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[Additional Parties On Next Page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

ANGELICA AGUALLO, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

BACARI PDR, LLC a limited liability
Company, et al.; and DOES 1 through 100,
inclusive,

Defendant.

Case No. 22STCV10062

[Related Case No. 23STCV11883]

*[Assigned for all purposes to Hon. Elaine Lu,
Dept. SSC-9]*

**DECLARATION OF MICHAEL J.
JAURIGUE IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
SETTLEMENT CLASS ACTION AND
PAGA**

*[Concurrently filed with: Notice of Motion and
Motion, Memorandum; Declarations of S. Sean
Shahabi, Jasmine Y. Kianfard, Angelica
Aguallo, Clemente Garcia, Sean Hartranft];
[Proposed] Order lodged concurrently
herewith]*

Hearing

Date: April 28, 2026

Time: 8:30 a.m.

Dept: SSC-9

Complaint Filed: March 23, 2022

Trial Date: Not Set

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Declaration of Michael J. Jaurigue

I, Michael J. Jaurigue, declare as follows:

1. I am an attorney licensed to practice in the State of California, a member in good standing of the State Bar of California, and one of the attorneys of record for Plaintiff Angelica Aguillo. I am making this declaration in support of Plaintiff's MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT.

2. I have personal knowledge of the facts to which I am hereafter attesting. If called upon to testify as a witness to the following statements, I could and would do so truthfully and based upon my personal knowledge.

3. I am the founder and managing shareholder of Jaurigue Law Group. I formerly served in the United States Marine Corps from 1992-1996. I graduated from UCLA in 1996 with a B.A. in Philosophy, magna cum laude, and obtained my law degree from U.C. Berkeley School of Law (formerly known as Boalt Hall School of Law) in 1999.

4. Upon graduating from law school, I joined Sheppard, Mullin, Richter & Hampton LLP in Los Angeles, California, where I represented individuals and corporations in a wide range of business litigation matters, including in civil fraud and abuse investigations and False Claims Act cases brought against my clients by the U.S. Department of Justice. In addition, I represented defendants, including the California State Compensation Insurance Fund, in class-action matters while at Sheppard Mullin. In 2008, after a brief stint at a mid-sized firm, I founded The Law Offices of Michael J. Jaurigue, now known as Jaurigue Law Group ("JLG"), which I have managed and where I have worked for over fifteen (15) years.

5. I founded JLG with this cornerstone belief: Everyone deserves great lawyers who care, especially individuals, small business owners, consumers, and employees. Since JLG's inception, I have successfully negotiated over 500 million dollars in settlements on behalf of my clients. JLG has been recognized as Glendale's Best Law Firm by the Los Angeles Times four consecutive years in a row (2017-2020).¹ I have been recognized several times as a "Rising Star" and most recently as a "Super Lawyer" by Super Lawyers and Los Angeles Magazine from 2018 through 2026. I am passionate about protecting consumers' privacy and employees' workplace rights.

1 6. I have worked on, or been appointed as class counsel, or managed JLG attorneys who were
2 appointed as class counsel, in numerous putative consumer and employment class actions, including
3 class actions brought under the California Invasion of Privacy Act section 632.7, the Telephone
4 Consumer Protection Act, the Fair Debt Collection Practices Act, and California's wage and hour laws.
5 For example, more recently, *Gruber v. Yelp*, San Francisco Cnty. Sup. Ct., Case No. CGC-16-554784
6 (\$15,000,000 class-wide settlement), *Story v. Mammoth Mountain Ski Area, LLC*, E.D. Cal. Case No.
7 2:14-cv—2422-JAM-DB (\$3,750,000 class-wide settlement); *Coletti v. Nugget Market, Inc.*, Marin
8 Cnty. Super. Ct. Case No. CIV1600425 (\$2,000,000 class-wide settlement); *Brown v. Cheesecake*
9 *Factory Restaurants, Inc.*, Marin Cnty. Super. Ct. Case No. CIV1504091 (\$350,000 class-wide
10 settlement); *Luna v. Renewal by Anderson, LLC*, N.D. Cal. Case No. 3:18-cv-07304-VC (CIPA
11 putative class action, which settled on an individual basis).

12 7. Consequently, I have substantial experience in using class action procedures for the
13 resolution of disputes. I have been or am currently involved in over 40 class action cases to date. I am
14 readily familiar with the requirements of class action litigation, plaintiffs, lead counsel, and the
15 procedures for resolution of cases as a class. I also have substantial knowledge and experience in legal
16 practice areas that are sometimes helpful in class action matters, including in the areas of bankruptcy
17 and corporations.

18 8. I am a member of the California Employment Lawyers Association ("CELA") and Consumer
19 Attorneys Association of Los Angeles ("CAALA").

20 9. I am currently litigating other class action lawsuits. I have never been disqualified to serve
21 as an attorney in any lawsuit, including any class action litigation.

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

24 Executed on February 20, 2026, at Glendale, California.

25
26 By: Michael Jaurigue
27 Michael J. Jaurigue
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles; I am over the age of eighteen years and am not a party to the within action; and my business address is 300 West Glenoaks Boulevard, Suite 300, Glendale, California 91202.

On February 20, 2026 I served the document(s) described as

DECLARATION OF MICHAEL J. JAURIGUE IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT CLASS ACTION AND PAGA
on the interested parties as follows:

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INCORPORATED, BACARI MC INCORPORATED,
BACARI OPERATIONS, LLC

☒ **BY ELECTRONIC SERVICE (CASE ANYWHERE):** I caused said document(s) to be delivered electronically to be delivered to the addressee(s) listed above via Case Anywhere. I did not receive any electronic message or other indication that the transmission was unsuccessful.

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

Executed on February 20, 2026 at Glendale, California.

/s/ Vanessa Cruz
Vanessa Cruz