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

1 I, Rosemary C. Khoury, declare as follows:

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

7 2. I am a 2019 University of San Diego graduate and admitted to the California
8 State Bar in 2020. I have been admitted to practice before the following courts: Ninth Circuit
9 Court of Appeals; Southern, Central, Northern, and Eastern Districts of California; and all
10 California State Courts.

11 3. In 2020, I joined CKS. I have been engaged in the practice of labor and
12 employment law since then. CKS, founded in 1981, has a long history of successful wage and
13 hour practice, as detailed in the declaration of Michael D. Singer, filed with the instant motion.
14 Since joining CKS, I have been primarily responsible for over a dozen wage and hour class
15 actions, from drafting the complaint, through discovery, dispositive motions, settlement, and
16 settlement approval.

17 4. I have worked substantially on, and have been certified class counsel for
18 settlement purposes in, the following class actions: *Garcia v. Lightning Source LLC, et al.*
19 (Fresno Superior Court Case No. 20CECG01641); *Lopez v. GE United Technologies, LLC d/b/a*
20 *Grassdoor* (L.A.S.C. Case No. 20STCV34691); *Caracoza, Jr. v. Ashley Furniture Industries,*
21 *Inc. d/b/a The Ashley Companies* (San Bernardino Superior Court Lead Case No.
22 CIVDS2012912); *Schiller v. Ashley Distribution Services, Ltd.* (San Bernardino Superior Court
23 Case No. CIVDS2014776); *Alfaro, et al. v. Broadly Inc.*, (Alameda Superior Court Case No.
24 RG19022174); *Butler v. PowerSchool Group LLC* (Sacramento Superior Court Case No. 34-
25 2021-00303458-CU-OE-GDS); *Scott, et al. v. Blackstone Consulting, Inc.* (U.S.D.C. Case No.
26 21CV1470 MMA (KSC)); *Morris v. The Lincoln National Life Insurance Company, et al.*
27 (L.A.S.C. Case No. 22STCV20426); *Magallan v. SW Ingredients Holdings, LLC d/b/a Spice*
28 *World, Inc.* (Fresno Superior Court Case No. 22CECG00586); *Martinez v. J & J Snack Foods*

1 *Corp. of California* (L.A.S.C. Case No. 19STCV31346); *Garcia v. Backyard Products LLC*
2 (Sacramento Superior Court Lead Case No. 24CV009779). Aside from these settlements, I am
3 currently litigating several putative class actions, PAGA actions, and actions which have been
4 compelled to individual arbitration.

5 5. I have successfully concluded one individual arbitration to date, with the award
6 issued to claimant being largely affirmed by the superior court; the employer has since appealed
7 the judgment affirming the award and filed its opening brief: *Wallace v. Optum360 Services,*
8 *Inc.* (Sacramento Superior Court Case No. 34-2020-00279464-CU-OE-GDS; California Court
9 of Appeal, Third Appellate District, Case No. C102891).

10 6. I have drafted the following amicus letters supporting publication or de-
11 publication of Court of Appeal decisions: *Joshua Magnetti v. The Highest Craft, LLC et al.*
12 (Case No. D084033) (on behalf of CKS); *Medina v. United Airlines* (Case No. B293677) (on
13 behalf of the California Employment Lawyers Association (“CELA”)).

14 7. I have also acted as appellate counsel in *Herrera and Rothstein v. Doctors*
15 *Medical Center of Modesto, Inc.*, Stanislaus County Superior Court Case No. CV-19-006126,
16 successfully arguing before the Court of Appeal that it should affirm its order denying
17 appellant’s petition to compel arbitration.

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

22 9. Plaintiff Curley consented to apportion fees between Class Counsel as follows:
23 55% of attorneys’ fees will be allocated to the Haines Law Group, APC; 31.5% to Cohelan
24 Khoury & Singer; and 13.5% to the Nakase Law Firm.

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

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

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

7
8 
9 Rosemary C. Khoury