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Attorneys for Plaintiff ERIC CALDERON, on behalf of himself,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

ERIC CALDERON on behalf of himself,
all others similarly situated, and on behalf
of the general public,

Plaintiffs,

v.

CELS ENTERPRISES, INC. DBA
CHINESE LAUNDRY; and DOES 1-100,
Defendants.

Case No. CIVSB2308785

*[Assigned for All Purposes to the
Hon. Jessica Morgan, Dept. S26]*

**DECLARATION OF PETER J. HORTON,
ESQ., IN SUPPORT OF PLAINTIFF ERIC
CALDERON'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT,
CONDITIONAL CERTIFICATION,
APPROVAL OF CLASS NOTICE, SETTING
OF FINAL APPROVAL HEARING DATE**

Date: November 21, 2024
Time: 8:30 a.m.

Complaint Filed: April 14, 2023
Trial Date: None Set

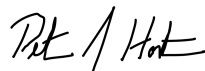
1 I, PETER J. HORTON, declare as follows:

- 2 1. I am the managing litigation attorney at the law firm of Lawyers for Employee and
3 Consumer Rights and counsel of record for Plaintiff and the aggrieved employees in this
4 matter. I am duly admitted to practice before all the courts of the state of California. The
5 following facts are within my personal knowledge and, if called to testify, I could and
6 would competently testify thereto.
- 7 2. I graduated from California Western School of Law in 2002.
- 8 3. I was admitted to practice law in California in December 2003. I have practiced law in
9 State and Federal court since that time.
- 10 4. My firm and I handle employment cases which involve violations of the California Labor
11 Code and Industrial Welfare Commission Wage Orders, such as wage and hour class
12 actions and cases alleging violations of the Private Attorneys General Act of 2004
13 ("PAGA"). We are currently involved in litigation in over fifty (50) PAGA cases.
- 14 5. My firm has been granted class certification in both state and federal courts.

15 I declare under penalty of perjury under the laws of the State of California that all the
16 foregoing is true and correct.

17
18 Dated: October 28, 2024

**LAWYERS FOR EMPLOYEE AND CONSUMER
RIGHTS**

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21 _____
22 Peter J. Horton, Esq.
23 Attorney for Eric Calderon, on behalf of himself,
24 all others similarly situated, and on behalf of the
25 general public.
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