

KINGSLEY & KINGSLEY, APC

ERIC B. KINGSLEY, Esq., Cal. Bar No. 185123

eric@kingsleykingsley.com

KELSEY M. SZAMET, Esq., Cal. Bar No. 260264

kelsey@kingsleykingsley.com

16133 Ventura Blvd., Suite 1200

Encino, CA 91436

Telephone: (818) 990-8300

Fax: (818) 990-2903

ABRAMSON LABOR GROUP

WILLIAM ZEV ABRAMSON, Esq. (SBN 289387)

Wza@abramsonlabor.com

11846 Ventura Blvd., Suite 100

Studio City, CA 91604

Tel: (213) 493-6300, Fax (213) 382-4083

Attorneys for Plaintiffs, the proposed class,
and all aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF HUMBOLDT**

GABRIEL GOMEZ, an individual, on behalf
of the State of California, as a private attorney
general; BARON QUIROS, and individual, on
behalf of himself and others similarly situated,

PLAINTIFFS,

v.

WAHID OF PENNSYLVANIA LLC; and
DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. CV2200078

[Case Assigned for All Purposes to Dept. 4]

**DECLARATION OF BARON QUIROS IN
SUPPORT OF FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: October 23, 2023

Time: 10:30 A.M.

Dept.: 4

Complaint Filed: January 14, 2022

Trial Date: None Set

DECLARATION OF BARON QUIROS

I, Baron Quiros, 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 am a former employee of Defendant Wahid of Pennsylvania LLC ("Wahid" or "Defendant") as an hourly employee.

3. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendant because I believe that Wahid did not pay wages and/or overtime, provide meal periods and rest periods, provide accurate itemized wage statements, and pay wages at the time of termination to me and other employees.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched experienced attorneys who are very experienced with these types of lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed on January 14, 2022.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys' various communications regarding this matter, attending a full-day mediation on October 14, 2022; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class Members.

7. I have worked to actively represent the other Class Members and their interests.

8. I have always kept the Class Members interests at heart in this litigation.

1 9. I am prepared to continue assisting with this litigation and am committed to
2 achieving the best possible results for the Class.

3 10. I believe that the Class Action and PAGA Settlement obtained on behalf of the
4 Class is fair and reasonable in light of the issues involved in this case. As mentioned above, I
5 reviewed and discussed the Agreement with my attorneys and asked them questions about it to
6 ensure that I understood its terms and what it would mean for all of the class members.

7 11. I believe that I have fairly represented the absent Class and request that the Court
8 finally approve this settlement and confirm me as Class Representative.

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

14 13. It is my opinion that the settlement agreement provides for a fair and adequate
15 enhancement for me as a Class Representative, in the amount of \$2,500.00. I believe that this is
16 fair and reasonable in light of all of the work that I have performed in my role as Class
17 Representative. As Class Representative, I have actively participated in all stages of the litigation,
18 as detailed above, and have always maintained the best interests of the Class while performing my
19 Class Representative duties.

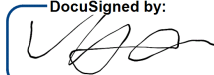
20 14. It is also my opinion that the Class Representative enhancement is fair, reasonable,
21 and adequate because, in addition to the many hours spent participating in the prosecution of this
22 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
23 were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

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

27 Executed this 28th day of September, 2023 at Davie,
28

1 Florida.

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DocuSigned by:

6A3358B09DB845D...
Baron Quiros

(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 September 29, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF BARON QUIROS IN SUPPORT OF FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

BOUTIN JONES INC. Bruce M. Timm btimm@boutinjones.com Kimberly A. Lucia KLucia@boutinjones.com Andrew Ducart aducart@boutinjones.com 555 Capitol Mall, Suite 1500 Sacramento, CA <i>Attorneys for Defendant</i>	ABRAMSON LABOR GROUP William Zev Abramson Wza@abramsonlabor.com 11846 Ventura Blvd, Suite 100 Studio City, CA 91604 <i>Attorneys for Plaintiffs</i>
---	--

☐ **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Encino, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ **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.

☒ **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).

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

Executed on September 29, 2023, at Woodland Hills, California.



Michelle Tanzer