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Attorneys for Plaintiff Korey Curley, on behalf of himself
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[Additional Counsel listed on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

KOREY CURLEY and SCOTT RYAN, on
behalf of themselves and other similarly-
situated and aggrieved employees,

Plaintiffs,

vs.

PAR ELECTRICAL CONTRACTORS,
INC., a Missouri Corporation; PAR
WESTERN LINE CONTRACTORS, LLC,
a Delaware corporation; QUANTA
SERVICES, INC., a Delaware corporation;
and DOES 1 through 10, inclusive,

Defendants.

CASE NO. 37-2021-00019761-CU-OE-CTL
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Katherine Bacal
Department C-63

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF BRAD NAKASE IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS AND
PAGA ACTION SETTLEMENT**

[IMAGED FILE]

Complaint filed: May 4, 2021
Trial date: December 6, 2024

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Attorneys for Plaintiff Scott Ryan, on behalf of himself
and other similarly-situated and aggrieved employees

1 I, Brad Nakase, declare as follows:

2 1. I am the president at Nakase Law Firm, Inc., co-counsel of record for Plaintiff
3 Korey Curley ("Plaintiff") in this Action. I am the only attorney practicing at Nakase Law Firm,
4 Inc. I submit this declaration in support of the Motion for Preliminary Approval of Class and
5 PAGA Action Settlement. The following facts are within my personal knowledge and if called
6 to testify I could and would competently testify to them.

7 2. I've been licensed to practice law in California since 2005. I have been practicing
8 wage and hour law since 2010.

9 3. I have been co-counsel in class action settlements, including:

- 10 • *Tanea Maldonado v. First Mansail, Inc., et al.*, San Diego County Superior Court,
11 Case No. 37-2020-00023369-CU-OE-CTL.
- 12 • *Linda Le v. Mile Square Surgery Center, et al.*, Orange County Superior Court,
13 Case No. 30-2020-01140872-CU-OE-CXC.

14 4. I have no conflicts of interest with the class or with the Plaintiffs, nor am I related
15 to either Plaintiff. I do not represent opposing factions within the class, in that all claims are
16 predicated upon the same theories of liability and benefit all class members equally.

17 5. As I have done since my firm's entry into this matter, I will continue to fulfill
18 my responsibility to the Plaintiffs and the members of the class.

19 6. I fully endorse the terms and conditions of the proposed Settlement. I respectfully
20 request that the Court grant preliminary approval of the Class and PAGA Action Settlement,
21 approve the proposed Class Notice, and set a date to conduct the final approval hearing.

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I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct and this declaration is executed on October 28, 2025 in San Diego, California.

____/s/ Brad Nakase____
Brad Nakase