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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF SACRAMENTO
12

13 JAMAL GAMBLE, individually, and on
14 behalf of other members of the general public
similarly situated,

15 Plaintiff,

16 vs.

17 AMERIPRIDE SERVICES, INC., an
18 unknown business entity; AMERIPRIDE
19 SERVICES, LLC, a California limited
liability company; and DOES 1 through 100,
inclusive

20 Defendants.
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Case No. 34-2022-00320558-CU-OE-GDS

Honorable Laurie A. Damrell
Department 8B

**DECLARATION OF SHAUN SETAREH IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: August 21, 2026
Time: 9:00 a.m.

Complaint Filed: May 23, 2022

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I am an attorney in good standing duly admitted to the State Bar of California, an
y of record for Plaintiff Jamal Gamble in this action against Defendants Ameripride Services,
d Ameripride Services, LLC. (“Defendants”). This declaration is made in support of
ff’s Motion for Preliminary Approval of the Class Action and PAGA Settlement.

Experience of Class Counsel

3. I received my undergraduate degree from UCLA in 1996 and my law degree from Loyola Law School in 1999. Since being admitted to the State Bar of California in 1999, I have actively practiced civil litigation for the entirety of that time period.

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being admitted to the State Bar of California in 1999, I have
for the entirety of that time period.

4. Setareh Law Group and I, as its principal attorney, are well-experienced class action attorneys. I, along with the attorneys assigned to this case, have considerable experience in class action and PAGA litigation. I, and the attorneys at Setareh Law Group, have been involved as lead class counsel, co-lead class counsel, and other levels of involvement in over 150 wage-and-hour, consumer, and antitrust class action cases. Because of this, Setareh Law Group has more than 250 Westlaw citable opinions, including the following noteworthy appellate decisions:

Corporation, et al., 5 Cal.5th 829 (2018) (reversed summary judgment), issuing a landmark published decision that clarified the application of the widely adopted federal *de minimis* doctrine to overtime laws). Due to the significance and importance of this decision, the California Supreme Court, I received the California Lawyer Award from the Daily Journal for my work on the case.

b. *Allen v. Labor Ready Southwest, Inc.* (Cal. App. 2 Dist., 2013) 2013 WL 1910293
(reversing an Order from the Superior Court of Los Angeles County compelling

- 1 Plaintiff's claims to arbitration, finding that Defendant waived the right to compel
2 arbitration by litigating the merits of Plaintiff's arbitrable federal and state claims).
- 3 c. *Lacour v. Marshalls of CA, LLC, et al.* (Cal. App. 1 Dist., 2023) 2023 WL 5543622
4 (reversing an Order from the Superior Court of Alameda County granting judgment on
5 the pleadings, holding that the trial court erred in giving claim preclusive effect to a
6 federal court judgment in a prior PAGA case against the same defendant.)

7 Below is a sampling of recent Ninth Circuit appeals in which Setareh Law Group prevailed:

8 *Ninth Circuit Decisions*

- 9 d. *Allen v. Bedolla*, 787 F.3d 1218 (9th Cir. 2015) (affirming the district court's Order
10 denying objector's motion to intervene and remanding to the district court where
11 settlement was granted final approval. Final approval was upheld on a subsequent appeal
12 in the 9th Cir. [*see Bedolla v. Allen*, 736 Fed.Appx. 614 (9th Cir. 2018)]).
- 13 e. *Troester v. Starbucks Corp.*, 738 Fed. Appx. 562 (9th Cir. 2018) (Ninth Circuit opinion
14 following the California Supreme Court answering the Ninth Circuit's certified
15 question).
- 16 f. *Gilberg v. California Check Cashing Stores, LLC*, 913 F.3d 1169 (9th Cir. 2019)
17 (vacated district court's summary judgment in favor of Defendants and remanded for
18 further proceedings, holding that Defendants' Fair Credit Reporting Act disclosure form
19 lacked sufficient clarity in a published opinion).
- 20 g. *Rodriguez v. U.S. Healthworks*, 813 Fed.Appx. 315 (9th Cir. 2020) (reversed district
21 court's summary judgement in favor of Defendants with instructions to remand the
22 action to state court).
- 23 h. *Harris v. KM Industrial, Inc.*, 980 F.3d 694 (9th Cir. November 13, 2020) (affirmed the
24 district court's granting of Plaintiff's motion to remand, holding in a published opinion
25 that Defendants had failed to establish by a preponderance of the evidence that the
26 amount in controversy exceeded \$5 million as required under the Class Action Fairness
27 Act for removal).
- 28 i. *Ahlstrom v. DHI Mortg. Co., Ltd., L.P.*, 21 F.4th 631 (9th Cir. 2021) (reversed the

1 district court's ruling compelling claims to arbitration, holding that parties cannot
2 delegate issues of formation of an arbitration agreement to the arbitrator for
3 determination).

- 4 j. *Ortiz v. Randstad Inhouse Services, LLC et al.*, 2024 WL 1070823 (9th Cir. March 12,
5 2024), (affirmed the District Court's order denying Defendants' Motion to Compel
6 Arbitration in a wage and hour class action, holding that warehouse workers are covered
7 by the Federal Arbitration Act's transportation worker exception).

