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Attorneys for Plaintiffs SYNTHIA CASTILLO GARCIA,  
LIZ ADRIANA CHAVEZ, and all other similarly situated persons

*[Additional Counsel on Next Page]*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF SAN BERNARDINO**

SYNTHIA CASTILLO GARCIA, on  
behalf of herself and all others similarly  
situated,

Plaintiff,

v.

KALAVERAS RC INC, a California  
corporation, and DOES 1-20, inclusive,

Defendants.

Case No. CIVSB2315395  
Assigned for All Purposes to:  
*The Hon. Christian Towns*  
Dept.: S-26

**DECLARATION OF TODD FRIEDMAN  
SUPPORT OF MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT**

Date: January 27, 2026  
Time: 8:30 a.m.  
Dept.: S26

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20 Attorneys for Plaintiff ERIK NOLASCO, and all other similarly situated persons

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Attorneys for Plaintiff ERIK NOLASCO, and all other similarly situated persons

- 1  
2 1. I am one of the attorneys for the Plaintiff Erik Nolasco in this action, (“Nolasco”). I am  
3 an attorney licensed to practice law in the State of California since 2001, the State of  
4 Illinois since 2002, and the State of Pennsylvania since 2011. I have been continuously  
5 licensed in California since 2001, Illinois since 2002, and Pennsylvania since 2011, and  
6 am in good standing with the California State Bar, Illinois State Bar, and Pennsylvania  
7 State Bar. I have litigated cases in both state and federal courts in California, Colorado,  
8 Florida, Ohio and Illinois. I am also admitted in every Federal district in California and  
9 have handled federal litigation in the federal districts of California.  
10  
11 2. The declaration is based upon my personal knowledge, except where expressly noted  
12 otherwise.  
13  
14 3. I submit this declaration in support of the Plaintiffs’ Motion for Preliminary Approval  
15 of Class Action Settlement and Certification of Settlement Class in the action against  
16 Defendant KALAVERAS RC INC (“Kalavaras” or “Defendant”).  
17  
18

#### 19 CLASS COUNSEL’S EXPERIENCE

- 20 4. The Law Offices of Todd M. Friedman, P.C. seeks appointment as Class Counsel in this  
21 Action. I am informed and believe that Class Counsel are qualified and able to conduct  
22 this litigation as a class action.  
23  
24 5. As one of the main plaintiff litigators of consumer rights cases in Southern California, I  
25 have been requested to and have made regular presentations to community organizations  
26 regarding debt collection laws and consumer rights.  
27  
28 6. I have extensive experience prosecuting cases related to consumer issues. My firm, The  
Law Offices of Todd M. Friedman, P.C., in which I am a principal, has litigated over  
2000 individual based consumer cases and litigated over 200 consumer class actions.  
These class actions were mostly litigated in federal courts in California, as well as  
California State Courts. Approximately 100% percent of my practice concerns consumer  
litigation in general, with approximately 90% of my class action experience involving  
consumer protection.

