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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

BREANN HOWARD, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiff,

vs.

KOULAX ENTERPRISES, a California
Corporation; and DOES 1 through 50,
Inclusive;

Defendants.

Case No.: 21GDCV01154

**DECLARATION OF PLAINTIFF
BREANN HOWARD IN SUPPORT OF
PLAINTIFF'S MOTION TO APPROVE
PAGA SETTLEMENT**

Date: January 14, 2026

Time: 8:30 a.m.

Reservation ID: 465957180582

Judge: Lauren A. R. Lofton

Dept.: X

1 I, BREANN HOWARD, declare as follows:

2 1. I am a party to this action and reside in the State of California. I am fully competent
3 to make this declaration. I have personal knowledge of the facts set forth herein, except for those
4 stated on information and belief, and as to those I am informed and believe them to be true. If called
5 upon to testify, I could and would testify as set forth herein.

6 2. I make this Declaration in support of Plaintiff's Motion to Approve PAGA
7 Settlement.

8 3. I was employed by Defendant KOULAX ENTERPRISES ("Defendant"), as a non-
9 exempt, hourly-paid employee within California from approximately May of 2019 through January
10 of 2021.

11 4. Throughout my employment with Defendant, I am informed and believe that myself
12 and other non-exempt, hourly-paid employees of Defendant were not paid all wages owed because
13 we were not paid for all time under Defendant's control, or for which we were suffered or permitted
14 to work by Defendant. In addition, I am informed and believe we were not paid or underpaid for
15 overtime hours worked at the overtime rate of pay owed due to, without limitation, failure to record
16 all time worked and failure to pay for off-the-clock work and/or miscalculation of regular rate of
17 pay.

18 5. During my employment with Defendant, I often took meal periods that were after the
19 fifth hour, short, or not duty-free. I witnessed other non-exempt, hourly-paid employees with my
20 job duties often taking meal periods that were after the fifth hour, short, or not duty-free, as well.

21 6. I do not believe I was provided with opportunities to take full, uninterrupted, separate
22 10-minute rest periods while working with Defendant and am informed and believe my coworkers
23 were not provided with such an opportunity, either.

24 7. Before and during the course of litigation, I was actively involved in assisting my
25 attorneys to support the wage and hour claims asserted. My involvement began before the initial
26 complaint was filed wherein, I provided first-hand knowledge and documentation as to Defendant's
27 practices, its ownership and corporate structure, and their wage and hour policies and practices.

28 8. Part of the information I relayed was with regard to Defendant's timekeeping policies

1 and practices, and their meal and rest period policies and practices.

2 9. I provided my attorneys with documentation provided to me by Defendant during
3 my employment.

4 10. I assisted in reviewing time and payroll records with my attorneys and informed them
5 of Defendant's employment policies and whether those policies matched Defendant's practices.

6 11. My attorneys called me to ask me questions over several times throughout the
7 litigation and I contacted my attorneys several times to stay updated on the case and offer my
8 assistance on any matters I could be helpful with. I was also available for mediation by telephone,
9 during which I was available to be called to answer the questions posed by the mediator regarding
10 the asserted claims, as well as arguments raised by Defendant. In addition, I worked with my
11 attorneys over the next several months after mediation to understand and execute a long form
12 settlement agreement.

13 12. Over the past few months since the mediation has been resolved, I have stayed in
14 touch with my attorneys to ensure that there was no undue delay in payment for other aggrieved
15 employees for whom I brought this Action.

16 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
17 rights of other employees who suffered from the same unfair wage practices. I felt that current
18 employees might not want to share their experiences with Defendant since they feared losing their
19 jobs. This is certainly understandable as I, too, have to provide for myself.

20 20. My goal in bringing this lawsuit was to obtain a recovery on behalf of the aggrieved
21 employees and, even more importantly, to put an end to what I believe are illegal practices on the
22 part of Defendant. I believe I have achieved both through this lawsuit and settlement.

23 21. I understand the obligations of adequately representing the non-exempt, hourly paid
24 employees of the Defendant.

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22. I understand the substantial burden I will have to undertake in order to represent the non-exempt, hourly paid employees of the Defendant.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 11/02/2025 (Date), at Riverside (City), California.

BREANN HOWARD