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5 Attorney for Plaintiff,
DANIEL ESTRADA
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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**
9 **(UNLIMITED JURISDICTION)**

10 DANIEL ESTRADA,
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12 Plaintiff,

13 vs.

14 ALLEN GWYNN CHEVROLET, INC.;
15 JAMES V. BACON SR.; and DOES 1 to 25,
inclusive,

16 Defendants.
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Case No.: 21STCV11667

*[Assigned for all purposes to Honorable
Virginia Keeny]*

**DECLARATION OF DANIEL ESTRADA
IN SUPPORT OF UNOPPOSED PAGA
APPROVAL MOTION**

[Filed Concurrently with Notice of Motion,
Memorandum of Points and Authorities,
Declaration of Harout Messrelian, and
Proposed Order]

Hearing Date: 7/27/26
Time: 8:30am
Department: 529

Res. ID: 893226014973

Complaint Filed: March 25, 2021

DECLARATION OF DANIEL ESTRADA

I, Daniel Estrada, declare as follows:

1. I am a resident of the State of California and am over 18 years of age. I am the named Plaintiff in this action and am represented by Harout Messrelian of Messrelian Law, Inc. in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I worked for Defendants for approximately thirteen to fourteen years, and my latest position was Internet Manager.

3. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am the Plaintiff and that ALLEN GWYNN CHEVROLET, INC. ("ALLEN GWYNN" or "Defendant") is the Defendant. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other ALLEN GWYNN employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who suffered labor code violations. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit. I don't have any disagreements with the other ALLEN GWYNN employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

4. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing ALLEN GWYNN. I agreed that I would do what is in the best interests of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it.

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1 5. The PAGA statute does not forbid service awards. Courts frequently award them
2 in PAGA-only cases as well. Although I did not keep official time records, I spent at least
3 approximately 10 hours prosecuting this case, starting in 2021. The work I have done on this
4 case includes hiring my attorneys; speaking with my attorneys by phone and via text message;
5 explaining what my employment at ALLEN GWYNN was like; explaining what my
6 employment at ALLEN GWYNN had in common with other employees who worked for
7 ALLEN GWYNN; providing documents to my attorneys relating to the labor code violations I
8 believed were being committed; explaining my claims to my attorneys; communicating with
9 my attorneys regarding the mediation; consistently following up on the progress of the case
10 and case updates; and reviewing and signing the settlement agreement and related documents
11 on the approval of the settlement.

12 6. I believe I did the right thing by filing this case on behalf of the State of
13 California and other aggrieved employees, who, subject to court approval, are in line to receive
14 monetary penalty payments as a result of this case and settlement. In light of the time I have
15 spent on this case, the risk I undertook by suing a former employer, the exposure to being
16 responsible for paying Defendant's costs in the event we did not win the case, the reputational
17 risk that future employers may hold this lawsuit against me, and in light of the size of the
18 settlement, I believe the request for \$10,000.00 as a Representative Service Payment is fair and
19 reasonable.

20 7. I reviewed (and ultimately signed) the PAGA Settlement Agreement, and my
21 attorneys answered all the questions I had. I believe the settlement terms and allocations are
22 fair, adequate, and reasonable given the strength of the PAGA claims and Defendant's
23 defenses.

24 8. I have no conflicts of interest, actual or potential, with any PAGA member or
25 the Settlement Administrator (ILYM Group).

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1 9. I am not aware of any other pending matter or action asserting claims that will
2 be extinguished or adversely affected by the Settlement.

3 I declare under the penalty of perjury of the laws of the State of California that the
4 foregoing is true and correct to the best of my knowledge.
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6 Executed on June 30, 2026 at Pasadena, California.
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9 Daniel Estrada,
10 Declarant
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