- 1 7. Therefore, my experience in litigating class actions and my years in practice allow me  
2 to provide outstanding representation to the Settlement Class. I will continue to strive to  
3 fairly, responsibly, vigorously and adequately represent the putative class members in  
4 this action.
- 5 8. I am unaware of any conflicts of interest between Plaintiff and putative class members  
6 and between proposed class counsel and the other parties to this litigation.
- 7 9. The Law Offices of Todd M. Friedman has served as plaintiff's counsel in at least the  
8 following class actions where a settlement was reached on a class-wide basis and has  
9 achieved over \$300,000,000 in class-wide relief for consumers and employees.
- 10 a. *Dancer v. L.A. Times*, BC472154 (L.A. Superior Court) (common fund class-  
11 wide settlement of \$3 million to \$4 million; final approval granted);
- 12 b. *Couser v. Comenity Bank*, 3:12-cv-02484-MMA-BGS (S.D. Cal.) (\$8.475  
13 million class-wide settlement achieved; final approval granted);
- 14 c. *Stemple v. QC Financial Services Group of California, Inc.*, 3:12-cv-01997-  
15 CAB-WVG (S.D. Cal.) (certified class achieved by motion, and subsequent  
16 class-wide settlement of \$1.5 million achieved; final approval granted);
- 17 d. *Couser v. Apria Healthcare, Inc.* 8:13-cv-00035-JVS-RNB (C.D. Cal.) (common  
18 fund class-wide settlement of \$400,000 to \$750,000; final approval granted);
- 19 e. *Abdeljalil v. General Electric Capital Corporation*, 12-CV-02078-IEG-RBB  
20 (S.D. Cal.) (class-wide settlement with common fund of \$6.125 million  
21 achieved; final approval granted);
- 22 f. *Fox v. Asset Acceptance*, 3:13-CV-00922-DMS-BGS (S.D. Cal.) (common fund  
23 of \$1 million in class-wide relief achieved; final approval granted);
- 24 g. *Friedman v. LAC Basketball Club, Inc.*, 2:13-cv-00818-CBM-AN (C.D. Cal.)  
25 (class-wide settlement achieved; final approval granted);
- 26 h. *Gerich et al. v. Chase Bank USA et al.* Case No 1:12-cv-5510 (N.D. Ill.) (class-  
27 wide settlement of \$34 million; final approval granted);
- 28 i. *Than Zaw v Nelnet, Inc.*, Penal Code § 632 class – (Achieved class-wide  
settlement of \$1,188,110; final approval granted);

- 1 j. *Medeiros v HSBC*, (common fund settlement of \$4.5 million - \$6.5 million  
2 achieved; final approval granted);
- 3 k. *Ann Fox v. Spectrum Club Holding Company et al.*, Case No. 2:14-CV-06766-  
4 PSG-FFMx (class-wide settlement; final approval granted);
- 5 l. *Sayan Aboudi v. T-Mobile USA, Inc.*, Case No. 3:12-cv-02169-BTM-NLS (class-  
6 wide settlement in TCPA case, with common fund of \$2.5 million to \$5 million  
7 and average per class member payment of \$500; final approval granted);
- 8 m. *Andrew Roseman v. BGASC, LLC, et al.*, Case No. EDCV 15-1100-VAP (SPx)  
9 (C.D. Cal.) (class-wide relief achieved; final approval granted);
- 10 n. *Everado Gonzalez v The Scotts Company*, Case No. BC577875, Consolidated  
11 with Case No: BC570350 (LASC) (class-wide settlement of \$925,000 in wage  
12 and hour class action on behalf of approximately 603 employees achieved; final  
13 approval granted);
- 14 o. *Payton v Luxe Valet*, Case No. BC588462 (LASC) (\$2.4 million class-wide  
15 settlement on behalf of 1,800 employees misclassified as independent contractor;  
16 final approval granted);
- 17 p. *Shelby v Two Jinn, Inc.*, Case No. 2:15-cv-03794-AB-GJS (C.D. Cal.) (EFTA  
18 class action involving no cognizable actual damages, with company net worth of  
19 \$25 million, settled for non-reversionary common fund of \$457,000, despite  
20 liability under 15 U.S. Code § 1693m(a) likely being only \$250,000; zero  
21 objections; final approval granted);
- 22 q. *Couser v Dish One Satellite*, Case No. 5:15-cv-02218-CBM-DTB (C.D. Cal.)  
23 (TCPA class action; final approval granted);
- 24 r. *Couser v Dish One Satellite*, Case No. RIC 1603185 (Riverside S.C.) (Penal  
25 Code 632 class action; final approval granted);
- 26 s. *De La Paz v Accurate Courier NCA LLC*, Case No. 16CV00555 (Santa Cruz  
27 County Superior Court) (PAGA and Labor Code class action; final approval  
28 granted);
- t. *Ross v Zurixx LLC*, Case No. 34-2016-00190874 (Sacramento SC) (UCL, FAL  
and CLRA class action alleging false advertising for real estate educational

