

# Exhibit 2

Jahan C. Sagafi (Cal. State Bar No. 224887)  
OUTTEN & GOLDEN LLP  
One California Street, 12<sup>th</sup> Floor  
San Francisco, CA 94111  
Telephone: (415) 638-8800  
Facsimile: (415) 638-8810  
[jsagafi@outtengolden.com](mailto:jsagafi@outtengolden.com)

Kevin J. Stoops (admitted *pro hac vice*)  
Jason J. Thompson (admitted *pro hac vice*)  
Charles R. Ash, IV (admitted *pro hac vice*)  
SOMMERS SCHWARTZ, P.C.  
One Towne Square, Suite 1700  
Southfield, Michigan 48076  
Telephone: (248) 355-0300  
Facsimile: (248) 436-8453  
[kstoops@sommerspc.com](mailto:kstoops@sommerspc.com)  
[jyoung@sommerspc.com](mailto:jyoung@sommerspc.com)

Attorneys for Plaintiffs and Proposed Class and  
Collective Members

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

DEBRA WOLF, individually and on behalf  
of all other similarly situated individuals,

Plaintiffs,

v.

THE PERMANENTE MEDICAL GROUP,  
INC., a California corporation,

Defendant.

Case No. 17-CV-05345-VC

**DECLARATION OF JAHAN C. SAGAFI  
IN SUPPORT OF MOTION FOR  
ATTORNEYS' FEES,  
LITIGATION/SETTLEMENT  
ADMINISTRATION EXPENSES, AND  
CLASS REPRESENTATIVE SERVICE  
AWARDS**

Hearing Date: N/A

Time: N/A

Courtroom: 4 – 17th Floor

Judge: The Honorable Vince Chhabria

1 I, JAHAN C. SAGAFI, declare as follows:

2 1. I am a partner at Outten & Golden LLP (“O&G”), attorneys for the plaintiffs and  
3 the settlement class, along with my co-counsel Sommers Schwartz, PC (“Sommers Schwartz”). I  
4 make these statements based on personal knowledge and would so testify if called as a witness.

5 2. This Declaration is submitted in support of the Plaintiffs’ Motion for Attorneys’  
6 Fees, Costs, and Class Representative Service Awards.

7 3. I am a member in good standing of the bar of the State of California, as well as  
8 the U.S. District Court for the Northern District of California.

9 **Outten & Golden LLP**

10 4. O&G is a 60+ attorney firm with offices in New York, San Francisco, Chicago,  
11 and Washington, D.C., representing plaintiffs in a wide variety of employment matters, including  
12 individual and class action litigation involving wage and hour, discrimination, and harassment  
13 claims, as well as contract and severance negotiations. In addition to taking contingency fee  
14 matters, O&G maintains a substantial practice of hourly work for paying clients and often  
15 receives fee awards in the cases it handles, giving O&G a solid foundation of resources from  
16 which to take on class action matters such as this one.

17 5. O&G has represented plaintiffs in hundreds of class and collective actions  
18 asserting employment rights on behalf of workers. O&G attorneys “have . . . extensive  
19 experience and expertise in prosecuting wage-and-hour class actions and collective actions.”  
20 *Lillehagen v. Alorica*, No. 13 Civ. 0092, ECF No. 262 (C.D. Cal. May 31, 2016); *Walsh v.*  
21 *CorePower Yoga LLC*, No. 16-cv-05610, 2017 WL 4390168, at \*7 (N.D. Cal. Oct. 3, 2017)  
22 (James, M.J.) (O&G “are experienced class action attorneys who have been qualified as lead  
23 class counsel by other California courts, both in employment wage and hour litigation and in  
24 other types of cases”); *Galeener v. Source*, No. 13 Civ. 4960, ECF No. 131 (N.D. Cal. Mar. 13,  
25 2015) (Chhabria, J.) (O&G have “extensive experience and expertise in prosecuting wage-and-  
26 hour class actions and collective actions”); *Yuzary v. HSBC Bank USA, N.A.*, No. 12 Civ. 3693,  
27 2013 WL 1832181, at \*4 (S.D.N.Y. Oct. 2, 2013) (appointing O&G as class counsel, finding that  
28

