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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 WILLIAM ZEV
ABRAMSON 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 WILLIAM ZEV ABRAMSON

I, William Zev Abramson, state and declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am a member in good standing with the State Bar of California. I am co-counsel in the class action representing named Plaintiff OSCAR IRUEGAS and have personal knowledge of the facts thereto. If called as a witness, I could and would competently testify herein.

2. I graduated from Ner Israel Rabbinical College. I graduated from Loyola Law School. I am currently the managing attorney at Abramson Labor Group in Los Angeles, California.

3. My legal experience since becoming a member of the California State Bar has been exclusively devoted to the practice of the California and federal employment law. My office represents plaintiffs in wage and hour actions with the same or similar causes of actions brought forth in the matter pending before this Court.

4. I have been actively participating in the prosecution and successful settlement of multiple wage and hour class action lawsuits, helping to recover wages and penalties on behalf of tens of thousands of class members.

5. I have been actively participating in the prosecution and successful settlement of multiple wage and hour class action lawsuits, helping to recover wages and penalties on behalf of tens of thousands of class members. My offices has been appointed as Class/PAGA Counsel in numerous class/PAGA actions, including helping to recover wages and penalties on behalf of tens of thousands of class members.

6. In addition, my office is currently counsel of record to approximately 70 wage and hour class/PAGA action lawsuits.

7. Although I am experienced in employment and class action matters, I associated in as co-counsel on this case with Kingsley Szamet Employment Lawyers, who has a great deal of experience in wage and hour class action employment cases, and together our firms have and will continue to aggressively and competently represent the named plaintiff and putative class members

1 in this case.

2 8. In light of the foregoing, I am qualified to act as co-Class Counsel in this matter
3 and fully support the proposed Settlement.
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5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct.

7 This Declaration was executed this 3rd day of April 2024, in Burbank, California.
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12 William Zev Abramson
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(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 WILLIAM ZEV ABRAMSON IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

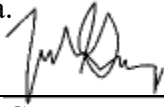
FERRIS & BRITTON A Professional Corporation Elyssa K. Kulas Scott H. Toothacre Michael R. Weinstein Debra L. Barker 501 West Broadway, Suite 1450 San Diego, California 92101 ekulas@ferrisbritton.com stoothacre@ferrisbritton.com mweinstein@ferrisbritton.com dbarker@ferrisbritton.com Attorneys for Defendant	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