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Attorneys for Plaintiffs PARKER CRAWLEY, CASSIA CARRAWAY, CHARLES DAVIS,
HUCKLEBERRY TAYLOR
Individually and on behalf of the Certified Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE
(UNLIMITED JURISDICTION)

PARKER CRAWLEY, CASSIA CARRAWAY,
CHARLES DAVIS, AND HUCKLEBERRY
TAYLOR individually and on behalf of others
similarly situated,

Plaintiffs,
vs.

RISE ENERGY, LLC, a limited liability
company; NUSUN POWER, LLC, a limited
liability; JORDAN KENT BINNING, an
individual; CHARLES LAZARUS, an
individual; JACOB HARRISON, an individual;
and DOES 1 through 100, inclusive,

Defendants.

CASE NO. 30-2023-01336866-CU-OE-CXC
Assigned to: Hon. Melissa R. McCormick

CLASS ACTION

Complaint Filed: July 7, 2023
FAC Filed: August 15, 2023
SAC Filed: December 7, 2023

**DECLARATION OF THOMAS SOLMER
IN SUPPORT OF PLAINTIFF'S NOTICE
OF MOTION AND UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

DATE:
TIME: A.M.
PLACE: Dept. CX104

1 I, Thomas Solmer, declare and state as follows:

2 1. I am over the age of 18 and competent to testify about the matters set forth in
3 this declaration. I have personal knowledge of the facts set forth in this declaration. I am an attorney
4 licensed to appear before all courts of the State of California and counsel of record for Plaintiffs herein.

5 2. Solmer Law Corporation was incorporated in 2020 but existed since 2016 as a sole
6 proprietorship under attorney Lilit Solmer (then Lilit Tovmasyan). The firm has specialized in
7 plaintiff's-side employment law litigation since its inception. Ms. Solmer and myself have handled
8 numerous PAGA representative lawsuits such as this action, as well as representing a substantial
9 number of plaintiffs in individual FEHA and wage and hour litigation.

10 3. I received my J.D. from the University of Minnesota Law School in 2008 and worked as
11 a state district court law clerk from 2009-2013. From 2013 to 2014, I operated a solo practice in
12 Faribault, Minnesota known as Solmer Law of Minnesota, PLLP, representing about 50 clients in
13 various civil, criminal, family, probate, child protection, and juvenile delinquency matters. From 2014
14 to 2019, I worked for The Law Offices of René Korper in Valencia, CA, a two-attorney lemon law
15 litigation firm with 70-100 active cases at any time. Since 2019, I have worked in plaintiff's-side
16 employment law litigation alongside Ms. Solmer and became an officer of Solmer Law Corporation
17 upon its incorporation in 2020. The firm litigates approximately 20-25 individual, PAGA, or class
18 action employment law actions each year. From March of 2021 to September of 2022 and from
19 September of 2023 to the present, I have had primary responsibility for these matters. Over my career,
20 I have taken well over one hundred depositions and defended nearly as many. I have drafted
21 approximately 7-8 appeals. I conducted twelve trials including five jury trials, both in state and federal
22 court, ten of which were as sole trial counsel.

23 4. Specific to class actions, my experience is more limited compared with PAGA and
24 individual employment matters. Solmer Law Corporation engaged attorney Christopher Adams of
25 Adams Employment Counsel, who has specialized in employee wage-and-hour class action litigation
26 for nearly the past ten years, to consult on procedural issues at the start of this litigation. After the
27 matter was consolidated with the Huckleberry Taylor action, I have relied primarily on co-counsel Mr.
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1 Ellison for expertise on procedural questions.

2 5. Ms. Solmer is the President of Solmer Law Corporation. She has been a member of the
3 State Bar of California in good standing since February of 2013. She has concentrated her practice in
4 employment law litigation, both on plaintiffs'- and defense-side, since she was admitted to the Bar.
5 Before establishing the firm that is now Solmer Law Corporation, she worked as an associate attorney
6 for LightGabler, LLP engaged principally in employment litigation defense of wage-and-hour claims in
7 individual, PAGA, and class action matters. Since 2016, she has litigated more than one hundred such
8 actions through settlement or trial, the vast majority on behalf of plaintiffs.

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

13 Executed on April 14, 2025 at Irvine, California.

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