- courses, non-reversionary common fund settlement for over \$600 per class member; final approval granted);
- u. *Eubank v Terminix International, Inc.*, Case No. 3:15-cv-00145-WQH-JMA (PAGA settlement reached in wage and hour action on behalf of pest control technicians; final approval granted);
- v. *Holland v Tenet Healthcare Corporation*, Case No. 15CVP0226 (Superior Court of San Luis Obispo County) (PAGA settlement reached in wage and hour action on behalf of nurses; final approval granted);
- w. *Jonathan Weisberg, v. HD Supply, Inc.*, Case No. 15-cv-08248-FMO (MRWx) (class-wide settlement in TCPA class action, settled for \$1.225 million; final approval granted);
- x. *Miler v Pacific Auto Wash Partners*, Case No. 30-2015-00813013-CU-OE-CXC (wage and hour class action; final approval granted);
- y. *Sonia Barrientos v Law Office of Jeffrey H. Jordan*, Case No. 2:15-cv-06282-JAK-GJS (FDCPA/RFDCPA letter class action, settled on class wide basis; final approval granted);
- z. *Tahmasian v Midway Rent A Car*, Case No. 30-2015-00813013-CU-OE-CXC (LASC) (PAGA and Labor Code class action; final approval granted);
- aa. *Craig Cunningham v Lexington Law Firm*, Case No. 1:17-cv-00087-EJF (N.D. UT) (TCPA class action MDL involving solicitation prerecorded voice calls made by a third party, vicarious liability alleged; final approval granted).
- bb. *Sheena Raffin v Medicredit, Inc., et al.*, Case No. 2:15-cv-04912-MWF-PJW (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified by Hon. George H. King Ret under Rule 23(b)(2) and (b)(3) by contested motion on behalf of 11,000 class members whose calls were recorded without knowledge or consent, settled for \$5 million; final approval granted);
- cc. *Fernandez v Reliance Home Services, Inc.* Case No. BC607572 Los Angeles Superior Court (wage and hour plus PAGA class action; final approval granted);
- dd. *Anne Wolf v Hewlett Packard Company*, Case No. 5:15-cv-01221-TJH-GJS (C.D. Cal.) (CLRA class action certified by contested motion on behalf of tens of thousands of consumers who purchased printer that was falsely advertised to

- 1 include Smart Install feature, settled on a wider multi-state, multi-product basis;  
2 final approval granted);
- 3 ee. *Jaylinda Girardot et al v. Bail Hotline Bail Bonds, Inc.*, Case No. BC700131 Los  
4 Angeles County Superior Court (wage and hour plus PAGA class action; final  
5 approval granted);
- 6 ff. *Ryoo Dental, Inc. v OCO Biomedical, Inc.*, Case No. 8:16-cv-01626-DOC-KES  
7 (TCPA fax blast class action, settled on class-wide basis; final approval granted);
- 8 gg. *Wondra Curtis v The Anthem Companies, Inc.*, Case No. 8:16-cv-01654-DOC-  
9 JCG (wage and hour class action for off the clock work, settled on class-wide  
10 basis; final approval granted);
- 11 hh. *Weinberg v Clarient, Inc.* Case No. 56-2017-00494914-CU-NP-VTA Ventura  
12 County Superior Court (Rosenthal Fair Debt Collection Practices Act class  
13 action settled on behalf of 1,830 class members for privacy infringements  
14 through clear envelope debt collection letters; final approval granted);
- 15 ii. *Aliav v Sunset Eats, LLC*, Case No. BC655401 Los Angeles Superior Court (false  
16 advertising class action on behalf of approximately 10,000 consumers, settled on  
17 class-wide basis; final approval granted);
- 18 jj. *Alfred Zaklit, et al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-02190-CAS-  
19 KK (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified by contested  
20 motion under Rule 23(b)(2) and (b)(3) on behalf of over 40,000 class members  
21 whose calls were recorded without knowledge or consent; final approval  
22 granted);
- 23 kk. *Mark Silva v. Olson and Co. Steel*, Case No. 17CV001045 (Contra Costa County  
24 Superior Court) (wage and hour class action settled on behalf of 563 class  
25 members, final approval granted);
- 26 ll. *Cohen v. Coca-Cola Refreshments, USA, Inc.*, Case No. 2:19-cv-04083-JAK  
27 (PLAx) (C.D. Cal.) (wage and hour class action settlement on behalf of trucking  
28 employees; preliminary approval granted);
- mm. *Manopla v. Home Depot USA, Inc.* Case No. 15-1120 (D. N.J.) (TCPA class  
action; final approval granted);

