

Eric K. Yaeckel [CSB No. 274608]

[yaeckel@sullivanlawgroupapc.com](mailto:yaeckel@sullivanlawgroupapc.com)

Cody D. Archer [CSB No. 361361]

[cody@sullivanlawgroupapc.com](mailto:cody@sullivanlawgroupapc.com)

**SULLIVAN & YAECKEL LAW GROUP, APC**

2330 Third Avenue

San Diego, California 92101

(619) 702-6760 | (619) 702-6761 FAX

Attorneys for Plaintiff ROBERT CELLA, Individually, and on behalf of other members of the general public similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF SAN DIEGO**

ROBERT CELLA, Individually, and on  
behalf of other members of the general public  
similarly situated

Plaintiff

v.

GRIFFIS INVESTMENT COMPANY, INC.,  
a Colorado Corporation; GRIFFIS GROUP  
RESIDENTIAL, LLC, a business entity  
unknown; GRIFFIS GROUP  
RESIDENTIAL PAYROLL, a business  
entity unknown; GRIFFIS RESIDENTIAL,  
a business entity unknown; and DOES 1-10,  
inclusive

Defendants

CASE NO. 24CU008274C

**DECLARATION OF ROBERT CELLA IN  
SUPPORT OF PLAINTIFF'S UNOPPOSED  
MOTION FOR FINAL APPROVAL OF (1)  
CLASS ACTION SETTLEMENT; (2)  
ATTORNEYS' FEES AND COSTS; and (3)  
CLASS REPRESENTATIVE AWARD**

Date: July 31, 2026

Time: 10:30 a.m.

Dept: C-64

Judge: Hon. Loren Freestone

1 I, Robert Cella, hereby declare as follows:

- 2 1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of  
3 Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement, Attorneys Fees  
4 and Costs, and Class Representative Award.
- 5 2. I am personally familiar with the facts set forth in this declaration, and if called to testify as  
6 a witness I could and would do so.
- 7 3. To my recollection, I personally met with my attorneys on at least 3 occasions. Several of  
8 those meetings lasted in excess of 2 hours.
- 9 4. During these meetings, I would review and explain numerous documents turned over by  
10 Defendants from my employment. I would also explain my (as well as others') role during  
11 work. I also helped identify numerous other employees who could support the claims I was  
12 making in this lawsuit. I contacted many of these individuals myself to verify their willingness  
13 to participate.
- 14 5. I also spoke with my attorneys at least 15 other occasions.
- 15 6. I also participated in numerous email exchanges with the attorneys.
- 16 7. In total, I estimate that I spent at least 30 hours related to the above mentioned tasks directly  
17 working with my attorneys. I also spent at least another 8-10 hours of my own time gathering  
18 evidence and outlining issues that I later shared with my attorneys.
- 19 8. When I decided to move forward with this case, I was counseled by my attorneys of the  
20 potential stigma of being a Class Representative in a class action dispute, as this is a publicly  
21 filed lawsuit.
- 22 9. I was also advised when I brought this case that had we lost, I could have been personally  
23 liable for paying all of Defendants' costs. I was further advised this could be well into the tens  
24 of thousands of dollars on this type of case.

25  
26  
27 ///

1 10. Despite these risks I was committed to achieving a settlement that would benefit all employees  
2 working for Defendants GRIFFIS INVESTMENT COMPANY, INC., GRIFFIS GROUP  
3 RESIDENTIAL, LLC., GRIFFIS GROUP RESIDENTIAL PAYROLL and GRIFFIS  
4 RESIDENTIAL.

5  
6 I declare under penalty of perjury under the laws of the State of California that the foregoing  
7 is true and correct. Executed this 9th day of July, 2026 at San Diego, California.

8 

9 \_\_\_\_\_  
10 Robert Cella  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

|                         |                                          |
|-------------------------|------------------------------------------|
| Title                   | Cella Declaration                        |
| File name               | Cella_Decl_Final.pdf                     |
| Document ID             | 66edff07475c086059f426a9cbd1c38d9314098a |
| Audit trail date format | MM / DD / YYYY                           |
| Status                  | ● Signed                                 |

## Document History



SENT

**07 / 08 / 2026**

23:38:55 UTC

Sent for signature to Robert Cella (mrrcella@yahoo.com) from yorke@sullivanlawgroupapc.com  
IP: 98.173.41.85



VIEWED

**07 / 09 / 2026**

07:33:47 UTC

Viewed by Robert Cella (mrrcella@yahoo.com)  
IP: 172.56.243.147



SIGNED

**07 / 09 / 2026**

07:36:43 UTC

Signed by Robert Cella (mrrcella@yahoo.com)  
IP: 172.56.243.147



COMPLETED

**07 / 09 / 2026**

07:36:43 UTC

The document has been completed.