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13 Attorneys for Defendant
14 FAM, LLC

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

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

16 vs.

17 FAM, LLC; and DOES 1 thru 50,
18 inclusive,

19 Defendant.

Case No. 21STCV33308

Assigned for All Purposes To:
Judge: Hon. Kenneth R Freeman
Dept: 14

**DEFENDANT'S AND DEFENSE
COUNSEL'S DECLARATION
IN SUPPORT OF
PRELIMINARY APPROVAL**

Date: October 7, 2025
Time: 10:00 AM
Dept. 14

22 We, Colleen O'Brien and Edward Gregory, state the facts set out below, which
23 are known to us personally.

24
25 1. We are the attorneys (Counsel) responsible for representing defendant
26 FAM, LLC in this wage and hour class action and PAGA matter. Ms. O'Brien serves
27 as General Counsel for defendant FAM and gives this declaration on FAM's behalf as
28 well as in her capacity as Counsel.

1 2. We Counsel and FAM have no business or financial connection to
2 Phoenix Class Action Administration Solutions, other than paying Phoenix to
3 administer *Belaire-West* notice earlier in this matter. We know of no actual or
4 potential conflict of interest that would arise should Phoenix serve as Settlement
5 Administrator.

6 3. We Counsel and FAM likewise have no business or financial connection
7 to Bet Tzedek Legal Services and know of no actual or potential conflict of interest
8 that would arise should Bet Tzedek be Cy Pres Recipient of funds represented by
9 uncashed individual class payment or PAGA payment checks issued under the
10 Settlement.

11 4. We Counsel and FAM are aware of no other pending matter or action
12 asserting claims that will be extinguished or adversely affected by the Settlement. A
13 putative class member left FAM's employ in March 2024 and retained William Zev
14 Abramson—one of the lawyers representing the putative class in this matter, at least
15 for a time. Mr. Abramson wrote FAM in December 2024, saying the former employee
16 might bring a number of claims against it, including wage and hour and PAGA claims
17 similar to those in this matter. FAM asked Mr. Abramson to provide more detail
18 about the former employee's allegations in January 2025. It has yet to hear back.
19

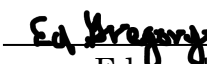
20 We declare these facts to be true and correct on penalty of perjury under
21 California law and execute this declaration in Los Angeles County, California, on the
22 date(s) written below.

23
24 Dated: April 11, 2025



Colleen O'Brien

25
26
27 Dated: April 11, 2025



Edward Gregory

(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 April 16, 2025, I served all interested parties in this action the following documents described as: **DEFENDANT'S AND DEFENSE COUNSEL'S DECLARATION IN SUPPORT OF PRELIMINARY APPROVAL** by placing a true copy thereof in a sealed envelope addressed as stated on the attached service list:

ED GREGORY LAW OFFICE

Ed Gregory (SBN 128375)
1528 Marion Drive
Email: edgregorylaw@outlook.com

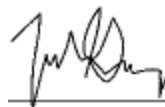
FAM, LLC

Colleen O'Brien (SBN 215514)
Nicolas Calzado
5553-B Bandini Blvd.
Bell, CA 90201
Email: cobrien@fambrands.com
ncalzado@fambrands.com

[XX] (BY ELECTRONIC MAIL THROUGH CASE ANYWHERE): On interested parties set forth on the attached service list.

[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 April 16, 2025, at Los Angeles, California.



Taylor Gregg