

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

JORGE OSWALDO AQUINO MARTINEZ,
ELVIS NAHUM CRUZ VASQUEZ, HEBER
ALFONSO ZAPATA CONTRERAS,
ISIDRO ARELLANO CHIHUAHUA,
JOSE MARIA RAMIREZ MORALES,
LUIS ADRIAN SALAZAR LOZANO,
VERONICA OLAN CASTILLO, and
AARON HERNAN PEREZ SALAZAR,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

MOBIS ALABAMA, LLC d/b/a HYUNDAI
MOBIS; KIA GEORGIA, INC.; GB2G, INC.
d/b/a ALLSWELL; SPJ CONNECT, INC.;
YOUNGJIN LEE, individually; JOB
KNOWLEDGE, LLC; and TOTAL
EMPLOYEE SOLUTION SUPPORT, LLC,

Defendants.

Civil Action No.
3:22-cv-00145-LMM

**DECLARATION OF JULIA SOLÓRZANO IN SUPPORT OF PLAINTIFFS'
APPLICATION FOR AN AWARD OF ATTORNEYS FEES AND EXPENSES**

COMES NOW JULIA SOLÓRZANO, who declares under penalty of
perjury and states as follows:

1. My name is Julia Solórzano. I am the Legal and Policy Director at Centro de los Derechos del Migrante, Inc. (“CDM”), and one of the attorneys for the Plaintiffs in the above-captioned civil action. I submit this declaration in support of Plaintiffs’ Application for an Award of Attorneys’ Fees and Expenses.

2. Founded in 2005, CDM is a binational migrant workers’ rights legal non-profit, headquartered in Mexico City, Mexico, with offices in Baltimore, Maryland, and Juxtlahuaca, Oaxaca. CDM provides direct legal representation for migrant workers and their family members on issues of regional and national importance, including in class action and complex litigation matters.

3. CDM’s legal team is currently engaged in litigation, including complex class action litigation, involving migrant workers’ rights, such as: *Martinez-Lopez v. GFA Alabama, Inc.*, No. 1:24-CV-2676-JPB-CCB (N.D. Ga.) (putative class of current and former TN visa holders at GFA Alabama and Glovis Georgia, LLC, challenging defendants’ visa fraud and discriminatory labor practices); *Velasco Rojas et al. v. First Pick Farms, LLC et al*, No. 1:23-cv-00604 (W.D. Mich.) (suit on behalf of two farmworkers challenging forced labor practices); and *Cuenca-Vidarte et al. v. Samuel et al.*, No. 8:20-cv-01885-GJH (D. Md.) (suit on behalf of former J-1 *au pairs* challenging employer’s forced labor practices); *Rodriguez Luna v. Avilez Castaneda et al.*, No. 7:26-cv-190 (E.D.N.C.)

(suit on behalf of farmworker challenging forced labor and wage theft by employer).

4. CDM currently has three attorneys dedicated entirely or predominately to migrant workers' rights litigation.

5. I received my J.D. from Yale Law School in May 2016. Since then, I have dedicated my legal career to high-impact civil rights and employment litigation and other advocacy on behalf of immigrant workers.

6. I have been a member of the Georgia bar since 2017 and am admitted to practice in the Georgia Supreme Court, the United States District Court for the Northern District of Georgia, and the United States Court of Appeals for the Fourth Circuit.

7. I am the Legal and Policy Director at CDM, where I have worked since 2024. In my current role, I lead CDM's legal services, litigation, and policy advocacy efforts and supervise all of CDM's attorneys and legal support staff. Prior to joining CDM, I was a Senior Staff Attorney in Southern Poverty Law Center's ("SPLC") Immigrant Justice Project. I joined SPLC in 2017 with a Skadden Fellowship focused specifically on defending the rights of noncitizen meat and poultry processing workers, and I have represented hundreds of migrant workers in civil rights and employment cases. Prior to joining SPLC, I

clerked for the Honorable Keith P. Ellison of the U.S. District Court for the Southern District of Texas.

8. I have served as counsel on numerous cases involving constitutional and/or statutory claims on behalf of noncitizens, including *Zelaya v. Hammer*, 3:19-CV-00062-TRM-CHS (E.D. Tn. 2022); *Farm Labor Organizing Committee, et al. v. Stein*, 1:17-cv-01037 (M.D.N.C. 2019) and *Episcopal Farmworker Ministry, et al. v. North Carolina Department of Labor*, 20-CVS-013794 (Wake Cnty., N.C. Superior Court 2020) (North Carolina Administrative Procedure Act challenge to unlawful denial of worker rights advocates' Petition for Rulemaking).

