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11 Attorneys for Plaintiffs
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13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF SAN DIEGO

15 ANTHONY COLBOURNE, an)
individual, on behalf of himself, the State)
16 of California, and aggrieved employees)
17 pursuant to the Private Attorneys General)
Act (PAGA))

18)
19 Plaintiff,)

20 v.)

21)
22 RAYNE DEALERSHIP)
CORPORATION, a Delaware)
23 Corporation; and DOES 1 through 50,)

24 Defendants.)
25)
26)
27)
28)

Case No.: 25CU016047C

**DECLARATION OF IAN PANCER
ISO PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Judge: Euketa Oliver
Dept.-C-75
Hearing Date: 4/3/2026
Time: 9:00 a.m.

[Decs. of Thomas D. Rutledge and Joe
Virgilio, [Proposed] Order, MPA ISO
Motion, and Not. of Mot. filed
concurrently herewith]

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1. I am the counsel of record for the named Plaintiff, the putative Class, and a quasi-attorney general for the State of California and Aggrieved Employees as their designated proxy pursuant to the Private Attorney General Act (PAGA). As such, I am fully familiar with the facts, pleadings, and history of this matter. The following facts are within my own personal knowledge, and if called as a witness, I could testify competently to the matters stated herein.

My Experience Handling Class and Representative Actions.

4. I became a member of the State Bar of California in December 2006.

6. A very small amount of my practice is devoted to other matters.

8. I have been participating in, and approved as, class counsel, on class and representative cases since 2016 (earliest case filing date). I have been counsel of record in numerous putative class actions and Private Attorneys General Act (PAGA) cases. I have been appointed as class counsel in the following class action cases:

- *Don v. Penn, et al.*, San Diego County Superior Court case number 37-2016-00025005-CU-OE-CTL. (filed 2016)
- *Aniezue v. The Sherwin-Williams Company, et al.*, San Diego Superior Court case number 37-2020-00025415-CU-OE-CTL. (filed 2020)

- *Spurlock v. Perry Motors of National City, LLC*, et al., San Diego County Superior Court case no. 37-2020-00007493-CU-OE-CTL. (filed 2020)
- *Smith v. DI Logistics, LLC, et al.* San Bernadino County Superior Court case no. CIVDS 2011469 (filed 2020)
- *Craft v. UAG Escondido MI, Inc., et al.*, San Diego County Superior Court case number 37-2021-00000982-CU-OE-CTL. (filed 2021)
- *Povarnitson v. Electronic Control Systems, LLC* San Diego County Superior Court case number 37-2021-00043575-CU-OE-CTL (filed 2021)

9. I believe the average recovery for the Settlement Class is very good in view of the facts of the case and particularly given the risks inherent in further litigation. The settlement is favorable given that members of the Settlement Class will be promptly compensated, rather than face uncertainties inherent in further litigation and waiting for years of litigation to ensue. Based on all considerations, I believe this settlement is highly favorable, fundamentally fair, adequate, and a reasonable resolution of disputed issues and is in the best interests of the Settlement Class.

Except as to those matters stated on information and belief, I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed March 9, 2026, at San Diego, California

/s/Ian Pancer

Declarant