1 O&G attorneys “have substantial experience prosecuting and settling employment class actions,  
2 including wage and hour class actions[,] and are well-versed in wage and hour and class action  
3 law”); *Johnson v. Brennan*, No. 10 Civ. 4712, 2011 WL 1872405, at \*2 (S.D.N.Y. May 17,  
4 2011) (same); *accord Ballinger v. Advance Magazine Publishers, Inc.*, No. 13 Civ. 4036, 2014  
5 WL 7495092, at \*7 (S.D.N.Y. Dec. 29, 2014) (appointing O&G as class counsel, explaining that  
6 “[b]ased on the firm’s performance before me in this and other cases and its work in the  
7 foregoing and other cases, I have no question that it will prosecute the interests of the class  
8 vigorously”); *Perez v. Allstate Ins. Co.*, No. 11 Civ. 1812, 2014 WL 4635745, at \*25 (E.D.N.Y.  
9 Sept. 16, 2014) (appointing O&G as class counsel and noting that “O & G has the requisite  
10 experience in handling class actions . . . , are well versed in the applicable law, and have the  
11 resources necessary to represent the NYLL Class fairly and adequately”); *Capsolas v. Pasta*  
12 *Res., Inc.*, No. 10 Civ. 5595, 2012 WL 1656920, at \*2 (S.D.N.Y. May 9, 2012) (O&G attorneys  
13 “have years of experience prosecuting and settling wage and hour class actions, and are well-  
14 versed in wage and hour law and in class action law”); *Alli v. Boston Mkt. Corp.*, No. 10 Civ. 4,  
15 2011 WL 6156938, at \*2 (D. Conn. Dec. 9, 2011) (O&G counsel are “qualified and experienced  
16 in the issues raised in” wage and hour overtime litigation); *McMahon v. Olivier Cheng Catering*  
17 *& Events, LLC*, No. 08 Civ. 8713, 2010 WL 2399328 at \*6 (S.D.N.Y. Mar. 3, 2010) (O&G “are  
18 experienced employment lawyers with good reputations among the employment law bar . . .  
19 [and] have prosecuted and favorably settled many employment law class actions, including wage  
20 and hour class actions”); *Damassia v. Duane Reade, Inc.*, 250 F.R.D. 152, 158 (S.D.N.Y. 2008)  
21 (O&G lawyers have “an established record of competent and successful prosecution of large  
22 wage and hour class actions, and the attorneys working on the case are likewise competent and  
23 experienced in the area”).

#### **My Background and Experience**

24           6. I graduated *magna cum laude* from Harvard College in 1994, where I  
25 concentrated in Social Studies. I graduated from Harvard Law School in 2001 and throughout  
26 my practice have specialized in class actions, with a focus on employment class actions.  
27  
28

1 7. For the first year after I graduated from law school, I clerked for the Honorable  
2 William W Schwarzer, Senior Judge of the United States District Court for the Northern District  
3 of California.

4 8. Immediately thereafter, in 2002, I joined Loeff, Cabraser, Heimann & Bernstein,  
5 LLP, where I became a partner in January 2008. My practice consisted primarily of representing  
6 class members in employment class actions (including wage and hour, employment  
7 discrimination, and other employment-related disputes), as well as significant work representing  
8 plaintiffs in consumer class actions and appeals of consumer and product liability cases in the  
9 Ninth Circuit and other appellate courts.

10 9. I joined O&G as the partner in charge of the San Francisco office, which we  
11 opened in fall 2013. Here, my practice has consisted almost exclusively of representing workers  
12 in employment class actions (including wage and hour, employment discrimination, and other  
13 employment-related disputes).

14 10. Currently, I represent plaintiffs asserting employment claims in representative  
15 actions in this District, other federal districts, and California state court.

