

1 Julian Burns King (Bar No. 298617)
julian@kingsiegel.com
2 Elliot J. Siegel (Bar No. 286798)
elliott@kingsiegel.com
3 KING & SIEGEL LLP
724 S. Spring Street, Suite 201
4 Los Angeles, California 90014
Telephone: (213) 419-5101
5 Facsimile: (213) 465-4803

6 Daniel Hutchinson (Bar No. 239458)
dhutchinson@lchb.com
7 Lin Y. Chan (Bar No. 255027)
lchan@lchb.com
8 LIEFF CABRASER HEIMANN &
BERNSTEIN LLP
9 275 Battery Street, 29th Floor
San Francisco, California 94111
10 Telephone: (415) 956-1000
Facsimile: (415) 956-1008

11 *Counsel for Plaintiffs and the Proposed Class*

12
13 **UNITED STATES DISTRICT COURT**
14 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

15
16 Marcie Le and Karen Dao, individually
and on behalf of all others similarly
17 situated,

18 **Plaintiffs,**

19 v.

20 Walgreen Co., an Illinois corporation;
Walgreen Pharmacy Services Midwest,
21 LLC, an Illinois limited liability
company; and Walgreens Boots
22 Alliance, a Delaware corporation,

23 **Defendants.**

Case No. 8:18-cv-01548

**DECLARATION OF ELLIOT J.
SIEGEL IN SUPPORT OF
PLAINTIFFS' MOTION TO
DIRECT NOTICE TO THE CLASS**

Hon. David O. Carter

Hearing Date: April 12, 2021
Hearing Time: 8:30 a.m.

24
25
26
27
28

1 I, Elliot J. Siegel, declare as follows:

2 1. I am a founding and managing shareholder in the firm of King &
3 Siegel LLP, attorney of record (“Class Counsel” or “Plaintiffs’ Counsel”) for
4 Plaintiffs Marcie Le and Karen Dao (“Plaintiffs” or “Class Representatives”) and
5 the proposed Settlement Class (the “Class”) in the above-captioned matter. I have
6 been one of the lawyers primarily responsible for the prosecution of Plaintiffs’
7 claims on behalf of the proposed Class.

8 2. I am admitted to practice before this Court and am a member in good
9 standing of the bar of the State of California; the United States District Court for
10 the Central, Northern, and Eastern Districts of California; and the U.S. Court of
11 Appeals for the Ninth Circuit.

12 3. I respectfully submit this declaration in support of Plaintiffs’
13 Unopposed Motion to Direct Notice to the Class. I have personal knowledge of the
14 facts set forth in this declaration and if called upon to testify, could and would
15 testify competently thereto.

16 **Plaintiffs’ Counsel’s Academic and Professional Background**

17 4. Throughout my career, I have gained significant experience regarding
18 the obligations and burdens of representing California workers in wage-and-hour
19 litigation. This knowledge has allowed me and my firm, King & Siegel LLP, to
20 successfully represent plaintiffs in multiple litigations, including several class
21 actions, in the past years.

22 5. I received a B.A. from University of California, Los Angeles in 2007,
23 while graduating *summa cum laude*. In 2012, I received my J.D. from New York
24 University School of Law in New York, New York and graduated with *cum laude*
25 honors. I became a member of the Bar of the State of California in June 2012 and
26 first practiced with the firm of Quinn Emanuel Urquhart & Sullivan, LLP, an
27 AmLaw 100 firm, for approximately three years. After practicing at Quinn
28

1 Emanuel, I worked as an associate in the litigation department at Elkins Kalt
2 Weintraub Reuben Gartside LLP, a boutique full-service law firm.

3 6. At my prior firms, my practice covered a wide range of matters
4 running from high-value commercial litigation, to patent matters (including the
5 *Apple v. Samsung* litigation), to class actions (including a wage-and-hour class
6 action against Barnes & Noble). I worked on complex civil litigation matters
7 including *United States ex rel. Bilotta v. Novartis Pharm. Corp.*, No. 11-civ-0071
8 (PGG) (S.D.N.Y. 2011) (False Claims Act case relating to alleged kickbacks); *In re*
9 *Countrywide Financial Corporation Mortgage-Backed Securities Litig.*, Case Nos.
10 2:11-ml-02265-MRP and 2:11-cv-10549-MRP (C.D. Cal. 2011) (fraud and
11 securities case alleging false representations regarding RMBS); *In re RFC and*
12 *RESCAP Liquidating Trust Litig.*, No. 13-3451 (D. Minn. 2013) (breach of contract
13 case involving RMBS); *Gaming and Leisure Properties, Inc. v. Cannery Casino*
14 *Resorts LLC*, No. 1:14-cv-08571 (S.D.N.Y. 2014) (breach of contract case
15 involving \$465 million casino purchase); *Apple Inc. v. Samsung Elecs. Co., Ltd.*,
16 No. 11-civ-1846 (N.D. Cal. 2011) (patent case involving smart phones); and *HCT*
17 *Group Holdings, Ltd., et al. v. Nicholas Gardner, et al.*, No. BC645615 (Los
18 Angeles Cnty. Sup. Ct. 2017) (fraud and breach of fiduciary duty case against
19 former executive).

