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Attorneys for Plaintiff PAUL MAISNIER,
individually and on behalf of all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA**

PAUL MAISNIER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

PDS CONSULTANTS, INC., a California
corporation dba PDS OPTICAL and DOES
1-50, inclusive,

Defendant

Case No. C25-01606

Assigned for All Purposes to:
Hon. Edward G. Weil
Department 39

**DECLARATION OF PLAINTIFF PAUL
MAISNIER IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA SETTLEMENT**

DECLARATION OF PAUL MAISNIER

I, PAUL MAISNIER hereby declare as follows:

1. I am over the age of eighteen and I submit this Declaration in support of the Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement. The following is based upon my personal knowledge and if called as a witness, I could and would competently testify thereto.

2. I was employed by Defendant PDS Consultants, Inc. ("Defendant") in March of 2022 as a Non-Exempt Employee with the title of Optician and worked during the liability period for Defendant.

3. As a non-exempt employee, I suffered the same damages as other employees. These included not being paid all my wages, not provided accurate wage statements, not provide with meal periods, not paid timely during my employment, from Defendant's employ all in accordance with California law. As a result of these alleged violations, I sought consultation with my attorneys at James Hawkins, APLC.

4. Based upon my allegations, and after consultation and full disclosure from my attorneys about the potential risks I faced as a Plaintiff in a putative class action, I freely decided to pursue this lawsuit to try and vindicate my rights and the rights of others who also worked for Defendant and suffered similar harms due to Defendant's common practices and policies.

5. Prior to filing my action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendant. During those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

6. My attorneys provided me with a draft of the complaint for my review and approval. I closely reviewed the complaint to ensure accuracy and completeness. As a result, I caused my attorneys to file the class action complaint alleging claims for the allegations alleged therein. Thereafter, I have been fully involved in my case. Following the filing of the

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2 complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly
3 contacted my attorneys to stay current on the status of the litigation, and to discuss my
4 attorneys' progress in prosecuting the claims.

5 7. Since I believe I was not provided accurate wage statements, not provide with
6 meal periods, not paid timely during my employment, I believe that I have been similarly
7 injured as to all other class members in the settlement who worked for Defendant during the
8 class period. I believe the claims asserted in the Complaint are also shared by the other Class
9 Members. I worked with various other non-exempt employees, and I believe we were all treated
10 the same and subject to the same unlawful policies.

11 8. On June 9, 2025, I, through my attorneys, filed this action against Defendant for
12 Defendant's alleged: failure to pay minimum and overtime wages, failure to provide meal
13 periods, failure to pay wages timely during employment, failure to provide accurate itemized
14 wage statements, and violation of Business & Professions Code section 17200, et seq.

15 9. On June 6, 2025, I, through my attorneys, submitted a notice with the Labor &
16 Workforce Development Agency ("LWDA") alleging that Defendant violated Labor Code
17 sections 201-204, 226, 510, 558, 226.3, 1174, 1174.5, 1175, 1194, 1197, 1197.1, 1198, pursuant
18 to Labor Code section 2699.

19 10. Since I agreed to become a Class Representative, I have worked every step of the
20 way with my attorneys. During the course of the litigation, I have always kept the best interest
21 of the Class Members on equal footing as mine. I have been, and I am willing to continue to
22 pursue the Class Members' claims vigorously on our collective behalf if the Settlement is not
23 finally approved. As a result, I firmly believe that I do not have any interests adverse to the
24 interests of the Class Members. I have maintained the Class Members best interest from the
25 inception of the case.

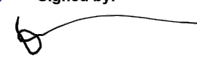
26 11. As the Class Representative, I have spent numerous hours consulting with my
27 attorneys, providing documentation, consulting with other Class Members, responding to
28 questions by my attorneys, providing documents to my attorneys, working with my attorneys to
review documents received, helping my attorneys in preparing for the mediation and attending

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2 the mediation via telephone. I was consulted about the status of the case and provided constant
3 feedback about the case from my attorneys including the mediation, settlement negotiations and
4 eventual settlement. I estimate I have spent approximately 41 hours working on this case.

5 12. From the beginning of this case, I have freely chosen to accept the risks of
6 being the Class Representative in this class action lawsuit. I chose to assume these risks and
7 pursue the claims on behalf of the Class Members as I wanted to vindicate their rights. I believe
8 we have achieved that result with the settlement and the individual payments to the Class
9 Members. I believe the settlement is fair reasonable and adequate based on the numerous
10 defenses asserted by Defendant. I believe the efforts and work I put forth helped to achieve the
11 fair settlement that will benefit the Class Members. As a result of my efforts, I also believe the
12 Enhancement Payment is reasonable, and I respectfully request the Court approve the amount of
13 \$10,000.00 as fair and reasonable.

14 I declare under penalty of perjury under the laws of the state of California that the
15 foregoing is true and correct. Executed on June 25, 2026, at Oakley, California.

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Signed by:

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PAUL MAISNIER