

1 Galen T. Shimoda (Cal. State Bar No. 226752)
Justin P. Rodriguez (Cal. State Bar No. 278275)
2 Renald Konini (Cal. State Bar No. 312080)
Shimoda & Rodriguez Law, PC
3 9401 East Stockton Boulevard, Suite 120
Elk Grove, CA 95624
4 Telephone: (916) 525-0716
Facsimile: (916) 760-3733

5 Attorneys for Plaintiffs SAM KEOPHIMANE and LUIS MEDINA
6 individually and on behalf of similarly situated employees

7
8 **SUPERIOR COURT OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN JOAQUIN**
10

11 SAM KEOPHIMANE and LUIS MEDINA,
12 individually and on behalf of all other
similarly situated employees,

13 Plaintiffs,

14 vs.

15 TRACY AUTO L.P. (DBA TRACY
16 TOYOTA), a California Limited Partnership;
17 LOTT AUTOMOTIVE, INC., a California
18 Corporation; RONALD M. LOTT, an
individual; and DOES 1 to 100, inclusive,
19 Defendants.
20
21

Case No. STK-CV-UOE-2022-0001117

*Assigned for All Purposes to Hon. Robert T.
Waters, Department 11B*

PROOF OF SERVICE

Date:

Time: 9:00 a.m.

Dept.: 11B

Judge: Hon. Robert T. Waters

Filed: February 14, 2022

Trial Date: None Set

1 *Keophimane, et al. v. Tracy Auto L.P. (dba Tracy Toyota)*
2 *San Joaquin County Superior Court of California STK-CV-UOE-2022-0001117*

3 **PROOF OF SERVICE — CCP §§ 1013a and 2015.5**
4 **and California Rules of Court, Rule 1.21 and Rule 2.150**

5 I, Elias Tapia, declare that:

6 I am a citizen of the United States and am over the age of eighteen years and not a
7 party to the within above-entitled action.

8 On August 9, 2023, I served the following documents on the party below:

- 9 • PLAINTIFFS' NOTICE OF MOTION AND MOTION TO APPROVE
10 PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT
- 11 • MEMORANDUM OF POINTS & AUTHORITIES IN SUPPORT OF
12 PLAINTIFFS' MOTION TO APPROVE PRIVATE ATTORNEYS
13 GENERAL ACT SETTLEMENT
- 14 • EXHIBIT LIST AND EXHIBITS IN SUPPORT OF PLAINTIFFS'
15 MOTION TO APPROVE PRIVATE ATTORNEYS GENERAL ACT
16 SETTLEMENT
- 17 • DECLARATION OF JUSTIN P. RODRIGUEZ IN SUPPORT OF
18 PLAINTIFFS' MOTION TO APPROVE PRIVATE ATTORNEYS
19 GENERAL ACT SETTLEMENT
- 20 • DECLARATION OF LUIS MEDINA IN SUPPORT OF PLAINTIFFS'
21 MOTION TO APPROVE PRIVATE ATTORNEYS GENERAL ACT
22 SETTLEMENT
- 23 • DECLARATION OF SAM KEOPHIMANE IN SUPPORT OF
24 PLAINTIFFS' MOTION TO APPROVE PRIVATE ATTORNEYS
25 GENERAL ACT SETTLEMENT
- 26 • [PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO
27 APPROVE PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT
- 28 • LETTER TO COURT REGARDING HEARING DATES

21 John P. Boggs (SBN 172578) 22 David J. Reese (SBN 184682) 23 Daniel Padova (SBN 182143) 24 FINE, BOGGS, & PERKINS LLP 25 111 W. Ocean Blvd., Ste, 2400 26 Long Beach, CA 90802 27 Phone: (562) 366-0861 28 Facsimile: (562) 490-8561 Email: jboggs@employerlawyers.com dreese@employerlawyers.com dpadova@employerlawyers.com Kcherry@employerlawyers.com vspenik@employerlawyers.com	
---	--

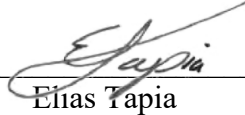
1 [] [By Mail] I am familiar with my employer's practice for the
2 collection and processing of correspondence for mailing with the
3 United States Postal Service and that each day's mail is deposited
4 with the United States Postal Service that same day in the ordinary
5 course of business. On the date set forth above, I served the
6 aforementioned document(s) on the parties in said action by
placing a true copy thereof enclosed in a sealed envelope with
postage thereon fully prepaid, for collection and mailing on this
date, following ordinary business practices, at Elk Grove,
California, addressed as set forth above.

7 [] [By Personal Service] By personally delivering a true copy thereof
to the office of the addressee above.

8 [XXX] [By Electronic Mail] I e-mailed the documents(s) to the person(s)
9 shown above. No error was reported by the e-mail service that I
used.

10 [] [By Overnight Courier] By causing a true copy and/or original
11 thereof to be personally delivered via the following overnight
courier service: _____.

12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct, and that this declaration was executed on August 8, 2023, at
14 Elk Grove, California.

15 
Elias Tapia