

Sam Kim [SBN 258467]
Yoonis Han [SBN 256151]
VERUM LAW GROUP, APC
360 N. Pacific Coast Hwy, Suite 1025
El Segundo, CA 90245
Telephone: (424) 320-2000
Facsimile: (424) 221-5010
skim@verumlg.com
yhan@verumlg.com

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. Kevin C. Lee

Dept.: S-26

SUPPLEMENTAL DECLARATION OF ADIB
ASSASSI IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT

Date: April 24, 2026

Time: 8:30 a.m.

1 ZACHARY M. CROSNER, ESQ. (SBN 272295)

2 zach@crosnerlegal.com

3 JAMIE SERB, ESQ. (SBN 289601)

4 jamie@crosnerlegal.com

5 SEPIDEH ARDESTANI, ESQ (SBN 274259)

6 **CROSNER LEGAL, PC**

7 9440 Santa Monica Blvd. Suite 301

8 Beverly Hills, CA 90210

9 Tel: (866) 276-7637

10 Fax: (310) 510-6429

11 Attorneys for Plaintiff GILBERT GARCIA, and all other similarly situated persons

12 Todd M. Friedman (SBN 216752)

13 Adrian R. Bacon (SBN 280332)

14 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**

15 21031 Ventura Blvd., Suite 340

16 Woodland Hills, CA 91364

17 Phone: 323-306-4234

18 Fax: 866-633-0228

19 tfriedman@toddfllaw.com

20 abacon@toddfllaw.com

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

22 Adib Assassi (SBN 301036)

23 Veronica Cruz (SBN318648)

24 **Assassi & Cruz Law Firm, PC**

25 1100 Town and Country Rd.

26 Orange, CA 92868

27 Telephone: (949) 688-6009

28 veronica@aclegalteam.com

adib@aclegalteam.com

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

DECLARATION OF ADIB ASSASSI

I, ADIB ASSASSI, declare:

1. I am a partner at Assassi & Cruz Law Firm, P.C. and an attorney in good standing duly admitted to the State Bar of California and before this Court and an attorney of record for Plaintiff Erik Nolasco (“Plaintiff”) in this class action against Defendant Kalaveras RC Inc. (“Defendant”).

2. This declaration is submitted in support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement in the above-captioned action. Except for those matters stated on information and belief, which I am informed and believe are true and correct, I have personal knowledge of all matters set forth herein. If called as a witness, I could and would competently testify thereto.

3. I am filing this Declaration to supplement my prior declaration in support of preliminary approval and provide the court with my firm’s lodestar summary. At final approval I will offer further substantiation for these figures.

4. To the present date, my firm has incurred approximately 48.2 hours in relation to this action against Defendants. All hours were logged contemporaneously in the normal course of business. I have been involved in every major aspect of the case to date. Based on our extensive experience litigating wage and hour and consumer actions and the customary rates on the Laffey Matrix, I believe my proposed hourly rate of \$800, and partner Veronica Cruz’s hourly rate of \$750 is fair and reasonable. Below is a summary of attorney time and lodestar fees:

Attorney	Year Admitted	Hours	Hourly Rate	Total
Adib Assassi	2014	22.8	\$800	\$18,240
Veronica Cruz	2017	25.4	\$750	\$19,050
TOTAL **				\$37,290

1
2 *** This does not include anticipated attorney time to take the case through the approval*
3 *process, attend the hearing and any supplemental hearings, provide supplemental briefings*
4 *or declarations, work with defense counsel and settlement administrator regarding funding,*
5 *distribution, tax forms, answer settlement group member questions, etc.*

6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct. Executed on March 29, 2026, at Orange, California.

8 /s/Adib Assassi
9 Declarant