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7 PAUL VARGAS, as Private Attorney General

Electronically FILED by
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

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 PAUL VARGAS IN**
) **SUPPORT OF PLAINTIFF'S MOTION**
) **FOR APPROVAL OF PAGA**
) **SETTLEMENT**

) Judge: Hon. Tiana J. Murillo

) Action Filed: December 27, 2022

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DECLARATION OF PAUL VARGAS

I, Paul Vargas, declare as follows:

1. I am over the age of eighteen (18) years old. I submit this Declaration in support of the concurrently filed Motion for Approval of the PAGA Settlement (“Settlement” or “Settlement Agreement”) and Enhancement Award. The following is based upon my personal knowledge, and if called as a witness, I could and would competently testify regarding the statements in this Declaration.

2. I am currently a resident of California. I was employed by Defendant Econo-West, Inc. (“Defendant”) from on or about from on or about March 2, 2021 through on or about November 29, 2021 as technician for Defendants.

3. I hired Kring & Associates, APC, formerly Kring & Chung, LLP, to represent me in this representative action on behalf of myself and other similarly aggrieved employees of Defendants. On December 27, 2022, a Complaint was filed in this action in Los Angeles Superior Court, *State of California ex rel. Paul Vargas adv. Econo-West, Inc.*, Case No. 22STVC40464. I understand that I have brought a claim against Defendant as the representative of other similarly aggrieved employees of Defendant.

4. I understand my counsel will request that I be awarded an enhancement payment of \$8,000.00 for my efforts and that this payment is not guaranteed, but must be approved by the Court. I believe the requested enhancement payment is fair and reasonable based upon the result achieved and the risks I took as a named representative, as well as the tasks I have performed on behalf of other aggrieved employees and the State of California, including, but not limited to, ongoing review of my case with counsel both conducted via in-person meetings and telephonically/virtually, compilation of documents for assistance with prosecution of my case and evaluation of my claims, assisting in informal discovery and mediation, and participating in the approval process of the settlement of this case, among other things.

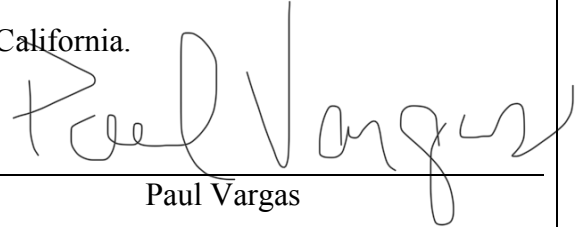
5. I believe the requested enhancement payment is fair and reasonable because my decision to accept the risk of being a representative in a representative action may affect my future.



1 I risked this public lawsuit having a potential negative impact on future employment opportunities
2 and accepted the risk of potentially being liable for the opposing party's attorneys' fees and costs. I
3 voluntarily assumed these risks and the case would not have been brought without me.

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

6 Executed this 14th day of May, 2025, at Oceano, California.

7 
8 _____
9 Paul Vargas



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 Kring &
mbennett@kringandassociates.com.

5 On May 16, 2025, I served true copies of the foregoing document(s) described as
6 **DECLARATION OF PAUL VARGAS IN SUPPORT OF PLAINTIFF'S MOTION FOR**
7 **APPROVAL OF PAGA SETTLEMENT** on the interested parties in this action, addressed as
follows:

8 **SEE ATTACHED SERVICE LIST**

9 ☒ BY E-MAIL: As California Code of Civil Procedure section 1010.6 and all other
10 applicable law including California Rules of Court permits, I caused a true copy of the
document to be sent to the persons at the corresponding electronic address as indicated on
11 the attached mailing list on the above-mentioned date. My electronic notification address is
mbennett@kringandassociates.com. I am readily familiar with this firm's Microsoft
12 Outlook electronic mail system and did not receive any electronic message or other
indication that the transmission was unsuccessful.

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

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

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17 MICHELLE BENNETT



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PAUL VARGAS V. ECONO-WEST, INC.

K&A CLIENT: Paul Vargas
CLIENT NO.: 9300.0815

SERVICE LIST

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