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Superior Court of California,
County of Los Angeles
5/16/2025 11:38 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By V. Sino-Cruz, Deputy Clerk

6 Attorneys for Plaintiff
7 PAUL VARGAS, as Private Attorney General

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

10
11 STATE OF CALIFORNIA ex rel. PAUL
VARGAS, as Private Attorney General,

12 Plaintiff,

13 vs.

14 ECONO-WEST, INC.; and DOES 1-25,
15 inclusive,

16 Defendants.

) Case No. 22STCV40464

) Date: August 21, 2025

) Time: 8:30 AM

) Dept: 78

) **DECLARATION OF JEFFREY T.
GREEN IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

) Judge: Hon. Tiana J. Murillo

) Action Filed: December 27, 2022

18
19 **DECLARATION OF JEFFREY T. GREEN**

20
21 I, Jeffrey T. Green, declare as follows:

22 1. I am an attorney at law duly licensed to practice before all of the courts in the State
23 of California. I am a senior associate attorney with the law firm of KRING & ASSOCIATES,
24 APC, counsel of record for Paul Vargas in this action. I have personal knowledge of the facts set
25 forth in this Declaration and, if called as a witness, could and would testify competently to such
26 facts under oath.

27 2. I submit this Declaration in support of Plaintiff's Motion for Approval of PAGA
28 Settlement.

DECLARATION OF JEFFREY T. GREEN



1 3. **Background and Experience:** I have practiced law cumulatively for four (4) years,
2 have focused my practice on wage and hour class actions and have obtained substantial recovery
3 for over 20,000 employees through these cases. I graduated from California Baptist University in
4 2015 and received my law degree from University of La Verne College of Law in 2018. I was
5 admitted to the California bar in 2019, and the United States District Courts for the Northern,
6 Eastern, Central and Southern Districts of California in 2020. Prior to joining Kring & Chung,
7 LLP, I worked with some of Southern California's preeminent trial lawyers at Quintilone &
8 Associates. I am currently a member of the Orange County Bar Association and was formerly a
9 member of the California Employment Law Attorneys Association, Orange County Trial Lawyers
10 Association and Consumer Attorneys Association of Los Angeles.

11 4. For the last four (4) years, I have focused my practice on primarily employee wage
12 and hour class action and PAGA litigation. I have filed contested class certification motions in the
13 past and have been appointed lead and co-lead counsel in approximately ten (10) cases in both the
14 California and United States District Courts. Some of my successes with Quintilone & Associates
15 (through April of 2023) include:

- 16 A. Harrison v. Bank of America. San Francisco Superior Court. Co-counsel in a
17 nationwide FLSA and state law class action for **\$11.5 million** resolving a dispute
18 between Bank of America and over 4,226 employees for failure to pay wages
19 including overtime, off-the-clock work, meal and rest break violations, as well as
20 other derivative claims. Approximately 4,226 class members. Approval granted
21 **November 24, 2021;**
- 22 B. Duro v. Splitsville Bowling. Orange County Superior Court- Complex. Co-counsel
23 in a state law class action for resolving a California Labor Code dispute between
24 employees and management. Final Approval granted on **June 28, 2022;**
- 25 C. Vasquez v. Bank of America. USDC Northern District of California. Cocounsel in a
26 nationwide FLSA and state law class action for **\$4 million** resolving a dispute
27 between Bank of America and over 4,226 employees for PAGA case. Approval
28 granted on **July 29, 2022;**



- 1 D. Cali v. Smitty's Grill. Los Angeles Superior Court Complex Division. Counsel on
2 certified class action of approximately 150 employees for Labor Code claims. Final
3 approval granted **September 9, 2022**;
- 4 E. Giebe v. Bed Bath & Beyond. San Bernardino Superior Court – Complex Division.
5 Counsel on a Certified Class Action relating to Labor Code claims for
6 approximately 300 employees. Final Approval granted **December 6, 2022**;
- 7 F. Allison v. Dignity Health. San Francisco Superior Court. Co-Counsel on a Certified
8 Class Action for approximately 3,000+ employees. Class Certified in **January**
9 **2022**. Currently on appeal; and
- 10 G. Bell v. Redfin. USDC Southern District of California. Co-Counsel on state-wide
11 class and PAGA action between 3,000 misclassified employees and management for
12 \$3 million. Final Approval granted **July 21, 2024**.

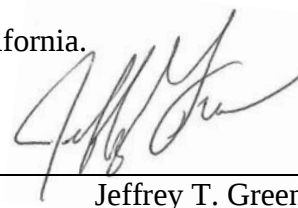
13 5. I have continued my practice of employee wage and hour class action and PAGA
14 litigation with Kring & Associates, APC, formerly Kring & Chung, LLP. Some of my success with
15 Kring & Associates, APC (since April of 2023) include:

- 16 H. Gonzalez v. Imperial Imports. San Bernardino Superior Court. Co-counsel in
17 statewide PAGA action for approximately 600 employees, which settled for
18 \$325,000.00. Approval granted on **July 12, 2024**; and
- 19 I. Latorre v. Patriot Group Global, Inc. San Mateo Superior Court. Counsel in
20 statewide PAGA action for approximately 229 employees, which settled for
21 \$525,000.00. Approval granted on **May 9, 2025**.

22 6. My hourly rate requested is \$550.00 and I believe that I am sufficiently experienced
23 and qualified to evaluate the claims asserted by Plaintiff and viability of Defendants' defenses.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct.

26 Executed this 16th day of May, 2025, at Irvine, California.

27 
28 _____

Jeffrey T. Green



1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF ORANGE

3 I, the undersigned, am employed in the County of Orange, State of California. I am over
4 the age of eighteen (18) years and not a party to the within action. My business address is 38
Corporate Park, Irvine, CA 92606-5105. My business e-mail address is
mbennett@kringandassociates.com.

5
6 On May 16, 2025, I served true copies of the foregoing document(s) described as
DECLARATION OF JEFFREY T. GREEN IN SUPPORT OF PLAINTIFF'S MOTION
7 **FOR APPROVAL OF PAGA SETTLEMENT** on the interested parties in this action, addressed
as follows:

8 Beth A. Kahn
9 Matthew R. Richardson
MUSICK, PEELER & GARRETT, LLP
333 South Hope Street, Suite 2900
10 Los Angeles, CA 90071
b.kahn@musickpeeler.com
11 m.richardson@musickpeeler.com

12 ☒ BY E-MAIL: By transmitting a true copy of the foregoing document(s) to the e-mail
13 addresses set forth above.

14 I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.

15 Executed on May 16, 2025, at Irvine, California.

16
17 
18 MICHELLE BENNETT

