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Attorneys for Plaintiff and the Class

Electronically FILED by
Superior Court of California,
County of Los Angeles
9/16/2025 9:57 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By M. Strano, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DAVID SAFIER, individually and on behalf of
all others similarly situated;

Plaintiff,

vs.

NSA DOC PREP LLC dba MILLENNIA TAX
RELIEF, a Nevada Limited Liability Company;
MILLENNIA TAX RELIEF DBA LIMITED
LIABILITY CO.; Robert Kim aka Rob King, an
individual; Calen Meza, an individual; Jimmy
Perez, an individual; and DOES 1 through 50,
inclusive;

Defendants.

Case No.: 21STCV27782

**DECLARATION OF ERIC A.
LAGUARDIA IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Judge: Hon. Elihu M. Berle

Date: October 17, 2025

Time: 9:00 AM

Courtroom: Dept. 6 at Spring St Courthouse

1 I, Eric A. LaGuardia, declare:

2 1. I am an attorney at law duly licensed to practice before all of the Superior Courts of
3 the State of California, the United States District Courts for the Southern, Central, and Northern
4 Districts of California; and the Ninth Circuit Court of Appeals. I am counsel of record for Plaintiff
5 David Safier. I have personal knowledge of the facts contained in this declaration and can testify
6 competently thereto if called as a witness.

7 2. I was admitted to the California bar on December 3, 2010. I graduated from
8 California Western School of Law in San Diego, California in May of 2010. I passed the California
9 bar exam in July 2010.

10 3. Approximately fifty percent of my of my practice has been in the area of
11 Employment Law. The balance of my practice has consisted of consumer matters representing
12 consumer plaintiffs. During my clerkship in law school, and in all the years since, I have worked
13 on every portion of several class actions, on behalf of plaintiffs.

14 4. I am named counsel in several past, or currently pending, class action cases. The
15 following are examples of cases I have personally litigated as co-lead counsel:

16 a. In *Mendez et al. v. All State Security Services, Inc.*, 37-2018-00017058-CU-OE-
17 CTL, I served as co-lead counsel in a wage-and-hour class action on behalf of
18 approximately 585 current and former security guards. We alleged failure to pay
19 minimum and overtime wages, denial of meal and rest breaks, failure to reimburse
20 expenses (including requiring employees to use their personal cell phones and data
21 plans for timekeeping), inaccurate wage statements, and related Labor Code and
22 PAGA violations, and reached a class settlement after extensive discovery and
23 mediation.

24 b. In *Park v. Zuffa, LLC et al.*, 2:17-cv-02282-APG-VCF, I was co-lead counsel along
25 with five other firms where we certified a class of over 100,000 people and obtained
26 a settlement providing up to full refunds, and additional compensation for incidental
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1 damages, to class members who were unable to view various portions of a live
2 sporting event due to Defendants' technical difficulties.

3 c. In *Turnette v. Fulton, Friedman, and Gullace*, 3:11-cv-02617-JAH-BLM, I was co-
4 lead counsel with another firm where we certified, after a contested motion, a class
5 of over 30,000 victims of the Defendant's unfair debt collection practices, settling
6 that case only after the close of all discovery.

7 5. After considering the available discovery, range of possible recovery, risk of losing
8 at trial, the difficulties and complexity of the litigation, lengthy process of litigating to judgment,
9 the possibility of delays and appeals, and the substantial risk Defendants' finances pose that
10 proceeding further with the Action would result in no recovery at all, I believe the Stipulation,
11 reached through negotiations facilitated by an experienced and knowledgeable mediator, is in the
12 best interest of the Settlement Class Members, and represents a fair, reasonable, and adequate
13 resolution of this action.

14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct. Executed this 16th day of September 2025, at San Diego, California.

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18 Eric A. LaGuardia
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