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Attorneys for WILLIAM GIRON, 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 LOS ANGELES

WILLIAM GIRON on behalf of himself,
all others similarly situated, and on behalf
of the general public,

Plaintiffs,

v.

ACCENT BUILDING RESTORATION,
INC.; and DOES 1-100,

Defendants.

Case No. 23STCV08941

*[Assigned for All Purposes to the
Hon. Elihu M. Berle; Dept. 6]*

**DECLARATION OF PLAINTIFF WILLIAM
GIRON IN SUPPORT OF SETTLEMENT
APPROVAL**

Complaint Filed: April 21, 2023
Trial Date: None Set

1 I, WILLIAM GIRON, declare as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could
3 and would competently testify thereto, except as to those matters stated upon information
4 and belief, and as to those matters, I believe them to be true.
- 5 2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I
6 submit this declaration in support of settlement approval.
- 7 3. I worked for Accent Building Restoration, Inc. ("Accent Building") as a non-exempt
8 hourly employee in California from approximately October 2020 to approximately
9 January 2023. I worked for Accent Building as a painter.
- 10 4. I brought this action to redress certain employment claims that I had against Accent
11 Building. On April 21, 2023, I brought this lawsuit.
- 12 5. I had many meetings and conversations with my attorneys about my experience working
13 for Accent Building.
- 14 6. Since becoming a class representative, I have diligently worked on this case.
- 15 7. Throughout the case, I regularly talked with my attorneys. I always answered phone calls
16 from my attorneys or called them back promptly when they called. I also promptly
17 responded to emails sent by my attorneys.
- 18 8. I also looked for documents from my employment with Accent Building and provided my
19 attorneys with all documents I found, such as wage statements and pay records. I have
20 worked hard to help move the case forward. I have spent many hours in prosecuting this
21 case.
- 22 9. I was aware that, at some point in this case, I would have my deposition taken. I knew that
23 the deposition could take a full day and that I may have to meet with my attorneys prior
24 to my deposition. I was at all times ready and willing to sit for my deposition.
- 25 10. Although I did not attend the mediation in person, I was available on the phone. I gave my
26 consent to settle with Accent Building for the gross settlement amount of \$800,000. I
27 completely and carefully reviewed the Memorandum of Understanding ("MOU") and
28 settlement agreement. I then signed the MOU and settlement agreement.

- 1 11. In light of the work I performed in this case and the duties associated with being a class
2 representative in a case of this magnitude, I believe the \$15,000 class representative
3 enhancement payment is reasonable. I understand that this additional payment is not
4 guaranteed and is subject to Court approval.
- 5 12. In addition, I believe the \$15,000 class representative enhancement payment is reasonable
6 because I feel like I was wrongfully terminated from Accent Building and contemplated
7 bringing action against them for this. By accepting this \$15,000, I am releasing the right
8 to bring those claims. Therefore, I think from the work I did on this case and the fact that
9 I am releasing my right to bring a wrongful termination lawsuit against Accent Building,
10 the \$15,000 should be permitted.
- 11 13. I have and will continue to adequately represent all of the interests of the class. With my
12 status as class representative, I will treat the interests of the Class above my interests.
- 13 14. My claims are typical of the Class Members because I am similarly situated to all current
14 and former non-exempt hourly, employees who were employed by Accent Building in
15 California at any time from April 21, 2019, through November 16, 2023. Thus, my interests
16 are the same as all members of the Class.
- 17 15. I recognize that any resolution of this matter must be approved by the Court in terms of
18 whether the settlement is fair and reasonable, and that I am obligated to protect the interests
19 of all of Class Members for the Class Period.
- 20 16. I do not have any conflicts of interest with the settlement administrator, ILYM Group, Inc.
- 21 17. I am unaware of any other pending matter or action asserting the same claims.

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

24
25 Date: 03/08/2024 16:11 UTC

26 *William Giron*

27 WILLIAM GIRON

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