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Attorneys for Plaintiff
JORDAN KEITH HELTON

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

JORDAN KEITH HELTON, individually, and
on behalf of other members of the general public
similarly situated,

Plaintiff,

vs.

AMEE BAY, LLC, an unknown business entity;
THREE SAINTS BAY, LLC, an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 37-2022-00027268-CU-OE-CTL
(Lead Case)
*Consolidated with Case No.: 37-2022-
00027280-CU-OE-CTL*

*Assigned for all purposes to the Honorable
Richard S. Whitney, Dept. C-68*

**DECLARATION OF JORDAN KEITH
HELTON IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: April 10, 2026
Time: 10:30 a.m.
Dept.: C-68

Complaint Filed: July 12, 2022
Trial Date: Not set

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I, Jordan Keith Helton, declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in representative class action lawsuit entitled *Helton v. Amee Bay LLC* (San Diego County Superior Court Case No. 32-2022-00027268-CU-OE-CTL) and the representative PAGA lawsuit entitled *Helton v. Amee Bay LLC* (San Diego County Superior Court Case No. 37-2022-00027280-CU-OE-CTL) (collectively, “Actions”). I have personal knowledge of the facts stated herein and if sworn to as a witness I could and would competently testify thereto.

2. I make this declaration in support of the parties' Joint Stipulation of Class Action
GA Settlement ("Settlement" or "Agreement").

3. I am a former employee of Defendants Amee Bay LLC and Three Saints Bay LLC (collectively, "Defendants"). I was employed by Defendants as an hourly-paid, non-exempt Combat Systems Technician from approximately August 2018 to July 2021.

4. After my employment with Defendants ended, I reached out to my attorneys at Lawyers for Justice, PC to discuss my employment with Defendants and the ways I believed I was undercompensated during my employment. I wanted to take steps to make sure that Defendants was held accountable for not paying their employees properly. I spent several hours discussing my experiences working for Defendants with the attorneys at Lawyers for Justice, PC, as complex wage and hour class actions and representative actions under the Labor Code and the Attorney Generals Act. I also had extensive discussions with my attorneys about what it would be to be a named plaintiff and class and PAGA representative, and the duties and risks associated with those roles. After speaking with my attorneys, I agreed to serve as a class and PAGA representative in the Actions.

5. As part of becoming a class representative, I understood that I have a fiduciary duty to the potential class. My duties were explained to me by my attorneys. I understood that in representing the interests of other class members, I must put the interests of the Class above my personal interests in the Actions. I was also aware that serving in this role required me to monitor the progress of the lawsuit, to provide all relevant facts to assist my attorneys with the Actions, and

1 to actively participate in the case as necessary. I understood that it was my duty and responsibility
2 to vigorously prosecute the Actions to obtain the best possible recovery for the other Class
3 Members, and that I would have additional duties and responsibilities, such as responding to
4 written discovery, having my deposition taken, and traveling and participating in the case when
5 needed. I understood that I might have to miss time from work in order to perform these duties. I
6 still agreed to serve as class representative in order to recover unpaid wages for Labor Code
7 violations suffered by myself and other employees.

8 6. Throughout the course of the Actions, I have spent a significant amount of time
9 meeting with my attorneys regarding the Actions and fulfilling my responsibilities as a class
10 representative, including but not limited to, the following tasks: (a) initial consultations with my
11 attorneys regarding my potential claims against Defendants and my duties as a potential class and
12 PAGA representative; (b) conducting my own independent research regarding wage and hour
13 class action and PAGA lawsuits and employment law firms; (c) participating in numerous lengthy
14 meetings, telephone calls and other communications with my attorneys throughout the course of
15 the litigation regarding Defendants' policies, practices, procedures, and operational structure,
16 Class Members' job duties, and my own personal experiences working for Defendants; (d)
17 gathering documents pertaining to my employment with Defendants at the request of my
18 attorneys; (e) reviewing documents with my attorneys and answering their questions; (f) helping
19 my attorneys develop a strategy regarding the documents and information needed to establish the
20 claims alleged in the Actions; (g) providing information regarding potential witnesses to my
21 attorneys; (h) regularly checking in with my attorneys to monitor the status of the Actions; (i)
22 making myself available throughout the day of the mediation and providing my attorneys with
23 additional information during the mediation; (j) reviewing the Agreement and extensively
24 discussing its terms with my attorneys; and (k) reviewing and discussing this declaration in
25 support of the Motion for Preliminary Approval with my attorneys.

