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Attorneys for Defendant
EIG MANAGEMENT, INC.,
dba ECOSTAR REMODELING
& CONSTRUCTION

Electronically FILED by
Superior Court of California,
County of Los Angeles
3/24/2025 5:54 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By K. Valenzuela, Deputy Clerk

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

**MISAN AKUYA, individually, and on
behalf of all others similarly situated,**

Plaintiff,

**v.
EIG MANAGEMENT DBA
ECOSTAR REMODELING &
CONSTRUCTION, a California
corporation; and DOES 1 through 10,
inclusive,**

Defendants.

**CASE NO. 23STCV15280
CLASS ACTION**

**DECLARATION OF TIMOTHY
BOWLES IN SUPPORT OF
PREMINARY APPROVAL OF
SETTLEMENT AGREEMENT**

Assigned for all purposes to:
Hon. Stuart M. Rice

Complaint Filed: 06/30/2023

I, Timothy Bowles, declare:

1. I am a member in good standing of the State Bar of California and managing partner of Law Offices of Timothy Bowles, P.C. (Law Firm). I have personal knowledge of the matters specified in this declaration and am able and willing to testify to them. I submit this declaration in support of preliminary approval of the settlement agreement for this case (Settlement or Agreement). I

represent defendant EIG Management, Inc., dba Ecostar Remodeling & Construction (EIG).

2. By paragraph 7.1 of the Agreement, the parties have appointed CPT Group, Inc. as the neutral entity to administer the Settlement (CPT).

3. By paragraph 6.1 of the Agreement, I am not aware of any facts that establish any actual or potential conflict of interest between EIG, Law Firm, myself or any other Law Firm attorney, on the one hand, and CPT, any of its principals, agents or representatives, on the other.

4. By paragraph 6.1 of the Agreement, I am also not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement aside from the specific individual wage and hour claims included in the matter of *Elijah Bernal v. EIG Management dba Ecostar Remodeling & Construction*, Los Angeles Co. Superior Court 24STCV28952, filed 11/5/24 and reportedly sub-served on EIC on 11/20/24 (*Bernal*). In addition to individual claims for retaliation and wrongful termination, *Bernal* asserts individual Labor Code claims. Short of plaintiff Mr. Bernal opting out of the Settlement by its terms, the Agreement will dispose of all his individual Labor Code claims.

I declare under penalty of perjury under California law that the above is true and correct. Signed December 13, 2024 in Pasadena, California.

DocuSigned by:

E7953E8A4A09495...

Timothy Bowles

PROOF OF SERVICE

Akuya v. E I G Management dba Ecostar Remodeling & Construction, et al.
23STCV15280

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Rebecca Padilla, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12th Floor, Los Angeles, California 90010. My electronic service address is rebecca.padilla@wilshirelawfirm.com.

On March 24, 2025, I served the foregoing **DECLARATION OF TIMOTHY BOWLES IN SUPPORT OF PREMINARY APPROVAL OF SETTLEMENT AGREEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

Timothy Bowles (SBN 78727)

tbowles@tbowleslaw.com

Daniska Coronado

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Peggy Alexandre

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Attorneys for Defendants

(X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor and Workforce Development Agency Online Filing Site.

(X) **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service **CASEANYWHERE.**

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

Executed on March 24, 2025, at Los Angeles, California.



Rebecca Padilla