16 a. Ongoing wage and hour class actions in this District. Currently, I  
17 represent plaintiffs and proposed class members asserting wage and hour claims in several class  
18 and collective action cases in this District, including: *Whitworth v. SolarCity Corp.*, No. 16-cv-  
19 1540-JSC (N.D. Cal.) (off-the-clock and meal break claims on behalf of installers); *Godhigh v*  
20 *Savers*, No. 16-cv-2874-WHO (N.D. Cal.) (misclassification claims on behalf of retail store  
21 assistant managers); *Wolf v. Permanente Medical Group, Inc.*, No. 17-cv-05345-VC (N.D. Cal.)  
22 (off-the-clock claims on behalf of telephone service representatives).

23 b. Ongoing discrimination class actions in this District. Currently, I  
24 represent plaintiffs and proposed class members asserting employment discrimination claims in  
25 several class and collective action cases in this District, including: *del Toro Lopez v. Uber*  
26 *Technologies, Inc.*, No. 17-cv-06255-YGR (N.D. Cal.) (nationwide gender and race  
27 discrimination class action on behalf of software engineers); *Rabin v. PricewaterhouseCoopers*  
28

1 *LLP*, No. 16-cv-2276-JST (N.D. Cal.) (nationwide age discrimination class action on behalf of  
2 applicants for introductory accountant positions); *Onuoha v. Facebook, Inc.*, No. 16-cv-6440-  
3 EJD (N.D. Cal.) (discrimination claims on behalf of African American, Latino, and Asian  
4 American Facebook users excluded from employment, housing, and credit ads provided to  
5 similarly situated white users).

6 c. Ongoing employment class actions in other districts. I also represent  
7 plaintiffs and proposed class members asserting employment claims in several federal class and  
8 collective action cases in other Districts, including: *Strauch v. Computer Sciences Corp.*, No.  
9 14 Civ. 956 (D. Conn.) (unanimous jury verdict for plaintiffs on classwide basis, with  
10 willfulness finding, in December 2017) (technical support worker exemption misclassification  
11 claims); *Delnoce v. GlobalTranz Enterprises*, No. 17 Civ. 01278-MHB (D. Ariz.)  
12 (misclassification claims on behalf of sales representatives and freight brokers). *Strauch* is one  
13 of a handful of employment class actions that have been successfully tried to verdict.

14 d. Ongoing employment class actions in California state courts. I also  
15 represent plaintiffs asserting employment-related claims in class actions in California state court:  
16 *Borrego v. Raley's Family of Fine Stores*, 34-2015-00177687 (Sacramento Co. Super. Ct.)  
17 (pregnancy discrimination); *Chen v. Morgan Stanley Smith Barney LLC*, 30-2014-00724866-  
18 CU-OE-CJC (Orange Co. Super. Ct.) (PAGA claims on behalf of Financial Advisors regarding  
19 reimbursement of business expenses); *Lee v. The Hertz Corp.*, No. CGC-15-547520 (San  
20 Francisco Co. Super. Ct.) (Fair Credit Reporting Act claims based on employment application  
21 process); *Beilke v. Uber Technologies, Inc.*, No. CGC-17-560916 (San Francisco Co. Super. Ct.)  
22 (claims by drivers for miscalculation of fees contractually owed).

23 11. During my career, I have represented plaintiff classes and collectives in many  
24 employment class actions.

25 a. Past wage and hour class actions in this District. In the past, I have  
26 successfully represented plaintiff classes in other wage and hour class and/or collective actions in  
27 this District, including: *Zamora v. Lyft, Inc.*, No. 16-cv-02558-VC (N.D. Cal.) (\$1,950,000  
28

