

# EXHIBIT E

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14 Attorneys for Plaintiffs

15 UNITED STATES DISTRICT COURT  
16 CENTRAL DISTRICT OF CALIFORNIA  
17 EASTERN DIVISION  
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19 EVERARDO CARRILLO, *et al.*, for  
20 themselves and all others similarly  
21 situated and the general public,  
22 Plaintiffs,  
23 v.  
24 SCHNEIDER LOGISTICS, INC.,  
*et al.*,  
25 Defendants.

Case No. CV 11-8557 CAS (DTBx)

**DECLARATION OF DAN  
STORMER IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
INTERIM ATTORNEYS' FEES**

Date: December 16, 2013  
Time: 10:00 a.m.  
Judge: Hon. Christina A. Snyder

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**DECLARATION OF DAN STORMER**

I, DAN STORMER, declare and state as follows:

**BACKGROUND**

1. I am an attorney licensed to practice law by the State of California. This declaration is submitted in support of the motion for interim attorneys’ fees filed by plaintiffs in the above-captioned matter. It is submitted to provide current reasonable market rates for counsel. I have personal knowledge of the facts set forth below, and if called to testify, could and would competently testify thereto.

2. I am a partner of the law firm of Hadsell Stormer Richardson & Renick, LLP, which practices primarily in the area of constitutional, civil rights, International Human Rights, and public interest law. I have been in the practice of law since 1974 and a member of the State Bar of California since 1981, an inactive member of the State Bar of Colorado (1974), and former member of the State Bar of Washington (1977).

3. I am “AV Preeminent” rated by Martindale-Hubbell. I have been listed in “The Best Lawyers In America” since 1994. Also, as a result of surveys of attorneys by the *Daily Journal*, I have been repeatedly listed as one of the “Top 100 Most Influential Lawyers in California” (Cal. Law Business). I have been repeatedly selected as a SUPER LAWYER by *Los Angeles Magazine* and *Law & Politics Magazine*. In the same surveys, I was also selected as one of the top 10 lawyers in the Los Angeles area. I have been listed since 1999 in “Guide to the World’s Leading Labor and Employment Lawyers.” I have been named as a Fellow of the College by the Governors of The College of Labor and Employment Lawyers. I have been rated as one of the top ten employment lawyers in this state in the only *Daily Journal* survey done on this subject (February 22, 1993). I have also been listed as one of the top five plaintiff employment lawyers in California (Chambers USA–America’s Leading Business Lawyers, 2003-2004). Our firm is also listed in the same study as being one of the top four firms in the state.



1 lectured extensively on Civil Rights and Harassment to students, bar groups, CEB  
2 organizations and community groups.

3 6. I have been the subject of three *Daily Journal* profiles (May 2005,  
4 August 14, 1989, and December 1985), one profile in the *Los Angeles Lawyer*  
5 (December 1984), one in the *California Lawyer* (December 1988) and one in the  
6 *Legal Exchange* (May 1990) and in *California Law Business* (November 1993) as  
7 well as the *Pasadena Star News* (April 20, 2005). I was also profiled in the Wagner  
8 alumni journal (Fall 2008). Additionally, I was profiled in the Santa Monica  
9 Community College semi-annual publication *Voices on Higher Education* in 1998.

10 7. I have been acknowledged internationally as one of the leading civil  
11 rights, employment, plaintiff-side labor and constitutional law attorneys, as  
12 recognized in “The Best Lawyers in America,” Euromoney Publications’ “Guide to  
13 the Worlds’ Leading Labour and Employment Lawyers,” “America’s Registry of  
14 Outstanding Professionals,” as well as the National and International “Who’s Who of  
15 Professionals.”

16 8. I have tried many cases to juries, including with Theresa Traber, Lauren  
17 Teukolsky and Sandra Muñoz. On a number of occasions I have achieved results of  
18 a million dollars or more. Examples are *Martin v. Texaco* (\$20 million), *Steffens v.*  
19 *Regus* (\$4.64 million), *Schell v. Parks* (\$4.31 million), *Zinzun v. City of Los Angeles*  
20 (\$3.84 million), *Ruiz v. Jackson* (\$1.6 million), *Wysinger v. The Automobile Club of*  
21 *Southern California* (\$1.3 million), and *Bonsangue v. ADP* (slightly over \$1  
22 million). I have been co-counsel or lead counsel in several dozen cases which have  
23 settled for seven or eight figures (no decimals included).

24 **REASONABLENESS OF HOURLY RATES**

25 9. Through my writing and practice, I have become familiar with the  
26 market rates charged by attorneys in Los Angeles and elsewhere. This familiarity  
27 has been obtained in several ways: (1) by handling attorneys’ fee litigation; (2) by  
28 discussing fees with other attorneys; (3) by obtaining declarations regarding

1 prevailing market rates in cases in which I represent attorneys seeking fees; and (4)  
 2 by reviewing attorneys’ fee applications and awards in other cases, as well as articles  
 3 on attorneys’ fees in legal newspapers and treatises.

