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6 Attorneys for Defendant, J.W. Peterson Painting, Inc.
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF ALAMEDA**

10 CUITLAHUAC NINO, individually, and
11 on behalf of all others similarly situated,

12 Plaintiff,

13 vs.

14 J.W. PETERSON PAINTING, INC., a
15 corporation; and DOES 1 through 10,
inclusive;

16 Defendants.
17

No. RG 21111509

**DECLARATION OF JEFFREY G.
McCLURE IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

18 I, Jeffrey G. McClure, declare under penalty of perjury as follows:

19 1. I am an attorney licensed to practice law in all the Courts of the State of California
20 and am attorney of record in the within action for Defendant J.W. Peterson Painting, Inc.

21 2. I am not aware of any actual or potential conflict of interest between CPT Group,
22 Inc. and my firm.

23 3. On January 22, 2024, Jose A. Soto Martinez, a former employee of J.W. Peterson
24 Painting, Inc., filed a civil complaint against Defendant in Alameda County Superior Court, Case
25 No. 24CV060849. I have not determined whether any of the claims in such action will be
26 extinguished or adversely affected by the Settlement. There has been limited activity in the case
27 because plaintiff's counsel has filed a motion to withdraw as counsel of record.

28 4. Aside from the matter disclosed in paragraph no. 3, I am not aware of any other

1 pending matter or action asserting claims that will be extinguished or adversely affected by the
2 settlement.

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

5
6 Dated: July 10, 2024

DAVENPORT GERSTNER & McCLURE,
a Professional Corporation

7
8 
9 JEFFREY G. McCLURE
Attorneys for Defendant, J.W. Peterson Painting, Inc.

PROOF OF SERVICE

Nino v. J.W. Peterson Painting, Inc., et al.
RG21111509

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Ashley Narinyans, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12th Floor, Los Angeles, California 90010. My electronic service address is ashley.narinyans@wilshirelawfirm.com.

On July 24, 2024, I served the foregoing **DECLARATION OF JEFFREY G. MCCLURE IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

Jeffrey G. McClure (SBN 152974)

jeff@laborcounsel.com

Anne Kelson Hummel (SBN 257851)

akh@laborcounsel.com

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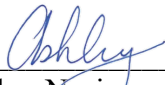
Attorneys for Defendant

(X) **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known email address or e-mail of record in this action.

(X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor & Workforce Development Agency Online Filing Site.

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

Executed on July 24, 2024, at Los Angeles, California.



Ashley Narinyans