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Attorneys for Defendant CLASSIC COLLISION, LLC, erroneously sued and served herein as
CLASSIC COLLISION CORPORATE SERVICES, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

RICARDO GALLARDO, individually, on a
representative basis, and on behalf of all others
similarly situated;

Plaintiff,

vs.

CLASSIC COLLISION CORPORATE
SERVICES, INC., a Georgia Corporation; and
DOES 1 through 20, inclusive;

Defendants.

CASE NO. CVRI2303068

*[Assigned for All Purposes to Hon. Harold Hopp,
Dept I]*

**DECLARATION OF CHUL KWAK IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF THE
CLASS ACTION SETTLEMENT**

Date: February 19, 2025
Time: 8:30 am
Dept.: 1

DECLARATION OF CHUL KWAK

I, Chul Kwak, declare as follows:

1. I am the chief legal officer of Defendant CLASSIC COLLISION, LLC ("Classic Collision") in the within lawsuit filed by Plaintiff RICARDO GALLARDO ("Plaintiff"). The following is based upon my personal knowledge of the facts stated herein and, if called to testify, I would and could competently testify thereto.

2. Classic Collision employs individuals across the age spectrum in California, from people in their twenties to individuals who have worked for the company for decades and are in their sixties.

3. I do not know the educational background of hourly employees in California because there is no education requirement for applying for hourly positions at Classic Collision. I do believe that some employees have some post-secondary education.

4. A large percentage of hourly employees that work for Classic Collision in California speak and read English fluently. There are some employees who speak Spanish as their primary language but speak sufficient English to communicate within the workplace.

5. Pride Collision Centers, Inc. was acquired by Classic Collision on October 30, 2020. Classic Collision acquired the stock of Pride Collision Centers, Inc. and therefore inherited any potential liabilities associated with its wage and hour practices as of October 30, 2020.

6. Ultimate Auto Glass, LLC was created by Classic Collision on September 9, 2019. At all relevant times, individuals who perform services for Ultimate Auto Glass, LLC are treated as Classic Collision employees and are paid by Classic Collision.

I declare under penalty of perjury that the foregoing is true and correct. This declaration was executed pursuant to the laws of the State of California on the 23 day of January 2025 in Minneapolis.

Minnesota.



Chul Kwak
Chief Legal Officer