- 1 nn. *Cawthorne v Rush Truck Centers of California, Inc.* Case No. 5:17-cv-01541-  
2 JGB-SP (wage and hour class action on behalf of 560 employees; final approval  
3 granted);
- 4 oo. *Lizama v Medical Data Systems, Inc.* Case No. 34-2017-00210986-CU-NP-GDS  
5 (Sacramento County Superior Court) (Penal Code 632.7 class action alleging  
6 illegal call recording, settled for \$2.2 million on behalf of over 30,000  
7 consumers, final approval granted);
- 8 pp. *Romano v SCI, Inc.* Case No. 2:17-cv-03537-ODW-JEM (wage and hour class  
9 action for independent contractor misclassification, settled for \$2.5 million on  
10 behalf of 230 employees, final approval granted);
- 11 qq. *Edward Makaron v. Enagic USA, Inc.*, Case No. 2:15-cv-05145-DDP-E (C.D.  
12 Cal.) (TCPA class action certified on behalf of approximately 2,000,000 class  
13 members under Rule 23(b)(2) and 23(b)(3), subsequently settled on a Rule  
14 23(b)(2) and 23(b)(3) basis, final approval granted);
- 15 rr. *Walsh v Fry's Electronics, Inc.* Case No. MSC18-01681 (Contra Costa County  
16 Superior Court) (Gift Card Act, CLRA, UCL, FAL class action settled for class-  
17 wide public injunctive relief; final approval granted);
- 18 ss. *In RE HP Firmware Update Litigation*, Case No. 5:16-cv-05820-EJD (N.D. Cal.)  
19 (co-lead class counsel in consolidated Unfair Competition class action alleging  
20 HP pushed a firmware update on consumers' printers that blocked their ability to  
21 use third party ink cartridges, preliminary approval granted; final approval  
22 granted);
- 23 tt. *Nishimoto v T&S Business Corporation*, Case No. 34-2017-00211426  
24 (Sacramento County Superior Court) (wage and hour and PAGA class action on  
25 behalf of janitorial workers; final approval granted);
- 26 uu. *Rodriguez v. Experian Information Solutions, Inc. et. al.* Case No. 2:15-cv-  
27 01224-RAJ (W.D. Wash.) (FCRA class action for improper credit pulls; certified  
28 under Rule 23 by contested motion, and settled on class-wide basis, final  
approval granted);
- vv. *Ahmed v HSBC Bank USA*, Case No. 5:15-cv-02057-FMO (SPx) (C.D. Cal.)  
(TCPA class; final approval granted);



