

Aaron A. Bartz (SBN 198722)
aaron@bartzlawgroup.com
BARTZ LAW GROUP, APC
5151 California Ave., Suite 100
Irvine, California 92617
Tel: (949) 504-4413 / Fax: (949) 656-7760

Walter L. Haines, Esq. (SBN 71075)
walter@uelglaw.com
UNITED EMPLOYEES LAW GROUP, PC
8605 Santa Monica Blvd., #63354
West Hollywood, CA 90069
Tel.: (562) 256-1047 / Fax: (562) 256-1006

Attorneys for Plaintiff CHRISTOPHER FRANCESCHI and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

ANDREW TREJO BACA; CHRISTOPHER
FRANCESCHI, on behalf of themselves and
all others similarly situated, and the general
public,

Plaintiffs,

v.

AIRPORT APPLIANCE, INC., a California
corporation; AIRPORT HOME APPLIANCE,
a business entity of unknown form; and DOES
1 through 50, inclusive,

Defendants.

) Case No. 23CV421926

) [Assigned for all purposes to the Hon. Theodore
) C. Zayner, Dept. 19]

) **DECLARATION OF CLASS**
) **REPRESENTATIVE CHRISTOPHER**
) **FRANCESCHI IN SUPPORT OF**
) **PLAINTIFF'S MOTION FOR FINAL**
) **APPROVAL OF CLASS ACTION**
) **SETTLEMENT**

) Date: February 11, 2026

) Time: 1:30 p.m.

) Dept: 19

I, CHRISTOPHER FRANCESCHI, declare as follows:

1. I am over the age of eighteen and am a Class Representative Plaintiff in the matter *Baca et al. v. Airport Appliance, Inc.* The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiff's Motion for Final Approval of Class Settlement.

3. I was employed as a salesperson for Defendant Airport Appliance, Inc. ("Defendant") between September 2020 and May 2023. During my time working for Defendant, I was subjected to the same wage and hour policies and practices that are at issue in this case, including the Defendant's practice of failing to pay employees all wages owed, failing to pay the regular rate for all overtime, failing to provide meal periods, failing to authorize and permit rest periods, failing to provide accurate wage statements, failing to reimburse employees for their reasonable and necessary expenses, and related issues.

4. Since the beginning of this case, I have been closely involved in assisting my attorneys to prosecute this action and have done so diligently and aggressively for the past 2.5 years. Prior to becoming one of the named class representatives in this case, I spoke at length with my attorneys and relayed to them the alleged illegal wage and hour policies and practices of Defendant. I spent countless hours discussing the issues in the case and the possibility of filing a representative action with my attorneys at that time.

5. Prior to filing this case, I worked with my attorneys to interpret documents that had been produced as part of my personnel file, including my wage statements and Defendant's pay and reimbursement policies. My attorneys also called me frequently to discuss issues pertaining to other current and former employees, and I connected my attorneys with other employees who experienced similar wage and hour issues as myself. I also assisted my attorneys in opposing Defendant's motion to compel arbitration which, if granted, could have wiped out any class action recovery.

DECLARATION OF CLASS REPRESENTATIVE CHRISTOPHER FRANCESCHI IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

6. In 2024, the parties agreed to go to Mediation, and I worked with my attorneys to prepare for the Mediation. I spoke with my attorneys numerous times prior to the Mediation, I was on-call during the Mediation on September 25, 2024, and spoke to my attorneys during the Mediation to address factual issues that arose.

7. After the Mediation, I thereafter worked with my attorneys to ensure that the settlement was fair to all class members. I reviewed the Settlement Agreement and spoke with my attorneys to resolve any questions I had.

8. I have also continued to keep tabs on the settlement agreement, calling my attorneys from time to time to ensure that the settlement was on track.

9. As detailed above, I actively participated in all stages of litigation and have been continuously apprised of all aspects of this case. I believe that if not for my efforts and persistence in this case, that the class members would have benefitted far less without my involvement. I believe Defendant failed to pay me all of my wages that were due to me, and failed to provide legally compliant pay stubs to the entirety of the class. I received the same uniform pay stubs as every other hourly non-exempt employee, which do not list meal and rest period premiums, and fail to properly pay the regular rate for all overtime worked.

10. All in all, I estimate that I have spent more than 55 hours in conjunction with the case. I dedicated my time to the pursuit of this case, including consulting with my attorneys regarding the issues raised in the action. I have also assisted my counsel in reviewing, analyzing, and interpreting various internal documents generated by Defendant. Additionally, I have participated in numerous telephone conferences with my counsel to discuss the case. I have also assisted my counsel by corresponding with them on repeated occasions to answer any questions about my employment. I also discussed mediation and post-mediation settlement strategies with my counsel at various points over the last year. I have been diligent, and I believe I acted above and beyond that which was expected of me as a Class Representative throughout all stages of the litigation, up to and including the settlement of this Class Action. I have no claim that was

DECLARATION OF CLASS REPRESENTATIVE CHRISTOPHER FRANCESCHI IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

1 antagonistic to the class. I accepted the potential risk of being liable for the opposing parties'
2 costs if we were unsuccessful in this lawsuit.

3 11. In addition to performing work on this matter, I assumed a substantial risk in
4 serving as a class representative if the Defendant prevailed in this case. My willingness to
5 assume the financial risk was and is significant. Although I was confident in the merits of this
6 lawsuit, I do not have any substantial savings and bringing this lawsuit was a serious
7 commitment on my behalf and exposed myself to considerable risk. My attorneys have advised
8 me that California law provides that the losing party must pay the prevailing party's costs. As
9 such, if the Defendant had prevailed in this case, I would have been subjected to a cost award in
10 the amount of tens of thousands of dollars. Notwithstanding these risks, I chose to serve in my
11 capacity as Class Representative and pursue all claims against Defendant. Many employees have
12 been afraid to challenge Defendant's policies because they were afraid that they would lose their
13 jobs or face retaliation in the pursuit of other employment. I had that fear myself, but I pressed
14 on with the case nonetheless.

15 12. As one of the named plaintiffs in this case, moreover, any future employer can
16 Google my name and find out that I have sued one of my former employers. I believe this has
17 and will continue to impair my future employment.

18 13. I also chose to file this lawsuit so that other affected employees could benefit as
19 well, and gave up a potentially more lucrative individual lawsuit. Prior to my termination, I
20 suffered an injury at work, and was disabled. Shortly thereafter, I was terminated, which I
21 believe was in retaliation for suffering a disability and not being able to work.

22 14. Considering the amount of time I put into the case, the stigma of filing litigation,
23 and the impact it has had on all class members, I believe an enhancement of \$15,000 is fair and
24 reasonable.

25 15. I have been informed of and previously agreed to, in writing, of the attorneys' fee
26 sharing arrangement between Bartz Law Group APC (BLG) and United Employees Law Group
27
28

1 PC (UELG), and D.Law, whereby BLG and UELG are entitled to 80% of the attorneys' fees
2 received in this case, and D.Law is entitled to receive 20% of the attorneys' fees received.

3
4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct.

6 Executed on January 9, 2026, at Pleasant hill, California.

7
8  Signed by:
3426EA88F5A54CA...
9 Christopher Franceschi

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF CLASS REPRESENTATIVE CHRISTOPHER FRANCESCHI IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT