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

EUGENE CHIESA, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

AIRGAS USA, LLC a Delaware limited
liability company; and DOES 1 through 50,
inclusive,

Defendants.

Lead Case No.: 34-2022-00325292

Other Case No.: 34-2022-328603

(Assigned for all purposes to the Hon. Lauri
Damrell, Dept. 22)

**DECLARATION OF KEVIN MAHONEY
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: September 5, 2025

Time: 9:00 a.m

Dept.: 22

1 Larry W. Lee (State Bar No. 228175)
2 Max W. Gavron (State Bar No. 291697)
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1. I am an attorney duly admitted to practice law before the courts in the State of California. The information contained herein is based on my personal knowledge and if called as a witness I could and would testify competently thereto.
2. I am the principal at Mahoney Law Group, APC, and co-counsel of record along with Berkeh Alemzadeh, for co-Plaintiffs Eugene Chiesa, Travis Stephenson, Emerson Tabzon, and Benjamin Negrete (collectively, “Plaintiffs”) in this matter.
3. This declaration is submitted in support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement.

4. I received my Juris Doctorate from Howard University School of Law in 2002. I worked as an associate at Rose, Klein & Marias from 2005 until my resignation in August of 2009.
5. Since 2007, I have been involved in class action litigation involving various wage and hour violations, including the claims in the instant matter. The class size of these cases ranged anywhere between approximately 500 to over 15,000 putative class members with approved settlements in the millions.
6. I am the principal at Mahoney Law Group, APC in Long Beach, California. The firm currently employs ten (10) attorneys, and the practice is focused on representing employees in state and federal wage and hour class actions and consumer class actions.
7. In August 2009, I co-founded Mahoney, Perry & Burrows (now Mahoney Law Group). The firm currently serves as lead counsel and/or co-lead counsel in numerous wage and hour class action matters in Los Angeles Superior Court, Orange County Superior Court, Riverside Superior Court, San Bernardino Superior Court, the United States District Court for the Central District of California and the Southern District of California.
8. I have never faced any disciplinary action or received any sanction for misconduct or an ethical violation.
9. For the past thirteen (13) years my practice has focused on representing employees

1 in state and federal wage and hour class actions. Some examples of cases where I have served as
2 lead and/or co-lead counsel include: Denise Mays v Children's Hospital of Los Angeles, Los
3 Angeles Superior Court, Case No. BC477830; Valerie Brooks v. Life Care Centers of America,
4 Inc., et al., United States District Court, Central District of California, Case No. 8:12-cv-00659-
5 CJC-RNB; Branch v PM Realty Group, LP, Los Angeles Superior Court, Case No. BC575759;
6 Curiel v Glendora Grand, Inc., Los Angeles Superior Court, Case No. BC618831; Fajardo v Para
7 Los Ninos, Los Angeles Superior Court, Case No. BC618609; Flores v Cambrian Homecare, Los
8 Angeles Superior Court, Case No. BC544612 [case certified]; Flores v Galaxy Investments, LTD,
9 Orange County Superior Court. Case No. 30-2015- 00814157-CU-OE-CXC; Frausto v Cosmetix
10 West, Los Angeles Superior Court, Case No. BC548993; Hamann v Auction. Com, LLC, Orange
11 County Superior Court, Case No. 30-2014 00751733-CU-OE-CXC; Hernandez v Leonard
12 Chaidez, Inc., Orange County Superior Court, Case No.30-2015-00800771-CU-OE-CXC;
13 Bautista v 3 Thirty 3 Newport Beach, Orange County Superior Court Case No. 30-2016-
14 00839995-CU-OE-CXC; Sanchez v St. Mary's Medical Center, San Bernardino Superior Court,
15 Case No. CIVDS 1304898 [case certified]; McClean v Summit Career College, Inc., San
16 Bernardino Superior Court, Case No. CIVDS101 1407 [case certified]; Levanoff v SoCal Wings,
17 LLC, Orange County Superior Court, Case No. 30-2011-00511808-CU-OE-CXC [case certified];
18 Harvey Holt, et al. v. Parsec, Inc., et al., United States District Court, Central District of California
19 Case No. CV-9540-VBF (PJWx); Dorothy Berry v. Brierwood Terrace Convalescent Hospital, et
20 al., Los Angeles Superior Court Case No. BC437781; Dante Booker v. The Goodyear Tire and
21 Rubber Company, Los Angeles Superior Court Case No. BC498399; Manuel Diaz, et al. v. Excel
22 Sheet Metal, Inc., Los Angeles Superior Court Case No. BC504033; Fernando Albiar, et al. v.
23 Spectrum Athletics-Canoga Park, et al., Los Angeles Superior Court Case No. BC413860;
24 Gerardo Ortega, et al. v. CR & R Incorporated, Los Angeles Superior Court Case No. BC414434;
25 William Davis v. Pacific Hospital of Long Beach, et al., Los Angeles Superior Court Case No.
26 BC488542; Kurt Casadine v. Maxim Healthcare Services, Inc., United States District Court,
27 Central District of California Case No. CV 12-10078-DMG (CWx); Deborah Cabanillas v.
28 Lakewood Park Manor Healthcare, Inc. et al., Los Angeles Superior Court Case No. BC443859;

