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and other similarly-situated and aggrieved employees

[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 MICHAEL D. SINGER  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINARY APPROVAL OF CLASS  
AND PAGA ACTION SETTLEMENT**

Date: November 21, 2025  
Time: 1:30 p.m.  
Dept.: C-63

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

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and other similarly-situated and aggrieved employees

1 I, Michael D. Singer, declare as follows:

2 1. I am the Managing Partner at the law firm of Cohelan Khoury & Singer (“CKS”),  
3 co-counsel of record for Plaintiff Korey Curley (“Plaintiff”) in this Action. I submit this  
4 declaration in support of the Motion for Preliminary Approval of Class and PAGA Action  
5 Settlement. The following facts are within my personal knowledge and if called to testify I could  
6 and would competently testify to them.

7 2. I am a 1984 Hastings graduate, admitted to the California State Bar in 1984 and  
8 the Colorado State Bar in 2001. I have been admitted to practice before the following courts: U.S.  
9 Supreme Court; Ninth Circuit Court of Appeals; Southern, Central, Northern, and Eastern  
10 Districts of California; and all California State Courts.

11 3. In 1981, Timothy D. Cohelan and Isam C. Khoury formed Cohelan & Khoury, a  
12 Partnership of Professional Law Corporations, and within a few years began to focus on class  
13 actions. I joined Cohelan & Khoury in 2000 and was named partner in 2003. In 2009, Cohelan  
14 & Khoury became Cohelan Khoury & Singer. Our firm represents plaintiffs in complex, class  
15 and representative action litigation, including wage and hour, labor and employment, antitrust,  
16 consumer protection, construction defect and other public interest type class and representative  
17 actions.

18 4. I was admitted as a fellow to the College of Labor and Employment Attorneys in  
19 2020, and was named to the Daily Journal 2012, 2013, and 2018 list of Top California Labor and  
20 Employment Attorneys. I, along with Isam Khoury, a founding Partner of the firm, and Partner  
21 Diana M. Khoury, have also been selected by our peers based on ethics, experience and reputation  
22 as Super Lawyers in Civil Litigation by the Southern California Super Lawyers Magazine for the  
23 years 2012 through the present.

24 5. CKS has been certified by the State Bar of California to provide the Mandatory  
25 Continuing Legal Education activity titled “Litigating California Class Actions” and has  
26 conducted MCLE certified seminars on this topic. Senior Partner, Timothy D. Cohelan, is the  
27 author of Cohelan on California Class Actions (1997-2025, updated annually), part of Thomson  
28 Reuters Expert Series. I am a contributing author on the CEB publication California Wage and

1 Hour Law: Compliance and Litigation (2010-2024, updated annually), in which I wrote the  
2 opening chapter overview on California Wage and Hour laws, including the public policy  
3 underpinnings for those laws, and the Private Attorneys General Act (PAGA) Claim chapter. I  
4 am also a contributing author to the CEB Practitioner (2020), including guidelines for oral  
5 argument and forms for PAGA litigation. I have served as a columnist for the California State  
6 Bar, Litigation Section on wage and hour litigation and have contributed articles on wage and  
7 hour and class action issues through the years to numerous California publications.

8         6. Prior to COVID, I typically lectured several times per year for continuing  
9 education courses on wage and hour and class action issues at events in San Diego, Orange  
10 County, Los Angeles, and San Francisco. For over twelve years, I served as wage and hour  
11 amicus co-chair and liaison for the California Employment Lawyers Association, drafting,  
12 reviewing, and coordinating amicus filings on wage and hour issues in the California Supreme  
13 Court and Courts of Appeal.

