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Attorneys for Plaintiffs PARADICE BROOKS, IGNACIO GOMEZ,
and GAIL ANN GAINES

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN BERNARDINO

PARADICE BROOKS, IGNACIO GOMEZ,
and GAIL ANN GAINES, on behalf of
themselves, all others similarly situated, and
on behalf of the general public,
,

Plaintiff,

v.

BIG BANG ENTERPRISES, INC. dba THE
RETAIL OUTSOURCE; BIG BANG
ENTERPRISES, INC.; and DOES 1-100,
,

Defendants.

Case No.: CIVSB2135164

**DECLARATION OF IGNACIO GOMEZ IN
SUPPORT OF SETTLEMENT APPROVAL**

1 I, IGNACIO GOMEZ, declare as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and
3 would competently testify thereto, except as to those matters stated upon information and
4 belief, and as to those matters, I believe them to be true.
- 5 2. I am the named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit
6 this declaration in support of settlement approval.
- 7 3. I worked for Defendant BIG BANG ENTERPRISES, INC. ("Big Bang") as a non-exempt,
8 hourly employee in California during the Class Period.
- 9 4. Since becoming a class representative, I have diligently worked on this case. I always answered
10 phone calls from my attorneys or called them back promptly when they called.
- 11 5. On many occasions, I spoke with my attorneys for case related purposes. I assisted my
12 attorneys in investigating the case and reached out to them on numerous occasions to provide
13 them with information about my time at Big Bang that I thought might help the case.
- 14 6. I also looked for any paperwork or documents, like my paystubs, from my employment with
15 Big Bang to provide to my attorneys.
- 16 7. I was aware that, at some point in this case, I would have my deposition taken. I knew that the
17 deposition could take a full day and that I may have to meet with my attorneys prior to my
18 deposition. I was at all times ready and willing to sit for my deposition.
- 19 8. Although I did not attend the mediation in person, I was available on the phone for all the
20 negotiations. I spoke with my attorneys regularly throughout the entire process to provide
21 additional information my attorneys asked for and was kept informed on the status of the
22 negotiations.
- 23 9. I gave my consent as representative to settle with Big Bang for the gross settlement amount of
24 \$550,000. I completely and carefully reviewed the settlement agreement. I then signed the
25 settlement agreement.
- 26 10. I estimate that I spent approximately 33 hours or more on tasks like speaking with my attorneys,
27 searching for documents, speaking with other employees, assisting in the mediation process,
28 and reviewing the settlement documents.

11. In light of the work I performed in this case and the duties associated with being a class representative in a case of this magnitude, I believe a \$10,000 class representative enhancement payment is reasonable. I understand that this additional payment is not guaranteed and is subject to Court approval.

12. I have and will continue to adequately represent all of the interests of the class. With my status as class representative, I will treat the interests of the Class above my interests.

13. My claims are typical of the Class Members because I am similarly situated to all current and former non-exempt, hourly employees who worked for Big Bang in California at any time during the Class Period. Thus, my interests are the same as all members of the proposed Class.

14. I recognize that any resolution of this matter must be approved by the Court in terms of whether the settlement is fair and reasonable, and that I am obligated to protect the interests of all of class members for the Class Period.

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

Dated: November 18, 2025

DocuSigned by:
IGNACIO GOMEZ
516468F2B93C4AD...

Ignacio Gomez