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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA

LILIANA ESPINOZA, on behalf of herself
and all others similarly situated,

Plaintiff,

vs.

GROOMBUGGY, INC.; BARKBUS, LLC; and
DOES 1 through 100, inclusive,

Defendants.

Case No. C25-00618

**CLASS AND PAGA REPRESENTATIVE
ACTION**

*[Assigned for all purposes to the
Hon. Benjamin T. Reyes II, Dept. 16]*

**DECLARATION OF NEIL M. LARSEN
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA ACTION SETTLEMENT**

Date:
Time:
Dept.: 16

Action Filed: March 5, 2025
FAC Filed: May 12, 2025
Trial Date: None Set

1 I, NEIL LARSEN, declare as follows:

2 1. I am an attorney with Marquee Law Group, co-counsel for Plaintiffs Liliana
3 Espinoza and Remi Dillon (“Plaintiffs”) and the putative class in the above-captioned matter. I
4 am a member in good standing of the bar of the State of California and am admitted to practice
5 in this Court. I have personal knowledge of the facts stated in this declaration and could testify
6 competently to them if called upon to do so.

7 2. I am a 2010 graduate of Santa Clara University School of Law. I was admitted to
8 the California State Bar in June 2011 after passing the bar examination on my first attempt. From
9 January 2012 to February 2026, I worked as an attorney at several prominent employment law
10 firms in Los Angeles County. The vast majority of my work at these firms focused on representing
11 employees in wage and hour and wrongful termination actions, including wage and hour class
12 actions. Although non-exhaustive, the types of work I performed at those firms include:
13 conducting client intakes; performing pre-filing research and analysis; drafting complaints;
14 attending court hearings; corresponding with opposing counsel; drafting and responding to
15 written discovery; preparing for and taking and defending depositions; analyzing payroll and
16 timekeeping records and employee handbooks; drafting and opposing a variety of motions
17 including motions for summary judgment, motions for remand, demurrers and motions to dismiss,
18 motions to compel, motions to quash, and motions for class certification; drafting mediation briefs
19 and attending mediations; drafting long-form settlement agreements; drafting motions for
20 preliminary and final settlement approval; and overseeing the claims and/or opt-out processes.

21 3. Since February 2026, I have worked at my current firm, Marquee Law Group. I
22 am currently staffed on a significant number active wage and hour class actions in both state and
23 federal court in which I play a significant role. The type of work I perform in my current position
24 include, but are not limited: drafting class and representative action complaints, corresponding
25 with clients and opposing counsel, drafting and responding to written discovery requests, drafting
26 letters to the Labor & Workforce Development Agency, drafting mediation briefs and Settlement
27 Agreements, analyzing payroll and timekeeping records and employee handbooks, conducting
28 legal research, and drafting motions and other pleadings.

4. The following is a non-exhaustive list of wage and hour class actions in which I have been appointed as class counsel and/or played a significant role in prosecuting the litigation, and which have received final approval: *Espinoza v. Vander-Bend Manufacturing, LLC*, California Superior Court, Santa Clara County, Case No. 1-15-CV-283929 (granted final approval of settlement on behalf of non-exempt employees in California); *Galeano v. American ETC., Inc. dba Royal Laundry*, California Superior Court, San Mateo County, Case No. CIV534888 (granted final approval of settlement on behalf of non-exempt employees in California); *Granciano v. Southwind Foods, LLC, et al.*, California Superior Court, Los Angeles County, Case No. BC538900 (granted final approval of settlement on behalf of non-exempt employees in California); *Moppin v. Fastaff, LLC*, California Superior Court, Stanislaus County, Case No. 2020283 (granted final approval of settlement on behalf of non-exempt employees in California); *Reyes v. Pentagon Technologies Group, Inc.*, California Superior Court, Alameda County, Case No. HG15767111 (granted final approval of settlement on behalf of non-exempt employees in California); *Salgado v. Safran USA, Inc.*, California Superior Court, Orange County, Case No. 30-2018-00969981-CU-OE-CXC; *Torres v. JJ Motorcars, Inc., et al.*, California Superior Court, Los Angeles County, Case No. BC655446 (granted final approval of settlement on behalf of non-exempt employees in California); *Mustapha v. Palm Springs Motors, Inc.*, California Superior Court, Riverside County, Case No. RIC2003035 (granted final approval of settlement on behalf of non-exempt employees in California); *Ceballos v. Flair Cleaners, Inc.*, California Superior Court, Los Angeles County, Case No. 20STCV28196 (granted final approval of settlement on behalf of non-exempt employees in California); *Hernandez v. Spectra Company*, California Superior Court, Los Angeles County, Case No. 20STCV39910 (granted final approval of settlement on behalf of non-exempt employees in California); *Bojorquez v. JIPC Ventures, Inc.*, Case No. 37-2020-00029943-CU-OE-CTL, California Superior Court, San Diego County, (granted final approval of settlement on behalf of non-exempt employees in California); *Agapito v. La Verne Nursery, Inc.*, Case No. 56-2019-00527470-CU-OE-CTL, California Superior Court, Ventura County (granted final approval of settlement on behalf of non-exempt employees in California); *Whiteley v. Seco Manufacturing Company*, Case No. 192670, California Superior