1 settlement for wage and hours claims related to driver surcharges); *Walton v. AT&T Svcs., Inc.*,  
2 No. 15-cv-03653-VC (N.D. Cal.) (\$2,750,000 settlement for overtime misclassification claims of  
3 deliverers and designers of corporate trainings in 2018); *Brown v. Permanente Medical Group,*  
4 *Inc.*, No. 16-cv-05272-VC (N.D. Cal.) (\$6,255,000 settlement for off-the-clock claims for advice  
5 nurses in 2017); *Zajonc v. Morgan Stanley & Co. LLC*, No. 14 Civ. 5563 (N.D. Cal.)  
6 (\$5,995,000 settlement as part of multi-case settlement) (Final Analyst trainee off-the-clock  
7 wage and hour claims); *Zaborowski v. MHN Gov't Servs.*, No. 12 Civ. 5102 (N.D. Cal.) (FLSA  
8 conditional collective action certification granted; arbitration motion defeated and affirmed on  
9 appeal, 601 F. App'x 461 (9th Cir. 2014); settled on nationwide class basis) (military base  
10 counselor independent contractor misclassification claims); *Buccellato v. AT&T, Inc.*, No. 10  
11 Civ. 463 LHK (N.D. Cal.) (\$12.5 million settlement of overtime misclassification claims for  
12 technical support workers in 2011); *Lewis v. Wells Fargo & Co.*, No. 08 Civ. 2670 CW (N.D.  
13 Cal.) (\$6.72 million settlement for overtime misclassification claims for technical support  
14 workers in 2011); *Higazi v. Cadence Design Systems, Inc.*, No. 07 Civ. 2813 JW (N.D. Cal.)  
15 (\$7.7 million settlement overtime misclassification claims for technical support workers in  
16 2008); *Adams v. Inter-Con Security Services, Inc.*, No. 06 Civ. 5428 MHP (N.D. Cal.) (\$4  
17 million settlement of wage and hour off-the-clock work class and collective action on behalf of  
18 security officers in 2008); *Rosenburg v. Int'l Bus. Machines Corp.*, No. 06 Civ. 430 SBA (N.D.  
19 Cal.) (\$65 million settlement in 2007 for overtime misclassification claims for technical support  
20 workers); *Gerlach v. Wells Fargo & Co.*, No. 05 Civ. 585 CW (N.D. Cal.) (\$12.8 million  
21 settlement in 2007 for overtime misclassification claims for business systems consultants).

22           b.     Past discrimination class actions in this District. In the past, I have  
23 represented plaintiff classes in employment discrimination class actions, including: *Wynne v.*  
24 *McCormick & Schmick's Seafood Restaurants, Inc.*, No. 06 Civ. 3153 CW (N.D. Cal.)  
25 (\$2.1 million settlement of race discrimination class action in 2008); *Gonzalez v. Abercrombie &*  
26 *Fitch Stores, Inc.*, Case No. 03 Civ. 2817 SI (N.D. Cal.) (\$50 million settlement of race and  
27 gender discrimination class action in 2005).

1 c. Past wage and hour cases outside this District. I have also successfully  
 2 represented plaintiff classes in other wage and hour class and/or collective actions in other  
 3 federal and state courts, including: *Bush v. GlobalTranz Enterprises, Inc.*, No. 15-cv-0536-DJH  
 4 (D. Ariz.) (\$640,000 settlement for inside salespeople's misclassification claims); *Lillehagen v.*  
 5 *Alorica, Inc.*, No. 13 Civ. 92 (C.D. Cal.) (nationwide class action settlement) (call center worker  
 6 off-the-clock claims); *Sherrill v. Premera Blue Cross*, No. 10 Civ. 590 (W.D. Wash.) (\$1.45  
 7 million settlement in 2011 for 133 class members in overtime misclassification case); *Danieli v.*  
 8 *Int'l Bus. Machines Corp.*, No. 08 Civ. 3688 (S.D.N.Y.) (\$7.5 million settlement of overtime  
 9 misclassification claims in 2010); *In re Farmers Ins. Group Claims Reprs. Overtime Litigation*,  
 10 MDL Docket No. 1439 (D. Or.) (\$8 million settlement of overtime misclassification class and  
 11 collective action on behalf of insurance claims adjusters in 2010); *Giannetto v. CSC Corp.*, No.  
 12 03 Civ. 8201 (C.D. Cal.) (\$24.0 million settlement in 2005 for overtime misclassification  
 13 claims); *Barnett v. Wal-Mart*, No. 01-2-24553-8 (King Cty. Sup. Ct.) (\$35 million settlement of  
 14 wage and hour off-the-clock class action in 2009).

15 12. In addition, I have represented plaintiffs in various appeals.