- 1 ww. *Garcia et. al. v. HMS Host, Inc.*, Case Jo. 17-cv-03069-RS (N.D. Cal.) (wage  
2 and hour class action, final approval granted);
- 3 xx. *Aiken v. Malcolm Cisneros, A Law Corporation*, Case No. 5:17-cv-02462-JLS-  
4 SP (C.D. Cal.) (Fair Debt Collection Practices Act class action, settled on class  
5 wide basis, preliminary approval granted);
- 6 yy. *Bonilla, et al. v. Windsor Fashion, LLC*, Case No. CIVDS1723088 (wage and  
7 hour class action settled on behalf of over 5,000 employees, final approval  
8 granted);
- 9 zz. *Medina v. Enhanced Recovery Company, LLC*, Case No. 2:15-cv-14342-  
10 JEM/MAYNARD (S.D. Fla.) (TCPA class settlement common fund of \$1.45M,  
11 final approval granted);
- 12 aaa. *Pena v. John C Heath Attorney at Law, PLLC*, Case No. 1:18-cv-24407-UU  
13 (S.D. FL.) (consolidated TCPA class action, final approval granted);
- 14 bbb. *Kim v. Tinder, Inc.*, Case No. 2:18-cv-03093-JFW-AS (C.D. Cal.) (Unruh Act  
15 class settlement on behalf of 240,000 consumers; granted final approval, case on  
16 appeal);
- 17 ccc. *Griffey v. TA Operating, LLC*, Case No. CIVDS1907259 (San Bernardino  
18 County Superior Court) (PAGA settlement \$390,000; final approval granted);
- 19 ddd. *D'Angelo Santana v. Rady Children's Hospital*, Case No. 37-2014-00022411-  
20 CU-MT-CTL (San Diego County Superior Court) (Confidentiality of Medical  
21 Information Act, Cal. Civ. Code § 56, *et seq.* class settlement; final approval  
22 granted);
- 23 eee. *Chavis v. Three Group, Inc.*, Case No. 18STCV08737 (Los Angeles County  
24 Superior Court) (wage and hour PAGA settlement on behalf of dancers alleging  
25 contractor misclassification; final approval granted);
- 26 fff. *Fabricant v. AmeriSave Mortgage Corporation*, Case No. 2:19-cv-04659-AB-  
27 AS (C.D. Cal.) (\$6.25 million common fund TCPA class action settlement, final  
28 approval granted);
- ggg. *El Nasleh v. California Spaghetti Restaurants, Inc.*, Case No. CIVDS1812587  
(San Bernardino County Superior Court) (consolidated wage and hour class

action settlement on behalf of restaurant employees settled for \$1.5M, preliminary approval pending);

hhh. *Fisher v Osmose Utilities Services, Inc.*, Case No. 1:18-cv-01704-NONE-EPG (E.D. Cal.) (wage and hour class action settlement on behalf of electrical utilities employees, preliminary approval pending);

iii. *Nizam v Phiadon International USA, Inc.*, Case No. CGC-20-582322 (San Francisco Superior Court) (wage and hour misclassification class action settlement, preliminary approval pending);

jjj. *Martinez v Mattucini Plumbing, Inc.*, Case No. 18TRCV00133 (Los Angeles Superior Court) (wage and hour class action settlement on behalf of plumbers, preliminary approval pending);

kkk. *Western Dental Wage and Hour Cases*, JCCP No. 5079 (County of Sacramento) (consolidated JCCP wage and hour class action settlement, LOTMF acted as lead liaison counsel on behalf of dental employees, preliminary approval pending);

lll. *Barron v Paragon Building Maintenance, Inc.*, Case No. BC713754 (Los Angeles Superior Court) (wage and hour class action settlement on behalf of janitorial employees, final approval granted);

mmm. *Randolph v. Amazon.com LLC et. al*, Case No. 37-2017-00011078-CU-OE-CTL (San Diego County Superior Court) (wage and hour class action settlement on behalf of delivery drivers, preliminary approval granted final approval granted);

nnn. *Barnett v Trigram Education Partners, LLC*, Case No. ESX-L-006106-20 (N.J. Superior Court county of Essex) (wage and hour class action settlement on behalf of university employees, preliminary approval pending);

ooo. *Dilworth v Hong Holdings, LLC* Case No. 19STCV24101 (Los Angeles Superior Court) (consolidated wage and hour class action settlement on behalf of gas station employees, preliminary approval pending);

ppp. *Winters v Two Towns Ciderhouse, Inc.* Case No. 20-cv-00468-BAS-BGS (S.D. Cal.) (nationwide false advertising class action settlement on behalf of consumers who purchased mislabeled products, preliminary approval granted, final approval granted);