14         7. I have been engaged in the practice of labor and employment law since 2000,  
15 handling well over 300 wage and hour class and PAGA actions and several individual labor cases.  
16 I have litigated several types of employment actions, including complex ERISA employee  
17 welfare benefit plan cases, as well as wage and hour class actions before Federal and State Courts  
18 in California. In 2014, I tried a wage and hour class action involving claims for illegally deducted  
19 wages and unreimbursed expenses in the matter of *Dilts v Penske Logistics LLC, Inc.* I  
20 successfully appealed the trial court ruling in *Dilts* finding state laws preempted by the FAAAA  
21 for truck drivers.

22         8. I have participated in over 50 appellate cases and argued writs and appeals before  
23 several California District Courts of Appeal, successfully arguing the landmark *Vaquero* appeal  
24 for plaintiffs in the Second District Court of Appeal, *Vaquero v. Stoneledge Furniture, LLC*  
25 (2017) 9 Cal.App5th 98 (requiring employers separately pay commission sales employees for  
26 rest periods). As lead counsel in *Brinker Restaurant Corp. v. Superior Court* [formerly reported  
27 at (2008) 165 Cal.App.4th 25], I argued before the Fourth District Court of Appeal in May 2008  
28 on transfer from the California Supreme Court, and co-authored the briefing in the successful

1 Supreme Court appeal. I have also argued federal appeals in the Second, Third, and Ninth Circuit  
2 Courts of Appeals. In addition, I have drafted numerous appellate briefs as the appellant,  
3 respondent, or amicus curiae in various employment class and individual actions. My firm has  
4 successfully tried multiple class cases, obtained appellate reversals of class certification denials  
5 (*Hicks v. Kaufman and Broad*, (2001) 89 Cal.App.4th 908), and certified multiple consumer and  
6 wage and hour class actions.

7 9. I have drafted amicus letters on a range of issues, primarily for the California  
8 Employment Lawyers Association (CELA), supporting publication or depublication of Court of  
9 Appeal decisions. I have been primarily responsible for dozens of wage and hour class actions,  
10 from drafting the complaint, through discovery, dispositive motions, settlement, and settlement  
11 approval. I have also acted as lead appellate counsel in the following class action and PAGA  
12 action cases: *Maldonado, et al. v. Fast Auto Loans, Inc. dba RPM Lenders* (2021) 60 Cal. App.  
13 5th 710 (2021); *Mondragon v. Santa Ana Healthcare & Wellness Ctr., LP* (September 29, 2021,  
14 B307872) [nonpub. opn.].

15 10. As a part of our overall firm philosophy lawyers perform community service and  
16 pro bono work. Firm volunteer work includes service through the Legal Aid at Work, San Diego  
17 Volunteer Lawyer Program, the San Diego County Bar Foundation, and Consumer Attorneys of  
18 San Diego. I have served on the Legal Aid at Work Board of Directors since 2010. Mr. Cohelan  
19 served as the Chair of the San Diego Volunteer Lawyers Program from 2015-2018, and currently  
20 sits on the Board as past Chair. He completed 24 years of volunteer judicial service as a Judge  
21 Pro Tem of the San Diego Superior Court. Partner Diana M. Khoury has been a member of the  
22 San Diego County Bar Association, Consumer Attorneys of San Diego, and Consumer Attorneys  
23 of California, serving and chairing various committees through the years for these organizations.  
24 Partner Maggie Realin has volunteered at the Legal Aid Society of San Diego where she advised  
25 clients on preparing and filing civil restraining orders and answers to unlawful detainer, for which  
26 she was awarded a Wiley B. Manuel Award for Pro Bono Legal Services in 2010. Partner Jeff  
27 Geraci is a past recipient of the Wiley W. Manuel Award for Pro Bono Service. Our firm's pro  
28 bono victories include a settlement which prohibits the City of San Diego from targeting

homeless people for illegal lodging tickets under Penal Code Section 467(j). (*Spencer v. City of San Diego*, USDC Case No 04CV-2314 BEN (WMC).) The *Spencer* settlement had the effect of increasing the number of available shelter beds in San Diego.

