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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA

JOSHUA RICCABONA, individually, and on
behalf of the State of California and other
aggrieved persons,

Plaintiff,

v.

DOLANS OF PINOLE LUMBER AND
BUILDING MATERIALS CO., a California
corporation; DOLANS OF CONCORD, a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Lead Case No. C23-02758
Consolidated with Case No. C22-02810

*[Assigned for All Purposes to the Hon.
Edward G. Weil, Dept. 39]*

**DECLARATION OF JOSHUA
RICCABONA IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Class Action Filed: December 29, 2022
PAGA Action Filed: October 30, 2023

DECLARATION OF JOSHUA RICCABONA

I, Joshua Riccabona, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of the Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Defendant Dolans of Pinole Lumber and Building Materials Co. and Dolans of Concord (collectively "Defendants") as an hourly-paid non-exempt employee from approximately May 2022 to approximately October 2022.

3. Based on my experience and knowledge of Defendants' wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on behalf of myself as well as other hourly-paid non-exempt employees of Defendants.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to those of other hourly-paid non-exempt employees of Defendants. I believe we were all subject to the same employment policies and practices while working for Defendants.

5. I do not have any conflicts with other hourly-paid non-exempt employees of Defendants that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid non-exempt employees at Defendants.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Defendants' company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Defendants.

7. I have always kept the best interests of the other hourly-paid non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid non-exempt employees by initiating this lawsuit, providing information to my

1 attorneys, keeping in regular contact with my attorneys regarding the status of the case, meeting
2 with my attorneys regarding the claims, and reviewing the settlement agreement to make sure it
3 was fair.

4 8. I will continue to actively participate in this lawsuit as necessary and will continue
5 to make myself available to assist in this case moving forward as needed.

6 9. I do not have any actual or potential conflicts of interest with Class Members or the
7 proposed Settlement Administrator, ILYM Group Inc.

8 10. I am not aware of any other pending matter or action asserting claims that will be
9 extinguished or adversely affected by this Settlement.

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

12 Executed on 2/23/2026 at Pittsburg, California.
13 (City name)

DocuSigned by:

14 

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Joshua Riccabona