16 a. I have represented plaintiffs at oral argument in *Marsh v. J. Alexander's*  
 17 *LLC*, No. 15-15791 (9th Cir. en banc 2018) (validity of DOL's 20% rule from Field Operations  
 18 Handbook, interpreting 29 C.F.R. § 531.56e (dual jobs regulation)); *Guess?, Inc. v. Russell*, No.  
 19 15-56870 (9th Cir. 2017) (delegation of class arbitrability to the arbitrator); *Zaborowski v. MHN*  
 20 *Government Services, Inc.*, No. 13-15671 (9th Cir. 2014) (unconscionability analysis of  
 21 arbitration clause); *Taragan v. Nissan North America, Inc.*, No. 11-15664 (9th Cir. 2012)  
 22 (consumer deception regarding defective automobile design); *Degelmann v. Advanced Medical*  
 23 *Optics Inc.*, No. 10-15222 (9th Cir. 2011-12) (medical device preemption); *Integon Corp. v.*  
 24 *Gordon*, No. 1D05-3187 (Fla. 1st DCA 2007) (class certification of consumer claims asserting  
 25 insurance pricing deception).

26 b. I have also volunteered to write amicus briefs in the Ninth Circuit and  
 27 other appellate courts, including: *Meyer v. Kalanick*, No. 16-2750 (2d Cir. 2016) (internet  
 28



1 contract formation); *Braun v. Wal-Mart Stores, Inc.*, No. 32 EAP 2012 (S. Ct. Pa. 2013)  
2 (plaintiffs' class action trial victory upheld by Pennsylvania's highest court); *Mazza v. American*  
3 *Honda Motor Co.*, No. 09-55376 (9th Cir. 2012) (consumer class action choice-of-law issues);  
4 *DeLodder v. Aerotek, Inc.*, No. 10-56755 (9th Cir. 2011) (Rule 23 class certification of overtime  
5 misclassification case); *Gutierrez v. Johnson & Johnson*, No. 07-8025 (3rd Cir. 2007)  
6 (employment discrimination class action); *Ledbetter v. The Goodyear Tire & Rubber Co.*, No.  
7 05-1074 (U.S. S. Ct. 2006) (employment discrimination); *Dukes v. Wal-Mart Stores, Inc.*, Nos.  
8 04-16688 & 04-16720 (9th Cir. 2005) (employment discrimination class action).

9 13. In addition to being an active litigator, I have been involved in many educational  
10 and legal groups, including the American Constitution Society (Chair of the Executive Board of  
11 the Bay Area Lawyer Chapter, 2009-11; member of the Bay Area Lawyer Chapter Advisory  
12 Board 2014-present); Alliance for Justice (board of directors, 2014-present); Public Advocates,  
13 Inc. (board of governors, 2012-15); the American Civil Liberties Union of Northern California  
14 (2006-11) (Chair of the Legal Committee, 2010-11; Vice Chair, 2010-11; Executive Committee,  
15 2009-11); the American Bar Association Labor & Employment Law Section; the State Bar of  
16 California (Litigation Section Executive Committee); the National Employment Lawyers  
17 Association; the American Association for Justice; the Consumer Attorneys of California; and  
18 the Bar Association of San Francisco (volunteer attorney fee dispute arbitrator).

19 14. I have also received several awards, including being named one of the Top 75  
20 Labor & Employment Lawyers in California by *The Daily Journal* in 2015-17; Top 100 in the  
21 *Super Lawyers* Top Lists of California lawyers in all fields from 2015-2017; a "Super Lawyer"  
22 from 2014-17 and a "Northern California Rising Star" in 2009, 2010, and 2011 by *Super*  
23 *Lawyers*; being named one of *The Daily Journal's* "Top 20 California Lawyers Under 40" in  
24 January 2011; and receiving the "2008 Community Justice Award," from Centro Legal de la  
25 Raza for my work on behalf of the class in the *Gonzalez v. Abercrombie & Fitch Stores, Inc.* race  
26 and gender discrimination class action.

