

1 Adam Rose (210880)
adam@frontierlawcenter.com
2 Manny Starr (319778)
manny@frontierlawcenter.com
3 Frontier Law Center
23901 Calabasas Road, #2074
4 Calabasas, CA 91302
Telephone: (818) 914-3433
5 Facsimile: (818) 914-3433

6 Attorney for Plaintiff
7 Elsa Chavez

8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF SAN BERNARDINO

10 ELSA CHAVEZ, et al.,
11 Plaintiffs,

12 v.

13 TLD LOGISTICS SERVICES, INC., and DOES 1
14 to 100,
15 Defendants.

) NO. CIVSB2314330
) CLASS ACTION
)
) DECLARATION OF ADAM ROSE IN
) SUPPORT OF MOTION FOR
) PRELIMINARY APPROVAL
)
) Date: January 7, 2025
) Time: 8:30 a.m.
) Dept: S32
)
)
)

16
17
18
19 I, Adam Rose, declare the following:

- 20 1. I am one of the attorneys for plaintiff Elsa Chavez. I have personal knowledge of the
21 facts in this declaration, and if called on to testify I would competently do so.
- 22 2. I support all the arguments made in the motion for preliminary approval.
- 23 3. I am also very actively helped move this case into mediation and was aware that to
24 prepare for mediation we received informal discovery including a sampling of time and pay
25 data, the employee handbook, the meal and rest break policies, and Elsa Chavez's records.
- 26 4. As a result of the mediation with David Phillips of Signature Resolution, the parties
27 reached a settlement. I believe the settlement terms are fair, reasonable, and adequate.
- 28 5. Further, I am qualified to represent the class based on the below.

6. Since I graduated from University of San Francisco Law School in 1998, I have settled approximately 300 individual employment law cases (in addition to hundreds of other personal injury and habitability cases), and I have handled the following class actions from start to finish: *Ramirez v. Arevalo Landscaping*, Los Angeles Superior Court case number BC397109; *Friedrich v. La Vaquita Corp.*, Los Angeles Superior Court case number BC564432; *Carvalho v. Staff Pro*, Alameda County Superior Court case number RG16812554; *Hart v. Marriott International, Inc.*, United States District Court case number 8:17-cv-2021-JVS; *Cole v. Saucey, Inc.*, Los Angeles Superior Court case number BC707895; *Rowe v. Laura Geller Beauty, LLC*, United States Bankruptcy Court case number 1:18-bk-14102-MEW (New York); *Rowe v. Ulta Salon, Beauty, and Cosmetics, LLC*, Sacramento Superior Court case number 34-2019-00267231, *Luna et al. v. Triple Canopy, Inc.*, Santa Clara Superior Court case number 19CV345169, *Smith v. Budget Rent A Car System, Inc.*, United States District Court case number 2:19-cv-4720-SVW, *Shrum v. Sacramento Elite Patrol, Inc.*, Sacramento Superior Court case number 34-2019-002767231, *Morris v. Blue Mountain Enterprises, LLC*, Solano County Superior Court case number FCS035858, *Lopez v. Mac Arthur Co.*, Riverside County Superior Court case number RIC1905043, *Diaz v. Marriott International, Inc.*, San Diego Superior Court case number 37-2019-00044740, *Castellanos et al. v. Southwest Patrol, Inc.*, San Diego Superior Court case number 37-2020-00024905, *Inacio v. Land O' Lakes*, Merced Superior Court case number 19CV-04520, GSG Wage and Hour Cases, San Diego Superior Court case number JCCP5055, *Marroquin v. Teleferic Barcelona*, Santa Clara Superior Court case number 21CV388821, *Gonzalez, et al. v. Golden Gate Bell*, Contra Costa Superior Court case number MSC21-00956, *Navarro Garcia v. Widdicombe Enterprises, Inc.*, Orange County Superior Court case number 30-2021-01235358, *Gonzalez v. Seven Seas Associates, LLC*, San Diego Superior Court case number 37-2023-00042280-CU-OE-CTL, *Navarro v. Squad Security CA, Inc.*, Los Angeles Superior Court case number 22STCV24108, and *Gagliardi v. Ralph Lauren Retail, Inc.*, Riverside County Superior Court case number CVRI2103581.

