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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

GILBERT CHAVEZ, JESSE CHAVEZ,
individually, and on behalf of other members
of the general public similarly situated and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act; EVODIO VALLES,
individually, and on behalf of other members
of the general public similarly situated;

Plaintiffs,

vs.

KSC & SON CORPORATION, an unknown
business entity; CHANDI GROUP USA, an
unknown business entity; NACHHATTAR
S. CHANDI, an individual; and DOES 1
through 100, inclusive,

Defendants.

Lead Case No.: CIVSB2124237
Consolidated Case: CIVSB2126976

Honorable Christian Towns
Department S26

CLASS ACTION

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

Date: June 12, 2025
Time: 8:30 a.m.
Department: S26

Complaint Filed: August 20, 2021
FAC Filed: September 12, 2024
Trial Date: None Set

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1 I had obtained.

2 4. In addition, I assisted my attorneys in preparing responses to Defendants' Special
3 Interrogatories (Set One); Form Interrogatories - General (Set One); and Form Interrogatories –
4 Employment Law (Set One) and producing responsive documents. I prepared and appeared for
5 my deposition in connection with this matter on August 23, 2023. Subsequently, I spent time
6 reviewing my deposition transcript.

7 5. Throughout this matter, I was available to answer any questions my attorneys had,
8 and available to speak and meet with my attorneys whenever they needed me. I responded to
9 them as quickly as possible and gave them as much information and identified as many
10 documents as I could. I spent time speaking with my attorneys about the case, identifying
11 potential witnesses, providing my attorneys with documents and information concerning the
12 case, and also describing policies, practices, and procedures of Defendants.

13 6. As far as the settlement is concerned, I was available to review documents and
14 answer any questions my attorneys had. I reviewed the Term Sheet and the Settlement
15 Agreement and discussed the questions I had regarding the potential settlement with my
16 attorneys before signing the settlement papers.

17 7. I think my efforts helped to get the result obtained in this matter, and as a
18 potential class and PAGA representative, I respectfully request that the Court award me an
19 incentive award for my efforts in pursuing and participating in this matter, as well as my broader
20 release of claims. Taking into consideration the time that I have dedicated to this matter, I
21 believe that this amount is reasonable.

22 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

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9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an incentive award, as well as my share of the settlement as a class member and aggrieved employee.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this day February 27, 2025, at San Bernardino, California.

Electronically Signed: 2025-02-27 20:00:16 UTC - 172.56.181.6



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Gilbert Chavez