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

MICHAEL CASAS and RESHAUN
HARRIS, individually, and on behalf of other
similarly situated employees and aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiffs,

vs.

ENCORR SHEETS, LLC, a Delaware limited
liability company; and DOES 1 through 25,
inclusive,

Defendants.

Case No.: CIVSB2319925

Honorable David E. Driscoll
Department S22-SBJC

**DECLARATION OF JOSHUA FALAKASSA
ISO PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: August 25, 2025
Time: 8:30 a.m.
Dept: S22-SBJC

Complaint Filed: August 23, 2023
Trial Date: Not Set

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I, Joshua Falakassa, say and declare, as follows:

1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California, and I am the principal of Falakassa Law, P.C., and I serve as attorney of record, along with Blackstone Law, APC, and The Bokhour Law Group, P.C., for Plaintiffs Michael Casas and Reshaun Harris (“Plaintiffs”) and the Putative Class.

2. I am familiar with the file in this matter, and if called as a witness, I could and would competently testify to the following facts of my own personal knowledge.

3. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement.

4. I have been a member, in good standing, of the State Bar of California since 2013. I am admitted to practice before all California state courts, and the United States District Court of California for the Central, Northern, and Eastern Districts and have litigated class action and Private Attorney General Act (“PAGA”) representative action cases in various courts across California.

5. I graduated with a Bachelor of Arts with a major in History and a Minor in Public Affairs from the University of California, Los Angeles (“UCLA”) in 2009. I received my J.D. from University of California, Berkeley, School of Law (“Berkeley Law”) in 2013 and became a member of the California State Bar in December 2013.

6. During law school, I successfully completed courses in Labor Law, Employment Discrimination and Labor/Employment Arbitrations. I also served as a summer associate at Sanford, Wittels and Heisler LLP, a boutique plaintiffs' side employment law firm focusing on FMLA wage and hour class action litigation, and other public interest lawsuits. As a second-year law student, I served as a summer associate at the San Francisco office of Littler Mendelson, P.C., I aided employers in defending wage and hour class action lawsuits filed under California and federal law.

7. From August 2018-January 2019, I served as an associate at the Paul Haines Law Group, where I actively managed a caseload of more than 50 wage and hour class and PAGA action lawsuits in California and federal courts.

1 8. Thereafter, as principal of Falakassa Law, P.C., I have handled over 100 employee
2 vs. employer litigation matters, including more than 60 class action wage/hour and PAGA cases.
3 Over the last few years, my practice has almost entirely consisted of representing employees, the
4 majority of which has included class action and representative action wage and hour matters. In
5 total, I have handled upwards of 60 class action and representative action wage/hour cases.

6 9. Below is a non-exhaustive list of the cases which I was appointed Class and/or PAGA
7 Counsel:

- 8 • San Bernardino County Superior Court, CIVSB2133520, *Wilquin Orozco v. Taylored*
9 *Services, LLC*;
- 10 • Santa Clara County Superior Court, 21CV386657, *Brandon Moore, an individual,*
11 *on behalf of the State of California, as a private attorney general, and on behalf of*
12 *all others similarly situated v. Pure Storage Inc.*; CVRI2101452;
- 13 • Riverside County Superior Court, Case No. 0029574, *Sergio Enriquez Jr., on behalf*
14 *of himself and all others similarly situated v. Shipbob Inc*;
- 15 • Sacramento County Superior Court, *Brynn Salvador Lopez Benavides individually*
16 *and on behalf of all others similarly situated v. Production Framing Inc.*;
- 17 • Alameda County Superior Court, Case No. RG21088637, *Orlando Camp, on behalf*
18 *of himself and all others similarly situated v. Matson Logistics Warehousing Inc*;
- 19 • Sacramento County Superior Court, Case No. 00291534, *Rebecca Gibson on behalf*
20 *of herself and all others similarly situated v. Syblon Reid Construction Inc.*;
- 21 • Alameda County Superior Court, Case No. RG20080657, *Jonathan Buckner, on*
22 *behalf of himself and all others similarly situated v. Xpress Global Systems LLC.*;
- 23 • Stanislaus County Superior Court, *Patrick B. Farley on behalf of himself and all*
24 *others similarly situated v. Bimbo Bakeries USA Inc.*;
- 25 • Alameda County Superior Court, Case No. RG20063636, *Zirl Wilson, on behalf of*
26 *himself and all others similarly situated v. TCG Oakland LLC; NWLA Delivery Inc.*;
- 27 • Riverside County Superior Court, Case No. RIC2001892, *Christopher Joe Becerra,*
28 *on behalf of himself and all others similarly situated v. Luxfer Inc.*;

- Orange County Superior Court, Case No. 30-2020-01140863-CU-OE-CXC, *Manuel A. Villanueva v. Leach International corporation*;
- Sacramento County Superior Court, Case No. 00279448, *Nicholas B. Toy on behalf of himself and all others similarly situated v. Myers & Sons Construction LLC; Myers & Sons LP*;
- Alameda County Superior Court, Case No. RG20061789, *Deborah Churchill, an individual, on behalf of the State of California, as a private attorney general, and on behalf all others similarly situated v. MK Marketing LLC*;
- Solano County Superior Court, Case No. FCS054576, *Thomas Anderson Doty, on behalf of himself and all others similarly situated v. Underground Construction Co. Inc.*;
- San Francisco County Superior Court Case No. CIVDS2006687, *Counselo Jasso Ayala v. Fabfitfun, Inc; et al.*;
- Sacramento County Superior Court, Case No. 00272761, *Shaun Brasier individually and on behalf of all others similarly situated v. Valdez Painting Inc.*;
- Sacramento County Superior Court, Case No. 00272729, *Randy L. Hoff individually and on behalf of all others similarly situated v. Dependable Highway Express Inc.*;
- Solano County Superior Court, Case No. FCS054121, *Robert Earl Mann, on behalf of himself and all others similarly situated v. Altec Industries Inc.*;
- Sacramento County Superior Court Case No. 00269947, *Gary Sifuentes individually and on behalf of all others similarly situated v. Roofline Inc. dba Roofline Supply & Delivery*;
- Alameda County Superior Court, Case No. RG19038041, *Kevin Cistian Bautista, an individual, on behalf of the State of California, as a private attorney general, and on behalf of all others similarly situated v. Builder Services Group Inc.*;
- Sacramento County Superior Court, Case No. 00262122, *Sajida Zaman individually and on behalf of all others similarly situated v. Liqui-Box Corp.*;
- Alameda County Superior Court, Case No. RG19013755 *Carla Bran Hernandez, on behalf of herself and all others similarly situated v. Screen-Tech Inc.*