4 10. On numerous occasions I have had an opportunity to submit attorneys  
 5 fees applications to various courts under 42 U.S.C. § 1983, California Fair  
 6 Employment and Housing Act, Government Code Section 12900, *et seq.*, and other  
 7 fee-shifting statutes. I have done this in both state and federal courts. I have  
 8 repeatedly been awarded attorneys fees at my hourly rate and have regularly been  
 9 granted upward multipliers as well. Since a substantial portion of my firm’s practice  
 10 involves public interest law, we rely upon attorney fee awards as a substantial  
 11 funding base for our firm.

12 11. My 2013 rate is \$875 per hour, which I believe to be consistent with the  
 13 Los Angeles market for attorneys with similar skill, experience and reputation. My  
 14 hourly rates have frequently been approved by courts for work performed in the Los  
 15 Angeles area, including *Pierce v. County of Orange*, Case No. CV 01-00981-ABC-  
 16 MLG (approving my 2011 rate of \$825 per hour) and *Wang v. Chinese Daily News*,  
 17 Case No. CV 04-1498 CBM (JWJx) (approving my 2008 rate of \$800 per hour).

18 12. Although most of my work is done on a contingent basis, I currently  
 19 have a number of clients who pay me for my work on an hourly basis at my 2013 rate  
 20 of \$875 per hour. This further demonstrates that my hourly rate is consistent with  
 21 the Los Angeles market for attorneys with similar skill, experience and reputation.

22 13. I understand that fees are sought for the following attorneys in this case:

Attorney	Year of Graduation from Law School	Years of Experience	Hourly Rate
Michael Rubin	1977	36	\$875

1	Theresa Traber	1984	29	\$795
2	Jonathan Weissglass	1994	19	\$725
3	Janet Herold	1995	18	\$650
4	Sandra Muñoz	1997	16	\$615
5	Lauren Teukolsky	2000	13	\$570
6	Danielle Leonard	2001	12	\$565
7	Jennifer Sung	2004	9	\$490
8	Kevin Kish	2004	9	\$490
9	Eric Brown	2008	5	\$400
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11           14. I am extremely familiar with Theresa Traber, Sandra Muñoz and Lauren  
12 Teukolsky and their skill, experience and reputations. Ms. Traber was an associate  
13 and then a partner at my former law firm, Litt & Stormer, the biggest private public  
14 interest firm in Southern California until its dissolution in 1991. I worked directly  
15 with Ms. Traber on several cases at Litt & Stormer from 1984 to 1991. Since 1991,  
16 when Ms. Traber founded Traber & Voorhees, I have co-counseled several cases  
17 with Ms. Traber and others at her firm. Ms. Teukolsky was an associate at my firm,  
18 Hadsell Stormer Richardson & Renick, from 2002 to 2010, and I worked on  
19 numerous cases with her, including several trials and arbitrations. Ms. Muñoz was  
20 an associate at my firm from 1997 to 2003, and I similarly worked on numerous  
21 cases with her. Since Ms. Muñoz left my firm, I have co-counseled three cases with  
22 her, including one current case.

23           15. Ms. Traber, Ms. Teukolsky and Ms. Muñoz are exceptionally skilled far  
24 beyond many other attorneys I have worked with over the course of my career.  
25 Based on my interactions with other attorneys in Los Angeles, I believe that Ms.  
26 Traber is widely regarded as one of the leading public interest attorneys in Los  
27 Angeles, and that Ms. Teukolsky and Ms. Muñoz have excellent reputations in the  
28 legal community. Based on my extensive work with Ms. Traber, Ms. Teukolsky and

1 Ms. Muñoz, I believe that they are far more skilled than most other attorneys who  
2 have been practicing for the same length of time.

3 16. I am familiar with Altshuler Berzon LLP and Bet Tzedek Legal Serices.  
4 Altshuler Berzon has a reputation as a top notch firm, and Bet Tzedek is well known  
5 as an excellent legal organization, particularly in the area of employee rights. Based  
6 on my knowledge of the legal community and my review of legal newspapers and  
7 other legal publications, it is my understanding that Michael Rubin is widely  
8 regarded as one of the best labor and employment attorneys in California. I have  
9 reviewed the experience and qualifications of the attorneys from Altshuler Berzon  
10 and Bet Tzedek for whom plaintiffs seek compensation.

11 17. Based on my knowledge of billing rates for lawyers of similar skill,  
12 reputation and experience in the Los Angeles area, the hourly compensation sought  
13 by plaintiffs for their attorneys is well within the range of reasonable market rates.  
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15 I declare under penalty of perjury under the laws of the State of California and  
16 the United States of America that the foregoing is true and correct. Executed on  
17 November 12, 2013, at Pasadena, California.

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