- 1       qqq. *Vaccaro v Super Care, Inc.*, Case No. 20STCV03833 (Los Angeles Superior  
2       Court) (CIPA class action settlement on behalf of over 50,000 consumers,  
3       preliminary approval pending);
- 4       rrr. *Mansour v. Bumble, Inc.*, Case No. RIC1810011 (Riverside Superior Court)  
5       (Largest Unruh Act class settlement in the history of statute, \$70M in classwide  
6       benefits on behalf of 2 million consumers; preliminary approval granted);
- 7       sss. *Caldera v. American Medical Collection Association*, (C.D. Cal.) Case No. 2:16-  
8       cv-00381-CBM-AJW (TCPA class action certified by contested motion, settled  
9       on classwide basis out of bankruptcy proceeding, preliminary approval granted);
- 10      ttt. *Hale v. Mana Pro Products, LLC*, Case No. 2:18-cv-00209-KJM-DB (E.D. Cal.)  
11      (false advertising class action, final approval granted);
- 12      uuu. *Marko, et al. v. Doordash, Inc.*, Case No. BC659841 (Los Angeles County  
13      Superior Court) (First-filed and co-lead counsel in consolidated gig economy  
14      misclassification class action on behalf of delivery drivers, secured \$100 million  
15      common fund settlement, largest gig economy class settlement to date;  
16      preliminary approval granted); and
- 17      vvv. *Aleksanian, et al. v. Enrich Financial, Inc.*, Case No. BC698829 (Los Angeles  
18      County Superior Court) (certified class by contested motion under Credit Repair  
19      Organization Act, California Credit Services Act and Federal Credit Repair  
20      Organization Act, preliminary approval pending).
- 21      www. *Shankula v Ticketsale.com LLC*, Case No. 2022LA000282 (Dupage County  
22      Illinois) (nationwide class action settlement on behalf of ticket purchasers  
23      affected by COVID postponements and cancellations, final approval granted);
- 24      xxx. *Furman v Set and Services Resources, LLC*, Case No. 20CI000012 (Tehama  
25      County Superior Court) (wage and hour class action, final approval granted);
- 26      yyy. *Furman v ONP Snow Mountain LLC*, Case No. 21CI000138 (Tehama County  
27      Superior Court) (wage and hour class action, final approval granted);
- 28

zzz. *Lopez v Motel 6 Operating, L.P.*, Case No. 56-2020-00542312-CU-OE-VTA (Ventura County) (wage and hour class action on behalf of hotel workers, final approval granted);  
 aaaa. *Fabricant v Top Flight Financial, Inc.*, Case No. 20STCV13837 (Los Angeles) (CIPA class action on behalf of recorded consumers, final approval granted);  
 bbbb. *Wolf v The Oaks Hotel Paso Robles, Inc.*, Case No. 19CVP-0080 (San Luis Obispo County Superior Court) (wage and hour class action on behalf of non exempt hotel employees, final approval granted);  
 cccc. *Walsh v. B.P. Products North America, Inc.*, Case No. MSC21-00119 (contra costa county) (gift card act class action, final approval granted);  
 dddd. *Toste v Path Ventures*, Case No. 19STCV45845 (Los Angeles Superior Court) (wage and hour class action on behalf of non-exempt homeless shelter employees, final approval granted);  
 eeee. *Almazan v Botanx LLC*, Case No. 30-2020-01122459-CU-OE-CXC (Orange County Superior Court) (wage and hour class action on behalf of non-exempt homeless shelter employees, preliminary approval granted);  
 ffff. *Maynor v Western Refining Retail, LLC*, Case No. CIVSB2209052 (San Bernardino Superior Court) (wage and hour class action on behalf of gas station employees, final approval granted);  
 gggg. *Azzam v U.S. Telepacific Corp.*, Case No. 20STCV13325 (Los Angeles Superior Court) (PAGA case on behalf of nonexempt employees, approval granted);  
 hhhh. *Hernandez v Bamboo Couriers, Inc.*, Case No. 30-2021-01192697-CU-OE-CXC Orange County Superior Court (wage and hour class action on behalf of delivery drivers for Amazon contractor, preliminary approval pending);  
 iiiii. *Carter v. Osmose Utilities Services, Inc.*, Case No. CIVSB2131260 (San Bernardino Superior Court) (wage and hour class action on behalf of telecommunications workers, final approval granted);

