

Joseph Lavi, Esq. (SBN 209776)
Vincent C. Granberry, Esq. (SBN 276483)
Malcolm Clayton, Esq. (SBN 340680)
LAVI & EBRAHIMIAN, LLP
8889 W. Olympic Blvd., Suite 200
Beverly Hills, California 90211
Telephone: (310) 432-0000
Facsimile: (310) 432-0001
Email: jlavi@lelawfirm.com
vgranberry@lelawfirm.com
mclayton@lelawfirm.com

Attorneys for Plaintiff MELLISSA MARIE DELGADO,
on behalf of herself and others similarly situated

[Additional Counsel on Following Page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

MELLISSA MARIE DELGADO and
TERRANCE FLETCHER, on behalf of
themselves and others similarly situated,

Plaintiffs,

vs.

LAKIN TIRE WEST, LLC; LAKIN TIRE
WEST, INC.; ELS OF FLORIDA, INC. (DBA
LABOR FINDERS); LF STAFFING
SERVICES, INC. (DBA LABOR FINDERS);
and DOES 1 to 100, inclusive,

Defendants.

Case No.: 24STCV14080

*[Assigned for all purposes to Hon. Samantha
Jessner, Dept. 7]*

**DECLARATION OF MELLISSA MARIE
DELGADO IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL**



1 Jonathan M. Genish (State Bar No. 259031)
jgenish@blackstonepc.com
2 Karen I. Gold (State Bar No. 258360)
kgold@blackstonepc.com
3 Marissa A. Mayhood (State Bar No. 334376)
mmayhood@blackstonepc.com
4 Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
5 James S. Winn Jr. (State Bar No. 349690)
jwinn@blackstonepc.com
6 **BLACKSTONE LAW, APC**
8383 Wilshire Boulevard, Suite 745
7 Beverly Hills, California 90211
Telephone: (310) 622-4278
8 Attorneys for Plaintiff TERRANCE FLETCHER,
9 individually, and on behalf of others similarly situated
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



DECLARATION OF MELLISSA MARIE DELGADO

I, Mellissa Marie Delgado, declare:

1. I am over the age of 18 and am the named Plaintiff and class representative in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. This declaration is submitted in support of Preliminary Approval of the Class Action settlement in this matter.

3. I worked for Defendant LAKIN TIRE WEST, LLC, as an hourly, non-exempt employee from in or around September 12, 2023, until on or about December 7, 2023.

4. From the time of the filing of the lawsuit, I have understood that this is a class action lawsuit (the "Class Complaint") where I represent the interests of all hourly, non-exempt employees of LAKIN TIRE WEST, LLC; LAKIN TIRE WEST, INC.; ELS OF FLORIDA, INC. (DBA LABOR FINDERS) and LF STAFFING SERVICES, INC. (DBA LABOR FINDERS) ("Defendants") who worked at LAKIN TIRE WEST, LLC and LAKIN TIRE WEST, INC. (together, "Lakin Tire") in California during the Class Period ("Class"). From the time of filing a private attorneys general act lawsuit (the "PAGA Complaint") I have understood that I represented the interests of the State of California, and all hourly, non-exempt employees of Defendants who worked in California at Lakin Tire during the PAGA Period ("Aggrieved Employees").

5. I believe while working at Lakin Tire, I and all hourly, non-exempt employees of Defendants who worked for Lakin Tire in California during the Class Period, were subject to the same policies and procedures regarding payment of minimum and overtime wages, meal periods, rest periods, wage statements, and final payment of wages. I believe that the claims of all hourly, non-exempt employees of Defendants who worked for Lakin Tire in California during the Class Period, are identical to mine because Lakin Tire's policies and procedures applied to all of us.

6. I understand that I must continue to consider and protect the interests of all hourly, non-exempt employees who worked for Defendants in California during the Class Period. I have been protecting the rights of myself and all hourly, non-exempt employees of Defendants who worked for Lakin Tire in California during the Class Period, since approximately November of



2023 when I started looking for an attorney before this lawsuit was filed. I have been and continue to place the interests of all hourly, non-exempt employees of Defendants who worked for Lakin Tire in California during the Class Period before my own. I do not have any interests that conflict with those of other Class Members.

7. I provided information and made myself available to my attorneys since approximately November of 2023 when I was searching for my attorney. I have helped and been willing to support the lawsuit in any way I can for the last approximately 29 months. I have searched for an attorney, met with my attorneys to see if they would represent me, met with my attorneys to discuss the Defendants' policies, procedures, and practices for clocking in and out, paying wages for the hours that we worked, meal periods, rest periods, wage statements, and final payment of wages. I spent time searching for policies and procedures that were given to me during my employment, any timecards I had, any pay stubs I had, handbooks and other documents related to my employment. I produced all the documents to my attorneys. I responded to almost all of my attorneys' telephone calls and interviews and I met with them in person and/or telephonically to discuss any questions they had about my employment, Defendants' policies and procedures, and Defendants' payment of wages, meal periods, rest periods, providing wage statements, termination of employees, or the documents I had provided to them. I was available during the full day mediation in this case. Once the settlement agreement was finalized, I conferred with my attorneys on multiple occasions to review and discuss the settlement agreement before signing. I estimate that I have spent approximately 40 hours in my efforts.

8. I also understand that in the event this matter proceeds to trial, I must come to court to participate in the trial. I will come to court if I am needed and have been ready to perform any responsibility that is necessary for this lawsuit. I know that I took a risk by filing this lawsuit because if I lost, I would have to pay for all the costs incurred by the Defendant in the lawsuit. I also have the risk of losing income for any time that I would have to spend fulfilling my responsibilities including having to attend the trial. I also believe I have taken a risk by filing this lawsuit because my employers or potential employers in the future may find out that I sued my employer, and they may not like it. The other employees will be receiving money from this



1 lawsuit, and they have not had to file a lawsuit, look for an attorney, or take the risks that I have
2 had to take.

3 9. I understand that the settlement we have reached in this case must be approved by
4 the Court and I must protect the interests of all hourly, non-exempt employees of Defendants who
5 worked for Defendants at Lakin Tire in California during the Class Period.

6 I declare under penalty of perjury, under the laws of the State of California, that the foregoing
7 is true and correct.

8

9 Executed this 20th day of March 2026, in Alhambra, California.

10

11



12

Mellissa Marie Delgado

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

