

1 Taras Kick (SBN 143379)
Taras@kicklawfirm.com
2 Lauren Davis (SBN 294115)
Lauren@kicklawfirm.com
3 Tyler Dosaj (SBN 306938)
Tyler@kicklawfirm.com
4 **THE KICK LAW FIRM, APC**
815 Moraga Drive
5 Los Angeles, California 90049
Telephone: (310) 395-2988
6 Facsimile: (310) 395-2088

7 Attorneys for Plaintiff Jwlyous Golden,
8 individually, and on behalf of all others
9 similarly situated and aggrieved

10 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**
11 **CENTRAL DISTRICT - SPRING STREET COURTHOUSE**
12

13 JWLYOUS GOLDEN and BRYAN MILTON,
14 individually, and on behalf of all others similarly
situated and aggrieved,

15 Plaintiffs,

16 v.

17 JOBSOURCE, INC., a California Corporation;
18 JOBSOURCE HOLDINGS, INC., a California
Corporation; JOBSOURCE HUNTINGTON
19 PARK, a California Corporation; and DOES 1
through 50, inclusive,

20 Defendants.
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Lead Case No.: 20STCV14536
[Related to 23STCV06419 and 23STCV13024]

[Assigned for all purposes to the Hon. Judge
Samantha Jessner, Dept. 7]

**DECLARATION OF ROBERT
WEISSMAN**

Date: April 30, 2026
Time: 10:00 a.m.
Department: 7

Complaint Filed: April 15, 2020

1 **DECLARATION OF ROBERT WEISSMAN**

2 I, Robert Weissman, declare as follows:

3 1. I am Co-President of Public Citizen Foundation, a section 501(c)(3) non-profit
4 organization based in Washington, DC.

5 2. Among other things, Public Citizen does both research and litigation related to worker
6 rights and worker safety. Our work is supported by donations from individuals, foundation grants, and
7 court-awarded attorney fees. Public Citizen accepts no corporate or government funding.

8 3. If awarded cy pres funds in this case, Public Citizen would use the funds to support its
9 research and advocacy supporting strong protections for workers, including workers in California, and
10 its work on cases that involve wage-and-hour rights, worker safety, or that seek to protect workers'
11 access to the civil justice system.

12 4. Public Citizen conducts research and advocacy on worker protection issues, advocating
13 for rules to protect workers from hazards that may cause illness or injury in the workplace. Public
14 Citizen advocates with regulatory agencies to adopt or maintain worker safety measures, protect
15 workers from unfair wage practices, follow strong enforcement practices. Public Citizen has also done
16 extensive work examining and critiquing the mandatory arbitration clauses increasingly used by
17 employers to bar workers' access to the court system.

18 5. Public Citizen also works to support a legal system that permits workers and others to
19 pursue remedies effectively. We participate in the rulemaking processes of the federal courts and in that
20 setting seek to protect the class action device established in Federal Rule of Civil Procedure 23 by
21 opposing efforts to alter the rule to limit class actions, while advocating clarifications that ensure the
22 availability of class actions in appropriate cases and the fairness of class settlements. We also seek to
23 counter attacks on the civil justice system by those who would limit legal remedies. For example, in
24 2016, we issued a report demonstrating that claims in congressional testimony by class action opponents
25 that there has been a recent proliferation of successful class actions involving consumers who did not
26 suffer any actual injury were incorrect. In these and other ways we seek to educate the public in order
27 to promote informed policies that encourage the proper use of class actions to remedy broadly shared
28 harms to workers and consumers.

1 6. In addition, Public Citizen, through its fourteen-lawyer Litigation Group, works on
2 litigation involving worker and consumer protections, government transparency, class-action standards,
3 administrative law (federal health and safety regulation), and the First Amendment. Since its founding
4 in 1972, the Litigation Group has litigated cases at all levels of the federal and state judiciaries. The
5 Litigation Group's work is all pro bono.

6 7. Through the Litigation Group, Public Citizen has represented plaintiffs in many cases
7 involving claims under federal and state wage-and-hour statutes, including cases in the U.S. Supreme
8 Court and in the U.S. Court of Appeals for the Ninth Circuit. *See, e.g., EMD Sales, Inc. v. Carrera*, 604
9 U.S. 45 (2025) (lead counsel in the Supreme Court); *AMN Services, LLC v. Clarke*, 142 S. Ct. 710 (2021)
10 (Supreme Court co-counsel for plaintiff opposing a petition for certiorari from a Ninth Circuit decision in
11 a Fair Labor Standards Act case); *Karl v. Zimmer Biomet Holdings*, 140 S. Ct. 110 (2019) (same); *Garda*
12 *CL Nw., Inc. v. Hill*, 139 S. Ct. 2667 (2019) (same, in case arising under Washington State law). We have
13 also appeared as amicus curiae on behalf of plaintiffs in cases concerning misclassification of employees.
14 *See, e.g., Vanegas v. Signet Builders, Inc.*, 113 F.4th 718 (7th Cir. 2024) *Fischer v. Federal Express Corp.*,
15 42 F.4th 366 (3d Cir. 2023); *Bedoya v. American Eagle Express*, 914 F.3d 812 (3d Cir. 2019) (amicus
16 curiae), *cert. denied*, 140 S. Ct. 102 (2019) (co-counsel for plaintiff-respondent); *BeavEx, Inc. v. Costello*,
17 810 F.3d 1045 (7th Cir. 2016) (amicus curiae), *cert. denied*, 582 U.S. 929 (2017) (co-counsel for plaintiff-
18 respondent).

