

1 KENNETH D. SULZER (SBN 120253)
ksulzer@constangy.com

2 STEVEN B. KATZ (SBN 139078)
skatz@constangy.com

3 MATTHEW SCHOLL (SBN 301560)
mscholl@constangy.com

4 **CONSTANGY, BROOKS, SMITH
& PROPHETE, LLP**

5 2029 Century Park East, Suite 1100

6 Los Angeles, California 90067

7 Telephone: (310) 909-7775

8 Attorneys for Defendant

MACADI CLEANING CORPORATION

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES**

11 JOSE PASCUAL SALGADO, YRENE
12 DIAZ, individually, and on behalf of other
13 members of the public similarly situated, and
14 on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act,

15 Plaintiff,

16 v.

17 MACADI CLEANING CORPORATION, a
18 California corporation; and DOES 1 through
19 100 inclusive,

20 Defendant.

Case No. 21STCV33823

[Honorable Stuart M. Rice – Dept. 1]

**DECLARATION OF CARLA LOPEZ IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Complaint Filed: September 21, 2021

FAC Filed: August 29, 2024

SAC Filed: October 16, 2025

1 I, Carla Lopez, do hereby swear and affirm as follows:

2 1. I am over the age of 18 and I am competent to testify to the matters and facts set forth in this
3 Declaration. I personally am familiar with the facts and statements contained in this Declaration and
4 know them to be true.

5 2. I am signing this of my own free will and without any coercion or duress. I understand that
6 this means no one has forced me to make this statement and I am making it because it is the truth,
7 based on my own first-hand knowledge.

8 3. I am Director of Operations and the second-highest manager at Macadi Cleaning Corporation.
9 The Company is owned by my father, Marco Lopez, and ^{GL}myself my mother, Glenda Lopez.

10 4. I am familiar with the financial statement, which is in the form of a declaration by my father
11 and which is attached hereto as Exhibit A. I reviewed the document at the time it was created. To
12 the best of my knowledge, it is a true and accurate depiction of the financial condition of the
13 Company's financial condition at the time the document was generated.

14 5. I understand Exhibit A was provided to Plaintiffs during the parties' settlement negotiations.
15 The Company's financial condition has not improved since that time and, in fact, has become more
16 precarious.

17 6. Attached hereto as Exhibit B is a true and correct copy of the Profit and Loss Statement from
18 January through May 2024. I reviewed the document at the time it was created. To the best of my
19 knowledge, it is a true and accurate depiction of the financial condition of the Company's financial
20 condition at the time the document was generated.

21 I declare under penalty of perjury, under the laws of the State of California that the foregoing is true
22 and correct., and that this Declaration is executed on 2 day of December 2025, in Los Angeles, California.

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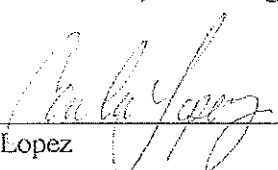

Carla Lopez

EXHIBIT A

Declaration of Marco Lopez

I, Marco Lopez, declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.

2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration. The facts set forth below are true of my personal knowledge.

3. I am the chief executive officer of Macadi Cleaning Corporation ("Macadi").

4. The information contained herein is based on my review of Macadi's tax returns for the tax years 2020, 2021, 2022, and 2023. The information is as follows:

	Gross Receipt/Sales	Gross Profit	Ordinary Business Income (after deductions):	Cash on Hand at Year-End
2020	4,886,950	4,720,040	\$246,000	\$200,390
2021	\$5,498,881	\$5,369,511	\$657,612	\$197,315
2022	\$5,424,339	\$5,348,196	\$593,326	\$71,928
2023	\$5,378,658	\$5,332,729	\$464,893	\$112,026

5. For 2023, the information provided is from the draft tax returns prepared by Macadi's accountants. The returns have not yet been finalized and filed. That said, I do not have any reason to believe that the information will materially change from what is provided in the chart.

6. As noted above, Macadi has limited funds from which to fund a substantial settlement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 12, 2024.

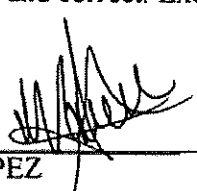

MARCO LOPEZ

EXHIBIT B

Macadi Cleaning Corporation

Profit and Loss

January - May, 2024

	TOTAL
Income	
Janitorial Supplies Sales	12,760.10
Returns & Allowances	-1,029.28
Services Income	2,124,030.86
Unapplied Cash Payment Income	28,999.44
Uncategorized Income	1,725.00
Total Income	\$2,166,486.12
Cost of Goods Sold	
Janitorial Supplies	24,073.91
Total Cost of Goods Sold	\$24,073.91
GROSS PROFIT	\$2,142,412.21
Expenses	
1- Deductions	
Advertising and Promotion	2,195.35
Employee Benefit Expense	55,906.35
Interest Expense	180.88
Rent Expense	7,934.00
Repairs & Maintenance	25,875.45
Salaries & Wages	1,422,101.70
Taxes & Licenses	145,635.21
Total 1- Deductions	1,659,828.94
2-Deductions	
Accounting Expense	8,818.00
Auto and Truck Expenses	20,338.54
Bank Fees	29.20
Commission Expense	6,147.00
Computer and Internet Expenses	1,644.16
Crew Expense	256.17
Education & Training Expense	515.97
Fuel Expense	10,843.77
Insurance Expense	126,019.34
Legal Expense	69,234.97
Meals Expense	5,518.66
Merchant Fees	58.23
Miscellaneous	3,388.08
Office Expense	11,709.91
Outside Services	31,162.00
Parking & Toll Expense	1,186.74
Payroll Processing Fees	13,537.25
Postage & Delivery	977.90
Promotional Expense	192.47
Software Expense	1,083.66

Macadi Cleaning Corporation

Profit and Loss

January - May, 2024

	TOTAL
Telephone Expense	4,359.58
Travel Expense	189.00
Uniforms	1,006.44
Total 2-Deductions	318,217.04
Unapplied Cash Bill Payment Expense	3,210.00
Total Expenses	\$1,981,255.98
NET OPERATING INCOME	\$161,156.23
Other Income	
Interest Income	0.14
Total Other Income	\$0.14
NET OTHER INCOME	\$0.14
NET INCOME	\$161,156.37