1 10. I was selected as a “Super Lawyer Rising Star” in Employment Litigation during
2 the years 2017-2025, a distinction that is reserved for the top 2.5 % of lawyers in the practice area.
3 I was also recognized by TopVerdicts.com for obtaining several of the highest wage and hour class
4 and PAGA action settlements in the State of California.

5 11. As set forth above, I have handled upwards of 90 class and representative actions,
6 have been appointed as class counsel and have successfully litigated and resolved several class
7 actions, and many others remain pending.

8 12. My firm possesses the experience, resources, and capacity necessary to provide
9 robust and effective representation to all Settlement Class Members in this matter.

10 13. From the outset, my firm, along with co-counsel, undertook this litigation on a
11 contingency fee basis, assuming full responsibility for all litigation costs with no assurance of
12 recovery. Throughout the pendency of this case, Class Counsel advanced all necessary expenses,
13 including court filing fees, research and expert costs, and mediator fees. At all times, the risk of
14 non-recovery was real and substantial.

15 14. My office has devoted significant time and resources to the investigation,
16 prosecution, and successful resolution of this case. Our efforts culminated in a favorable settlement
17 that provides meaningful relief to the Class. We diligently pursued the claims through fact-
18 gathering and informal discovery exchanges with defense counsel, which allowed both sides to
19 evaluate their respective legal positions and facilitated a fair and informed resolution before
20 experienced mediator Jeffrey Ross.

21 15. Given the risks inherent in continued litigation—including contested issues of fact
22 and law—Class Counsel believes the proposed Settlement is fair, reasonable, and adequate. The
23 agreement is the result of non-collusive, arm’s-length negotiations conducted by experienced
24 counsel with the assistance of a neutral mediator. The process included a thorough exchange of
25 information, enabling the parties to reach a resolution that serves the best interests of the Class.
26 Accordingly, Plaintiffs respectfully request that the Court preliminarily approve the Settlement,
27 conditionally certify the proposed Settlement Class pursuant to Code of Civil Procedure § 382,
28 approve the Notice Packet, appoint Class Counsel and a Settlement Administrator, and set a hearing

1 for final approval.

2 16. The Settlement was achieved through extensive arm's-length negotiations between
3 seasoned counsel with deep experience in wage-and-hour class litigation. While discussions were
4 cordial, they remained adversarial and rigorous throughout. The resulting compromise reflects the
5 commitment and advocacy of both sides and represents a fair and reasoned resolution of the claims.

6 17. While Plaintiffs and Class Counsel remained confident in the legal and factual
7 strength of their claims and believed class certification was attainable, they were also mindful of
8 the risks, costs, and delays associated with continued litigation. These included potential adverse
9 rulings at class certification, summary judgment, trial, or on appeal, any of which could delay or
10 foreclose recovery. In light of these uncertainties, the proposed Settlement offers a strong and
11 immediate benefit to Class Members.

12 18. The Settlement provides proportional payments to each Class Member based on the
13 number of compensable workweeks worked during the Class Period. As discussed above, Class
14 Counsel undertook a thorough investigation and analysis of the facts and legal claims to ensure a
15 fair resolution. After balancing the significant risks and delays of continued litigation against the
16 certainty of recovery under the Settlement, we strongly believe the compromise is fair, reasonable,
17 and in the best interests of the Class.

18 19. Class Counsel brought substantial experience and legal judgment to bear in
19 achieving this result. Our work included comprehensive informal discovery, targeted data analysis,
20 and expert consultation. We reviewed and evaluated key documents such as Defendant's wage and
21 hour policies, payroll records, timekeeping data, and personnel files. We also conducted data
22 extrapolation and damages modeling to estimate potential class-wide liability and inform
23 negotiations.

24 20. Based on our extensive experience handling complex wage-and-hour class and
25 PAGA actions, we believe that Class Counsel is well-qualified to evaluate the claims and defenses
26 at issue in this case. In our professional judgment, the proposed Settlement provides a fair and
27 reasonable recovery and avoids the considerable risks and burdens of further litigation, including
28 potential denials of class certification or adverse rulings on the merits.

21. Both Plaintiffs' counsel and Defendant's counsel endorse the terms and conditions of the Settlement as set forth in the Settlement Agreement.

22. The Settlement Amount represents a carefully considered compromise that accounts for the uncertainties and risks associated with class certification and the substantive defenses raised by Defendant. Importantly, the Settlement provides meaningful payments to Class Members with no reversion of unclaimed funds to Defendant.

23. For the foregoing reasons, Plaintiffs respectfully request that the Court grant preliminary approval of the proposed Settlement as fair, reasonable, and in the best interests of the Class. Plaintiffs also request preliminary approval of the requested attorneys' fees and costs, and the service award for the Class Representative.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct on this 10th day of June 2025, in Los Angeles, California.

/s/ Joshua Falakassa

By: _____
Joshua Falakassa