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Attorneys for Plaintiff JOSE GOMEZ,
in a Representative capacity only, and on behalf of
other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF IMPERIAL

JULIA TORRES, JOY OLIVER BANKS,
and JOSE GOMEZ, in a Representative
capacity only, and on behalf of other
members of the general public similarly
situated

Plaintiffs,

vs.

MANAGEMENT & TRAINING
CORPORATION, a Delaware Corporation;
and DOES 1-10, inclusive

Defendants.

CASE NO.: ECU003320

*[Assigned for all purposes to the Honorable
Jeffrey B. Jones, El Centro Dept. 5]*

**DECLARATION OF JOSE GOMEZ
IN SUPPORT OF PLAINTIFFS' *UNOPPOSED*
MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF JOSE GOMEZ

I, Jose Gomez, declare as follows:

1. I am over the age of 18 and am the named Plaintiff and class representative in this matter.
I have personal knowledge of the matters stated herein and, if called and sworn as a witness, I could and
would competently testify under oath thereto.

2. This declaration is submitted in support of approval of the Motion for Final Approval of

1 Class Action Settlement.

2 3. I worked for Defendants MANAGEMENT & TRAINING CORPORATION
3 (“Defendants”), as a non-exempt employee from approximately February 4, 2018, and I remain employed
4 by Defendants to the present.

5 4. From the time I became involved in this lawsuit, I fully understood the risks associated
6 with serving as a named plaintiff and class representative. I understood that my participation in a class
7 action against an employer could become known through background checks or other means and could
8 potentially affect future employment opportunities. I also understood that as a class representative, I was
9 taking on responsibilities and risks that absent class members would not face.

10 5. I understand that I must continue to consider and protect the interests of the Class. Since
11 approximately May 2024, I have made myself available to my attorneys and have participated in this
12 litigation to the best of my ability. I do not have any interests that conflict with those of other class
13 members.

14 6. I provided information and made myself available to my attorneys throughout the course
15 of this litigation. I assisted my attorneys by discussing Defendants’ policies, procedures, and practices
16 regarding timekeeping, wages, overtime, meal and rest breaks, wage statements, and other employment
17 practices. I searched for and provided relevant documents in my possession, including pay records, time
18 records, and other employment-related documents, and produced them to my attorneys. I also responded
19 to communications from my attorneys and participated in discussions regarding the case, including for
20 purposes of mediation and settlement discussions. I reviewed and discussed the settlement with my
21 attorneys before agreeing to its terms.

22 7. I also understand that if this matter had proceeded to trial, I would have been required to
23 appear and participate in court proceedings as necessary. I understand that by bringing this lawsuit, I
24 assumed risks, including potential financial exposure for costs in the event of an unsuccessful outcome,
25 as well as potential impacts on my future employment prospects due to my participation in litigation
26 against a former employer.

27 8. I believe that the requested \$9,500.00 Class Representative Service Award for serving as a
28 class representative is reasonable given the time, effort, and risks I undertook in connection with this case.

1 Based on my information and belief, approximately 1,015 class members will have the opportunity to
2 participate in the settlement and recover compensation for alleged wage and hour violations. Without my
3 participation, this action would not have been brought on behalf of the class.

4 9. I am aware of and have consented to a Joint Prosecution Agreement between Sullivan &
5 Yaeckel Law Group, APC ("SY"), and Lavi & Ebrahimiian, LLP ("LE"), and Labor Law PC ("LL") in
6 their representation of me and the class members. Per this agreement, SY is entitled to 42.5% of the
7 attorney fees being requested, LL is entitled to 15% of the fees requested, and LE is entitled to 42.5% of
8 the attorney fees.

9
10 I declare under penalty of perjury under the laws of the State of California that the foregoing is
11 true and correct. Executed this 29 day of 05, 2026, at Imperial, California.

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14 By: 
15 JOSE GOMEZ
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Document ID	c9ab24edd92295f6ab1206c9c5cdbda35606dce0
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