11. CKS has been certified Class Counsel in the following contested proceedings: *Aguilar v. Atlantic Richfield, et al.*, San Diego Superior Court Case No. 00700810; *Andino v. Kaiser Foundation Hospitals*, Alameda Superior Court Case No. RG11580548; *Arellano, et al. v. Container Connection of Southern California, Inc.*, Los Angeles Superior Court Case No. BC500675; *BANK OF AMERICA WAGE AND HOUR EMPLOYMENT PRACTICES LITIGATION*, United States District Court, District of Kansas MDL Case No. 2138 (FLSA Condition Certification); *Czuchaj v. Conair Corporation*, United States District Court, Southern District of California Case No. 13CV1901; *Dilts, et al. v. Penske Logistics, L.L.C., et al.*, United States District Court, Southern District of California Case No. 08CV0318; *Englert, et al. v. AT&T Wireless Services, Inc., et al.*, Circuit Court of the Second Circuit, State of Hawaii Case No. 02-1-0074; *Evans v. Washington Mutual Bank*, Orange County Superior Court Case No. 02CC15415; *Filion v. Ethan Allen Retail Inc.*, United States District Court, Southern District of California Case No. 05CV2340; *Gerard v. Les Schwab Tire Centers of California, Inc.*, Sacramento Superior Court Case No. 2007-30000003; *Grana, et al. v. PICO Enterprises, Inc. dba Phyle Inventory Control Specialist and PICS L.A.S.C.* Case No. BC472891; *Gutierrez v. Save Mart Supermarkets* San Mateo Superior Case No. CIV530955; *Wilcox v Albertsons*, San Diego Superior Court Case No. GIC833922; *Gonzalez, et al. v. Freedom Communications, Inc. d/b/a The Orange County Register*, Orange County Superior Court Case No. 03CC08756; *Graham, et al. v. Overland Solutions, Inc.*, United States District Court, Southern District of California Case No. 10CV0672 (FLSA Conditional Certification); *Hicks v. Kaufman and Broad Home Corp.*, Los Angeles Superior Court Case No. B198414; *Hohnbaum, et al. v. Brinker Restaurant Corporation, et al.*, San Diego Superior Court Case No. GIC834348; *KEMP, et al. v. CSEA, et al.*, Circuit Court of the First Circuit, State of Hawaii Case No. 98-3815-08; *LIBERTY MUTUAL OVERTIME CASES*, Los Angeles Superior Court Case No. JCCP 4234; *Mitchell, et al. v. Acosta, Inc., dba Acosta Sales and Marketing Company*, United States District Court,

Central District of California Case No.11CV07196 (FLSA Conditional Certification); *Parra v. Aztec Landscaping Inc.*, San Diego Superior Court Case No. 37-2019-00002992-CU-OE-CTL; *Santana v. Rady Children's Hospital-San Diego*, San Diego Superior Court Case No. 37-2014-00022411; *Schaffer v. Rady Children's Hospital-San Diego*, San Diego Superior Court Case No. 337-2015-00022978; *Schneider, et al. v. Catholic Healthcare West*, San Francisco Superior Court Case No. CGC-10-506243; *Salucci v. Amada Senior Care, Inc.*, Orange County Superior Court Case No. 37-2015-00778081; *Smith v. California Pizza Kitchen*, San Diego Superior Court Case No. 37-2008-00083992; STEROID HORMONE PRODUCT CASES, Los Angeles Superior Court Case No. JCCP 4363; *Stevenson Aibangbee v. Victoria Apartments, et al.*, Los Angeles County Superior Court Case No. BC299498; *Swift v. Liebert Corp.*, Orange County Superior Court Case No. 00CC04588; *Sylvia, et al. v. Wells Fargo Home Mortgage, Inc.*, Orange County Superior Co Case No. 03CC05747; *Vaquero v. Ashley Furniture Industries, Inc., et al.*, United States District Court, Central District of California Case No. 12CV8590; *Vaquero v. Stoneledge Furniture LLC*, Los Angeles Superior Court Case No. BC522676; *Vazquez v. Kraft Heinz Foods Company*, United States District Court, Southern District of California Case No. 16-CV-02749; *Watson v. Raytheon Company*, United States District Court, Southern District of California Case No. 10CV0634; and *Weigle v. FedEx Ground Package System, Inc.*, United States District Court, Southern District of California Case No. 06CV1330, among others, as well as being appointed Class Counsel in connection with well over 200 class action settlements.

