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13 Attorneys for Plaintiffs

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA

15 COUNTY OF SAN DIEGO-CENTRAL DIVISION

16 CHARLES CRAFT, an individual in
17 his representative capacity on behalf of
18 all Aggrieved Employees,

19 Plaintiffs,

20 v.

21 UAG ESCONDIDO M1, Inc., *et al.*,
22 and DOES 1 through 50,

23 Defendants.

) Case No.: 37-2021-00000982-CU-OE-
) CTL

) **DECLARATION OF IAN PANCER**
) **ISO PLAINTIFFS' MOTION FOR**
) **PRELIMINARY APPROVAL OF**
) **CLASS SETTLEMENT**

) Hearing Date: October 1, 2021

) Time: 9:00 a.m.

) Dept.: 75

) Judge: Hon. Richard Straus

) **[[Prop.] Order, Not. of Mot., MPA,**
) **and Dec. of Ian Pancer filed**
) **concurrently herewith]**
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I, IAN PANCER, declare and state as follows:

1. I am counsel of record for the named Plaintiff, putative Class, Aggrieved Employees, and the State of California as a quasi-assistant attorney general pursuant to the Private Attorney General Act (PAGA) in this matter. As such, I am fully familiar with the facts, pleadings, and history of this matter. The following facts are within my own personal knowledge, and if called as a witness, I could testify competently to the matters stated herein.

2. This declaration is submitted in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and for an Order: (1) Preliminarily Approving Class Action Settlement; (2) Directing Distribution of Notice of Settlement; and (3) Setting a Hearing for Final Approval of Class Action Settlement.

Material Facts.

3. I have reviewed Mr. Rutledge's Declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and for an Order: (1) Preliminarily Approving Class Action Settlement; (2) Directing Distribution of Notice of Settlement; and (3) Setting a Hearing for Final Approval of Class Action Settlement and the accompanying papers, and I generally agree with its contents where I have personal knowledge of the facts set forth.

4. I recommend and very respectfully request that the Court approve the proposed Class Settlement.

Experience and Views of Counsel.

5. The Law Ian Pancer consist of me and an assistant; as my workload requires, I engage other attorneys as independent contractors.

6. At all times, I have been an attorney of record in the above-entitled action.

7. I maintain an office in San Diego County.

8. I have been licensed to practice law for approximately 15 years.

1 9. I attended the University of California at Santa Barbara as a Regents
2 Scholar, graduating in 2002.

3 10. In 2006, I graduated from the University of San Diego school of law.

4 11. I became a member of the State Bar of California in December 2006,
5 opened the Law Office of Ian Pancer, and began representing plaintiffs in civil and
6 criminal actions, including employment cases.

7 12. I am admitted to practice in all state courts in California as well as
8 United States District Courts in the Southern and Northern Districts of California.

9 13. I am a member of various legal associations, including the Consumer
10 Attorneys of San Diego (“CASD”) and the California Employment Lawyers
11 Association.

12 14. I focus my practice on prosecuting employment law claims on behalf of
13 employee-plaintiffs and personal injury cases. A very small amount of my practice
14 devoted to other matters.

15 15. All my employee-plaintiff cases, including this case, are accepted on a
16 nothing down contingency fee basis.

17 16. I personally have represented or represent hundreds of plaintiffs in past
18 and current employment cases.

19 17. I have substantial experience in employment-related, representative
20 actions in that I am or have been an attorney of record in approximately nine putative
21 class action or PAGA cases. More particularly, I am presently attorney of record in
22 five class action or PAGA cases; I was an attorney of record in one class
23 action/PAGA case that was certified as a class action; and I have been attorney of
24 record in three additional putative class action or PAGA cases that resolved on an
25 individual basis, for a total of nine cases specifically relevant to my experience in
26 representative actions.

27 18. I have handled the representation of parties in numerous mediations
28 before well-known neutrals, such as Robert Kaplan, Craig Higgs, Hon. Steve Denton

1 (Ret.), Hon. Herbert B. Hoffman (Ret.), Hon. Linda Quinn (Ret.), and Hon. Joel
2 Pressman (Ret.), among others.

3 19. I also have a great deal of experience in jury trials, having tried over 20
4 jury trials to verdict, not including bench trials.

5 20. In summary, we very respectfully request that this court grant Plaintiffs'
6 Motion for an Order (1) Preliminarily Approving Class Action Settlement; (2)
7 Directing Distribution of Notice of Settlement; and (3) Setting a Hearing for Final
8 Approval of Class Action Settlement.

9 Except as to those matters stated on information and belief, I declare under
10 penalty of perjury under the laws of the State of California that the foregoing is true
11 and correct. Executed September 13, 2021, at San Diego, California

12 By: /s// Ian Pancer
13 Declarant, Ian Pancer
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COUNTY OF SAN DIEGO

I, IAN PANCER, the undersigned, am employed in the County of San Diego, State of California; I am over the age of 18 and not a party to the within action; my business address is 105 West F Street #400, San Diego, California 92101.

On September 13, 2021, I served the following document(s) described as:

**DECLARATION OF IAN PANCER ISO PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

on the interested parties to this action by placing a copy thereof enclosed in a sealed envelope addressed as follows: **See Attached List.**

☒ **(BY E-MAIL via E-file)** I am readily familiar with the business practice for of the Court's third party e-filing vendor, onelegal, for emailing notification of e-service and for providing a download link to recipients of the e-service. This documents identified herein are being sent for download via this third-party vendor pursuant to the vendor's policies and practices.

☐ (BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the above named addressee(s).

☐ (BY FACSIMILE) I caused such documents to be delivered via facsimile to the offices of the addressee(s) at the following facsimile number:

Executed September 13, 2021, at San Diego, California.

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

Ian Pancer
/s/IAN PANCER

SERVICE LIST

John Boggs/David Reese
Fine Boggs & Perkins LLP
80 Stone Pine Road, Suite 210
Half Moon Bay, CA 94019

Attorneys for Defendants