1                   **Risks of Representation And Resources Expended**

2           15.     This matter has required O&G to expend meaningful time that could have been  
3 spent on other fee-generating matters. We took this matter on a pure contingency basis,  
4 expending this effort without any guarantee of recovery.

5           16.     Because we often decline to represent workers with valid legal claims – who  
6 might pay hourly or retain us on a contingency basis – there is a significant opportunity cost to  
7 each class action we pursue. O&G undertook representation of Plaintiffs in this action without  
8 any assurance of payment for its services, litigating the case on a wholly contingent basis in the  
9 face of significant risk. Class cases of this type are, by their very nature, complicated and time-  
10 consuming. Any lawyer undertaking representation of large numbers of affected employees in  
11 class actions inevitably must be prepared to make a tremendous investment of time, energy, and  
12 resources. Sometimes these cases result in a recovery for the class, and sometimes they do not,  
13 in which case we are paid nothing for our time and costs incurred.

14           17.     For example, we have invested millions of dollars of time and hundreds of  
15 thousands of dollars of expenses with no reimbursement in cases with no recovery. *See, e.g.,*  
16 *Scott v. Chipotle Mexican Grill, Inc.*, No. 12 Civ. 8333, 2017 WL 1287512 (S.D.N.Y. Mar. 29,  
17 2017); *Benedict v. Hewlett-Packard Co.*, No. 13-cv-119-BLF (N.D. Cal.) (technical support  
18 worker exemption misclassification claims); *Barenboim v. Starbucks Corp.*, 21 N.Y.3d 460  
19 (2013); *Pippins v. KPMG LLP*, No. 11 Civ. 377, 2012 WL 6968332 (S.D.N.Y. Nov. 30, 2012).

20                   **Time Invested by Class Counsel**

21           18.     O&G performed the following work in this case: drafting and editing briefing,  
22 supporting Sommers Schwartz’s work in leading discovery efforts, damages calculations, and  
23 settlement discussions; participating in strategy discussions; and related work.

24           19.     Throughout the course of the litigation I have overseen the assignment of work to  
25 attorneys and paralegals in my firm, so that the necessary work would be handled as efficiently  
26 as possible by the lowest-billing member of the team who could feasibly, reliably, and efficiently  
27 perform each task.

1           20. I made every effort to litigate this action in an efficient and cost-effective manner  
2 by reducing duplication of effort and assigning work to the lowest billing timekeepers available  
3 for each task wherever feasible.

4           21. It is my firm's practice to maintain contemporaneous time records setting forth  
5 the amount of time spent (rounded to the nearest one-tenth of an hour) on each task and each  
6 case, and with explanatory statements regarding the actual task involved. My usual practice, and  
7 the usual practice of the other attorneys in my firm, is to record on daily time logs only those  
8 hours that my firm would customarily bill to a commercial client paying on an hourly basis. The  
9 time logs for this matter (including all billers) have been carefully reviewed, and any biller's  
10 time that may have been duplicative or inefficient is deleted from the billing records. While we  
11 also exercised billing judgment after recording my time in this case, and the time of other  
12 attorneys in my office (thus eliminating some of the time that had been originally recorded as an  
13 exercise of reasonable billing judgment), I also exercised billing judgment before recording my  
14 time, because I routinely did not enter time that I thought might be duplicative, and I reduced  
15 time for work that I thought may have been inefficient.

16           **The Value Of The Time Invested By Class Counsel**

17           22. As of June 27, 2018, my firm had expended 92 hours on this matter, with work  
18 still continuing. Attached hereto as **Exhibit A** is a true and correct summary by individual of the  
19 hours, billing rate, and lodestar for each biller's work on this matter through that date. The  
20 firm's total lodestar for these hours amounts to \$28,547.50.

21           23. O&G ordinarily and regularly bills clients on an hourly fee basis, based upon each  
22 attorney's standard hourly rate. Currently, O&G's rates range from \$550 to \$1,200 per partner's  
23 hour, \$650 to \$900 per counsel's hour, \$290 to \$500 per associate's hour, \$245 per law clerk's  
24 hour, and \$240 to \$285 per paralegal's hour. The firm's clients regularly accept and pay O&G's  
25 hourly rates.

