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Attorneys for Plaintiff and the proposed class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE

FIDEL PEREZ, an individual, on behalf of
himself and others similarly situated

PLAINTIFF,

v.

FAM, LLC; and DOES 1 thru 50, inclusive,
DEFENDANTS.

CASE NO. 21STCV33308

[Case Assigned for All Purposes to Hon.
Timothy Patrick Dillon in Dept. 15]

**DECLARATION OF FIDEL PEREZ IN
SUPPORT OF FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: June 22, 2026
Time: 10:00 AM
Dept.: 15

Complaint Filed: September 9, 2021
Trial Date: None Set

DECLARATION OF FIDEL PEREZ

I, FIDEL PEREZ, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I worked as a warehouse associate for FAM, LLC (“Defendant” or “FAM”) for four years, from June 5, 2017 to June 18, 2021.

3. In my role as a warehouse associate, I was regularly required to submit to temperature checks without clocking in. I also regularly was not provided a third rest period; reimbursed for necessary business expenses; provided accurate wage statements; and was not provided all wages due at the time of my resignation/termination.

4. I have spent significant time throughout this class action working with Class Counsel. Before filing this action, in 2021, I researched and identified Counsel that I believed could best represent the interests of the Class Members. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for FAM and provided all relevant employment documents in my possession.

5. I made myself available for a full-day mediation on May 24, 2024. On the day of mediation, I actively participated in the discussions with the Class Counsel and shared my knowledge and insights in order to help the Class obtain a favorable settlement.

6. In or around July 2024, I worked with my attorneys to prepare my responses to my former employee’s discovery and document requests. I then reviewed and verified the responses.

7. I was also deposed in person on August 14, 2024.

8. Throughout the entirety of this litigation, I have maintained regular contact with Class Counsel and assisted in any way possible by providing information and making myself available as needed.

9. Though I did not keep contemporaneous time records, I estimate I have spent

1 approximately 24.30 hours on these activities.

2 10. I was aware that by helping to initiate this lawsuit, my name would become known
3 and it was possible that my involvement in this matter could make it more difficult for me to obtain
4 employment in this field. Regardless, I believed it was important to proceed with this matter on
5 my behalf and on behalf of all others who were subject to the same problems during their
6 employment with FAM.

7 11. Based upon my participation in this case, I understand the merits of this settlement
8 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
9 of the class. I believe this Settlement will benefit the Class.

10 12. I am not aware of any conflicts of interest that prevent me from being confirmed as
11 Class Representative in this Lawsuit. I am not related in any way to my attorneys or to any other
12 member of the firm that is representing me. I have no business dealings or other involvement
13 beyond this lawsuit and this representation. I have not been promised any money or inducement
14 to serve as Class Representative in this Lawsuit.

15 13. It is my opinion that the settlement agreement provides for a fair and adequate
16 enhancement for me as a Class Representative, in the amount of \$7,500.00. I believe that this is
17 fair and reasonable in light of all of the work that I have performed in my role as Class
18 Representative. As Class Representative, I have actively participated in all stages of the litigation,
19 as detailed above, and have always maintained the best interests of the Class while performing my
20 Class Representative duties.

21 14. It is also my opinion that the Class Representative enhancement is fair, reasonable,
22 and adequate because, in addition to the many hours spent participating in the prosecution of this
23 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
24 were unsuccessful in this Lawsuit. Likewise, I risk the potential stigma of being a Class
25 Representative in a class action labor dispute, which may affect my future employability.

26 I declare under penalty of perjury under the laws of the State of California that the foregoing
27 is true and correct.
28

Executed this 24 day of May, 2026 at Wilmington, California.
(City)

Fidel Perez
FIDEL PEREZ

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On May 28, 2026, I served all interested parties in this action the following documents described as: **DECLARATION OF FIDEL PEREZ IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

ED GREGORY LAW OFFICE

Ed Gregory
1528 Marion Drive
Email: edgregorylaw@outlook.com

FAM, LLC

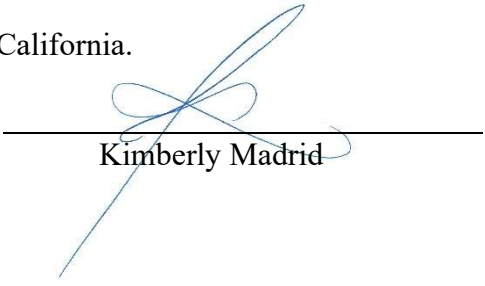
Colleen O'Brien
Nicolas Calzado
5553-B Bandini Blvd.
Bell, CA 90201
Email: cobrien@fambrands.com
ncalzado@fambrands.com

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 28, 2026, at Los Angeles, California.



Kimberly Madrid