

1 Justian Jusuf – State Bar No. 201507
 2 Email: jjusuf@jusuf-law.com
LAW OFFICE OF JUSTIAN JUSUF, APC
 3 17011 Beach Blvd., Suite 900
 4 Huntington Beach, California 92647
 Phone: (714) 274-9815

5 Sahag Majarian II – State Bar No. 146621
 6 Email: sahagii@aol.com
MAJARIAN LAW GROUP, APC
 7 18250 Ventura Blvd.
 Tarzana, California 91356
 8 Phone: (818) 609-0807
 9 Fax: (818) 609-0892

Attorneys for Plaintiff SEBASTIAN NICOLAS,
 individually and on behalf of others similarly situated

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 11 **FOR THE COUNTY OF SACRAMENTO**

12 SEBASTIAN NICOLAS, individually and on)
 13 behalf of others-similarly situated,)

14 Plaintiffs,)

15 vs.)

16 MASTERCRAFT PAINTING, INC. and)
 17 DOES 1 through 50,)

18 Defendants.)

CASE NO.: 23CV001218

CLASS ACTION

Assigned For All Purposes To:
 Judge: Hon. Jill Talley
 Dept.: 23

**SUPPLEMENTAL DECLARATION OF
 SEBASTIAN NICOLAS IN SUPPORT OF
 CLASS ACTION AND PAGA
 SETTLEMENT**

Final Approval Hearing:

Date: July 12, 2024

Time: 9:00 a.m.

Dept.: 23

Complaint Filed: May 8, 2023

1 I, SEBASTIAN NICOLAS, hereby declare:

2 1. I have personal knowledge of the following and if called as a witness, I could and
3 would competently testify thereto.

4 2. I am a plaintiff in this lawsuit, and I submit this declaration in support of the
5 settlement of the alleged class claims and claims for civil penalties under the Labor Code Private
6 Attorneys General Act ("PAGA") against Defendant Mastercraft Painting, Inc. ("Defendant") in
7 the lawsuit I have filed against the Defendant.

8 3. I was employed by Defendant as a non-exempt employee in California.

9 4. After my employment with Defendant ended, I contacted Majarian Law Group.
10 After an initial consultation, I spoke with Justian Jusuf of Law Office of Justian Jusuf and
11 discussed with him the employment practices of Defendant, particularly in regard to wage
12 payments, meal periods, rest periods, and related issues.

13 5. When I decided to start a lawsuit as a class action, I understood that I was not only
14 seeking recovery for myself, but also for all other current and former non-exempt employees who
15 had been subjected to the same employment practices. I understood that I could not put my
16 interest above those of the class members.

17 6. I also understood that I might be held responsible for some or all of Defendant's
18 costs in defending the case, if the case was not successful. Moreover, I also understood that filing
19 a lawsuit against my former employer might be considered as an act of disloyalty by other future
20 employers. Notwithstanding these risks, I was willing to go forward and represent the class.

21 7. I had numerous discussions with Mr. Jusuf before and after the filing of the
22 complaint in this action. I learned that a large amount of work was required of me as a class
23 representative and I was willing to engage in the work. I spent substantial amount of time
24 describing Defendant's policies and practices. I spoke with Mr. Jusuf and his assistant on a
25 regular basis regarding the status of the case. I have spent a total of no less than 10 (ten hours)
26 describing Defendant's practices to my attorney, discussing the case, and reviewing documents.

27 8. Once the settlement was agreed upon and the settlement paperwork was finalized, I
28 reviewed the documents with my attorney and discussed the procedure, and then I signed the

1 settlement documents. I believe the settlement provides substantial benefit to those employed by
2 the Defendants as non-exempt employees for the claims asserted in this action.

3 9. I believe the settlement should be approved, because I believe the terms of the
4 settlement are fair and reasonable, and represent substantial benefit to the class members.

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

7 Executed on June 11, 2024 at Sacramento, California.

8  DocuSigned by:
74335400051944B...

9 SEBASTIAN NICOLAS