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Attorneys for Defendants,
BOYRIE ENTERPRISES, INC.
dba MKB CONSTRUCTION, a corporation

SUPERIOR COURT OF CALIFORNIA

IN AND FOR THE COUNTY OF SONOMA

RAFAEL MANZO CORTES, an individual,
on behalf of himself and others similarly
situated,

Plaintiff,

vs.

BOYRIE ENTERPRISES, INC. dba MKB
CONSTRUCTION; a corporation; and DOES
1 thru 50, inclusive,

Defendants.

Case No. SCV-272909

*Assigned for All Purposes to Dept. 19
Hon. Oscar A. Pardo*

**MATT BOYRIE DECLARATION
REGARDING BOYRIE ENTERPRISES,
INC.**

Action Filed: March 23, 2023
Trial Date: None Set

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1 I, Matt Boyrie, declare:

- 2 1. I am the owner of Boyrie Enterprises, Inc. ("Defendant"), the Defendant in this action. I
3 have personal knowledge of the matters set forth in this declaration, and if called as a
4 witness, I could and would competently testify thereto.
- 5 2. Defendant is a construction company based in Sonoma County, California.
- 6 3. Over the past several years, the nature and scope of our construction business has
7 significantly changed. Historically, our company specialized in large-scale residential
8 development projects, including the construction of subdivision tracts containing hundreds
9 of homes. However, due to market conditions, financial constraints, and changes in
10 business strategy, we have transitioned into a much smaller-scale operation.
- 11 4. At present, our company primarily focuses on single-home, stand-alone residential
12 construction projects. We no longer engage in high-volume subdivision developments,
13 and our current business model generates substantially less revenue than in prior years.
- 14 5. In connection with the mediation and settlement negotiations in this case, our company
15 provided Plaintiff's counsel and the mediator with financial documentation covering the
16 years 2020 through 2023.
- 17 6. These records were made available to allow Plaintiff and the mediator to assess our
18 company's financial condition and ability to pay a potential judgment or settlement in this
19 matter.
- 20 7. I understand that these financial circumstances were taken into consideration during
21 settlement discussions and in determining an appropriate and realistic settlement amount
22 for purposes of resolving the claims asserted in this action.

23
24 I declare under penalty of perjury under the laws of the State of California that the foregoing is
25 true and correct.

26 Executed on August 4, 2025, at Cloverdale, California.

27
28 MATT BOYRIE

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By: Matt Boyrie

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On August 27, 2025, I served all interested parties in this action the following documents described as: **MATT BOYRIE DECLARATION REGARDING BOYRIE ENTERPRISES, INC.** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Elizabeth A. Fritzinger, Esq.
EF LAW GROUP, P.C.
101 Morris St., Suite 101
Sebastopol, CA 95472
elizabeth@efritzlaw.com
Attorneys for Defendant

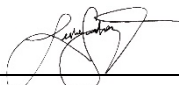
ABRAMSON LABOR GROUP
William Zev Abramson
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Burbank CA 91506
Attorneys for Plaintiff

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/432>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 27, 2025, at Chino, California.



Leslie Sanchez