19 8. Public Citizen Litigation Group attorneys have also represented workers attempting to
20 defend their right to access the courts to pursue claims under California's Private Attorneys General Act
21 (PAGA). For instance, we served as Supreme Court co-counsel and handled oral argument in *Viking River*
22 *Cruises v. Moriana*, U.S. No. 20-1573, which raised the question whether the Federal Arbitration Act
23 preempts California's rule prohibiting contractual waivers of PAGA causes of action. Other cases in which
24 we have represented plaintiffs opposing employer's petitions for certiorari on that issue and related issues
25 under PAGA include *The ServiceMaster Company, LLC v. Cooley*, 2024 WL 4486367 (2024) (denying
26 certiorari); *Five Star Senior Living v. Mandviwala*, 585 U.S. 1017 (2018) (denying certiorari);
27 *Bloomington's, Inc. v. Tanguilig*, 583 U.S. 931 (2017) (denying certiorari), *Bloomington's, Inc. v.*
28 *Vitolo*, 582 U.S. 915 (2017) (denying certiorari), *ABM Indus. Inc. v. Castro*, 580 U.S. 820 (2016) (denying

certiorari), *Bridgestone Retail Operations, LLC v. Brown*, 575 U.S. 1037 (2015) (denying certiorari), and *Chase Investment Services Corp. v. Baumann*, 574 U.S. 1060 (2014) (denying certiorari). On the same issue, we served as co-counsel in the California Supreme Court and the U.S. Supreme Court in *Iskanian v. CLS Transportation Los Angeles, LLC*, 59 Cal. 4th 348 (2014), *cert. denied*, 574 U.S. 1121 (2015).

9. Public Citizen attorneys also represent parties and amici curiae in cases brought by workers that raise issues about class-action standards. For example, we served as co-counsel in *Tyson Foods v. Bouaphakeo*, 577 U.S. 442 (2016), a wage-and-hour case in which the Supreme Court held that the plaintiffs' reliance on representative proof did not defeat class certification because representative proof is allowed in individual wage-and-hour cases, and it would shrink plaintiffs' rights to deny them the opportunity to use such evidence when proceeding as a class. Public Citizen also filed briefs as amicus curiae in several cases raising questions about standards for class certification, including in support of the plaintiffs in *Siegel v. Delta Airlines*, 714 Fed. Appx. 986 (11th Cir. 2018), *Torres v. S.G.E. Management, L.L.C.*, 838 F.3d 629 (5th Cir. 2016), and *In re Nexium Antitrust Litigation*, 777 F.3d 9, 13 (1st Cir. 2015).

10. Other cases in which Public Citizen has served as counsel or appeared as an amicus curiae in cases concerning workers' access to the civil justice system include *Molock v. Whole Foods Market Group*, 952 F.3d 293, 295 (D.C. Cir. 2020), and *United Airlines v. Hughes*, 565 U.S. 819 (2011) (denying cert.)

11. Public Citizen's litigation also focuses more generally on preserving the ability of consumers and workers to pursue class-action and collective remedies, which are essential to the protection of their interests. For example, Public Citizen served as Supreme Court co-counsel for the plaintiff class in *Campbell-Ewald Co. v. Gomez*, 577 U.S. 153 (2016). Ruling in our favor, the Supreme Court held that a Rule 68 offer of judgment does not moot a plaintiff's individual claim. Had the defendant prevailed, the ruling would have had a significant detrimental impact on the viability of consumer and worker class actions. Public Citizen has also addressed closely related issues on behalf of class plaintiffs in a number of federal appellate cases, including *Fulton Dental, LLC v. Bisco, Inc.*, 86 F.3d 541 (7th Cir. 2017); *Mey v. North American Bancard, LLC*, 655 F. Appx. 332 (6th Cir. 2016);

1 *Hooks v. Landmark Indus., Inc.*, 797 F.3d 309 (5th Cir. 2015); and *Keim v. ADF Midatlantic, LLC*, 586
2 F. App'x 573 (11th Cir. 2014)

3 12. Other cases in the Supreme Court involving class-action issues in which Public Citizen
4 served as lead Supreme Court counsel include *Shady Grove Orthopedic Associates v. Allstate Insurance*
5 *Co.*, 559 U.S. 393 (2010), and *AT&T Mobility LLC v. Concepcion*, 563 U.S. 333 (2011).

6 13. Public Citizen has also worked to ensure that class settlements provide real relief to class
7 members, and we have represented objectors seeking to improve such settlements in several cases,
8 including *Vargas v. Lott*, 2019 WL 4391225 (9th Cir. Sept. 13, 2019); *Fraley v. Batman*, 638 Fed. Appx.
9 594 (9th Cir. 2016); *Day v. Persels & Associates*, 729 F.3d 1309 (11th Cir. 2013); *In re Katrina Canal*
10 *Breaches*, 628 F.3d 185 (5th Cir. 2010); *True v. American Honda Motor Co.*, 749 F. Supp. 2d 1052
11 (C.D. Cal. 2010); and *In re TD Ameritrade Accountholder Litigation*, 266 F.R.D. 418 (N.D. Cal. 2009).
12 Our work in this area reflects our commitment to the view that class settlements should be aimed at
13 providing real value for class members and should minimize obstacles to the realization of those benefits
14 by the class.

15 I declare under the penalty of perjury that the foregoing is true and correct to the best of my
16 belief and knowledge.

17 Executed this 20th day of February 2026, in Washington, D.C.,

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19 

20 _____
Robert Weissman