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Attorneys for Plaintiff Gail Ann Gaines,
individually and on behalf of all others similarly situated.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
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,

Plaintiffs,

v.

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

Defendants.

Case No.: CIVSB2135164

**DECLARATION OF JOSEPH M.
SZILAGYI IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

1 I, Joseph M. Szilagyi, declare as follows:

2 1. I am an attorney at law duly admitted to practice before all the courts of the State
3 of California and am an associate attorney with Aegis Law Firm, PC (“Aegis”) of record for
4 Plaintiff Gail Ann Gaines (“Plaintiff”) in this matter. I have personal knowledge of the facts set
5 forth in this declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I am making this declaration in support of Plaintiffs’ Motion for Preliminary
7 Approval of Class Action Settlement (“Motion”).

8 **Counsel’s Qualifications**

9 3. Plaintiffs’ counsel in the present action includes my office, Aegis Law Firm, PC
10 (“Aegis”). Aegis is experienced and adequate to be appointed class counsel and has significant
11 experience in similar litigation.

12 4. Aegis prosecutes wage and hour class actions on behalf of employees and others
13 who have had their rights violated similarly to Plaintiffs. Aegis, either on its own, or with co-
14 counsel is currently serving as plaintiffs’ counsel of record in dozens of wage and hour and
15 employment class action cases pending in both state and federal court. The attorneys working
16 on this case have been appointed class counsel in many cases, through both contested motions
17 and settlement approval motions.

18 5. Aegis has litigated and successfully resolved many wage and hour class action
19 cases involving failure to pay wages and derivative Labor Code claims and penalties. *See, e.g.,*
20 *Calma v. Scooter Brew, Inc.*, San Diego Superior Court, Case No. 37-2021-00050379-CU-
21 OE-CTL (class certification granted on April 12, 2024 for non-exempt restaurant employees’
22 on issues of expense reimbursement, unpaid wages for off-the-clock work, meal violations,
23 inaccurate wage statements and waiting time penalties); *Vinalay v. Union City Hotel*
24 *Management Corp. et al.*, Case No. 37-2019-00021268-CU-OE-CTL (class certification
25 granted on April 4, 2022 for non-exempt employees on issues of unpaid overtime, automatic
26 meal period deductions, inaccurate wage statements, and waiting time penalties); *Bonello v.*
27 *Laboratory Express, Inc.*, Case No. CIVDS1714584 (class certification granted for
28 misclassification of employees as independent contractors); *Roman, et al. v. TRM*

1 *Manufacturing, Inc.*, Riverside Superior Court, Case No. RIC1706458 (class certification
2 granted on December 17, 2020 for all current and former non-exempt workers' on issues of
3 rounding, meal period, and rest period claims); *Gamboa v. Kamran, et al.*, San Bernardino
4 Superior Court, Case No. CIVDS1605273 (class certification granted on September 16, 2019,
5 for factory workers on issues of rounding, automatic deduction of first meal period, and second
6 meal period); *Romo, et. al, v. GMRI, Inc. d/b/a/ Olive Garden*, United States District Court
7 Central District of California, Case No. EDCV-12-0715-JLQ (class certification granted for
8 restaurant workers' rest period claims); *Sawyer v. Retail Data, LLC*, Orange County Superior
9 Court, Case No. 30-2014-00753767-CU-OE-CXC (unpaid wage and rest break claims for
10 piece rate workers); *Gonzalez v. SFFI Company, Inc., et. al*, San Bernardino County Superior
11 Court, Case No. CIV DS1504287 (unpaid wages, meal period and rest break claims for non-
12 exempt employees); *Antoine v. Riverstone Residential California, Inc., et. al*, Sacramento
13 County Superior Court, Case No. 34-2013-00155974 (rate of pay, on-call time, unpaid wage,
14 meal period, rest break, and expense reimbursement claims for non-exempt employees);
15 *Nguyen v. Pharmerica*, Orange County Superior Court, Case No. 30-2014-00716072-CU-OE-
16 CXC (unpaid wages and unreimbursed expenses for pharmacists); *Orellana v. Westlake*, Los
17 Angeles County Superior Court, Case No. BC539614 (unpaid overtime, meal period and rest
18 break claims for call center employees); *Kent v. Mountain View Child Care, Inc.*, Los Angeles
19 County Superior Court, Case No. BC539633 (minimum wage, overtime, meal period, and rest
20 break claims for hospital workers); *Durroh v. East West Bank*, Los Angeles County Superior
21 Court, Case No. BC528860 (overtime claims for failure to include bonuses in regular rate of
22 pay for bank workers); *O'Brien et al. v. Pizza Hut of Southeast Kansas, Inc. et al.*, Riverside
23 County Superior Court, Case No MCC 1301030 (meal period and expense reimbursement
24 claims for delivery drivers); *Bell v. Prime Healthcare*, Orange County Superior Court, Case
25 No. 30-2011-00475240-CU-OE-CXC (overtime claims for failure to include shift premiums
26 in regular rate of pay and failure to provide meal and rest periods to hospital workers), *Grana*
27 *v. Toys R US-Delaware, Inc.*, Central District of California, Case No. 2:13-cv-01302-DSF-
28 JCG (bag check claims for unpaid wages and failure to provide meal periods and rest breaks