12. As Class and PAGA Representative Counsel, CKS has actively commenced, prosecuted and concluded numerous state and federal class and representative actions. Since 2016, Cohelan Khoury & Singer has played a central role in the resolution of over 200 such cases, including the following, which have received court approval: (a) *Arellano, et al. v. Container Connection of Southern California, Inc.*, Los Angeles Superior Court, Case No. BC500675, Hon. Anne I. Jones; (b) *Castro v. Home Depot U.S.A., Inc.*, Los Angeles County Superior Court, Case No. BC577885, Hon. Elihu M. Berle; (c) *Czuchaj v. Conair Corporation*, United States District Court, Southern District of California, Case No. 13-CV-1901 BEN, Hon. Roger T. Benitez; (d) *Gardiner v. TSYS*, United States District Court, Central District of California, Case No. 18-cv-

00415, Hon. David O. Carter; (e) *Grana v. PICO Enterprises, Inc.*, Los Angeles County Superior Court, Case No. BC472891, Hon. Stephanie M. Bowick; (f) *Gutierrez v. Save Mart Supermarkets*, San Mateo County Superior Court, Case No. CIV530955, Hon. Marie S. Weiner; (g) *Hernandez v. Workforce Enterprises WFE, Inc.*, Los Angeles County Superior Court Case No. BC590913, Hon. Elihu M. Berle; (h) *Hicks v. Poway Academy of Hair Design, Inc.*, San Diego County Superior Court, Case No. 2014-00026517, Hon. Ronald L. Styn; (i) *Hubbard v. Caliber Home Loans, Inc.*, Orange County Superior Court, Case No. 2018-01017838; (j) *Klein v. Loomis Armored US, LLC*, San Bernardino County Superior Court, Case No. CIVDS1704547, Hon. David Cohn; (k) *Laureano v. The Art of Shaving*, Los Angeles Superior Court, Case No. BC550093, Hon. Amy D. Hogue; (l) *Lopez, et al. v. Management & Training Corporation, et al.*, United States District Court, Southern District of California, Case No. 17-CV-010624 JM, Hon. Jeffrey T. Miller; (m) *Magdaleno v. Shelly Automotive, LLC*, Orange County Superior Court Case No. 2013-0043958, Hon. Kim. G. Dunning; (n) *McGrath, et al. v. Wyndham Resort Development Corporation, et al.*, United States District Court, Southern District of California, Case No. 15-CV-1631 JM, Hon. Jeffrey T. Miller; (o) *Mena v. Wolfgang Puck Catering*, Los Angeles County Superior Court Case No. BC582743, Hon. John Shepard Wiley, Jr.; (p) *Morales v. The Los Angeles Country Club*, Los Angeles Superior Court, Case No. BC566493, Hon. William F. Highberger; (q) *Nijmeh v. Bon Appetit Management Company, Inc.*, Santa Clara County Superior Court, Case No. 16CV294127, Hon. Thomas E. Kuhnle; (r) *Plascencia v. Aramark Services, Inc.*, Santa Clara County Superior Court, Case No. 2015-1-CV-288310, Hon. Brian C. Walsh; (s) *Plimpton v. Gordon Trucking, Inc.*, San Bernardino County Superior Court, Case No. CIV-DS-1511918, Hon. Donald Alvarez; (t) *Raya v. Amazon*, USDC, Northern District of California, Case No. 15-CV-02005 MMC, Hon. Maxine M. Chesney; (u) *Rivas v. ESA Management*, USDC, Central District of California, Case No. 14-CV-5767, Hon. Dale S. Fischer; (v) *Rodriguez v Healthcare Partner Medical Group, Inc.*, Los Angeles Superior Court, Case No. BC541313, Hon. Kenneth Freeman; (w) *Ryan v. Dignity Health*, Sacramento County Superior Court Case No. 2013-00147371, Honorable Alan G. Perkins; (x) *Santana v. Rady Children's Hospital-San Diego*, San Diego Superior Court Case No. 37-2014-00022411, Hon. Joel R.



