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Attorneys for Plaintiff, QUASHAWN LORAL BROOKS,
on behalf of himself and all others similarly situated and aggrieved

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

QUASHAWN LORAL BROOKS, an
individual and on behalf of all others similarly
situated,

Plaintiff,

v.

ATLAS DISPOSAL INDUSTRIES., a Utah
limited liability company; and DOES 1
through 100, inclusive,

Defendants.

CASE NO.: 25CV004770

[Assigned to the Hon. Lauri A. Damrell in
Dept. 22]

**DECLARATION OF BRIAN ZAGHI IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT AND
PROVISIONAL CLASS
CERTIFICATION FOR SETTLEMENT
PURPOSES ONLY**

DECLARATION OF BRIAN ZAGHI

1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California and I am a principal of Zaghi & Chrzan, LLP, counsel of record for Quashawn Loral Brooks (“Plaintiff”) and all others similarly situated and aggrieved. As such, I am familiar with the file in this matter and, if called as a witness, I could and would competently testify to the following facts of my own personal knowledge.

2. I have reviewed the Court's checklist for Class and/or PAGA settlements.

Adequacy of Class Counsel

3. I am an experienced class action attorney, have been appointed as class counsel in other class actions, and have a successful track record in litigating class actions.

4. I received my Juris Doctor from The Colleges of Law in Santa Barbara & Ventura in 2021 and graduated with Honors.

5. For several years I was an attorney at Bibiyan Law Group, P.C., an experienced employment law firm located in Los Angeles, California, with a focus on wage and hour class actions. Therein, I practiced a range of employment civil litigation exclusively on behalf of plaintiffs, and with a major focus on wage and hour class actions. Among other tasks, I oversaw and managed a caseload of wage and hour class actions, led numerous mediations, drafted and filed motions (i.e. Motion for Class Certification, Motion to Remand, etc.), attended court hearings on a range of topics, and engaged in the discovery process.

6. In July of 2024, I established a law firm focused on representing employees in claims against employers, specializing in recovering unpaid wages and addressing issues of harassment, discrimination, and retaliation in various contexts.

7. My firm has the experience, resources and means necessary to allow us to provide adequate representation as Class Counsel to all class members in this litigation.

8. I have served as Class Counsel in numerous class actions filed in the Superior Court of California and, in some of those matters, have been formally appointed by the Court as Class Counsel for purposes of class certification or settlement approval. In other cases, I have served in the capacity of Class Counsel throughout the litigation, including investigation, discovery,

1 mediation, motion practice, and settlement stages. Examples of actions in which I have served as
2 or been appointed Class Counsel include, without limitation:

3 • *Kim v. Barefoot Dreams, Inc., et al.*, Case No. 23STCV03111, California Superior Court,
4 County of Los Angeles, Honorable Judge Theresa M. Traber, presiding.

5 • *Hernandez v. Todd Pipe & Supply, LLC.*, Case No. 22STCV30190, California Superior
6 Court, County of Los Angeles, Honorable Stuart M. Rice, presiding.

7 • *Low v. Triple Canopy, Inc.*, Case No. 37-2023-00007078-CU-OE-CTL, California
8 Superior Court, County of San Diego, Honorable Carolyn Caietti, presiding.

9 • *Chan v. Panera.*, Case No. 23STCV09024, California Superior Court, County of Los
10 Angeles, Honorable William F. Highberger, presiding.

11 • *Ortega v. BA2, LLC, et al.*, Case No. 22STCV35633, California Superior Court, County
12 of Los Angeles, Honorable Elihu M. Berle, presiding.

13 • *Rigsby v. Reyes Coca-Cola Bottling, LLC.*, Case No. 23CV010356, California Superior
14 Court, County of Sacramento, Honorable Lauri A. Damrell, presiding.

15 • *Arnett v. Traditions Health LLC., et al.*, Case No. CVRI2305219, Riverside Superior
16 Court, Honorable Harold W. Hopp, presiding.

17 • *Easton v. Sunset Tower Management, LLC, et al.*, Case No. 22STCV34112, Los Angeles
18 Superior Court, Honorable Laura A. Seigle, presiding.

19 • *Garcia v. United Site Services of California, Inc., et al.*, Case No. 23STCV02816,
20 County of Los Angeles, Honorable Maren Nelson, presiding.

21 • *Boothe v. Lemonade Restaurant Group, LLC.*, Case No. 22STCV38302, California
22 Superior Court, County of Los Angeles, Laura A. Seigle, presiding.

23 • *Hernandez vs. Hyder & Company*, Case No. 56-2022-00570283-CU-OE-VTA,
24 California Superior Court, County of Ventura, Hon. Jeffrey G. Bennett, presiding.

25 • *Nunley v. Cardinal Logistics Management Corporation, et al.*, Case No.
26 CIVSB2210430, California Superior Court, County of San Bernardino, Honorable David Cohn,
27 presiding.

28 • *Garzia, et al., v. Destiny Farms, LLC., et al.*, Case No. 21CV04529, California Superior

1 Court, County of Santa Barbara, Honorable James F. Rigali, presiding.

2 I have also settled matters on a “PAGA Only” basis for aggrieved employees in the past,
3 including, without limitation, in:

- 4 • *Alvarado v. The Irvine Company, LLC, et al.*, Case No. 30-2019-01050823-CU-OE-
5 CXC, California Superior Court, County of Orange, Honorable William Claster,
6 presiding;
- 7 • *Wright v. Aperto Property, et al.*, Case No. 30-2023-01312346-CU-OECXC,
8 California Superior Court, County of Orange, Honorable Judge Layne Melzer,
9 presiding;

10 9. Currently, my firm is acting as counsel in dozens of wage and hour class actions
11 and representative PAGA actions.

12 10. After a thorough investigation and settlement discussions, class counsel arrived at
13 terms that they viewed was in the best interest of both the class members and the parties.

14 11. Should the Court refuse to grant preliminary approval of this Settlement, many of
15 the Class Members may be denied any recourse for defendants’ alleged violations.

16 12. For these reasons, as well as the reasons provided in the Declaration of Zachary T.
17 Chrzan, I believe that Class Counsel are sufficiently experienced and qualified to evaluate the class
18 members’ claims and viability of defendants’ defenses.

19 13. As further set forth in the Declaration of Zachary T. Chrzan, the Settlement only
20 resulted after having engaged in extensive informal and formal discovery and investigation, and is
21 the product of hard-fought litigation and extensive arm’s-length negotiations.

22 14. I believe, based on my experience as class counsel, that the Settlement is fair,
23 reasonable, adequate and in the best interests of class members.

24 I declare under penalty of perjury under the laws of the state of California that the
25 foregoing is true and correct this April 29, 2026, at Los Angeles, California.

26
27 /s/ Brian Zaghi
28 Brian Zaghi