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Attorneys for Plaintiff and the proposed class

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

JEFFREY HUANG QIXIAN, an individual, on
behalf of himself, others similarly situated, and
on behalf of the State of California, as a private
attorney general,

PLAINTIFF,

v.

GITIBIN & ASSOCIATES, INC., DBA GO
RENTALS; and DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO.

[Case Assigned for All Purposes to Hon.
Somnath Raj Chatterjee in Dept. 21]

**DECLARATION OF JEFFREY HUANG
QIXIAN IN SUPPORT OF FINAL
APPROVAL OF CLASS SETTLEMENT**

Date: September 16, 2025

Time: 2:30 P.M.

Dept.: 21

Reservation ID: 831514238131

Complaint Filed: October 31, 2022

Trial Date: None Set

**DECLARATION OF JEFFREY HUANG QIXIAN IN SUPPORT OF FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

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DECLARATION OF JEFFREY HUANG QIXIAN

I, Jeffrey Huang Qixian, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant Gitibin & Associates, Inc., dba Go Rentals (“Gitibin” or “Defendant”) as a car detailer.

3. I brought this lawsuit, on behalf of myself and all other Settlement Class Members, against Defendant because I believe that Gitibin did not pay me and other Settlement Class Members for all hours worked, including overtime. I did not receive compliant meal breaks, I was not provided with accurate, itemized wage statements, I did not receive proper sick pay, and was not paid all wages due at the time of separation from Defendant’s employ.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched experienced attorneys who are very experienced with these types of lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed on October 31, 2022.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys’ various communications regarding this matter, attending a full-day mediation in March 13, 2024; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class Members.

7. Though I did not keep contemporaneous time records, I estimate the total time spent in connection with this matter is approximately 15-20 hours.

1 8. I have worked to actively represent the other Settlement Class Members and their
2 interests.

3 9. I have always kept the Settlement Class Members interests at heart in this litigation.

4 10. I am prepared to continue assisting with this litigation and am committed to
5 achieving the best possible results for the Settlement Class.

6 11. I believe that the class action settlement obtained on behalf of the Settlement Class
7 is fair and reasonable in light of the issues involved in this case. As mentioned above, I reviewed
8 and discussed the Settlement Agreement with my attorneys and asked them questions about it to
9 ensure that I understood its terms and what it would mean for all of the class members.

10 12. I believe that I have fairly represented the absent Settlement Class and request that
11 the Court finally approve this settlement and confirm me as Class Representative.

12 13. I am not aware of any conflicts of interest that prevent me from being confirmed as
13 Plaintiff in this Action. I am not related in any way to my attorneys or to any other member of the
14 firm that is representing me. I have no business dealings or other involvement beyond this lawsuit
15 and this representation. I have not been promised any money or inducement to serve as Plaintiff
16 in this Action.

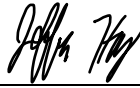
17 14. It is my opinion that the settlement agreement provides for a fair and adequate
18 enhancement for me as a Plaintiff, in the amount of \$10,000. I believe that this is fair and
19 reasonable in light of all of the work that I have performed in my role as Plaintiff. As Plaintiff, I
20 have actively participated in all stages of the litigation, as detailed above, and have always
21 maintained the best interests of the Settlement Class while performing my Plaintiff duties.

22 15. It is also my opinion that the Class Representative Enhancement Award is fair,
23 reasonable, and adequate because, in addition to the many hours spent participating in the
24 prosecution of this case, I accepted the potential risk of being liable for Defendant's attorneys' fees
25 and costs if we were unsuccessful in this Action. Likewise, I risk the potential stigma of being a
26 Plaintiff in a class action labor dispute, which may affect my future employability.

27 I declare under penalty of perjury under the laws of the State of California that the foregoing
28

1 is true and correct.

2 Executed this 15th day of August, 2025 at Hayward,
3 California. (City)

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5 _____
Jeffrey Huang Qixian

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On August 22, 2025, I served all interested parties in this action the following documents described as: **DECLARATION OF JEFFREY HUANG QIXIAN IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

David L. Cheng
dcheng@fordharrison.com
Min K. Kim
mkim@fordharrison.com
FORD & HARRISON LLP
350 S. Grand Avenue, Suite 2300
Los Angeles, CA 90071
Attorneys for Defendant

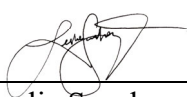
Emil Davtyan
emil@d.law
D.LAW, INC.
400 N. Brand Blvd, 7th Floor
Glendale, CA 91203
Attorneys for Plaintiff

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/432>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 22, 2025, at Encino, California.



Leslie Sanchez



Court Reservation Receipt

Reservation

Reservation ID:
831514238131

Status:
RESERVED

Reservation Type:
Motion re: (Motion for Final Approval of Class Action
Settlement)

Number of Motions:
1

Case Number:
22CV020833

Case Title:
QIXIAN vs GITIBIN & ASSOCIATES, INC., DBA GO
RENTALS

Filing Party:
Jeffrey Huang Qixian (Plaintiff)

Location:
Rene C. Davidson Courthouse - Department 21

Date/Time:
September 16th 2025, 2:30PM

Confirmation Code:
CR-VRCI5HFADSKTSWODY

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	.00	1	.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount:
\$1.00

Type:
MasterCard

Account Number:
XXXX4583

Authorization:
11923Z

Payment Date:
2025-08-21

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