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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 PETER HORTON,
ESQ., IN SUPPORT OF PLAINTIFF
WILLIAM GIRON MOTION FOR
APPROVAL OF CLASS AND PAGA
SETTLEMENT, CONDITIONAL
CERTIFICATION, APPROVAL OF CLASS
NOTICE, SETTING OF FINAL APPROVAL
HEARING DATE**

Date: April 16, 2024

Time: 10:00 a.m.

Complaint Filed: April 21, 2023

Trial Date: None Set

I, PETER HORTON, declare the following:

1. I am the managing litigation attorney at the law firm of Lawyers for Employee and Consumer Rights and counsel of record for Plaintiff and the aggrieved employees in this matter. I am duly admitted to practice before all the courts of the state of California. The

following facts are within my personal knowledge and, if called to testify, I could and would competently testify thereto.

2. I have been practicing law in California since 2004.
3. My firm and I handle employment cases which involve violations of the California Labor Code and Industrial Welfare Commission Wage Orders, such as wage and hour class actions and cases alleging violations of the Private Attorneys General Act of 2004 (“PAGA”).
4. My firm has been granted class certification in both state and federal courts.
5. All services were performed by Plaintiff’s Counsel on a contingent basis with no guarantee of any payment. Had the litigation continued, Defendants would undoubtedly have mounted an aggressive defense. A defeat on the merits would have foreclosed the possibility of recovering any remuneration for Plaintiff’s Counsel’s time and effort.
6. Plaintiffs’ counsel requested administration quotes from four administration companies. ILYM Group, Inc.’s bid was the lowest one at \$6,950. In addition, my firm received the following quotes: Phoenix’s quote was \$7,250, APEX’s quote was \$6,990, and Simpluris’ quote was \$8,000.
7. My firm and I do not have any interest or involvement in ILYM Group, Inc.
8. I am not aware of any related cases that involve the claims being released here.
9. Any attorneys’ fees awarded in this case will be split equally between my firm and the Mara Law Firm. Plaintiff gave written approval for this agreement on April 1, 2023.

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

Dated: March 11, 2024 **LAWYERS FOR EMPLOYEE AND CONSUMER RIGHTS**

Peter J Horton
Digitally signed by Peter J Horton
DN: cn=Peter J Horton, o=Lawyers for Employee
and Consumer Rights, ou
email=phorton@fecr.com, c=US
Date: 2024.03.11 12:08:17 -0700
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Attorney for William Giron, on behalf of himself,
all others similarly situated, and on behalf of the
general public.