9. I am currently co-counsel on *Martinez-Lopez v. GFA Alabama, Inc.*, No. 1:24-CV-2676-JPB-CCB (N.D. Ga.), a TN visa fraud, Title VIII, Section 1981, and Fair Labor Standards Act, class and collective action case on behalf of TN visa workers from Mexico whose employers misrepresented the terms and conditions of the workers employment and discriminated against them at work. In *GFA*, I represent a putative class of approximately 173 employees.

10. I have served as a moderator or presenter at seminars for which continuing legal education credit was granted. These include four presentations at the National Employment Lawyers Association Convention and two presentations at the National Farmworker Law Conference.

11. I am fluent in Spanish and regularly communicate with Spanish-speaking clients and witnesses in developing and litigating cases, including through my work on this case.

12. During the course of my representation of the Plaintiffs in this matter, I have kept contemporaneous time records related to my work. Those time records were recorded in TSheets, CDM's computerized timekeeping software, during the normal course and scope of my work.

13. I supervise the team of CDM attorneys litigating the instant case, which includes CDM's Deputy Legal Director Abigail Kerfoot, Law Fellow Isabelle Holt, and Executive Director Rachel Micah-Jones. In litigating the instant case, I have worked closely with Ms. Kerfoot, Ms. Holt, and Ms. Micah-Jones as well as non-attorney staff to investigate the facts of the case, to research legal theories and arguments, to draft and respond to significant motions, and to prepare for settlement negotiations. Additionally, former CDM attorneys, Benjamin Botts, Kristin Greer Love, and Shane Crary Ross contributed substantial work to this case before I started working at CDM.

14. Ms. Kerfoot received her J.D. from the University of California, Los Angeles School of Law in 2020. Ms. Kerfoot has been a member of the State Bar of California since 2021 and is also admitted to practice in the Southern District of California and the Western District of Michigan. She has appeared in the

Northern District of Georgia *pro hac vice* in this case and in *Martinez-Lopez v. GFA Alabama, Inc.*, No. 1:24-CV-2676-JPB-CCB (N.D. Ga.). Ms. Kerfoot is the Deputy Legal Director at CDM, where she has worked since 2020. In her current role, Ms. Kerfoot leads CDM's intake and legal services work, and she supervises CDM's Legal Services Manager. Ms. Kerfoot has served as a presenter at seminars for which continuing legal education credit was granted for her presentation and prepared materials, including two presentations at the National Farmworker Law Conference. Ms. Kerfoot has served as counsel on numerous cases involving statutory claims on behalf of noncitizens, including *Velasco Rojas v. First Pick Farms, LLC*, No. 1:23-cv-00604 (W.D. Mich.) and *Hernández-García v. Dana*, No. 3:21-cv-01673-JAH-DDS (S.D. Cal.). Ms. Kerfoot is also currently counsel on *Martinez-Lopez v. GFA Alabama, Inc.*, No. 1:24-CV-2676-JPB-CCB (N.D. Ga.).

15. Ms. Holt joined CDM in 2025 as a Law Fellow. Ms. Holt has been a member of the Massachusetts bar since 2023 and is admitted to practice in the Massachusetts Supreme Judicial Court and the U.S. District Court for the Northern District of Georgia *pro hac vice*. Ms. Holt is currently serving as part of the class counsel team in *Martinez-Lopez v. GFA Alabama, Inc.*, No. 1:24-CV-2676-JPB-CCB (N.D. Ga.), consisting of a potential class of approximately 173 immigrant workers who have or had TN visas. Prior to joining CDM, Ms. Holt received her J.D. from Harvard Law School in 2023 and clerked for the

Honorable James P. Bassett of the New Hampshire Supreme Court from 2023-2025.

16. Ms. Micah-Jones received her J.D. from American University Washington College of Law in 2003. Ms. Micah-Jones is a member of the Florida State Bar and of the New Jersey State Bar. Ms. Micah-Jones worked as a Staff Attorney at Florida Rural Legal Services from 2003 until 2005 before founding CDM in 2005. Ms. Micah-Jones has served as CDM's executive director for the past 20 years.

