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Attorneys for Plaintiff CHRISS SORENSEN, on behalf of himself and other aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SAN DIEGO**

CHRISS SORENSEN, on behalf of himself
 and other aggrieved employees

Plaintiff,

v.

P.F. AUTOMOTIVE, LLC, a California
 limited liability company; and DOES 1
 through 100, inclusive,

Defendants.

CASE NO. 37-2023-00025169-CU-OE-CTL

[Assigned for all purposes to the Hon. Joel R.
 Wohlfeil, Dept. C-73]

RESERVATION ID. 3075449

**DECLARATION OF CHRISS SORENSEN
 IN SUPPORT OF MOTION TO APPROVE
 PAGA SETTLEMENT**

Date: March 15, 2024

Time: 9:00 a.m.

Dept: C-73

1 I, CHRISS SORENSEN, declare as follows:

2 1. I am over the age of eighteen and am a named Plaintiff in *Chriss Sorensen v. P.F.*
3 *Automotive, LLC*. The foregoing is based upon my personal knowledge and, if called as a
4 witness, I could and would competently testify thereto.

5 2. I submit this declaration in support of Plaintiff's Motion for Approval of Private
6 Attorneys General Act Settlement Agreement.

7 3. I was previously employed by Defendant P.F. Automotive, LLC ("Defendant")
8 between 2021 and 2022 as a non-exempt hourly employee. During my time working for
9 Defendant, I was subjected to the same wage and hour policies and practices that are at issue in
10 this case, including Defendant's practice of failing to pay employees all wages owed, including
11 overtime compensation, failing to provide meal periods, failing to authorize and permit rest
12 periods, failing to provide accurate wage statements, and related issues.

13 4. Prior to getting involved in this case, I spoke with my attorneys for many hours to
14 understand the nature of the case, and shared with my attorneys the wage and hour violations that
15 I experienced while working for Defendant. After I became involved in this case, I assisted my
16 attorneys in reviewing and understanding the numerous documents exchanged during informal
17 discovery. I reviewed many of Defendant's policy documents with my attorneys, and answered
18 my attorney's questions relating to those documents.

19 5. During the informal discovery process, I assisted my attorneys with interpreting
20 various documents produced, and discussed with my attorneys strategies to ensure that the
21 settlement was fair to all of the aggrieved employees.

22 6. I believe that this PAGA Settlement for \$115,000 is a very good result given the
23 various issues involved with the case, and the recovery of penalties for the State of California
24 and aggrieved employees is fair, reasonable and adequate.

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

3 Executed on January 10, 2024, at San diego, California.

4 DocuSigned by:
5 
6 F7CEFF9F4ED04D6...
7 Chriss Sorensen