

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

CHERRY LYN MICLAT and BENZOR
SHEM VIDAL, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

ADVANCED CARE STAFFING, LLC, and
PRIORITY CARE STAFFING, LLC,

Defendants.

Civ. Action No.: 23-cv-5296

**DECLARATION OF
JUNO TURNER IN SUPPORT
OF PLAINTIFFS'
ATTORNEYS' FEES, COSTS,
SERVICE PAYMENTS, AND
SETTLEMENT
ADMINISTRATION
EXPENSES**

I, Juno Turner, declare the following:

1. I am an attorney and the Litigation Director at Towards Justice and one of Plaintiffs' counsel in this matter. I submit this declaration in support of the Plaintiffs' motion for motion for attorneys' fees, costs, service payments, and settlement administration expenses.

2. Towards Justice is a public interest law firm based in Denver, Colorado dedicated to advancing economic justice through impact litigation and policy advocacy.

3. Towards Justice was founded in response to the high volume of wage theft complaints that were not being addressed in Colorado, but broadened its scope to take on a variety of labor market abuses affecting workers across the country, including wage theft, discrimination, fraud, and other unfair and abusive practices. See www.towardsjustice.org.

My Education and Experience

4. I graduated from the University of Colorado at Boulder in 2000 and received my law degree from Fordham Law School in 2006.

5. Before joining Towards Justice, I was a partner at the plaintiff-side employment law firm Outten & Golden LLP, where I represented workers in wage and hour and discrimination class and collective actions.

6. Prior to working at Outten & Golden, I was a federal law clerk in the Eastern District of New York and an Assistant Attorney General in the Labor Bureau of the Office of the New York State Attorney General.

7. I am counsel of record in the following cases, many of which are putative or certified class or collective actions: *Menocal et al v. The GEO Group, Inc.*, 14-cv-02887- JLK (D. Colo.); *Burrell v. Loungo, et al.*, 3:14-cv-01891-RDM (M.D. Pa.); *Fuchs et al. v. SpecialtyCare, Inc.*, 3:23-cv-00892 (M.D. Tenn.); *McFalls v. NCH Healthcare System, Inc.*, et al, 2:23-cv-00572-SPC-KCD (M.D. Fla.); *Mortis v. Polis*, 2022CV030421 (Colo. Dist. Ct., Denver Co.).

8. The vast majority of these cases allege federal or state claims on behalf of low-wage and immigrant workers.

David Seligman's Education and Experience

9. David Seligman is an attorney and the Executive Director of Towards Justice. Mr. Seligman graduated from Williams College *magna cum laude* in 2005 and received his law degree from Harvard Law School in 2010.

10. Before working at Towards Justice, Mr. Seligman was a staff attorney at the National Consumer Law Center, where he litigated and advocated on behalf of low-income consumers with a particular focus on class actions.

11. Before working at the National Consumer Law Center, Mr. Seligman clerked for federal district and appellate court judges on the United States District Court for the District of Massachusetts and the United States Court of Appeals for the Second Circuit.

12. Mr. Seligman is counsel of record in the following cases, many of which are

putative or certified class or collective actions: *Menocal et al v. The GEO Group, Inc.*, 14-cv-02887- JLK (D. Colo.); *Beltran v. Noonan et al*, 14-cv-03074-CMA-CBS (D. Colo.); *Castillo v. Western Range Association et al*, 16-cv-00237-RCJ-VPC (D. Nev.); *Bautista v. Carl Karcher Enterprises LLC*, No.BC649777 (Cal. Super. Ct.); *Trejo et al v. Xclusive Staffing, Inc. et al*, 2017cv01602 (D. Colo.); *Gambles, et al. v. Sterling Infosystems, Inc.*, 15-09746 (D. Colo.); *MedPro v. Clunis*, CACE-20-010694 (Fl. Cir. Ct.); *Morales-Posada v. Cultural Care, Inc.*, 1:20-cv-11862-IT (D. Mass); *McFalls v. NCH Healthcare System, Inc.*, 2:23-cv-00572-SPC-KCD (M.D. Fla.); *Carmen v. Health Carousel, LLC*, 1:20-cv-00313-DRC (S.D. Ohio).

13. The vast majority of these cases allege federal or state claims on behalf of low-wage workers.

Valerie Collins' Education and Experience

14. Valerie Collins is an attorney at Towards Justice. She graduated from American University in 2002 and received her law degree from Howard University School of Law in 2009.

15. Prior to joining Towards Justice in 2020, Ms. Collins was an attorney in the Appellate and Supreme Court Litigation Branch of the National Labor Relations Board from 2014-2020. Ms. Collins was a judicial law clerk on the United States Court of Appeals for the Fourth Circuit and in the United States District Court for the District of Columbia.

16. Ms. Collins is counsel of record on the following cases, many of which are putative class or collective actions: *Cross, et al. v. Amazon.com Inc. et al.*, 1:23-cv-02099-NYW-SBP (D. Colo.); *Bourgoyne v. Total Beverage, LLC*, 2023CV030499 (Colo. Dist. Ct., Jefferson Co.); *Carmen v. Health Carousel, LLC*, 1:20-cv-00313-DRC (S.D. Ohio).

17. Each of these cases allege federal or state claims on behalf of low-wage and immigrant workers.

18. As with many of our cases, Towards Justice has litigated this case on a pure

contingency basis. Towards Justice has been closely involved in the briefing and strategy discussions in this case, spending more than 340 hours of work and incurring more than \$200,000 in fees. To date, Towards Justice has not received any compensation for its work on this matter.

Attorneys’ Fees and Costs

19. To date, Towards Justice has incurred \$3,291.40 in unreimbursed out-of-pocket costs to litigate the *Vidal* and *Miclat* actions.

20. These costs are summarized here:

ABA Expense Code	Description	Cost Paid by Towards Justice
E108 Postage	I have included the cost of postage and shipping here	\$124.80
E110, E11 Out-of-Town Travel and Meals	I have included the cost of lawyers and Plaintiffs traveling to and from court appearances here, as well as hotels and meal costs associated with the same.	\$575.87
E112 Court Fees	I have included the cost of pro hac vice filings and ordering certificates of good standing here	\$646.98
E121 Arbitrators/Mediators	I have included the mediator’s fee here	\$1943.75
		<i>TOTAL: \$3291.40</i>

Attorneys’ Fees, Time, and Labor

21. Towards Justice has spent a significant amount of time on this case since investigating with co-counsel beginning in 2022. After exercising billing discretion to remove time entries associated with redundant or unnecessary work, media and publicity, erroneous entries, reconciling inconsistencies, and the like, Towards Justice’s total time on this case through January 27, 2026, equals 341.7 hours. I am confident that these hours were necessary to achieve the results

we achieved for our clients, including the Settlement Class. These hours amount to a lodestar of \$205,885.00 when using current rates. Broken down by timekeeper, these hours, rates, and lodestar amounts are as follows.

Towards Justice				
Timekeeper	Position	Hours	Current Rate	Lodestar Using Current Rate
Juno Turner	Litigation Director	113.1	\$600	\$67,860
David H. Seligman	Executive Director	62.5	\$600	\$37,500
Valerie Collins	Attorney	161.1	\$600	\$99,900
Deb Schaffer	Investigator/ Analyst	5	\$125	\$625
<i>Total for Towards Justice</i>		<i>341.7</i>		<i>\$205,885</i>

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: February 2, 2026

/s/ Juno Turner
Juno Turner