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Attorneys for Plaintiff ELIZER PINEDA, in a Representative Capacity only, and on behalf of other members of the general public similarly situated

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

ELIZER PINEDA, in a Representative
 capacity only, and on behalf of other members
 of the general public similarly situated,

Plaintiff,

v.

GOLDEN WEST TIRE CENTERS, LLC, a
 California Limited Liability Company; and
 DOES 1-10, inclusive,

Defendants.

CASE NO. CVRI2203246

**DECLARATION OF ELIZER PINEDA IN
 SUPPORT OF PLAINTIFF'S MOTION FOR
 COURT APPROVAL OF THE PARTIES'
 PAGA SETTLEMENT**

Date:

Time: 8:30 a.m.

Dept.: 1

Judge: Hon. Harold W. Hopp

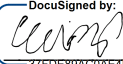
Complaint Filed: August 3, 2022

Trial Date: None Set

1 I, ELIZER PINEDA, hereby declare as follows:

- 2 1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of
3 Plaintiff's Motion for PAGA Approval, Attorneys Fees and Costs, and Plaintiffs' Enhancement
4 Award.
- 5 2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a witness I
6 could and would do so.
- 7 3. To my recollection, I personally met with my Attorneys on at least 2 occasions. Several of those
8 meetings lasted in excess of one hour.
- 9 4. During these meetings, I would review and explain numerous documents turned over by Defendants
10 from my employment. I would also explain my (as well as others') role during work. I also helped
11 identify numerous other employees who could support the claims I was making in this lawsuit.
- 12 5. I also spoke with my attorneys on the phone on at least 15 other occasions.
- 13 6. In total, I estimate that I spent at least 32 hours related to the above mentioned tasks directly working
14 with my attorneys. I also estimate I spent at least another 4 hours of my own time gathering evidence
15 and outlining issues that I later shared with my attorneys.
- 16 7. When I decided to move forward with this case, I was counseled by my attorneys of the potential
17 stigma of being a Representative in a "Wage and Hour," dispute, as this is a publicly filed lawsuit.
- 18 8. I was also advised when I brought this case that had we lost, I could have been personally liable for
19 paying all of Defendants' costs. I was further advised this could be well into the tens of thousands of
20 dollars on this type of case.
- 21 9. Despite these risks I was committed to achieving a settlement that would benefit all employees
22 working for Golden West Tire Centers, LLC.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
24 and correct. Executed this 22nd day of May, 2025.

DocuSigned by:

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ELIZER PINEDA