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Class Counsel and Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SONOMA

SHARON FELKER; HERMAN GRISHAVER;
EDGAR CRUZ SORIANO; and JEANACE
ZETINO, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

JRK RESIDENTIAL GROUP, INC.; JRK
PROPERTY HOLDINGS, INC.; and DOES 1
through 100,

Defendants.

Case No. SCV-267587

**DECLARATION OF JOSHUA KATZ IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS and
SERVICE AWARDS**

Hon. Patrick M. Broderick

Date: August 19, 2026

Time: 3:00 p.m.

Dept.: 16

1 I, Joshua Katz declare:

2 1. I am licensed to practice law in the State of California and I am one of the counsel of
3 record for Plaintiffs Sharon Felker, Herman Grishaver, Edgar Cruz Soriano and Jeanace Zetino
4 (collectively, “Plaintiffs”) and the Settlement Classes.

5 2. I have practiced law for over 36 years and have been admitted to practice in
6 Massachusetts (1989, inactive); the District of Columbia (1991, inactive) and California (1998,
7 active). I am also admitted to practice before the Ninth Circuit and multiple federal district courts.

8 3. My experience includes class actions in state and federal courts, federal multi-district
9 litigation, California state coordinated actions, and individual actions in state and federal courts.

10 4. I have practiced in Sonoma County since 1998. For over 23 years, I have maintained a
11 solo practice in Santa Rosa representing injured persons. Most of my work involves housing
12 issues, such as substandard conditions, improper rent amounts or other charges, and retaliation for
13 the exercise of legal rights. These cases involve single tenants, families and multiple units at a
14 complex.

15 5. Recent representative actions in Sonoma County involving housing include: *Molina v.*
16 *Adhikari*, Case No. 24CV02558 (action regarding substandard housing conditions on behalf of
17 family of two adults and two minors), *Martinez v. Kane*, Case No. SCV-267975 (action
18 regarding substandard conditions at a Cloverdale complex on behalf of seven families including 14
19 adults and 15 minors); *Adile v. Loomis*, Case No. 26CV03809 (action on behalf of tenant at illegal
20 rental unit with causes of action including larceny under Penal Code section 496, wrongful
21 eviction, retaliation and substandard conditions); *Hernandez v. Traboulsi*, Case No. 25CV03834
22 (action on behalf of family with two adults and three minors for substandard conditions and related
23 causes of action); *Gonzales v. Sequoia Equities*, Case No. 24 CV02152 (action on behalf of tenant
24 family for substandard conditions, retaliation and constructive eviction); and two recent unlawful
25 detainer actions (which are sealed by statute) in which I successfully moved to vacate defaults and
26 default judgments – both cases were subsequently dismissed.

27 //

28 //

1 6. I have volunteered with Legal Aid of Sonoma County and California Rural Legal
2 Assistance on housing issues for over 20 years. I regularly advise and represent people on a pro
3 bono basis.

4 7. My current billing rate is \$650 per hour.

5 8. Because I do not have detailed, contemporaneous records of the time I spent, I am
6 providing this declaration. (*Mardirossian & Assocs., Inc. v. Ersoff* (2007) 153 Cal.App.4th 257,
7 269 ('[a]n attorney's testimony as to the number of hours worked is sufficient evidence to support
8 an award of attorney fees, even in the absence of detailed time records.')); *Theme Promotions, Inc.*
9 *v. News America Marketing FSI, Inc* (N.D. Cal. 2010) 731 F.Supp.2d 937, 944 (court awarded fees
10 over objection of insufficient documentation, noting "[i]n California, an attorney need not submit
11 contemporaneous time records in order to recover attorney fees").)

12 9. I estimate I spent over 1685 hours on this matter from January 2020 through
13 preliminary approval and give an overview of my efforts below.

14 10. I have been involved with all aspects of the litigation, from investigation through this
15 motion for final approval.

16 11. I was first contacted regarding some of the issues which are addressed in this action in
17 2019. After several contacts, I began investigating potential claims against the defendants in 2020.
18 In addition to the current and former tenants of JRK apartments who contacted me, I spoke at a
19 meeting arranged by tenant organizers of the North Bay Organizing Project, along with my co-
20 counsel Todd Espinosa.

21 12. Because of the amount at stake for each claimant was small, we looked at what claims
22 could be brought on a class-wide basis. I also interviewed potential plaintiffs and reviewed
23 documents to select the appropriate class representatives.

24 13. We filed the initial complaint on December 20, 2020.

25 14. My work, individually and jointly with co-counsel included preparing the Complaint;
26 evaluating Defendants' demurrer and motion to strike portions of the complaint; preparing
27 Plaintiff's First Amended Complaint; evaluating and opposing Defendants' demurrer and motion
28 to strike portions of the First Amended Complaint, presenting oral argument and preparing

1 supplemental briefing; evaluating Defendants' Answer and meeting and conferring re defects;
2 evaluating Defendants' Amended Answer and meeting and conferring re defects; preparing and
3 filing Plaintiffs' Demurrer to Amended Answer; evaluating and opposing Defendants' Motion for
4 Sanctions Pursuant to Code of Civil Procedure sections 128.5 and 128.7, and presenting argument;
5 propounding forms interrogatories, special interrogatories, requests for production; preparing the
6 named Plaintiff's responses to form interrogatories, special interrogatories, requests for production
7 and requests for admission; reviewing and producing Plaintiffs' document production; reviewing
8 Defendants' responses to discovery, reviewing documents, meeting and conferring re deficiencies.
9 I prepared three of the four named Plaintiffs for depositions and represented them at deposition.

10 15. I was also involved, though not primarily responsible for, Plaintiffs' Second Amended
11 Complaint, Opposition to Summary Judgment and Motions for Preliminary and Final Approval.

12 16. Throughout the litigation, I communicated with the named Plaintiffs regularly via
13 phone, email and in-person. I used an interpreter when necessary and also had documents
14 translated into Spanish as necessary. To accommodate Plaintiffs' schedules, at times I met with
15 several of them at their home or another convenient location.

16 17. This litigation involved several unsettled legal questions. Among other issues,
17 Defendants challenged the applicability of the Consumer Legal Remedies Act, whether Penal
18 Code section 396 price gouging protections could be applied here, and whether there was
19 sufficient factual support for the claims. We prevailed on all issues.

20 18. I believe this was an important case to bring. For example, despite important policy
21 values, there was inadequate public enforcement of the price-gouging statute. In fact, while the
22 Defendants' records which we reviewed showed many violations of the price-gouging statute at
23 Defendants' property in Sonoma County, the Sonoma County District Attorney had investigated
24 tenant complaints but did not pursue the matter. Nor did we find any evidence of other California
25 counties or the state addressing violations by these Defendants. And the improper liquidated
26 damages (late fees and renter's insurance fees), while disallowed by Civil Code § 1671, are
27 common abuses in California rental contracts. Enforcement of these consumer protection statutes
28 serves a valuable purpose and furthers the public policies reflected in the laws. While this has been

1 a long process against larger and wealthier opponents, we recovered money for the classes and
2 caused a change in behavior at a landlord with 14 complexes in California, and I believe this result
3 will have an impact beyond these parties.

4 19. I have worked on this litigation for over six years. Any fee is contingent. Because I am
5 a solo practitioner, handling this matter impacted my ability to take other cases. My estimate of
6 1685 billable hours understates the actual time spent on this matter and the impact it had on my
7 practice.

8 20. I have advanced \$19,793 in costs in this case for filing fees, transcripts, translation
9 services, and other litigation expenses.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct.

12
13 Dated: July 20, 2026

14 
Joshua Katz