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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

CHETERRA YOUNG, an Individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

PFT ALEXANDER, INC., a California
corporation; and DOES 1 through 10,
inclusive,

Defendant.

Case No. 23STCV07449

ASSIGNED FOR ALL PURPOSES TO:

Hon. Timothy Patrick Dillon

Department 15

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF CHETERRA YOUNG
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT AND APPROVAL OF
ATTORNEYS' FEES AND COSTS AND
CLASS REPRESENTATIVE'S SERVICE
PAYMENT**

Date: March 25, 2026

Time: 10:00 a.m.

Dept.: 15

Complaint filed: April 5, 2023

1 I, Cheterra Young, declare as follows:

2 1. I am the named plaintiff in this class and representative action against Defendant
3 PFT Alexander, Inc. ("Defendant"), and make this declaration in support of the Class and
4 Representative Action Settlement. I have personal knowledge of the facts stated in this
5 declaration, except as to those matters stated upon information or belief, and, as to those
6 matters, I believe them to be true. If called as a witness, I could and would testify truthfully and
7 competently to the matters stated in this Declaration.

8 2. I am not related to anyone associated with or who works for The Markham Law
9 Firm or Cohelan Khoury & Singer.

10 3. I worked for Defendant as a non-exempt service coordinator from approximately
11 June 2022 to March 2023 at Defendant's Signal Hill location. I was responsible for dispatching
12 technicians who serviced flow management and control systems, providing quotes to
13 customers, and technician billing.

14 4. During my employment, I did not feel that I was treated fairly. On one occasion,
15 although I received permission to leave my workstation, I was later terminated for allegedly
16 "abandoning" my position. This decision was unjust and completely unexpected. As a parent
17 with a child to support, the sudden loss of my income caused immediate and significant
18 financial hardship.

19 5. After my termination, I believed I may have had individual claims arising from
20 both the wage-and-hour violations and the circumstances of my separation. I consulted with
21 counsel because I felt I had not been paid for all hours worked and had not been provided
22 compliant meal and rest periods. I also felt deeply wronged by the way my employment ended.

23 6. However, after discussing my options with counsel and reflecting on my goals, I
24 decided not to pursue separate individual claims focused solely on my termination or personal
25 recovery. Instead, I chose to focus on bringing a class and representative action to address
26 broader wage-and-hour issues that affected other employees as well. I initially spoke with the
27 attorneys at Markham Law Firm, and later with the attorneys at Cohelan Khoury & Singer, and
28 told them about everything I had experienced while working for Defendant. I decided to

1 become a named plaintiff in a class and representative action against Defendant. My attorneys
2 explained the duties and responsibilities of a class representative to me, and I decided to
3 undertake this role for the benefit of other employees of Defendant who experienced the same
4 issues that I had experienced.

5 7. I understood that by doing so, I was prioritizing the interests of the class over
6 potentially pursuing additional remedies for myself. As part of the settlement, I signed a
7 general release of all claims against Defendant, not only the claims alleged in this lawsuit.

8 8. In the Complaint and Amended Complaint, I alleged that Defendant failed to
9 pay all wages owed, including for all hours worked, and failed to provide compliant meal and
10 rest periods, among other claims. My goal in pursuing this action was to ensure that employees
11 were fully compensated for all time worked and provided the protections required by California
12 law.

13 9. Even before the lawsuit was filed, I worked closely with my attorneys. I
14 answered questions by phone, email, and text message; searched for and gathered records; and
15 provided detailed information about my employment. I estimate that I have devoted
16 approximately 70 to 80 hours to this case.

17 10. I spent many hours reviewing documents, organizing records, responding to
18 Defendant's information, and assisting counsel in understanding workplace practices.
19 Whenever my attorneys requested additional information or clarification, I made myself
20 available and responded as promptly as possible.

21 11. I was also on standby for a full-day mediation and remained available
22 throughout the mediation to answer questions and provide input regarding my claims. My
23 participation and availability were necessary to help facilitate settlement discussions.

24 12. I reviewed the terms of the Settlement Agreement carefully, asked questions
25 about its provisions, and ultimately signed the agreement and declarations in support of the
26 settlement.

27 13. In deciding to file this lawsuit, I understood that there were risks involved. By
28 serving as a class and representative plaintiff in a wage dispute against my former employer, I

1 recognize that I may face stigma as a result. In today's digital age, it is also likely that
2 prospective employers or professional contacts could discover, simply by searching my name
3 online, that I acted as a class representative in this action.

4 14. Participating in this case was not easy for me. I work as a case manager for an
5 organization that serves homeless and disabled individuals, helping them secure housing, attend
6 medical appointments, and rebuild stability in their lives. My job is demanding and often
7 requires me to be out in the field where I search for apartments, coordinate services, schedule
8 doctors' visits, and handle urgent, time-sensitive matters for my clients. Balancing these
9 responsibilities with my role in this lawsuit was a significant challenge. Whenever I needed to
10 speak with my attorneys, review documents, or assist with the case, I had to extend my unpaid
11 meal breaks or take unpaid time off from work. As a result, my income was directly impacted.
12 There were times when the financial strain was so severe that I fell behind on my rent and
13 incurred late fees because I simply did not have enough money. Despite these hardships, I
14 remained committed to seeing this case through.

15 15. I am also aware that if I lost this case, I might have been responsible for
16 Defendant's costs of defending this case. This added to the stress of assuming the role of a
17 named plaintiff in this case.

18 16. I am very pleased that the case has settled on a class-wide and representative
19 basis for \$225,000.00, from which payments will be made to settlement class members and
20 aggrieved employees. I believe this is an excellent result and am proud that, by stepping
21 forward and taking action when I felt something was wrong, other employees will benefit
22 financially. I also understand that every single class member has chosen to participate in this
23 lawsuit, as no one opted out, which I believe demonstrates the fairness of the settlement and its
24 terms.

25 17. I have no conflict of interest with any other aggrieved employees or class
26 members. I have not entered into any undisclosed agreements, nor have I received any
27 undisclosed compensation in this case. The only compensation I will receive is whatever
28 amount the Court awards as a Service Payment, in addition to my share of the settlement fund

1 as a class member and aggrieved employee.

2 18. For all of the reasons stated above, the personal and professional sacrifices I
3 made, the substantial time and effort I devoted to this action, and the financial impact I
4 experienced as a result of my participation, I believe a Service Award of \$10,000 is fair and
5 appropriate.

6 19. I respectfully request that the Court grant final approval of the Settlement and
7 take all necessary steps to bring this matter to a conclusion. I remain fully committed to this
8 case and will continue to make myself available as needed throughout the remainder of the
9 settlement process.

10 I declare under the penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct and this declaration is executed on 2/26/2026, in,
12 Bellflower, California.

13 Signed by:
14 
15 AACF92382C14474...
16 Cheterra Young