20 7. At both Quinn Emanuel and Elkins Kalt, I played a significant role in
21 the employment law and class action matters that I was staffed on and received an
22 array of experience, including drafting demurrers and motions to dismiss, drafting
23 and responding to discovery, drafting and opposing discovery-related motions,
24 arguing discovery-related motions, interviewing and deposing class members and
25 obtaining declarations in connection with class certification motions, drafting
26 mediation briefs, and opposing a writ of prejudgment attachment against a highly
27 compensated employee by a former employer. I also supervised the work of more
28 junior attorneys and paralegals.

1 8. Throughout my career, I have gained significant experience regarding
2 the obligations and burdens of representing a class. This knowledge has allowed me
3 and my firm, King & Siegel LLP, to successfully represent employees in class
4 actions. Our practice is devoted to representing employees in individual and class
5 action litigation in California State and federal courts, as well as in arbitration
6 hearings. Though our firm was only founded in 2018, we have been appointed class
7 counsel in multiple wage-and-hour class actions, including *Martinez v. Arvato*
8 *Digital Servs., LLC*, No. CIVDS1823989 (San Bernardino Cnty. Sup. Ct. 2018)
9 (final approval granted March 2, 2020); *Quintero v. Miller Milling Company, LLC*,
10 No. 2:19-cv-07459 DMG (JCx) (C.D. Cal. 2019) (final approval granted July 31,
11 2020); *Ayala, et al. v. Four Seasons Heating & Cooling, Inc., et al.*, No. 56-2019-
12 00529287-CU-OE-VTA (Ventura Cnty. Sup. Ct. 2018) (final approval granted on
13 September 3, 2020); *Martin, et al., v. Break the Floor Productions*, Case No. 37-
14 2019-00029711-CU-OE-CTL, (San Diego Cnty. Sup. Ct. 2019) (final approval
15 granted October 23, 2020); *Talkington v. Sanrose Home Health*, Case No.
16 RIC1902475 (Riverside Cnty. Sup. Ct. 2019) (final approval granted December 7,
17 2020); *Lachman, et al. v. Berlitz Languages, Inc., et al.*, Case No. 19STCV01533
18 (Los Angeles Cnty. Sup. Ct. 2019) (preliminary approval granted August 2020);
19 and *Shaquille Oliver, et al. v. The J. Paul Getty Trust*, Case No. 19STCV40123
20 (Los Angeles Cnty. Sup. Ct. 2019) (final approval granted October 22, 2020). We
21 are also currently prosecuting claims on behalf of numerous putative class members
22 in multiple pending class actions, including: *Awwad, et al. v. Splitsville*, Case No.
23 30-2018-01026248-CU-OE-CXC (Orange Cnty. Sup. Ct. 2018) (wage-and-hour
24 case relating to failure to authorize and permit off-duty rest periods); *Torres v. D/T*
25 *Carson*, Case No. RIC1821431 (Riverside Cnty. Sup. Ct. 2018) (wage-and-hour
26 case relating to failure to authorize and permit off-duty, off-premises rest periods);
27 *Cohen v. Living Spaces Furniture LLC*, Case No. 30-2020-01140662-CU-OE-CXC
28 (Orange Cnty. Sup. Ct. 2020) (wage-and-hour relating to failure to provide suitable

1 seating and compliant rest periods); *Leon v. Matrix Environmental Inc.*, Case No.
2 21STCV01416 (Los Angeles Cnty. Sup. Ct. 2021) (wage-and-hour case relating to
3 unpaid wages and failure to authorize and permit off-duty, off-premises rest
4 periods); and *Romero v. Retrofitting360, Inc*, Case No. 56-2020-00546674 (Ventura
5 Cnty. Sup. Ct. 2020) (wage-and-hour case relating to failure to authorize and permit
6 off-duty, off-premises rest periods); and this case, in which our firm filed a
7 contested motion for class certification.

8 9. My firm has received a variety of professional awards and honors and
9 I am active in the plaintiffs' bar and other community organizations. In each year
10 from 2018 to 2020, I was named a Southern California Super Lawyers Rising Star.

11 10. In addition to myself, the attorneys at my law firm who seek to be
12 appointed Class Counsel also have significant experience in employment litigation,
13 wage-and-hour class actions, and other complex litigation.

14 11. My partner, Julian Burns King has also expended a substantial amount
15 of time on the Le case. Prior to involvement by our co-counsel, Mr. Siegel and I
16 investigated Plaintiffs' claims, researched applicable law and regulations involving
17 pharmacists, determined the appropriate defendants, filed PAGA notices, drafted
18 filings and discovery, and identified an appropriate class representative for the meal
19 period claims. After co-counsel joined this litigation, we continued to play a co-lead
20 role in all case matters

21 12. Ms. King is a 2012 *cum laude* graduate of Harvard Law School, where
22 she was an editor and a member of the submissions committee on the *Harvard*
23 *Journal of Law & Gender* and an editor of the *Harvard International Law Journal*.
24 After graduating from law school, she spent five years as an associate at Paul,
25 Weiss, Rifkind, Wharton & Garrison, LLP (2012 to 2013); Quinn Emanuel
26 Urquhart & Sullivan, LLP (2013 to 2015); and Bird Marella Boxer Wolpert Nessim
27 Dooks Lincenberg & Rhow, PC (2015 to 2017), before starting her own practice at
28 King & Siegel LLP.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.