1       jjjj. *Serrano v Open Road Delivery Holdings Inc.*, Case No. 2:22-cv-07245-SB-AS  
 2       (TCPA Class Action on behalf of 1,700 Class Members settled for \$400,000,  
 3       final approval granted);  
 4       kkkk. *Bell v Redfin Corporation* Case No. 3:20-cv-02264-AJB-SBC (S.D. Cal.) (\$3  
 5       million settlement in wage and hour class action on behalf of real estate agents  
 6       who were allegedly misclassified, final approval granted);  
 7       llll. *Tran v Sprouts Farmers Market, Inc.* Case No. 22STCV26572 (FACTA class  
 8       action settled for \$5 million, preliminary approval pending);  
 9       mmmm. *Bruno v Dr. Squatch, LLC* Case No. 22STCV36410 Los Angeles Superior Court  
 10       (false advertising class action settled on nationwide basis, preliminary approval  
 11       pending);  
 12       nnnn. *Furman v The Lemos Family Farm Inc.* Case No. 23CIV04280 San Mateo County  
 13       (wage and hour class action, preliminary approval pending);  
 14       oooo. *In Re Chevy Bolt EV Battery Litigation*, Case No. 2:20-cv-13256-TGB-CI (E.D.>  
 15       MI) (vehicle defect class action settled on nationwide basis for \$150 million,  
 16       preliminary approval granted);  
 17       pppp. *Ratzak v Thinkware Systems USA, Inc.* Case No. S-CV-0049793 Placer County  
 18       (false advertising class action settled on nationwide basis, preliminary approval  
 19       pending)  
 20       qqqq. *Zuniga v House Foods America Corp.* Case No. 8:22-cv-00372-JWH-JDE (C.D.  
 21       Cal.) (FCRA class action settled on nationwide basis, final approval pending);  
 22       rrrr. *Jweinat v Loandepot, Inc.* Case No. San Francisco Superior Court (EFTA class  
 23       action settled on nationwide basis, preliminary approval granted);  
 24       ssss. *Grey v Pacific Coast Logistix* Case No. 23CV425509 Santa Clara County  
 25       Superior Court (wage and hour class action, preliminary approval pending); and  
 26       tttt. *S.C. v. Buddi US LLC*, Case No. 8:20-cv-01370-MCS-KES (C.D. Cal.)  
 27       (Geolocation monitoring class action settled for \$1,700 per class member,  
 28       granted final approval).