8 **Class Counsel Appointments.** The following is a sampling of class actions in which the Setareh
9 Law Group and I have been appointed as class counsel:

10 Federal Cases

- 11 k. *Cerdenia v. USA Truck, Inc.*, U.S. District Court, Central District of California, Case No.
12 10-CV-1489-JVS (granted final approval in an action on behalf of truck drivers for meal
13 and rest period violations, off-the-clock pre- and post-shift work, and unauthorized wage
14 deductions).
- 15 l. *Fronza v. Staffmark*, U.S. District Court, Northern District of California, Case No. 15-
16 CV-02315-MEJ (granted final approval in a case involving alleged uncompensated
17 security checks for warehouse workers).
- 18 m. *Garcia v. Am. Gen. Fin. Mgmt. Corp.*, U.S. District Court, Central District of California,
19 Case No. 09-CV-1916 (granted final approval in a case filed on behalf of account
20 managers in case involving, among other things, alleged overtime miscalculations and
21 meal and rest period violations).
- 22 n. *Jones v. Shred-It USA, Inc.*, U.S. District Court, Central District of California, Case No.
23 11-CV-00526 (granted final approval in a case brought on behalf of customer service
24 representatives and balers for alleged off-the-clock work and meal and rest period
25 violations).
- 26 o. *O'Neill v. Genesis Logistics, Inc.*, U.S. District Court, Northern District of California,
27 Case No. 08-CV-4707 (granted final approval in a case involving claims for failure to
28 provide meal periods to employees who worked as drivers delivering goods to 7-11

stores throughout California and failure to pay final wages in a timely manner to terminated employees).

- p. *Padilla v. UPS*, U.S. District Court, Central District of California, Case No. 08-CV-1590 (granted final approval in a case involving claims for failure to provide meal periods to part time employees engaged in sort operations and failure to pay final wages in a timely manner to terminated employees).
- q. *Pitre v. Wal-Mart Stores, Inc.*, U.S. District Court, Central District of California, Case No. 17-cv-01281-DOC (granting class certification in a highly contested Action against Wal-Mart for a class of almost 5,000,000 in a Fair Credit Reporting Act action).
- r. *Utne v. Home Depot U.S.A., Inc.*, U.S. District Court, Northern District of California, Case No. 16-cv-01854-RS (granting class certification in a highly contested Action against Home Depot in connection with uncompensated off-the-clock work occurring at the start of all employee shifts and at the end of closing shifts).
- s. *Vang v. Burlington Coat Factory Warehouse Corp.*, U.S. District Court, Central District of California Case No. 09-CV-8061 (granted final approval in a case involving, among other things, vacation pay forfeitures, failures to provide meal and rest periods, and failures to pay overtime wages based on employee misclassification).
- t. *Wilson v. TE Connectivity*, Northern District of California Case No. 3:14-cv-04872-EDL (granted class certification through contested motion in case on behalf of manufacturing facility employees subject to auto-deduction of meal breaks).

State Cases

- u. *Alvarez v. Gary Grace Enterprises, LP*, Marin Superior Court, Case No. CIV 1002553 (granted final approval in a case on behalf of hair salon employees for overtime miscalculation and related claims).
- v. *Butler v. Lexxiom, Inc.*, San Bernardino Superior Court, Case No. CIVRS 1001579 (granted final approval in an action on behalf of debt resolution center employees alleging, among other things, meal and rest period violations and overtime calculation errors).

- 1 w. *Calderon v. GreatCall, Inc.*, San Diego Superior Court, Case No. 37-2010- 00093743-
2 CU-OE-CTL (granted final approval in a case on behalf of customer service employees
3 for, among other things, alleged meal and rest period violations and overtime
4 calculation errors).
- 5 x. *Douglas v. California Credit Union*, Los Angeles Superior Court, Case No. BC445050
6 (granted final approval in a case on behalf of customer service representatives alleging
7 overtime miscalculation claims).
- 8 y. *Green v. Staples Contract and Commercial, Inc.*, Los Angeles Superior Court, Case
9 No. BC389789 (granted final approval in a case involving claims for unprovided meal
10 and rest periods, inaccurate wage statements, waiting time penalties, and unfair
11 business practices on behalf of truck drivers delivering Staples office supplies in
12 California).
- 13 z. *Green v. Universal Music Group*, Los Angeles Superior Court, Case No. BC374253
14 (granted final approval in a case involving misclassification claims of current or former
15 IT Support employees, including engineers, server analysts, desktop support, and
16 technical leads).
- 17 aa. *Sandoval v. Rite Aid Corp.*, Los Angeles County Superior Court, Case No. BC431249
18 (granted class certification through contested motion in case on behalf of former
19 pharmacy employees based on late final wage payments in violation of Labor Code §§
20 201–203; subsequently granted final approval of class action settlement).
- 21 bb. *Spokes v. Lush Cosmetics, LLC*, Los Angeles Superior Court, Case No. BC391397
22 (granted final approval in a case alleging failures to provide meal and rest periods and
23 failure to timely pay all final wages to California sales associates and key holders).
- 24 cc. *Valencia v. SCIS Air Security Corp.*, Los Angeles Superior Court, Case No. BC421485
25 (granted class certification through contested motion in case on behalf of former
26 security workers based on late final wage payments in violation of Labor Code §§ 201–
27 203; subsequently granted preliminary approval of proposed class action settlement).
- 28 5. I am the owner and managing attorney of Setareh Law Group. All strategic decisions

