

Jean-Claude Lapuyade (248676)
jlapuyade@jcl-lawfirm.com
JCL LAW FIRM, APC
3990 Old Town Ave., Suite C204
San Diego, CA 92110
Telephone: (619) 599-8292
Facsimile: (619) 599-8291

Attorney for Plaintiff
Alexander Castellanos

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO

ALEXANDER CASTELLANOS, et al.

Plaintiff,

v.

SOUTHWEST PATROL, INC., et al.,

Defendants.

NO. 37-2020-00024905-CU-OE-CTL

DECLARATION OF ADAM ROSE IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL

I, Adam Rose, declare the following:

1. I am one of the attorneys for plaintiff Robert Mauna and Douglas Alonzo Allen Gray in the above-entitled action. I have personal knowledge of the matters set forth herein, and if called upon as a witness about the facts below, I could and would competently do so.

2. Since its inception, Frontier Law Center has been at the forefront of helping employees with a variety of wage and hour, harassment/discrimination, and other complex litigation matters.

3. Further, based on my experience with employment law cases as explained below, I respectfully request the court to preliminarily approve the settlement.

4. Specifically, in addition to over 200 individual wage and hour cases, I have also handled the following class actions from start to finish: *Ramirez v. Arevalo Landscaping*, Los Angeles Superior

1 Court case number BC397109; *Friedrich v. La Vaquita Corp.*, Los Angeles Superior Court case
2 number BC564432; *Carvalho v. Staff Pro*, Alameda County Superior Court case number
3 RG16812554; *Hart v. Marriott International, Inc.*, United States District Court case number 8:17-
4 cv-2021-JVS; *Cole v. Saucey, Inc.*, Los Angeles Superior Court case number BC707895; *Rowe v.*
5 *Laura Geller Beauty, LLC*, United States Bankruptcy Court case number 1:18-bk-14102-MEW (New
6 York); *Rowe v. Ulta Salon, Cosmetics & Fragrance, Inc.*, Sacramento Superior Court case number
7 34-2019-00267231, also *Luna v. Triple Canopy, Inc.*, Santa Clara Superior Court case number
8 19CV345169, *Smith v. Budget Rent A Car System, Inc.*, United States District Court case number
9 2:19-cv-4720-SVW, *Shrum v. Sacramento Elite Patrol, Inc.*, Sacramento Superior Court case
10 number 34-2019-002767231, *Morris v. Blue Mountain Enterprises, LLC*, Solano County Superior
11 Court case number FCS035858, *Lopez v. Mac Arthur Co.*, Riverside County Superior Court case
12 number RIC1905043, and *Diaz v. Marriott International, Inc.*, San Diego Superior Court case
13 number 37-2019-0007740.

14 5. I have also actively participated in and helped finalize class action settlements in the
15 following class actions: *Allen v. Caine & Weiner*, Los Angeles Superior Court case number
16 BC465806, *Terry v. SHAC, LLC dba Sapphire*, Eighth Judicial District of Nevada case number A-
17 09-602800-C, *Carter v. Fantasy Castle*, Los Angeles Superior Court case number BC433666, and
18 *Blunt v. Valley Ball Cabaret*, Los Angeles Superior Court case number BC380265.

19 6. I also helped to recently obtain class certification for *Van Bebber v. Dignity Health*, United
20 States District Court case number 1:19-cv-00264.

21 7. Further, I obtained FLSA certification and finalized an FLSA settlement involving over 300
22 opt-ins in *Desio v. Russell Road Food & Beverage*, United States District Court case number 2:15-
23 1440-GMN (Nevada).

24 8. I have handled and finalized settlements on the following substantial PAGA-only cases:
25 *McAfee v. Chief Protective Services*, Riverside County Superior Court case number RIC1721984;
26 *Hall v. Pirch, Inc.*, San Diego Superior Court case number 37-2016-00036606, *Green v. American*
27 *Guard*, Los Angeles Superior Court case number BC688437; *Hernandez v. Contemporary Services*
28 *Corp.*, Los Angeles Superior Court case number BC684206, *McNeal v. Platinum Security Services*,

1 Los Angeles Superior Court case number 19STCV05709, *Cruz v. Holder Construction Group, LLC*,
2 Santa Clara Superior Court case number 19CV341862, *Lori Nunes v. Westmont Living*, San Luis
3 Obispo Superior Court case number 19CV-0935, and *Katabyan v. Awesome Doughnut*, Los Angeles
4 Superior Court case number 20STCV19903.

5 9. Thus, based on the above, and the other concurrently filed declarations in support, I
6 respectfully request the court to grant the motion.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing
8 is true and correct.

9

10 Date: September 30, 2021

/s/ Adam Rose
ADAM ROSE
Attorney for Plaintiffs

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28