7. I also actively participated in and helped finalize class action settlements in the following: *Arya Security Services Cases*, Orange County Superior Court case number JCCP4991, *Allen v. Caine & Weiner*, Los Angeles Superior Court case number BC465806, *Terry v. SHAC, LLC dba Sapphire*, Eighth Judicial District of Nevada case number A-09-602800-C, *Carter v. Fantasy Castle*, Los Angeles Superior Court case number BC433666, *Blunt v. Valley Ball Cabaret*, Los Angeles Superior Court case number BC380265, *Hills v. Todd & Katie, Inc.*, Los Angeles Superior Court case number BC437919, *Lawrenz, et al. v. Blacktalon Enterprises, Inc.*, et al., Sacramento Superior Court case number 34-2019-00267748, *Stricklin, et al. v. First Alarm Security & Patrol, Inc.*, Santa Clara Superior Court case number 18CV323753, *Rushing v. Security Intelligence Specialist Corporation*, San Mateo Superior Court case number 18-CIV-01808, *Massey v. Hummel + Mann*, Santa Barbara Superior Court case number 21CV02985, *Sunshine Retirement Wage and Hour Cases*, Sacramento Superior Court case number JCCP5247, and *Houser v. Fish House Vera Cruz*, San Diego Superior Court case number 37-2023-00045659-CU-OE-NC.

8. I helped obtain class certification for *Van Bebber v. Dignity Health*, U.S. District Court case number 1:19-cv-00264, and I obtained FLSA certification and finalized FLSA settlements in *Desio v. Russell Road Food & Beverage*, U.S. District Court case number 2:15-1440-GMN (D.Nev.) and *Aguilar v. American-Paragon Protective Services*, U.S. District Court case number 5:20-cv-01892-EJD (N.D.Cal.).

9. I handled and finalized settlements on the following PAGA-only cases: *McAfee v. Chief Protective Services*, Riverside County Superior Court case number RIC1721984, *Hall v. Pirch, Inc.*, San Diego Superior Court case number 37-2016-00036606, *Green v. American Guard*, Los Angeles Superior Court case number BC688437, *Hernandez v. Contemporary Services Corp.*, Los Angeles Superior Court case number BC684206, *McNeal v. Platinum Security Services*, Los Angeles Superior Court case number 19STCV05709, *Cruz v. Holder Construction Group, LLC*, Santa Clara Superior Court case number 19CV341862, *Nunes v. Westmont Living*, San Luis Obispo Superior Court case number 19CV-0935, *Gibson v. Swift Transportation Co.*, United States District Court case

1 number 5:20-cv-00318-ODW, *Katabyan v. Awesome Doughnut*, Los Angeles Superior
2 Court case number 20STCV19903, *Ayoub v. Harry Winston, Inc.*, United States District
3 Court case number 4:21-cv-01599-JST, *Williams v. St. Joseph Personal Care Services,*
4 *LLC*, Orange County Superior Court case number 30-2020-01134268-CU-OE-CXC,
5 *Rodriguez v. Modern Parking, Inc.*, Los Angeles Superior Court case number
6 23STCV00936, *Valdivieso v. Universal Auto Group*, Los Angeles Superior Court case
7 number 23GDCV00191, *Hanna v. Ulta Salon, Cosmetics & Fragrance, Inc.*, Sacramento
8 Superior Court case number 34-2019-00252198, *Bullock v. Atria Management*, Nevada
9 County Superior Court case number CU22-086285, *Ramirez-Batres v. Lee Mechanical*
10 *Contractors, Inc.*, Kern County Superior Court case number BCV-23-102686, *Mathews v.*
11 *Assignment America, LLC*, Los Angeles Superior Court case number 22STCV13033,
12 *Castro v. Clay Lacy Aviation, Inc.*, Los Angeles Superior Court case number
13 21VECV00304, *Elwood v. Alameda Healthcare & Wellness Center, LLC*, Alameda County
14 Superior Court case number 23CV028398, *Vasquez v. Anton Devco, Inc.*, Sacramento
15 County Superior Court case number 34-2021-00310326, *Selvy-Medina v. Nothing Bundt*
16 *Cakes*, San Diego Superior Court case number 37-2023-00041657-CU-OE-CTL, and
17 *Barboza et al. v. Mission Federal Credit Union*, San Diego Superior Court case number 37-
18 2019-00024579-CU-OE-CTL.

19 10. Thus, I strongly believe the settlement is fair, reasonable, and adequate, and I
20 respectfully request the court to grant the motion for preliminary approval.

21
22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 Date: December 6, 2024

/s/ Adam Rose