17. Mr. Botts received his J.D. from the University of California, Berkeley School of Law in 2010. Mr. Botts has been a member of the State Bar of California since 2010. Mr. Botts worked as a Department of Labor Honors Program Attorney and Trial Attorney for six years before serving as CDM's Legal Director from 2017 until 2023.

18. Ms. Greer Love received her J.D. from the University of Chicago Law School in 2009. Ms. Greer Love has been a member of the State Bar of California since 2010. Ms. Greer Love began her career as a Skadden Fellow at CDM between 2009 and 2011 and subsequently served as a CDM Staff Attorney until 2012. After serving as a Staff Attorney for the Young Center for Immigrant Children's Rights, Ms. Greer Love returned to CDM as the Director of Strategy and Development between 2013 and 2014. After leaving CDM, Ms. Greer Love

continued to litigate immigrant workers' rights cases in various roles and once again returned to CDM as a Consultant, Writer, and as Counsel between 2020 and 2023.

19. Ms. Crary Ross received her J.D. from the University of California Berkeley School of Law in 2018. Ms. Crary Ross has been a member of the State Bar of California since 2018. Ms. Crary Ross began her career as a Skadden Fellow at California Rural Legal Assistance, Inc. from 2018 to 2020 where she then served as a Managing Attorney until 2021. During her time at California Rural Legal Assistance, Ms. Crary Ross represented low wage immigrant workers in a variety of matters. Ms. Crary Ross subsequently worked as the Director of Investigations for the New York City Department of Consumer and Worker Protection, enforcing workers' rights, from 2021 until she joined CDM in 2023. Ms. Crary Ross served as CDM's Deputy Advocacy Director and then as Director of Policy and Legal Services until 2025.

20. The lodestar billing rates for all CDM attorneys and all non-attorney support staff who have worked on this case, and their corresponding fees, are: ^{(b)(5)}

CDM Staff Member	Position (experience)	Rate	Hours	Total
Rachel Micah-Jones	Attorney (22)	\$650	4.1	\$2,665
Kristin Greer Love	Attorney (14)	\$550	81.5	\$44,825
Benjamin Botts	Attorney (13)	\$550	117.1	\$64,405
Julia Solórzano	Attorney (9)	\$550	96.0	\$52,800
Shane Crary Ross	Attorney (6)	\$450	3.0	\$1,350

Abigail Kerfoot	Attorney (5)	\$450	83.0	\$37,350
Isabelle Holt	Attorney (2)	\$350	65.2	\$22,820
Camila Herrera	Law Clerk	\$250	16	\$4,000
Isabel Hellman	Law Clerk	\$250	5.2	\$1,300
Non-Attorney Paralegal Work	--	\$125	188.4	\$23,550
TOTAL:				\$255,065

21. CDM exercised significant discretion in the number of hours billed in this case. CDM removed all billings for time spent reviewing orders, discussing communications strategy, and sharing internal case updates with CDM staff. CDM additionally removed all billings for attorney time that was used for purely administrative, non-legal, work.

22. The lodestar billing rates for all attorneys and non-attorney support staff who have worked on this case, and their corresponding fees, are:¹

Attorney	Position (experience)	Rate	Hours	Total
Christopher Hall	Partner (29)	\$750	338.3	\$258,375

¹ Atticus was engaged as the settlement administrator for this case, and Class Counsel agreed to pay Atticus \$24,965.00 for settlement administration. Because Centro de los Derechos del Migrante (“CDM”) has a proven track record of being able to reach settlement class members who have returned to Mexico, Atticus subcontracted CDM for assistance with class member outreach. Atticus agreed to pay CDM a flat fee of \$10,000.00 for its settlement administration work. CDM has already accrued far more than \$10,000.00 in costs and attorney, paralegal, and outreach staff time – for which it will not be compensated – performing this subcontracted role for Atticus. CDM anticipates accruing at least an additional \$12,000 in time and costs (again, without reimbursement) before distribution is complete.