1 to retail employees); *Mendez v. H.J. Heinz Company, L.P., et. al*, Orange County Superior
2 Court, Case No. 30-2013-00644915-CU-OE-CXC (failure to pay all wages to factory workers
3 due to rounding practice); *Fresh & Easy Wage and Hour Cases*, Los Angeles Superior Court,
4 Cas No. JCCP 4705 (failure to provide meal and rest periods to supermarket workers);
5 *Lunsford v Stater Bros.*, Riverside Superior Court, Case No. RIC 1104475 (failure to provide
6 meal and rest periods to supermarket workers); *Gregg v. Belo*, Riverside Superior Court, Case
7 No. RIC 523697 (unpaid wages and missed meal and rest periods due to misclassification of
8 newspaper delivery employees); *Brown v. Experian Information Solutions, Inc., et. al.*, Orange
9 County Superior Court, Case No. 30-2012-00375163 (misclassification of engineers and
10 similar positions); *Tereth v. Shakey's USA, Inc.*, Los Angeles Superior Court, Case No.
11 BC441359 (failure to provide meal and rest periods to restaurant employees); *Azurin v. Harbor*
12 *Distributing LLC, et. al.*, Los Angeles Superior Court, Case No. BC421392 (failure to pay
13 overtime wages, provide meal and rest periods, reimburse business expenses to Account
14 Managers); *Caffero v. ABC* (failure to provide meal periods and reimburse expenses of
15 therapists).

16 6. Samuel A. Wong is a graduate of University of Pennsylvania Law School, where
17 he received his J.D. in 2001. Mr. Wong received a Bachelors of Arts in Sociology from the
18 University of California at Berkeley in 1997.

19 7. After graduation from law school in 2001, the same year in which Mr. Wong took
20 and successfully passed the California Bar Exam, Mr. Wong moved back to Los Angeles,
21 California where he was employed at Paul Hastings, Janofsky & Walker, LLP. While working
22 in the employment department at Paul Hastings, he was involved in numerous wage and hour
23 class action lawsuits and other employment related matters.

24 8. Mr. Wong became a founding partner of Aegis Law Firm, PC in 2003, and focused
25 his practice on plaintiff's side employment work. Throughout his years of practice, Mr. Wong
26 represented and obtained successful outcomes for his clients, including awards through
27 arbitration and trial.
28

1 9. Mr. Wong is a member of the Orange County Bar Association, Orange County
2 Trial Lawyers Association, and California Employment Lawyers Association.

3 10. Mr. Wong was chosen by Law and Politics Magazine as a Super Lawyer Rising
4 Star, representing one of the top 2.5% of lawyers under 40 in Southern California in 2011, 2012,
5 2013, and 2014. He was chosen by Law and Politics Magazine as a Super Lawyer in 2015, 2016,
6 2017, and 2018. Mr. Wong was also chosen as a Top Attorney in the field of employment law
7 by OC Metro in 2014, 2015, and 2018.

8 11. Kashif Haque received his J.D. in 2001 from Washington University School of
9 Law. While in law school, Mr. Haque was a member of the Law Review Editorial Board, author
10 of an article published in the Law Review, Executive Board Member of Moot Court, and a
11 member of the Dean's List. He received a Bachelor's of Science in Business Administration
12 from the University of Central Missouri in 1998, where he was a member of the Beta Alpha Psi
13 honors fraternity.

14 12. Since 2004, Mr. Haque has exclusively focused his practice on plaintiff's
15 employment litigation with a specific focus on wage and hour claims. Since then, he has
16 represented over 500,000 employees with their employment claims, many of which included
17 wage and hour claims. He has been appointed class counsel in approximately 100 cases and is
18 currently litigating over 150 employment wage and hour class action cases.

19 13. Mr. Haque authored a book on employment litigation strategies with West
20 Publishing and has been invited to speak on class action and wage and hour issues on numerous
21 occasions. He has spoken at seminars by the State Bar of California, California Employment
22 Lawyer's Association (CELA), Orange County Bar Association, and various other CLE
23 providers. Mr. Haque is the former Chair for the Labor and Employment Section of the Orange
24 County Bar Association. He was selected as one of the Top 50 Attorneys in Orange County by
25 Super Lawyers for 2017 and 2019. He has been a Super Lawyer for every year from 2009 to the
26 present. OC Register/Metro has selected him as one of the Top 5 Employment Lawyers in
27 Orange County for every year the list was published, from 2012 to 2018.

1 14. Jessica L. Campbell is a Partner at Aegis. She was admitted to the California Bar
2 in December of 2011, and received her J.D. from Santa Clara University School of Law and her
3 B.A. from the University of California, Berkeley. She has dedicated her career to plaintiffs'-side
4 class action. Her experience includes successful work on class action appeals, class certification
5 motions, and class settlements. She was chosen by Law and Politics Magazine as a Super
6 Lawyer Rising Star, representing one of the top 2.5% of lawyers under 40 in Southern California
7 in 2018-2021.

8 15. I am a senior attorney at Aegis Law Firm. I was admitted to the California Bar in
9 December of 2017. I received my J.D. from Loyola Law School, and B.A. from California State
10 University, Fullerton. I have worked exclusively on wage and hour class and representative
11 action litigation since joining Aegis in 2019, including on successful class certification motions,
12 approval of class action and PAGA settlements, management of cases through the course of
13 litigation, and with success in the Court of Appeals. Prior to joining Aegis, my experience
14 includes defense-side employment law litigation.

15 16. Aegis has expended considerable time and effort on this case and will continue to
16 do so through final approval of the Settlement.

17 17. Aegis believes that the settlement is fair and reasonable in light of the complexities
18 of the case, the uncertainties of class certification and litigation, and the secured benefit to the
19 class.

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21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct. Executed this 19th day of November, 2025, in Irvine, California.

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24
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26 _____
27 Joseph M. Szilagyi
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