.

18 NEAL’S COFFEE SHOP, INC., a California
 19 corporation; SUNIL PRASAD, an individual,
 and DOES 1 through 20, inclusive,

20 Defendants.

Case No. 24-CIV-03380
 Assigned for All Purposes to
 Honorable Nicole S. Healy, Dept. 28

**DECLARATION OF CONNIE K. CHAN IN
 SUPPORT OF PLAINTIFFS’ MOTION
 FOR ATTORNEY’S FEES, COSTS, AND
 SERVICE AWARDS**

Date: March 25, 2026
 Time: 2:00 p.m.
 Place: Dept. 28
 Judge: Honorable Nicole S. Healy

Complaint Filed: June 17, 2024
 Trial Date: None Set

1 I, Connie K. Chan, declare as follows:

2 1. I am a partner in the law firm of Altshuler Berzon LLP in San Francisco and am a
3 member of the State Bar of California. I have personal knowledge of the matters set forth herein
4 and could competently testify upon these matters if called upon to do so.

5 2. I make this declaration in support of Plaintiffs' Motion for Attorney's Fees, Costs,
6 and Service Awards in the above captioned matter.

7 **Background and Experience**

8 3. I received my J.D. from Yale Law School in 2010 and my B.A. from Yale
9 University in 2005.

10 4. After law school, I served as a law clerk to the Honorable Michael Daly Hawkins,
11 United States Court of Appeals, Ninth Circuit, and to the Honorable Lucy H. Koh, United States
12 District Court, Northern District of California. After clerking, I joined Altshuler Berzon LLP as
13 an associate. From 2018 to 2020, I worked as a deputy city attorney in the Affirmative Litigation
14 Division of the Los Angeles City Attorney's Office, where I served as lead counsel in complex
15 consumer protection actions brought on behalf of the People of California. I thereafter returned to
16 Altshuler Berzon as a partner in 2020.

17 5. My practice includes class action and complex civil litigation in state and federal
18 courts. I have served as plaintiff's counsel or class counsel in numerous class actions in both
19 federal and state trial court, including: *In re Bank of America Cal. Unemployment Benefits*
20 *Litigation*, No. 3:21-md-02992-GPC-MSB (S.D. Cal.) (appointed class counsel in statewide class
21 action on behalf of California unemployment insurance beneficiaries against state contractor
22 bank for alleged violations of statutory, constitutional, and common law); *Tassinari v. The*
23 *Salvation Army*, Case No. 1:21-cv-10806-LTS (D. Mass.) (appointed class counsel in class action
24 on behalf of individuals with opioid use disorder alleging disability discrimination in violation of
25 Section 504 and the Fair Housing Act); *McBurnie v. Acceptance Now, LLC*, Case No. 3:21-cv-
26 01429-JD (N.D. Cal.) (appointed class counsel in statewide class action on behalf of low-income
27 consumers against rent-to-own company that allegedly violates price-cap restrictions imposed by
28 California's Karnette Rental Purchase Act and UCL); *Jewett v. Oracle Corp.*, Case No. 17-CIV-

1 02669 (San Mateo Super. Ct.) (along with Rudy Exelrod Zieff & Lowe LLP (“REZL”), class
2 counsel in \$25 million settlement of statewide class action on behalf of women employees for
3 alleged violations of the California Equal Pay Act and UCL); *Sarmiento v. Fresh Harvest, Inc.*,
4 Case No. 5:20-cv-7974-BLF (class counsel in settlement of class action on behalf of agricultural
5 truck drivers alleging violations of Migrant and Seasonal Agricultural Workers Protection Act
6 and various Labor Code provisions); *Spicher v. Aidells Sausage Co.*, Case No. 3:15-cv-05012-
7 WHO (N.D. Cal.) (along with REZL, class counsel in settlement of statewide class action on
8 behalf of low-wage workers alleging various violations of the Labor Code); and *Cancilla v.*
9 *Ecolab, Inc.*, Case No. 12-cv-03001-JD (N.D. Cal.) (along with REZL and other firms, class
10 counsel in settlement of nationwide class action on behalf of low-wage workers alleging
11 misclassification under the Fair Labor Standards Act and various state wage-and-hour laws).

12 6. In 2017, I was named a “California Lawyer of the Year” in the Worker Health and
13 Safety category. I have been selected to the Northern California Super Lawyers every year since
14 2022 and have been listed as one of *Lawdragon Magazine’s* 500 leading plaintiff employment
15 and civil rights lawyers every year since 2021.

