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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

STEVE CORDOVA and HUYEN PHUONG
LE, on behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

NORMAN INDUSTRIAL MATERIALS,
INC., a California Corporation; and DOES 1-
50, inclusive.

Defendants.

Case No.: 23STCV17785
Related to Case No.: 23STCV19388

*[Assigned for all purposes to the Hon.
Kenneth R. Freeman, Dept. SSC-14]*

**DECLARATION OF JOSHUA
FALAKASSA IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT**

Date: May 13, 2025
Time: 10:00 a.m.
Dept.: SSC-14

Action Filed: July 27, 2023
Trial Date: None Set

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1 Over the last few years, my practice has almost entirely consisted of representing employees, the
2 majority of which has included class action and representative action wage and hour matters. In
3 total, I have handled upwards of 90 class action and representative action wage/hour cases.

4 8. I was selected as a “Super Lawyer Rising Star” in Employment Litigation during the
5 years 2017 through 2024, a distinction that is reserved for the top 2.5 % of lawyers in the practice
6 area. I have also been recognized by Topverdicts.com for achieving Top 20 and Top 50 wage and
7 hour class and/or PAGA action settlements in California in 2021, 2022 and 2023.

8 9. My firm has the experience, resources, and means necessary to allow us to provide
9 adequate representation to all Settlement Class Members in this Action.

10 10. Currently, my firm is acting as counsel in at least thirty wage-and-hour class actions.

11 11. Class Counsel are respected members of the California Bar with strong records of
12 vigorous and effective advocacy of their clients, and they are experienced in handling complex
13 class action litigation. Both Class Counsel and Plaintiffs were prepared to litigate the claims in this
14 action, but they strongly and unequivocally support the proposed Settlement as being in the best
15 interest of the Settlement Class based on the circumstances referenced herein.

16 12. I have been appointed class counsel in various courts across California.

17 13. My office has played a meaningful role in investigating, prosecuting, and resolving
18 this case. We conducted substantial factual and legal analysis and participated in meaningful
19 informal discovery and information exchange with Defense counsel. These efforts culminated in a
20 successful mediation facilitated by experienced mediator Steve Mehta, Esq., resulting in the
21 proposed class-wide Settlement.

22 14. In light of the risks inherent in continued litigation—including contested factual and
23 legal issues—Plaintiffs’ counsel believes the Settlement is fair, reasonable, and adequate. The
24 resolution was reached through arm’s-length negotiations between experienced counsel after an
25 informed exchange of relevant documents and data.

26 15. The Settlement was reached through adversarial yet professional negotiations,
27 facilitated by an experienced mediator with expertise in wage-and-hour class actions. The result
28 reflects significant effort and advocacy by both sides.

1 16. While Plaintiffs and their counsel were confident in the strength of the claims and the
2 ability to achieve class certification, they also recognized the risks, costs, and potential delays of
3 ongoing litigation, including the possibility of adverse rulings at certification, summary judgment,
4 trial, or on appeal.

5 17. The Settlement provides fair and proportionate payments to each Class Member based
6 on the number of Compensable Workweeks worked during the Class Period. Plaintiffs' counsel
7 conducted thorough investigation and analysis with the aim of maximizing recovery while avoiding
8 the expense and delay of protracted litigation. In our judgment, the Settlement is in the best interests
9 of the Class.

10 18. Plaintiffs' counsel performed extensive informal discovery, including review and
11 analysis of Defendant's policies, payroll and time records, personnel documents, and wage
12 statements. I along with my co-counsels also engaged in sampling and extrapolation of class-wide
13 data to assess damages and evaluate the strength of the claims.

14 19. Based on my collective experience in wage-and-hour class and PAGA litigation, I
15 believe the proposed Settlement is fair, reasonable, and adequate. It provides meaningful
16 compensation to the Class while avoiding the risks and delays of continued litigation.

17 20. Plaintiffs' counsel and Defense counsel fully support the terms of the Settlement, as
18 set forth in the Settlement Agreement.

19 21. The Settlement represents a compromise that accounts for the legal and factual risks
20 associated with class certification, liability, and damages. Importantly, the Settlement provides for
21 non-reversionary payments to the Class.

22 22. For these reasons, Plaintiffs respectfully request that the Court grant preliminary
23 approval of the Settlement as fair, reasonable, and in the best interests of the Class. Plaintiffs also
24 request that the Court preliminarily approve the requested attorneys' fees, litigation costs, and service
25 awards to the Class Representatives.

26 23. All Plaintiffs and Plaintiffs' counsel entered into a joint prosecution agreement that
27 complies with the California Rules of Professional Conduct, including Rule 1.5.1, as well as
28 California Rules of Court, Rule 3.769(b), which governs applications for class action settlements.

1 The joint prosecution agreement ensures coordinated representation, facilitates the efficient
2 prosecution of the litigation, and avoids conflicts of interest, all in the best interest of the Class.

3 I declare under penalty of perjury under the laws of the state of California that the foregoing
4 is true and correct on this 2nd day of April 2025, in Los Angeles, California.

5 By: /s/ Joshua Falakassa
6 Joshua Falakassa
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