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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

EDGARDO MARQUINA, MARVIN
LOUKA, ULISES URIBE and JULIAN
DOMINGO, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

AT&T MOBILITY SERVICES LLC,
a Limited Liability Company; and DOES
1 through 50, inclusive,

Defendants.

Case No. 23STCV24512

**DECLARATION OF STEPHEN MATCHA
IN SUPPORT OF UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: December 4, 2025

Hearing Time: 11:00 a.m.

Judge: Hon. Timothy Patrick Dillon
Dept.: 15

Complaint Filed: October 9, 2023

Trial Date: Not Set

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1 I, Stephen Matcha, declare as follows:

2 1. I am an attorney at law duly admitted to practice before all courts of the State of
3 California and one of the attorneys of record herein for Plaintiffs EDGARDO MARQUINA,
4 MARVIN LOUKA, ULISES URIBE and JULIAN DOMINGO ("Plaintiffs") in Los Angeles
5 County Superior Court Case No. 23STCV24512. The following facts are known to me of my
6 own personal knowledge and circumstances in the above-entitled matter as they relate to this
7 Declaration, and if called upon, I could and would testify competently thereto.

8 2. My legal practice consists of representing employees on a contingency
9 basis. I attended law school on scholarship, graduated in the top 5% of my class in 2006; and
10 after passing the first-available Bar Examination, I was admitted to the State Bar of California.

11 3. For over seventeen years, I have represented employees on individual and
12 class- wide bases. For the first half of my career, I represented individual employees with
13 miscellaneous employment claims including wrongful termination, unpaid wages, and
14 violations of the Fair Employment and Housing Act. I have also represented employees in
15 various administrative fora including the Labor Commissioner's Office, San Diego
16 County Employees Retirement Association, California Unemployment Insurance Appeals
17 Board, Equal Employment Opportunity Commission, and Merit Systems Protection Board.

18 4. In recent years, I have been counsel on numerous class-action complaints
19 including, among others, *Alviz, et al. v. LHM CORP TSD, et al.*, Case No. 37-2020-00027584-
20 CU-OE-CTL; *Preston v. Porch.com, et al.*, Case No. 21CV168-JLS(BLM); *Bennett v.*
21 *Wyndham Vacation Ownership, Inc., et al.*, Case No. 22CV1050-JES(BLM); *Haluska v.*
22 *Homes.com, et al.*, Case No. 37-2022-00020303-CU-OE-CTL.

23 5. While I continue to represent employees individually, I have been
24 focusing on nationwide claims under the Uniformed Services Employment and
25 Reemployment Rights Act. Those cases have led to numerous successful appeals,
26 including a recent victory before the Supreme Court of the United States in *Torres v.*
27 *Texas Dept. of Public Safety*, 142. S.Ct. 2455 (2022). The Court reversed a Texas appellate
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1 decision, thereby eliminating sovereign immunity as a defense for State employers. The
2 decision paved the way for numerous servicemembers whose rights were being violated with
3 impunity by State employers. After remand, six years of vigorous litigation and appeals
4 culminated in a \$2.5 million jury verdict for Mr. Torres.

5 6. I am competent, skilled and experienced in litigating class action matters of this
6 type. I have substantial experience litigating class action cases before both trial and appellate
7 courts throughout California

8 7. To ensure that this case was properly prosecuted, I was precluded from taking on
9 other cases, and in fact had to turn away other meritorious fee generating cases. This case was
10 accepted on a contingency basis.

11 8. My co-counsel's and my experience in wage and hour class actions was integral
12 in evaluating the strengths and weaknesses of the case and the reasonableness of the settlement.
13 We collectively believe this settlement is fair, reasonable and adequate. My co-counsel and I
14 believe that under the proposed Settlement, Class Members will receive substantial benefits and
15 will achieve the desired relief sought by the claims brought on behalf of the Class in the present
16 action, in the most expeditious and efficient manner practicable.

17 9. The named Plaintiffs have performed their duties admirably by working with
18 their counsel, responding to discovery requests, communicating with putative class members,
19 attending mediation, and reviewing numerous drafts of the comprehensive Settlement and
20 proposed Class Notice.

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

23 Executed this 18th day of August 2025 at San Diego, California.

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25 Stephen Matcha
26 Stephen Matcha
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