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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

LILIANA SANDOVAL, ELIZETH MONTES
SOTO, and FLOR ESTRELLITA
ARELLANO PETLACALCO, on behalf of
the State of California and themselves and
aggrieved employees,

Plaintiffs,

v.

LAMPS PLUS, INC.; PACIFIC COAST
LIGHTING, INC.; LAMPS
PLUS/CENETENNIAL, INC.; and DOES 1
through 100, inclusive,

Defendants.

Case No. 22CV014052

[Assigned to the Hon. Ruben Sundeen, Dept. 23]

**DECLARATION OF ELIZETH MONTES
SOTO SUPPORT OF PLAINTIFFS'
MOTION FOR ORDER APPROVING
PAGA SETTLEMENT**

Date: April 30, 2026
Time: 2:30 p.m.
Dept: 23

Reservation ID.: 799595435151

Complaint Filed: July 11, 2022

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DECLARATION OF ELIZABETH MONTES SOTO

I, Elizeth Montes Soto, declare:

1. I am one of the plaintiffs in this action against defendant Lamp Plus, Inc. ("Defendant") and related companies. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I could and would competently testify under oath thereto.

2. I am requesting the Court to award me a service payment of \$15,000. I believe this is a reasonable request in light of the magnitude of the settlement achieved in this case. The gross settlement amount in this case is \$1,760,000 and the amount of service award I am requesting is approximately 0.85% of the gross settlement amount. Based on what has been explained to me by my attorneys, my understanding is that service awards in class and PAGA actions are typically at least 1% of the gross settlement amount.

3. I also believe the amount of service payment I am requesting is reasonable in light of the excellent result achieved on behalf of the aggrieved employees covered by the settlement. Based on what has been explained to me by my attorneys, my understanding is that the settlement covers approximately 1,427 employees. That means that the settlement achieves, on average, a gross recovery of approximately \$1,233 per aggrieved employee. Based on what has been explained to me by my attorneys, I believe that is a very high amount of average gross recovery for aggrieved employees in a PAGA settlement.

4. To date, I have spent approximately 80 hours on this case, including providing my attorneys information and documents regarding the asserted violations against Defendant. Throughout this litigation, I have been available to answer any questions that my attorneys had and assisted in their investigation and pursuit of the claims against Defendant. I was also available by telephone during the mediation on January 24, 2025. During the mediation, I had multiple calls with my attorneys during the mediation and provided important feedback on the merits of the claims. I

1 also spent time reviewing and agreeing to the settlement, and preparing this declaration in support of
2 the settlement.

3 5. My decision to pursue the claims in the Complaint and put my name on the publicly
4 filed document was based on my commitment to assist all employees employed by Defendant and
5 protect employee rights under California law.

6 6. In exchange for receipt of a service payment, I agreed to release any personal claims I
7 had against Defendant. My goal has always been to achieve the best result possible for the
8 employees on whose behalf I brought a PAGA action against Defendant and I believe the amount of
9 service award I am requesting is fair and reasonable in light of what the settlement achieved on
10 behalf of so many aggrieved employees.

11 I declare under penalty of perjury that the foregoing is true and correct, and that this
12 declaration was executed in San Bernardino, California on April 3, 2026.

DocuSigned by:


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Elizeth Montes Soto