

JAMES HAWKINS APLC
James R. Hawkins, Esq. (#192925)
Gregory Mauro, Esq. (#222239)
Michael Calvo, Esq. (#314986)
9880 Research Drive, Suite 200
Irvine, CA 92618
Tel.: (949) 387-7200
Fax: (949) 387-6676

David Mara, Esq. (SBN 230498)
Carter Cordura, Esq. (SBN 359252)
MARA LAW FIRM, PC
3160 Camino Del Rio South, Suite 207
San Diego, California 92108
Telephone: (619) 234-2833
Facsimile: (619) 234-4048

Attorneys for Plaintiff Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

RIBALDO OLVERA and IGNACIO
GOMEZ individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

AMERICAN CORPORATE SECURITY, A
California Corporation; AMERICAN
CORPORATE SECURITY INC.; and DOES
1-50,

Defendants.

Case No. 21STCV16417

**PLAINTIFF IGNACIO GOMEZ'S
DECLARATION IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT, APPROVAL OF CLASS
NOTICE, SETTING OF FINAL APPROVAL
HEARING DATE**

I IGNACIO GOMEZ, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.
2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit this declaration in support of settlement approval.
3. I worked for American Corporate Security Inc. ("ACS") from November 12, 2019, to about December 24, 2019 as an hourly, non-exempt security guard.
4. Since becoming a class representative, I have diligently worked on this case. I always answered phone calls from my attorneys or called them back promptly when they called.
5. On many occasions, I spoke with my attorneys for case related purposes. I assisted my attorneys in investigating the case and reached out to them on numerous occasions to provide them with information about my time at ACS that I thought might help the case.
6. I also looked for any paperwork or documents, like my paystubs, from my employment with ACS to provide to my attorneys.
7. I had my deposition taken on April 24, 2024. I was available for the full day for my deposition. I met and prepared with my attorneys on numerous occasions prior to my deposition.
8. I also assisted my attorneys and provided a declaration in support of class certification.
9. Although I did not attend either of the three mediations in person, I was available on the phone for all the negotiations, which I was kept apprised of and assisted in. I was also apprised of the settlement discussions that occurred after the mediations. I gave my consent to settle with ACS for the settlement amount of \$698,000. I completely and carefully reviewed the settlement agreement. I then signed the settlement agreement.
10. I estimate that I spent approximately 50 hours or more on tasks like responding to discovery, speaking with my attorneys, searching for documents, preparing for my deposition, sitting for my deposition, and reviewing the settlement documents.
11. In light of the work I performed in this case and the duties associated with being a class representative in a case of this magnitude, I believe the \$15,000 class representative service

1 payment is reasonable. I understand that this additional payment is not guaranteed and is
2 subject to Court approval.

3 12. I have and will continue to adequately represent all of the interests of the class. With my status
4 as class representative, I will treat the interests of the Class above my interests.

5 13. My claims are typical of the Class Members because I am similarly situated to all current and
6 former non-exempt, hourly security guards, security officers, and other workers with similar
7 designations who worked for ACS in California at any time during the Class Period. Thus, my
8 interests are the same as all members of the proposed Class.

9 14. I recognize that any resolution of this matter must be approved by the Court in terms of
10 whether the settlement is fair and reasonable, and that I am obligated to protect the interests
11 of all of class members for the Class Period.

12 I declare under penalty of perjury under the laws of the State of California that all the
13 foregoing is true and correct.

14 Dated: 3/31/2026

15 By: 
16 Ignacio Gomez