1 Daniel Branch v. Indiana Plumbing Supply, Co. Inc. et al., Los Angeles Superior Court Case
2 No. BC425627; Santos v Double Vision Concepts, Inc., Orange County Superior Court, Case No.
3 30- 2014-00723893-CU-OE-CXC; Butch Calvo v. Providence Health Systems-Southern
4 California, et al., Los Angeles Superior Court Case No. BC419843; John De La Torre v. Cri-
5 Help, Inc., Los Angeles Superior Court Case No. BC508430; Esmerelda Fernandez, et al. v. Teva
6 Parenteral Medicines, Inc., Orange County Superior Court Case No. 30-2010-00412849-CU-OE-
7 CXC; Kimya Oliver, et al. v. College Health Enterprise, et al., Los Angeles Superior Court Case
8 No. BC406481; Audi Velazquez v. New Vista Health Services, Inc., Los Angeles Superior Court
9 Case No. BC424797; Rick Wilcox, et al. v. Presbyterian Intercommunity Hospital, et al., Los
10 Angeles Superior Court Case No. BC424796; Raenan Guadez, et al. v. Sega Gameworks, LLC,
11 San Bernardino Superior Court Case No. CIVRS 1105099; Erica Teyuca v Pacific Alliance
12 Medical Center, Inc., Los Angeles Superior Court Case No. BC459422; Yessenia Martinez v.
13 Fresh & Easy Neighborhood Market, Inc., San Bernardino Superior Court Case No. CIVRSI
14 104607; and Maria Zimmerman v. Quality Children's Services, Los Angeles Superior Court Case
15 No. BC472001.

16 10. Neither Plaintiff nor our firm has any known conflicts of interest with any putative
17 class members.

18 **REASONABLENESS OF SETTLEMENT**

19 11. I believe that the Settlement Amount of two million five hundred thousand dollars
20 (\$2,500,000.00) provides a fair recovery to the class for the alleged claims and easily falls within
21 the range of reasonableness, considering all risk factors and potential defenses in the matter.
22 Further, this Settlement is fair and reasonable, because it provides substantial and immediate
23 benefits to the Class Members.

24 12. To my knowledge, neither Plaintiffs nor Plaintiffs' counsels have a conflict with
25 the Class Members.

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1 13. To date, Mahoney Law Group, APC has incurred six thousand nine hundred
2 thirteen dollars and eighty-five cents (\$6,913.85). See attached as Ex. A, a true and correct copy
3 of Mahoney Law Group, APC's costs to date.

4 I declare under penalty of perjury, under the laws of the State of California, that the foregoing
5 is true and correct. Executed this 7th day of August 2025, at Long Beach, California.

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9 Kevin Mahoney
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EXHIBIT A

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Postage STATUS LETTER	BILLABLE	4/1/2025	\$0.69	\$0.69	1	CS
Electronic Service Provider ONE LEGAL: 06122357 EFILING CHARGE - NOTICE OF REMOTE APPEARANCE	BILLABLE	6/14/2024	\$19.10	\$19.10	1	BAM
Electronic Service Provider ONE LEGAL: 06099078 EFILING CHARGE - CASE MANAGEMENT CONFERENCE STATEMENT	BILLABLE	6/7/2024	\$19.10	\$19.10	1	BAM
Litigation support vendors JT CALCS: 240604 (FEE SPLIT WITH CO COUNSEL, THREE WAYS) SUPPORT OF AIRGAS MEDIATION	BILLABLE	6/6/2024	\$816.67	\$816.67	1	BAM
Arbitrators/mediators CK # 1080 PLAINTIFF'S MEDIATION STEPHENSON V. AIRGAS	BILLABLE	5/21/2024	\$4,333.33	\$4,333.33	1	BAM
Electronic Service Provider ONE LEGAL - CASE MANAGEMENT CONFERENCE STATEMENT FILED INV# 21427161 CK# PAID CC	BILLABLE	10/30/2023	\$17.04	\$17.04	1	MF
Postage USPS CMC STATEMENT	BILLABLE	10/16/2023	\$1.74	\$1.74	1	BAM
Postage USPS DISCOVERY REQUESTS	BILLABLE	7/18/2023	\$6.54	\$6.54	1	BAM

