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Attorneys for Plaintiff and the proposed class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

OSCAR IRUEGAS, an individual, on behalf of
himself and others similarly situated

PLAINTIFF,

v.

BALD EAGLE SECURITY SERVICES, INC.;
and DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 37-2023-00030158-CU-OE-CTL

[Case Assigned for All Purposes to Hon. Blaine
K. Bowman in Dept. C-74]

**DECLARATION OF OSCAR IRUEGAS
IN SUPPORT OF FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: April 25, 2025
Time: 8:30 AM
Dept.: C-74

Complaint Filed: July 18, 2023
FAC Filed: September 25, 2023
Trial Date: None Set

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DECLARATION OF OSCAR IRUEGAS

I, Oscar Iruegas, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant Bald Eagle Security Services, Inc. ("Bald Eagle" or "Defendant") as an hourly employee.

3. In my role as a security officer, I regularly did not receive thirty (30) minute uninterrupted meal periods within the first five (5) hours of my shift when working five hours or more. I also regularly was not provided with ten-minute paid rest periods for every major fraction of four hours that I worked. In addition, I did not receive reimbursement for business related use of my personal cell phone. Lastly, I did not receive timely wages at the time of termination or separation.

4. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendant because I believe that Bald Eagle did not provide complaint meal and rest periods, reimburse necessary business expenses, and pau all wages due at the time of resignation/termination to me and other employees.

5. I understand that I am representing other employees and I believe that I am able to represent them well.

6. I first researched experienced attorneys who are very experienced with these types of lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed in July 2023.

7. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my

1 attorneys' various communications regarding this matter, attending a full-day mediation on April
2 23, 2024; and reviewing and analyzing the settlement agreement and settlement papers to ensure
3 the settlement was fair and reasonable and in the best interests of the Class Members.

4 8. Moreover, I have agreed to serve as Class Representative and have retained
5 qualified Counsel who is experienced in prosecuting wage and hour class actions. This
6 demonstrates my commitment to bringing about the best possible results for the benefit of the
7 Class.

8 9. Although I did not keep contemporaneous time records, I estimate the total time
9 spent in connection with this matter is approximately 10-15 hours.

10 10. I have worked to actively represent the other Class Members and their interests.

11 11. I have always kept the Class Members interests at heart in this litigation.

12 12. I believe my interests in this litigation are coextensive with the interests of the Class
13 Members. The members of the Class all worked for Defendant during the relevant time period and
14 incurred the same type of alleged damages with regard to Defendant's alleged violations of the
15 law.

16 13. I am prepared to continue assisting with this litigation and am committed to
17 achieving the best possible results for the Class.

18 14. I believe that the class action settlement obtained on behalf of the Class is fair and
19 reasonable in light of the issues involved in this case. As mentioned above, I reviewed and
20 discussed the Settlement Agreement with my attorneys and asked them questions about it to ensure
21 that I understood its terms and what it would mean for all of the class members.

22 15. I believe that I have fairly represented the absent Class and request that the Court
23 finally approve this settlement and confirm me as Class Representative.

24 16. I am not aware of any conflicts of interest that prevent me from being confirmed as
25 Class Representative in this Lawsuit. I am not related in any way to my attorneys or to any other
26 member of the firm that is representing me. I have no business dealings or other involvement
27 beyond this lawsuit and this representation. I have not been promised any money or inducement
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1 to serve as Class Representative in this Lawsuit.

2 17. It is my opinion that the settlement agreement provides for a fair and adequate
3 enhancement for me as a Class Representative, in the amount of \$5,000.00. I believe that this is
4 fair and reasonable in light of all of the work that I have performed in my role as Class
5 Representative. As Class Representative, I have actively participated in all stages of the litigation,
6 as detailed above, and have always maintained the best interests of the Class while performing my
7 Class Representative duties.

8 18. It is also my opinion that the Class Representative enhancement is fair, reasonable,
9 and adequate because, in addition to the many hours spent participating in the prosecution of this
10 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
11 were unsuccessful in this Lawsuit. Likewise, I risk the potential stigma of being a Class
12 Representative in a class action labor dispute, which may affect my future employability.

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

15 Executed this 31 day of March, 2025 at San Diego, California.
16 (City)

17 

18 Oscar Iruegas

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 3, 2025, I served all interested parties in this action the following documents described as: **DECLARATION OF OSCAR IRUEGAS IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

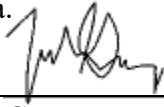
FERRIS & BRITTON A Professional Corporation Elyssa K. Kulas Scott H. Toothacre Michael R. Weinstein Debra L. Barker 501 West Broadway, Suite 1450 San Diego, California 92101 ekulas@ferrisbritton.com stoothacre@ferrisbritton.com mweinstein@ferrisbritton.com dbarker@ferrisbritton.com Attorneys for Defendant	ABRAMSON LABOR GROUP WILLIAM ZEV ABRAMSON Wza@abramsonlabor.com 11846 Ventura Blvd., Suite 100 Studio City, CA 91604 Attorneys for Plaintiff
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[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 3, 2025, at Los Angeles, California.



Taylor Gregg