1 Court, Shasta County (granted final approval of settlement on behalf of non-exempt employees
2 in California); *Carrillo v. Bikehub*, Case No. 20STCV28879, California Superior Court, Los
3 Angeles County (granted final approval of settlement on behalf of non-exempt employees in
4 California); *Macabulit v. DMC Power, Inc.*, Case No. 20STCV32034, California Superior Court,
5 Los Angeles County (granted final approval of settlement on behalf of non-exempt employees in
6 California); *Perez v. Edpo, LLC dba Energy Distribution Partners*, Case No. CU-22-00156,
7 California Superior Court, San Benito County (granted final approval of settlement on behalf of
8 non-exempt employees in California); *Reyes v. B.W. Hotel, LLC*, Case No. 22STCV34570,
9 California Superior Court, Los Angeles County (granted final approval of settlement on behalf of
10 non-exempt employees in California); *Green v. Union Rescue Mission*, Case No. 22STCV30872,
11 California Superior Court, Los Angeles County (granted final approval of settlement on behalf of
12 non-exempt employees in California); *Walters v. UFP Thronton, LLC*, Case No. STK-CV-UOE-
13 2022-0012249, California Superior Court, San Joaquin County (granted final approval of
14 settlement on behalf of non-exempt employees in California); *Rivera v. Copenhagen Sausage*
15 *Garden, LLC*, Case No. 22CV04059, California Superior Court, Santa Barbara County (granted
16 final approval of settlement on behalf of non-exempt employees in California); *Jimenez v. Delta*
17 *View Farms, LLC*, Case No. VCU293548, California Superior Court, Tulare County (granted
18 final approval of settlement on behalf of non-exempt employees in California); *Arce v. Bezsam,*
19 *Inc.*, Case No. 37-2023-00018583-CU-OE-CTL, California Superior Court, San Diego County
20 (granted final approval of settlement on behalf of non-exempt employees in California); *Martinez*
21 *v. TRC Investments, LLC dba ServPro*, Case No. 23STCV03176, California Superior Court, Los
22 Angeles County (granted final approval of settlement on behalf of non-exempt employees in
23 California).

24 5. I have also moved to certify and have received an order certifying a class action in
25 *Juarez v. Dignity Health*, California Superior Court, Los Angeles County, Case No. BC550950
26 (certifying a class of non-exempt employees involving s donning and doffing claim and other
27 wage and hour claims); *Ibarra v. Artisan Screen Printing, Inc.*, California Superior Court, Los
28 Angeles County, Case No. BC644708 (certifying a class of non-exempt employees involving

1 meal period claims, rest period claims, rounding claims, and other wage and hour claims); and
2 *Raymond Barela v. Vicrez.com, LLC* (certifying a class of non-exempt employees involving meal
3 period claims, rest period claims, reimbursement claims, wage statement claims, and waiting time
4 penalty claims).

5 6. As co-counsel for Plaintiffs and the Settlement Class, I have been thoroughly
6 involved in every aspect of this case since joining Marquee Law Group through the present. Based
7 on my experience litigating similar wage and hour class actions, I believe the proposed Settlement
8 is fair, reasonable, and adequate for the Settlement Class.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct. Executed on June 22, 2026 at Beverly Hills, California.

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12 /s/ Neil M. Larsen
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