1 regarding the selection of clients to represent and the major strategic decisions for each client fall to me
2 to make or approve. I bear all of the risk associated with the operation of a law firm. As a result, my
3 scope of responsibility is substantially greater than an attorney of equal years of experience who does
4 not bear these additional obligations.

5 6. As the above shows, the Setareh Law Group and I have substantial experience in wage-
6 and-hour class action litigation, including actions alleging failure to provide meal and/or rest periods,
7 failure to pay wages, failure to provide accurate wage statements, failure to provide timely final wage
8 payments, and other related claims. We are knowledgeable about the applicable law and have worked
9 diligently to investigate and identify the potential claims in this action. I will continue to commit my
10 firm's resources to further the interests of the Class. Setareh Law Group and I have no known conflicts
11 of interest with Plaintiff or with absent Class Members or aggrieved employees.

12 ***Actual Litigation Costs***

13 7. Class Counsel request litigation costs, supported by proof, to be paid out of the Gross
14 Settlement Amount.

15 8. Setareh Law Group has incurred litigation costs, to date, of **\$2,955.90**. A true and
16 correct copy of the costs incurred by my firm to date has been prepared by my firm's bookkeeper
17 and is attached hereto as **Exhibit 1**.

18 I declare under the penalty of perjury of the laws of the State of California that the foregoing
19 is true and correct to the best of my knowledge.

20 Executed on the 30th day of July 2026 in Beverly Hills, California.

21 /s/ Shaun Setareh
22 Shaun Setareh
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EXHIBIT 1

LAW OFFICE OF SHAUN SETAREH, APC
Account QuickReport
All Dates

Transaction date	Name	Description	Account Name	Amount
07/01/2023	One Legal LLC	OneLegal CCSALE05114026	Client Costs:Ameripride Services, Inc. (WH)	57.65
09/27/2023	One Legal LLC	Case No. 34-2022-00320558 JAMAL GAMBLE	Client Costs:Ameripride Services, Inc. (WH)	74.12
01/11/2024	One Legal LLC	Case No. 34-2022-00320558 JAMAL GAMBLE	Client Costs:Ameripride Services, Inc. (WH)	74.12
04/04/2024	One Legal LLC	Case No. 34-2022-00320558 JAMAL GAMBLE	Client Costs:Ameripride Services, Inc. (WH)	15.35
04/08/2024	Delta Air	Transportation	Client Costs:Ameripride Services, Inc. (WH)	297.20
04/08/2024	Holiday Inn	Travel	Client Costs:Ameripride Services, Inc. (WH)	188.77
04/15/2024	One Legal LLC	Case No. 34-2022-00320558 JAMAL GAMBLE	Client Costs:Ameripride Services, Inc. (WH)	15.35
04/23/2024	Veritext Legal Solutions	Case No. 34202200320558 Gamble, Jamal v. Ameripride Services, Inc., Et Al.	Client Costs:Ameripride Services, Inc. (WH)	1,642.60
04/24/2024	USPS	Postage	Client Costs:Ameripride Services, Inc. (WH)	0.64
08/02/2024	Uber	Transportation--Tyson Gibb reimbursement for Uber rides	Client Costs:Ameripride Services, Inc. (WH)	294.20
08/02/2024	One Legal LLC	Case No. 34-2022-00320558-CU-OE-GDS Jamal Gamble vs. Ameripride Services Inc	Client Costs:Ameripride Services, Inc. (WH)	15.35
01/22/2025	One Legal LLC	Case No. 34-2022-00320558-CU-OE-GDS AMERIPRIDE	Client Costs:Ameripride Services, Inc. (WH)	39.30
03/28/2025	One Legal LLC	Case No. 34-2022-00320558-CU-OE-GDS Jamal Gamble vs. Ameripride Services Inc	Client Costs:Ameripride Services, Inc. (WH)	115.64
03/28/2025	One Legal LLC	Case No. 34-2022-00320558-CU-OE-GDS Jamal Gamble vs. Ameripride Services Inc	Client Costs:Ameripride Services, Inc. (WH)	39.30
01/07/2026	DLSE	Case no. LWDA-CM-1148117-26 AmeriPride Services, LLC.	Client Costs:Ameripride Services, Inc. (WH)	75.00
01/31/2026	USPS	Ameripride Services Inc (WH) Certified PAGA letter Mail	Client Costs:Ameripride Services, Inc. (WH)	11.31
Total for Ameripride Services, Inc. (WH)				\$2,955.90