26 7. Throughout the course of the Actions, I have made sure that I understood
27 everything that was going on in the cases so I could make the best decisions on behalf of myself
28 and the Class Members. I have routinely checked in with my attorneys to monitor the status of

1 the Actions. I also promptly responded to several additional phone calls from my attorneys
2 throughout the Actions and provided additional information needed for the Actions, including
3 several extensive discussions prior to mediation. I kept in contact with my attorneys throughout
4 the mediation and provided additional information when my attorneys reached out to me during
5 the mediation. After the Parties accepted the mediator's proposal in this matter, I continued to
6 contact my attorneys on a regular basis for updates on their efforts to finalize the Agreement and
7 the Motion for Preliminary Approval. I will continue to actively participate in the Actions and
8 monitor the Settlement until it is finalized.

9 8. When the Actions settled, I reviewed the Settlement and discussed its terms with
10 my attorneys. I recognize and accept that any resolution of the Actions is subject to court approval,
11 and must be designed in the best interest of the Class as a whole. I believe the Settlement is fair
12 and reasonable in light of the issues presented by the Actions.

13 9. Since initiating the Actions, I have considered the interests of the Class just as I
14 would consider my own interests and have put the interests of the other Class Members before
15 my own interests. I am not aware of any interests that I have that are contrary to the interests of
16 the proposed Class Members, and I do not know of any conflicts of interest that would keep me
17 from adequately representing the Class.

18 10. I fully realized the risks I would be taking by pursuing the Actions as a named
19 plaintiff, class representative, and PAGA representative. I knew that future employers might
20 conduct a background check on me or otherwise find out about my participation in the lawsuit,
21 and that serving as the class representative could affect my employment opportunities and my
22 ability to secure a job in the future. I also knew that there was no certainty as to the ultimate
23 outcome of the Actions, and that if Defendants were to prevail in the Actions there was a
24 possibility I could have been liable for Defendants' litigation costs. Despite these risks, I felt so
25 strongly about standing up for the rights of Defendants' employees that I initiated and participated
26 fully in this lawsuit.

27 11. I believe that I have done everything that my attorneys have asked of me and have
28 tried, to the best of my ability, to represent the Class. I think my efforts helped get the result

1 obtained in the Actions. Accordingly, I respectfully request that the Court award me the
2 Enhancement Payment in the amount of \$5,000.00 in recognition of the benefit I helped obtain
3 for other putative Class Members and my active participation in the Actions. I believe that this
4 amount is fair and reasonable in light of the time I have spent on the Actions, the risk I assumed
5 in acting as a class representative, and the broader general release I have agreed to as part of the
6 Settlement.

7 12. I am not related to anyone associated with anyone at Lawyers for Justice, PC or
8 Parker & Minne, LLP.

9 13. I do not have any relationship with or financial interest in the Settlement
10 Administrator, ILYM Group, Inc.

11 14. I have not entered into any undisclosed agreements, and I have not received any
12 undisclosed compensation in the Actions. The only compensation I will receive is whatever
13 amount the Court awards as an enhancement payment, as well as my share of the settlement fund
14 as a Class Member and PAGA Group Member.

15 15. I understand that my attorneys in this case - Parker & Minne, LLP and Lawyers
16 for Justice, PC - have agreed to share the attorneys' fees awarded in this case. I was provided a
17 full written disclosure of this agreement and consented to the agreement in writing.

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

20 Executed on 10/01/2025.

21
22 *Jordan Keith Helton*

23 Jordan Keith Helton (Oct 1, 2025 11:28:34 PDT)

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