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

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**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 ADIB ASSASSI IN  
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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21 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

**DECLARATION OF ADIB ASSASSI**

I, ADIB ASSASSI, Declare:

1. I am an attorney admitted to the State Bar of California on December 7, 2014, and have been a member in good standing since that time.

2. I am over the age of 18 and am fully competent to make this declaration.

3. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief and, as to such matters, I am informed and believe that they are true and correct.

4. I am a founding partner at Assassi & Cruz Law Firm, PC and counsel of record for plaintiff Erik Nolasco.

5. I graduated from the University of California, Santa Barbara in 2006 with a bachelor's in science in computer engineering, earned an MBA from California Polytechnic State University San Luis Obispo in 2007, and obtained my J.D. from the University of California, Irvine in 2014. I have been a member of the California Bar since 2014 and am also licensed in all California Federal District Courts.

6. After graduating from law school, I founded Black Oak Law Firm which I ran until I established Assassi & Cruz Law Firm, PC with Vernoica Cruz. My entire legal career has been dedicated to consumer and employee rights.

7. Assassi & Cruz Law Firm, PC practices exclusively on plaintiffs' side litigation in the areas of consumer and employment actions, including vehicle defect matters, breach of warranty, breach of contract, unfair and deceptive practices and advertising, FEHA violations, wage and hour claims, and California anti-spam litigation.

8. Assassi & Cruz Law Firm, PC represents clients in federal and state court in both individual, and class actions and has recovered millions of dollars for individuals across California.

1           9.     I have been involved in litigating numerous consumer and employment class  
2 actions.

3           10.    I have been appointed class counsel in class actions, including:

4                   a.     *Lo v. Nutribullet, LLC*, No. 21STCV12852, (Sup. Ct. Los  
5 Angeles, Nov. 3, 2022) (finally approved class action involving alleged  
6 violations of Song-Beverly Warranty Act);

7                   b.     *Schneider, et al. v. All-Clad Metal Crafters LLC, et. al.*, No. 30-  
8 2021-01188953-CU-BT-CXX (Sup. Ct. Orange County, Oct. 18, 2024)  
9 (finally approved class action involving alleged violations of Song-Beverly  
10 Warranty Act)

11           11.    Veronica Cruz is attorney at law duly admitted to practice before all courts of  
12 the State of California. She is a founding partner at Assassi & Cruz Law, PC and she serve as  
13 counsel for Plaintiffs and the Proposed Class in the above-entitled action. She was admitted  
14 to the State Bar of California on December 6, 2017.

15           12.    She graduated from the University of California, Los Angeles with a Bachelor  
16 of Arts degree in English and a minor in Chicano/a Studies in 2011. Thereafter, she attended  
17 Pepperdine School of Law, where she obtained a Juris Doctor degree in 2017.

18           13.    Following her graduation from law school, she worked at Kazerouni Law  
19 Group, APC, where she focused on employment matters, including wage and hour class  
20 actions. She then subsequently joined the boutique law firm of Barber & Bauermeister, where  
21 her practice included the representation of school districts across Southern California. In  
22 2023, she co-founded Assassi & Cruz Law where she has continued to handle complex class  
23 action litigation. She has been involved in litigating numerous consumer and employment  
24 class actions. She has been selected to the Rising Stars list for four consecutive years from  
25 2023-2026.

26           16.    Neither Plaintiffs nor our firm has any known conflicts of interest with any  
27  
28

1 putative class members.

2 17. Based upon the analysis and conclusions of Plaintiffs' counsel in this matter,  
3 their experts, review of Defendant-provided documents and records, and frank, candid  
4 discussions with an experienced mediator, Plaintiffs and our office assess the value of the  
5 proposed settlement as reasonable.

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 August 28, 2025, at Orange, California.  
8

9 /s/Adib Assassi  
10 Declarant