

Benjamin H. Haber (SBN 315664)
benjamin.haber@wilshirelawfirm.com
Daniel J. Kramer (SBN 314625)
daniel.kramer@wilshirelawfirm.com
Chase M. Stern (SBN 290540)
chase.stern@wilshirelawfirm.com
Alan Wilcox (SBN 287476)
alan.wilcox@wilshirelawfirm.com
Bradford Smith (SBN 345879)
bradford.smith@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010
Telephone (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

KEVIN ADONAY QUIJADA MOLINA,
individually, and on behalf of all others
similarly situated,

Plaintiff,

v.

CCN FRAMING, INC., a California
corporation; and DOES 1 through 10,
inclusive,

Defendants.

Electronically FILED by
Superior Court of California,
County of Los Angeles
6/18/2025 5:43 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By G. Carini, Deputy Clerk

Case No.: 22STCV10819

CLASS & REPRESENTATIVE ACTION

*[Assigned for all purposes to: Hon. David S.
Cunningham III, Dept. 11]*

**DECLARATION OF PLAINTIFF KEVIN
ADONAY QUIJADA MOLINA IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

DECLARATION OF PLAINTIFF KEVIN ADONAY QUIJADA MOLINA

I, Kevin Adonay Quijada Molina, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of CCN Framing, Inc. (“Defendant”). I worked for Defendant from approximately January 2021 to approximately August 2021 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendant’s policies and practices that have been alleged as unlawful in the Class Action Complaint and Private Attorneys General Act (“PAGA”) Notice sent to Defendant and the Labor & Workforce Development Agency (“LWDA”).

4. I initiated this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all of my meal and rest breaks.

5. By originating this lawsuit as a class representative, I hoped that I might be able to change Defendant’s policies to better protect the working conditions of my co-workers. I also understood that it was my duty as a class representative to represent the best interests of the class, know about the lawsuit, assist my attorneys, and keep updated on the case.

6. I have invested a lot of personal time and energy into this lawsuit, while simultaneously battling financial hardships. As detailed more fully below, I have spent at least 70 hours on this case since I first contacted Wilshire Law Firm. I made it a priority to be actively involved because I wanted to do everything I can to assist my attorneys in prosecuting this case.

7. Throughout this case, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information. For example, during some of the phone

calls, my attorneys and I were able to identify instances when I was not paid correctly. Additionally, leading up to the mediation, I had multiple lengthy phone calls with Wilshire Law Firm regarding the claims at issue and what was to transpire at the mediation

8. Throughout the case, I also spent time looking for documents relevant to the case to send to my attorneys. I spent numerous hours looking for these documents, including when I first contacted my attorneys and before my attorneys filed the case. I also spent time reviewing legal documents in this case, including the retainer and settlement agreement and discussed, in detail, the terms with my attorneys.

9. I believe the settlement is a good settlement and I would recommend that the Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I had the opportunity to represent the class in this lawsuit and that I was able to recover money through a settlement for the class.

10. I did not make the decision to file a class action lightly. I was concerned by the attention a publicly filed lawsuit, and especially a class action, would attract. My name would be associated with a lawsuit that I filed against my former employer. I am mindful that prospective employers might find out that I sued Defendant. Nevertheless, I felt that important rights were at stake that hurt everyone, and something ought to be done about it.

11. I also understand that there was financial risk in bringing this lawsuit. For example, I knew that if I did not prevail in this lawsuit that I could potentially be responsible for Defendant's attorneys' fees and costs.

12. I understand that the settlement agreement provides a service payment to me of up to \$10,000.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment. In addition, the settlement requires that I enter into a general release, which I understand is broader than the release that will bind other class members. I struggled to find consistent work for over two years after my employment with the Defendant ended. Additionally, I have borrowed money from family members to pay bills and rent during this time. I am receiving no additional compensation from Defendant than what is provided for in the settlement.

13. I understand that I could have chosen to pursue these claims on an individual basis, which may have resulted in quicker and potentially more recovery. However, I chose to pursue these claims on behalf of other employees and myself because I believed it was important to help my fellow co-workers. Based on my involvement in this case and the benefits provided to my former co-workers, I can say I helped stand up for the other workers who were too afraid to say anything to management because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care about helping out my former co-workers.

14. I reviewed and signed the Class Action and PAGA Settlement Agreement and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and Defendant's defenses.

15. I have no conflicts of interest with any class member or the Settlement Administrator, Apex Class Action Administration.

16. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

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

Executed on June 17, 2025, at Los Angeles, California.

Firmado por:
KAGM

68170C8A6A53433...
Kevin Adonay Quijada Molina

Molina, et al. v. CCN Framing, Inc., et al.
22STCV10819

1 PROOF OF SERVICE