16 **Rudy Exelrod Zieff & Lowe’s Rates**

17 7. I am familiar with REZL’s work, accomplishments, and reputation in the legal
18 community. I have co-counseled several cases with REZL, including *Jewett v. Oracle America,*
19 *Inc.*, Case No. 17-CIV-02669 (San Mateo Super. Ct.), *Spicher v. Aidells Sausage Co.*, Case No.
20 3:15-cv-05012-WHO (N.D. Cal.), and *Cancilla v. Ecolab, Inc.*, Case No. 12-cv-03001 (N.D. Cal.
21 2012). In October 2024, the Court in *Jewett* approved class counsel’s request for attorney’s fees,
22 finding that “Class Counsel’s hourly rates are reasonable, particularly given Class Counsel’s
23 substantial experience in complex class actions and employment discrimination litigation.”

24 8. In litigating fee motions in state and federal court, I have had considerable
25 opportunity to familiarize myself with the hourly rates charged by attorneys of varying degrees of
26 experience. In my fees practice, I have also reviewed the hourly rates of other law firms in
27 California and elsewhere. I am also familiar with the hourly rates awarded by state and federal
28 courts in the cases in which my law firm has acted as counsel, as well as the rates awarded in

1 many other fees cases by state and federal courts in California.

2 9. Below are some of the representative 2026 rates that my law firm currently
3 charges to commercial hourly-paying clients:

Attorney	Graduation Year	Hourly Rate
Partner	2001	\$1,215
Partner	2010	\$1,080
Associate	2023	\$640
Paralegals	N/A	\$365

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9 10. Altshuler Berzon LLP’s commercial rates are the hourly rates that Altshuler
10 Berzon bills to its full-rate clients who are billed, and pay, for legal services on a monthly basis.
11 Altshuler Berzon’s commercial hourly rates (or their historical equivalents) have also been
12 approved by numerous courts in cases arising under fee-shifting statutes and/or involving
13 common-fund fees, including in *Freedom from Religion Foundation, Inc. v. Chino Valley Unified*
14 *Sch. Dist. Bd. of Educ.*, No. EDCV 14-2336 JGB (DTBx) (C.D. Cal. Jan. 7, 2026); *Summers v.*
15 *Cross Country Healthcare, Inc.*, No. CGC-23-611080 (San Francisco Super. Ct. Mar. 14, 2025);
16 *Jewett v. Oracle America, Inc.*, No. 17-CIV-02669 (San Mateo Super. Ct. Oct. 10, 2024);
17 *Sarmiento v. Fresh Harvest*, No. 5:20-cv-7974-BLF (N.D. Cal. Oct. 30, 2023); *Chang v. Wells*
18 *Fargo Bank, N.A.*, No. 19-cv-01973-HSG (N.D. Cal. Oct. 19, 2023); *Center for Workers Rights*
19 *v. Employment Development Dept.*, No. RG21106525 (Alameda County Superior Ct., June 5,
20 2023); *Ellis v. Google, LLC*, No. CGC-17-561299 (S.F. County Super. Ct. Oct. 25, 2022); *Kang*
21 *v. Wells Fargo Bank, N.A.*, No. 17-CV-06220-BLF, 2021 WL 5826230, at *17 (N.D. Cal. Dec. 8,
22 2021).

23 11. The hourly rates charged by Rudy, Exelrod, Zieff & Lowe, LLP are comparable to
24 my rates and those of attorneys and paralegals at my firm. I understand that REZL is seeking fees
25 for its work as Plaintiffs’ counsel in this case based on the following hourly rates: \$1,150 for
26 partner John Mullan (2002 graduate), \$950 for partner Michelle Lee (2009 graduate), \$600 for
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1 associate Jessica Spierer (2022 graduate), \$500 for associate Julia Hermann (2023 graduate), and
2 \$400 for paralegals.

3 12. Based on my familiarity with REZL’s experience, skill, and reputation in the legal
4 community and my knowledge and experience of billing rates for work of similar complexity, it
5 is my opinion that the hourly rates sought by Plaintiffs’ counsel in this case are well within the
6 range of prevailing market rates in the community for attorneys and support staff of similar skill,
7 experience, and reputation performing work of similar complexity.

8 I declare under penalty of perjury, under the laws of the United States, that the foregoing is
9 true and correct. Executed January 29, 2026 in Burlingame, California.

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13 CONNIE K. CHAN
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