Daniel Werner	Partner (29)	\$750	362.8	\$272,100
Rachel Micah-Jones	Attorney (22)	\$650	4.1	\$2,665
Brian Sutherland	Partner (20)	\$600	278.3	\$166,980
James Radford	Partner (18)	\$600	8.23	\$4,938.00
Rachel Berlin Benjamin ²	Partner (17)	\$575	335.1	\$194,977.5
Julia Solórzano	Attorney (9)	\$550	96.0	\$52,800
Kristin Greer Love	Attorney (14)	\$550	81.5	\$44,825
Benjamin Botts	Attorney (13)	\$550	117.1	\$64,405
Abigail Kerfoot	Attorney (4)	\$450	83.0	\$37,350
Gordon Van Remmen	Partner (11)	\$450	10.7	4,815.00
Shane Crary Ross	Attorney (6)	\$450	3.0	\$1,350
Isabelle Holt	Attorney (2)	\$350	65.2	\$22,820
Ricardo Gilb	Associate (6)	\$300	28.2	\$8,460.00
Camila Herrera	Law Clerk	\$250	16	\$4,000
Isabel Hellman	Law Clerk	\$250	5.2	\$1,300
Jusu Sirleaf	Bilingual Paralegal (8)	\$125	3.7	\$462.50
Isabella Valadez	Bilingual Paralegal (3)	\$125	1.2	\$150.00
CDM Non-Attorney Paralegal Work	--	\$125	188.4	\$23,550
Max Lavinthal	Paralegal	\$100	2.5	\$250
Total				\$1,166,573.00

23. In conjunction with the Settlement Administrator (“Atticus” or “Atticus Administration”), CDM attorneys are helping to oversee class notice

² Ms. Berlin Benjamin billed at a rate of \$600 per hour for the 91.8 hours she dedicated to this case while she was working at Hall & Lampros and \$575 per hour for the 243.3 hours she dedicated to this case at Beal, Sutherland Berlin & Brown, LLC.

and the motion for final approval. If the settlement is approved, CDM will oversee distribution of the settlement funds. Based on past experience, I anticipate that CDM will accrue at least an additional \$20,000.00 in fees.

24. Defendants originally provided 614 unique records for individual Class Members. After discussion between Class Counsel and Counsel for Defendants, Seventeen individuals who were identified as non-TN visa holders were removed from the class data. This resulted in a class list of 597 Class Members. In total, Class Counsel have contacted 585 of the 597 Class Members by WhatsApp, e-mail, text message, and/or U.S. Mail.

25. Out of the 12 records who have not received the Class Notice, all 12 were sent the Class Notice by text message. However, the Settlement Administrator, has not received confirmation that the 12 text messages were successfully delivered. The Class Notice was also sent by email to the four of these twelve Class Members for whom email addresses had been included on the class list, however, the Settlement Administrator received confirmation that all four of these emails “bounced” and could not be delivered. Out of the 12 records who have not received the Class Notice, Atticus mailed the Class Notice by U.S. First Class Mail to the seven of these twelve Class Members for whom mailing addresses had been provided.

26. To date, two hundred and ninety-eight of the five hundred and ninety-seven Class Members have completed and provided Plaintiffs' counsel and the Settlement Administrator with Settlement Distribution Forms, and Plaintiffs' counsel continues to receive Settlement Distribution Forms from other Class Members. Additional individuals who did not appear on either list provided by Class Counsel have contacted Atticus claiming to be members of the class. Their claims are being evaluated with the help of Class Counsel. No Class Member has objected and only one Class Member has sought to be excluded from the class thus far.

27. Settlement administration is particularly important and challenging in this case because many Class Members returned to Mexico. CDM has extensive experience conducting worker outreach in Mexico. It is common for workers who reside in Mexico to not want to deposit large sums by check or wire into Mexican banks for security reasons. Accordingly, Class Counsel offers to make payment in the manner directed by each Class Member either by check or wire. CDM has taken the time and expense to prepare notice documents in English and Spanish.

28. CDM has \$24,965.00 in costs associated with the litigation to date. This is the fee Class Counsel agreed to pay Atticus Administration for its class action administration services.

29. Prior to beginning representation of the named Plaintiffs, CDM entered into contingency fee agreements with them providing for payment of the greater of 40 percent of any settlement fund or such hourly fees awarded separately from the fund. If class counsel had not achieved a recovery, we would not have received any attorneys' fees.

30. When the settlement amounts are compared to the damages on class and collective action members' strongest claims, the amounts recovered are substantial. Even excluding their FLSA damages, Class Members will receive between \$4,112.50 and \$16,800.00 each. Settlement Agreement at § 17.4. This is significantly higher than their actual damages, which, for some individuals, were less than a thousand dollars. *See* Doc. 74. ¶¶ 174, 205, 232-37, 273-74, 337.

31. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Date: April 29, 2026.

/s/ Julia Solórzano
Julia Solórzano