26           24. My current hourly rate is \$850 per hour. The other O&G attorney who spent  
27 meaningful time litigating this action is Danica Li, whose regular hourly rate is \$280 per hour.

1 These rates are my firm's current billing rates and are supported by the extensive and specialized  
2 experience in these types of cases and recognized expertise described. Our rate structure has  
3 been approved by other courts and has been paid to our firm by hourly-paying clients.

4 25. I have personal knowledge of the hourly rates charged by other attorneys with  
5 comparable experience as well as to the attorneys within the firm who worked on this matter.  
6 Based on that information, I believe that these rates are fully consistent with, if not lower than,  
7 the market rate in San Francisco for attorneys with comparable expertise, experience and  
8 qualifications, and that they are comparable to rates of attorneys specializing in complex  
9 litigation around the country. Based on the information I have, I believe that the rates charged  
10 by O&G for its partner and non-partner attorney time are reasonable and appropriate fees for  
11 those with comparable expertise, experience, and qualifications.

12 **Out-Of-Pocket Costs Incurred by Class Counsel**

13 26. O&G maintains all records regarding litigation expenses incurred on each case. I  
14 have reviewed the records of litigation expenses incurred in this matter. According to our  
15 records, our firm has incurred approximately \$980.60 in costs as of June 29, 2018. This amount  
16 includes costs attributable to telephonic conferences, copies, travel, and expenses associated with  
17 the preparation, research, and filing of the papers in this matter. Attached hereto as **Exhibit B** is  
18 a true and correct summary of the litigation expenses incurred by O&G in this matter. O&G has  
19 not received any reimbursement for any of the monies expended to cover costs incurred.

20 **Class Counsel's Continued Work for the Class Beyond Today's Filing**

21 27. In my experience, administering class settlements of this nature and size requires  
22 a substantial and ongoing commitment. O&G will continue to invest time and incur costs over  
23 the next several months as the firm prepares supplemental briefing for final settlement approval,  
24 communicates with class members regarding the settlement, prepares for and attends the hearing  
25 on settlement approval, and monitors the implementation of the settlement. Thus, the final  
26 lodestar and litigation expense amounts will be higher – potentially significantly higher – than  
27 the current amounts reported in this declaration.

28

\* \* \*

I declare, under penalty of perjury, under the laws of the State of California that the foregoing is true and correct. Executed this 2nd day of July, 2018, at San Francisco, California.

/s/ Jahan C. Sagafi  
Jahan C. Sagafi

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# **Exhibit A**

**Exhibit A -- Lodestar Report**  
**Outten & Golden LLP**  
***Wolf v. Permanente Medical Group, Inc.***  
**July 2, 2018**

Name	Position	Hours	Hourly Rate	Total
<b><u>Attorneys</u></b>				
Jahan C. Sagafi	Partner	6.0	\$850	\$5,100.00
Danica Li	Staff Attorney	57.0	\$280	\$15,960.00
<b>Subtotal</b>		<b>63.0</b>		<b>\$21,060.00</b>
<b><u>Staff</u></b>				
Ashley N. Campbell	Paralegal	3.2	\$260	\$832.00
Natalie Yu	Paralegal	22.3	\$260	\$5,798.00
SF Law Clerk	Law Clerk	3.5	\$245	\$857.50
<b>Subtotal</b>		<b>29.0</b>		<b>\$7,487.50</b>
<b>TOTAL</b>		<b>92.0</b>		<b>\$28,547.50</b>

# **Exhibit B**



**Exhibit B -- Costs Summary**  
**Outten & Golden LLP**  
***Wolf v. Permanente Medical Group, Inc.***  
**July 2, 2018**

<b>Category</b>	<b>Amount</b>
Computerized Research	\$471.78
Court Filing Fees	\$400.00
FedEx/UPS	\$17.77
Postage (U.S. Mail)	\$7.75
Printing/Copying	\$0.30
Travel	\$8.00
PAGA Claim Fee	\$75.00
<b>Total</b>	<b>\$980.60</b>