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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

RYAN ALLEN, individually, and on behalf of
all others similarly situated,

Plaintiff,

v.

THE ASIAN AMERICANS FOR
COMMUNITY INVOLVEMENT OF SANTA
CLARA COUNTY, INC, a California
Corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 25CV457665

CLASS ACTION

[Assigned for all purposes to: Hon. Beth McGowen, Dept. 22]

**DECLARATION OF PLAINTIFF RYAN
ALLEN IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

PRELIMINARY APPROVAL HEARING

Date: December 10, 2026

Time: 1:30 p.m.

Dept.: 22

Complaint filed: January 28, 2025

Trial date: Not Set

DECLARATION OF RYAN ALLEN

I, Ryan Allen, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for The Asian Americans For Community Involvement of Santa Clara County, Inc. ("AACI") as an hourly-paid, non-exempt employee from approximately October 2024 to approximately November 2024.

3. Based on my experience and knowledge of AACI's wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid, non-exempt employees of AACI.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of AACI. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees at AACI.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by AACI's company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by AACI.

7. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the

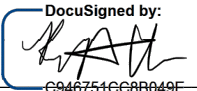
1 other hourly-paid, non-exempt employees by initiating this lawsuit, providing documents and
2 information to my attorneys, keeping in regular contact with my attorneys regarding the status of
3 the case, and reviewing the settlement agreement to make sure it was fair.

4 8. I will continue to actively participate in this lawsuit as necessary and will continue
5 to make myself available to assist in this case moving forward as needed.

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

8 Executed on 4/9/2026, at Turlock, California.

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Ryan Allen