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15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

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19 JUSTIN LARKIN, ANTHONY TIJERINO, and
 20 AHMAD DEANES, on behalf of themselves and
 all others similarly situated,

21 Plaintiffs,

22 v.

23 YELP!, INC.,

24 Defendant.

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) Case No. 3:11-cv-01503-EMC

) **DECLARATION OF THOMAS V.
 URMY, JR., IN SUPPORT OF
 PLAINTIFFS' MOTION FOR
 PRELIMINARY APPROVAL OF
 CLASS AND COLLECTIVE ACTION
 SETTLEMENT**

) Date: June 1, 2012
 Time: 1:30 p.m.
 Courtroom: 5 – 17th Floor
 Judge: Hon. Edward M. Chen

1 I, Thomas V. Urmey, Jr., being duly sworn, depose and say:

2 1. I am a partner in the law firm of Shapiro Haber & Urmey LLP. Together with
3 Rukin Hyland Doria & Tindall LLP and Gallenberg PC, my firm has represented the Plaintiffs
4 Justin Larkin, Anthony Tijerino and Ahmad Deanes in this action against Yelp, Inc.

5 2. I submit this declaration in support of Plaintiffs' motion for preliminary approval
6 of the proposed settlement in this action.

7 3. My firm has regularly litigated wage and hour class and collective actions for over
8 a decade, both in Massachusetts and across the country. My firm has prosecuted wage and hour
9 cases that have recovered over \$50 million dollars in settlements for employees. Those
10 settlements include two settlements exceeding \$15 million for artists and computer programmers
11 working in the video game industry, another settlement against a different video game company
12 for \$8.5 million, a settlement of \$7 million for municipal trash hauling service employees who
13 were not paid the correct prevailing wage rate, and a \$6.2 million settlement for automobile
14 appraisers working for an insurance company. The cases against the video game companies were
15 California state law claims brought in California state courts. An accurate description of some of
16 my firm's wage and hour cases is available on my firm's website at
17 <http://www.shulaw.com/About-Us/Litigation-Successes/Employee-Wage-Litigation/>.

18 4. My firm's substantial skill and experience in wage and hour class and collective
19 actions has been recognized even by opposing counsel in our prior cases. For example, in
20 connection with a \$7 million settlement of a wage and hour class action on behalf of municipal
21 trash hauling service workers, counsel for defendant in that case, David C. Casey of Littler
22 Mendelson P.C., recognized Shapiro Haber & Urmey LLP as a plaintiff-side firm of the highest
23 quality. Specifically, Mr. Casey stated:

24 Littler Mendelson is a national management sized labor and employment firm with
25 . . . almost 800 employer [clients] in nearly fifty cities at this point; we do more
26 class action defense work than any law firm in the country. And at any one time,
27 we have more than 300 active class action cases that we're defending. And I will
28 say that both the quality of the lawyering by the Plaintiffs and the result they got is
very much on the high end of the spectrum here, and they've earned what they're
asking for. They're fair requests, both for themselves and for the main Plaintiffs.

1 *Mullally v. Waste Mgmt. of Mass., Inc.*, NOCV2006-00882 (Norfolk Super. Ct. June 24, 2010),
2 Transcript of Motion Hearing Before the Honorable Elizabeth Donovan at 13 (typographical
3 errors corrected).

4 5. While Shapiro Haber & Urmy LLP has prosecuted many large wage and hour
5 class and collective actions, the firm also has a *pro bono* practice that provides legal services to
6 individuals in need, and also offers to represent some individuals on a reduced fee basis. My firm
7 has represented a number of low-income, and typically Spanish-speaking, employees who have
8 not been paid all their wages. In one case, my firm represented a Peruvian refugee who worked
9 as a nanny for a family in Brookline, Massachusetts. My firm recovered over \$30,000 in unpaid
10 wages for her.

11 6. In addition to our wage and hour practice, attorneys at my firm have handled
12 asylum cases on a *pro bono* basis. Shapiro Haber & Urmy LLP was honored with the 2011 Pro
13 Bono Law Firm Award from the Political Asylum/Immigration Representation Project (PAIR) for
14 its work in representing those seeking asylum here in the United States.

15 7. My firm was actively involved in this case. My firm was involved in the
16 investigation of this case before filing the action, including engaging in discussions with account
17 executives. My firm also conducted legal research of the various issues underlying the claims in
18 the case and assisted with the briefing of those issues as part of the mediation brief. In addition,
19 my firm attended the mediation and was heavily involved with the negotiation of the settlement
20 reached by the parties.

21 8. I believe the proposed settlement here represents a favorable compromise for the
22 class, providing them with substantial compensation for the claims alleged in this action. Given
23 the risks of continued litigation, both with respect to liability and class certification, as well as the
24 results of counsel's investigation of both the facts and the law, the settlement is, in my opinion,
25 fair, reasonable, and adequate.

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I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct.

Executed this 26th day of April, 2012, at Boston, Massachusetts.

/s/ Thomas V. Urmey, Jr.
Thomas V. Urmey, Jr.