

COHELAN KHOURY & SINGER

Michael D. Singer (SBN 115301)

msinger@ckslaw.com

Rosemary C. Khoury (SBN 331307)

rkhoury@ckslaw.com

605 C Street, Suite 200

San Diego, CA 92101

Telephone: (619) 595-3001/Facsimile: (619) 595-3000

Attorneys for Plaintiff Korey Curley, on behalf of himself
and other similarly-situated and aggrieved employees

[Additional Counsel listed on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

KOREY CURLEY and SCOTT RYAN, on
behalf of themselves and other similarly-
situated and aggrieved employees,

Plaintiffs,

vs.

PAR ELECTRICAL CONTRACTORS,
INC., a Missouri Corporation; PAR
WESTERN LINE CONTRACTORS, LLC,
a Delaware corporation; QUANTA
SERVICES, INC., a Delaware corporation;
and DOES 1 through 10, inclusive,

Defendants.

CASE NO. 37-2021-00019761-CU-OE-CTL
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Katherine Bacal
Department C-63

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF BRAD NAKASE IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT**

Date: July 31, 2026

Time: 1:30 p.m.

Dept.: C-63

[IMAGED FILE]

Complaint filed: May 4, 2021

Trial date: December 6, 2024

NAKASE LAW FIRM, INC.

Brad Nakase (SBN 236226)

brad@nakaselawfirm.com

2221 Camino Del Rio South, Suite 300

San Diego, CA 92108

Telephone: (619) 550-1321

Attorneys for Plaintiff Korey Curley, on behalf of himself
and other similarly-situated and aggrieved employees

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)

phaines@haineslawgroup.com

Fletcher W. Schmidt (SBN 286462)

fschmidt@haineslawgroup.com

Andrew J. Rowbotham (SBN 301367)

arowbotham@haineslawgroup.com

Susan J. Perez (SBN 329044)

sperez@haineslawgroup.com

2155 Campus Drive, Suite 180

El Segundo, CA 90245

Telephone: (424) 292-2350/Facsimile: (424) 292-2355

Attorneys for Plaintiff Scott Ryan, on behalf of himself
and other similarly-situated and aggrieved employees

1 I, Brad Nakase, declare as follows:

2 1. I am the president at Nakase Law Firm, Inc., co-counsel of record for Plaintiff
3 Korey Curley (“Plaintiff”) in this Action. I am the only attorney practicing at Nakase Law Firm,
4 Inc. I submit this declaration in support of the Motion for Final Approval of Class and PAGA
5 Action Settlement. The following facts are within my personal knowledge and if called to testify
6 I could and would competently testify to them.

7 2. I’ve been licensed to practice law in California since 2005. I have been practicing
8 wage and hour law since 2010.

9 3. I have been co-counsel in class action settlements, including:

- 10 • *Tanea Maldonado v. First Mansail, Inc., et al.*, San Diego County Superior
11 Court, Case No. 37-2020-00023369-CU-OE-CTL.
- 12 • *Linda Le v. Mile Square Surgery Center, et al.*, Orange County Superior Court,
13 Case No. 30-2020-01140872-CU-OE-CXC.

14 4. I have no conflicts of interest with the class or with the Plaintiffs, nor am I related
15 to either Plaintiff. I do not represent opposing factions within the class, in that all claims are
16 predicated upon the same theories of liability and benefit all class members equally.

17 5. As I have done since my firm’s entry into this matter, I will continue to fulfill my
18 responsibility to the Plaintiffs and the members of the class.

19 6. I have spent 9.2 hours working on this matter. At \$800 per hour, my lodestar is
20 \$7,360. I have incurred no costs in litigating this matter.

21 7. I fully endorse the terms and conditions of the proposed Settlement. I respectfully
22 request that the Court grant final approval of the Class and PAGA Action Settlement and enter a
23 Judgment.

24 ///

25 ///

26 ///

27 ///

28 ///

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct and this declaration is executed on July 1, 2026 in San Diego, California.

- 2 -