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7 DIGBY SOUTHWEST, INC.

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**

10
11 ALBERT LIZARRAGA, individually, and on
behalf of all others similarly situated,

12
13 Plaintiff,

14 v.

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16 DIGBY SOUTHWEST, INC. an Arizona
Corporation; and DOES 1 through 100, inclusive,

17
18 Defendants.
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Case No.: 19STCV27901

*Assigned for all purposes to the Honorable
Stuart M. Rice, Dept. 1*

**DECLARATION OF RICHARD RAHM
IN SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT AGREEMENT**

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1. I am an attorney authorized to practice before the courts of the State of California and a Partner at DLA Piper LLP (US) (“Defense Counsel”), counsel for Defendant Digby Southwest, Inc. (“Defendant”). I submit this Declaration in support of Motion for Preliminary Approval of the Class Action and PAGA Settlement Agreement. The matters set forth in this Declaration are based on my personal knowledge. If called to testify, I could and would testify competently to the matters set forth in this Declaration.

3. Defense Counsel is not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.


Richard H. Rahm
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Attorneys for Defendant
Digby Southwest, Inc.