1 Wohlfeil; (y) *Schaffer v. Rady Children's Hospital-San Diego*, San Diego Superior Court Case  
2 No. 337-2015-00022978; Hon. Joel R. Wohlfeil; (z) *Schneider v. Catholic Healthcare West*, San  
3 Francisco Superior Court, Case No. CGC-10-506243, Hon. Angela Bradstreet; (aa) *Schwartz v*  
4 *Bank of the West*, San Francisco Superior Court, Case No. CGC-14-538955, Hon. Harold E.  
5 Kahn; (bb) *Syed v. M.I. Swaco*, USDC, Eastern District of California, Case No. 12-CV-01718  
6 DAD, Hon. Dale A. Drozd; (cc) *Vaquero, et al. v. Stoneledge Furniture, LLC*, Los Angeles  
7 Superior Court Case No. BC522676, Hon. Elihu M. Berle; (dd) *Vazquez v. Kraft Heinz Foods*  
8 *Company*, USDC, Southern District of California Case No. 16-CV-02749, Hon. William Q.  
9 Hayes; (ee) *Walsh v. Cedars-Sinai Medical Center*, Los Angeles County Superior Court Case  
10 No. BC487290, Hon. William F. Highberger; among others.

11 13. Our attorneys have recognized expertise in class action evaluation, adjudication,  
12 and resolution. This allowed our firm to assist in evaluating and achieving a settlement for the  
13 class.

14 14. The Parties attended mediation on November 29, 2022, with Steve J. Rottman, Esq.,  
15 an experienced wage and hour neutral. The Parties could not resolve the Action after the first  
16 mediation.

17 15. After the failed mediation, the Parties continued to vigorously litigate the matter,  
18 with Plaintiffs filing a Motion for Summary Adjudication.

19 16. On January 9, 2025, the Parties participated in a second all-day mediation  
20 presided over by Steve G. Mehta, Esq. an experienced wage and hour neutral. At the conclusion  
21 of the mediation session, the Parties were not able to reach a settlement, but with ongoing  
22 settlement negotiations facilitated by Mr. Mehta, the Parties reached a settlement in principle in  
23 late August 2025.

24 17. No member of CKS has any conflicts of interest with the class or with the  
25 Plaintiffs, nor are they related to either Plaintiff.

26 18. As CKS has done since its entry into this matter, we will continue to fulfill our  
27 responsibility to the Plaintiffs and the members of the class.

28 ///

1           19.     CKS endorses the terms and conditions of the proposed Settlement. We  
2 respectfully request that the Court grant preliminary approval of the Class and PAGA Action  
3 Settlement, approve the proposed Class Notice, and set a date to conduct the final approval  
4 hearing.

5           20.     Plaintiff Curley consented to apportion fees between Class Counsel as follows:  
6 55% of attorneys' fees will be allocated to the Haines Law Group, APC; 31.5% to Cohelan  
7 Khoury & Singer; and 13.5% to the Nakase Law Firm.

8           21.     I confirm that neither I, nor the members of my firm, have any interest or  
9 involvement in, and are not affiliated with, the proposed settlement administrator, Apex Class  
10 Action Administration.

11           I declare under the penalty of perjury under the laws of the State of California that the  
12 foregoing is true and correct and this declaration is executed on October 27, 2025 in San Diego,  
13 California.

14  
15   
16 Michael D. Singer