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Electronic Service Provider ONE LEGAL - CASE MANAGEMENT CONFERENCE STATEMENT FILED INV# 20762195 CK# PAID CC	BILLABLE	7/10/2023	\$17.04	\$17.04	1	MF
Postage USPS CNC STATEMENT	BILLABLE	7/10/2023	\$1.74	\$1.74	1	BAM
Postage FED EX SHIP TO: HON. CHARLES STEVE TREAT MARTINEZ-WAKEFIELD TAYLOR COURTHOUSE 725 COURT STREET DEPT. 12 MARTINEZ, CA 94553 TRACKING: 771535233718 CK# PAID MLG FED EX ACCOUNT	BILLABLE	3/10/2023	\$28.53	\$28.53	1	MF
Postage FED EX SHIP TO: CHERYL D. ORR, ESQ. FAEGRE DRINKER BIDDLE & REATH, LLP FOUR EMBARCADERO CENTER 27TH FLOOR SAN FRANCISCO, CA 94111 TRACKING: 771534857829 CK# PAID MLG FED EX ACCOUNT	BILLABLE	3/10/2023	\$28.53	\$28.53	1	MF
Postage FED EX SHIP TO: AMANDA SEMAAN FAEGRE DRINGER BIDDLE & REATH LLP 1800 CENTURY PARK EAST STE. 1500 LOS ANGELES, CA 90067 TRACKING: 771534898726 CK# PAID MLG FED EX ACCOUNT	BILLABLE	3/10/2023	\$22.52	\$22.52	1	MF

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Electronic Service Provider ONE LEGAL - OPPOSITION FILED INV# 19987962 CK# PAID CC	BILLABLE	3/10/2023	\$17.04	\$17.04	1	MF
Electronic Service Provider ONE LEGAL - CASE MANAGEMENT CONFERENCE STATEMENT FILED INV# 19651402 CK# PAID CC	BILLABLE	1/18/2023	\$16.57	\$16.57	1	MF
Electronic Service Provider ONE LEGAL - CASE MANAGEMENT CONFERENCE STATEMENT FILED INV# 19250955 CK# PAID CC	BILLABLE	11/7/2022	\$16.57	\$16.57	1	MF
Electronic Service Provider ONE LEGAL - CASE MANAGEMENT CONFERENCE STATEMENT FILED INV# 19270422 CK# PAID CC	BILLABLE	11/7/2022	\$16.57	\$16.57	1	MF
Postage USPS-POSTAGE-JPA AND RETAINER	BILLABLE	9/26/2022	\$1.62	\$1.62	1	MF
Electronic Service Provider ONE LEGAL - PROOF OF SERVICE INV# 18672465 CK# PAID CC	BILLABLE	8/9/2022	\$16.57	\$16.57	1	MF
Electronic Service Provider ONE LEGAL - CIVIL CASE COVER SHEET, SUMMONS ISSUED/FILE, INITIAL COMPLAINT FILED INV# 18549167 CK# PAID CC	BILLABLE	7/20/2022	\$1,494.06	\$1,494.06	1	MF

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Postage USPS-POSTAGE-RETENTION LETTER TO REFERRAL	BILLABLE	4/21/2022	\$0.53	\$0.53	1	MF
Postage USPS-POSTAGE-PERSONNEL FILE REQUEST	BILLABLE	4/20/2022	\$15.06	\$15.06	1	MF
Postage USPS-POSTAGE-WELCOME LETTER AND QUESTIONNAIRE	BILLABLE	4/20/2022	\$2.69	\$2.69	1	MF
Electronic Service Provider SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES -PRINT DOCUMENTS RECEIPT: 1220413J1244 CK# PAID CC	BILLABLE	4/13/2022	\$4.00	\$4.00	1	MF
				\$6,913.85 USD		