10. My firm also certified the following cases as class actions by contested motion and was appointed class counsel. I wrote the certification briefs for the majority of these cases:
- a. *Anne Wolf v. Hewlett Packard Company*, Case No. 5:15-cv-01221-TJH-GJS (C.D. Cal.) (class action certified by contested motion on behalf of tens of thousands of class members who purchased printer that was falsely advertised to include Smart Install feature);
  - b. *Caldera v. American Medical Collection Association*, Case No. 2:16-cv-00381-CBM-AJW (C.D. Cal.) (TCPA class action certified by contested motion);
  - c. *Alfred Zaklit, et al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-02190-CAS-KK (C.D. Cal.) Cal. Penal Code § 632.7 class action certified under Rule 23(b)(2) and (b)(3) on behalf of class members whose calls were recorded without knowledge or consent);
  - d. *D'Angelo Santana v. Rady Children's Hospital*, Case No. 37-2014-00022411-CU-MT-CTL (San Diego County Superior Court) (Confidentiality of Medical Information Act, Cal. Civ. Code § 56, *et seq.*);
  - e. *Edward Makaron v. Enagic USA, Inc.*, Case No. 2:15-cv-05145-DDP-E (C.D. Cal.) (TCPA class action certified on behalf of approximately 2,000,000 class members under Rule 23(b)(2) and 23(b)(3));
  - f. *Rodriguez v. Experian Information Solutions, Inc., et al.*, Case No. 2:15-cv-01224-RAJ (W.D. Wash.) (FCRA class action for improper credit pulls; certified under Rule 23);
  - g. *Sheena Raffin v. Medcredit, Inc., et al.*, Case No. 2:15-cv-04912-MWF-PJW (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified by Hon. George H. King Ret. under Rule 23(b)(2) and (b)(3) on behalf of class members whose calls were recorded without knowledge or consent);
  - h. *Stemple v. QC Financial Services Group of California, Inc.*, Case No. 3:12-cv-01997-CAB-WVG (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide settlement);

- i. *Abdeljalil v. General Electric Capital Corporation*, Case No. 12-CV-02078-IEG-RBB (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide settlement);
- j. *Aleksanian, et al. v. Enrich Financial, Inc.*, Case No. BC698829 (Los Angeles County Superior Court) (certified class under Credit Repair Organization Act, California Credit Services Act and Federal Credit Repair Organization Act).
- k. *Noohi v Johnson & Johnson Consumer, Inc.*, Case No. 2:20-cv-03575-TJH-JEM (Central District Cal.) (false advertising mislabeling class action certified on behalf of purchasers of oil free face moisturizer, alleging product contained oils.
- l. *Bazarganfard et. al. v. Club 360 LLC, et. all*, Case No. 2:21-cv-02272-CBM-PLA (EFTA class action on behalf of consumers whose debit cards and bank accounts were debited during COVID for gym fees without authorization.
- m. *Guzman v Polaris Industries Inc.* Case No. 8:19-cv-01543-FLA-KES (C.D. Cal.) (CLRA class action certified on behalf of consumers who purchased UTVs with allegedly falsely advertised roll cages that failed to meet advertised government safety standards under OSHA.
- n. *Hellman et. al. v Polaris Industries Inc.* Case No. 2:23-cv-07187-FLA (KESx) (C.D. Cal.) (CLRA class action certified on behalf of consumers who purchased UTVs with allegedly falsely advertised roll cages that failed to meet advertised government safety standards under OSHA)
11. My office often litigates class actions to late stages of litigation, and is currently preparing multiple certified class actions for trial.
12. For example, in *Bazarganfard et. al. v. Club 360 LLC, et. all*, Case No. 2:21-cv-02272-CBM-PLA, Class Counsel represent a certified class in an Electronic Funds Transfer Act case that has gone through numerous rounds of dispositive motions, class certification motions, and reconsideration motions, and is currently scheduled to go to trial in June of 2025.
13. And in *Guzman v Polaris Industries Inc.* Case No. 8:19-cv-01543-FLA-KES, Class

1 Counsel represent a certified class in a CLRA class action that has been pending for  
2 nearly six years and has similarly gone through numerous rounds of dispositive motions,  
3 class certification motions, class decertification motions, two appeals, and is likely to go  
4 to trial later this year.

5  
6 I declare under penalty of perjury under the laws of California and the United States of America  
7 that the foregoing is true and correct, and that this declaration was executed on September 9,  
8 2025.

9  
10 By: Todd M. Friedman  
11 S/ Todd M. Friedman, Esq.  
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