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Attorneys for Plaintiff LAVONTRA BREAUX, Individually and on behalf of other members of the general public similarly situated

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

VANESSA HERNANDEZ, LAVONTRA BREAUX, NARON TRIPLETT, and NATALIE FLORES Individually, and on behalf of other members of the general public similarly situated;

Plaintiffs,

vs.

PANDORA JEWELRY LLC, a Maryland Limited Liability Company; PANDORA VENTURES, LLC, a Maryland Limited Liability Company; and DOES 1-10, inclusive,

Defendants.

CASE NO. 24STCV04554

[Related Case Nos.: 23SMCV04825; 24SMCV00844; 24STCV04697; and 24STCV15396]

**DECLARATION OF JOSHUA FALAKASSA
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: June 5, 2026

Time: 11:30 a.m.

Dept.: 12

Judge: Hon. Carolyn B. Kuhl

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Attorneys for Plaintiff NARON TRIPLET

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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 managing attorney of Falakassa Law, P.C., and I serve as attorney of record for Plaintiffs Lavontra Breaux, Natalie Flores, Naron Triplett, and Vanessa Hernandez (collectively, “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 Final 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 Northern, Central District and Eastern District and have litigated class action and Private Attorney General Act (“PAGA”) representative action cases in various courts across California.

5. I am a 2013 graduate from the University of California, Berkeley, School of Law, (“Berkeley Law”) where I successfully completed courses in Labor Law, Employment Discrimination and Labor/Employment Arbitrations. During law school, I 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.

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

7. Thereafter, as principal of Falakassa Law, P.C., I have handled nearly 100 employee vs. employer litigation matters, including more than 40 class action wage/hour and PAGA cases.

1 Over the last few years, my practice has almost entirely consisted of representing employees, the
2 majority of which has included class action and representative action wage and hour matters. In
3 total, I have handled upwards of 90 class action and representative action wage/hour cases.

4 8. I was selected as a “Super Lawyer Rising Star” in Employment Litigation during
5 the years 2017-2025, a distinction that is reserved for the top 2.5 % of lawyers in the practice area.
6 I have also been recognized by Topverdicts.com for achieving Top 20 and Top 50 wage and hour
7 class and/or PAGA action settlements in California in 2021, 2022, 2023, and 2024.

8 9. My office has devoted substantial time and resources to investigating, prosecuting,
9 and resolving this action. These efforts have directly contributed to the creation of a meaningful
10 settlement fund for the benefit of the Class. From the outset, my office undertook a comprehensive
11 factual and legal analysis of the claims, including a review of Defendant’s timekeeping, payroll,
12 and policy documents, as well as interviews with Plaintiff Natalie Flores and other Class Members.

13 10. Throughout the litigation, Plaintiffs’ counsel diligently advanced the case through
14 informed, substantive negotiations and law and motion practice, enabling both sides to fully
15 evaluate the strengths and weaknesses of their respective positions and ultimately reach a fair and
16 reasonable resolution.

17 11. My office and my co-counsel pursued this matter with diligence and persistence,
18 engaging in discovery, analysis of class-wide data, and significant law and motion work. We
19 conducted detailed damages modeling and consulted with experts to quantify the value of the
20 claims and ensure that the settlement achieved was grounded in evidentiary and legal reality. These
21 efforts culminated in a settlement that meaningfully compensates Class Members for their alleged
22 losses.

23 12. In my professional opinion, the recovery provided to each Settlement Class Member
24 falls well within the range of reasonableness for wage-and-hour class actions of this nature. The
25 Settlement offers a meaningful and prompt recovery to Class Members, avoiding the significant
26 delays and uncertainties inherent in continued litigation, including the prospect of years of
27 additional proceedings before trial and potential appeals. It is also significant that the Settlement
28 Class has overwhelmingly supported the Settlement on the terms set forth in the Settlement
Agreement. Taking all of these factors into account, I believe the Settlement is highly favorable

1 and firmly in the best interests of the Settlement Class.

2 13. In sum, all relevant factors support final approval of the Settlement. The resolution
3 was achieved through arm's-length negotiations under the guidance of an experienced and well-
4 respected mediator. Throughout the litigation, I conducted a thorough investigation and analysis
5 of the class claims and defenses, including reviewing relevant documents and evaluating potential
6 exposure. Based on this work, and my experience litigating class actions, I strongly believe that
7 the Settlement represents an excellent result for the Settlement Class.

8 14. I have expended approximately 44.6 hours working on this matter since its
9 inception. My current hourly rate is \$725, resulting in a lodestar of \$32,335. The time I devoted
10 to this case includes, among other things, conducting a thorough factual and legal investigation;
11 reviewing and analyzing relevant documents and data produced by Defendant; evaluating potential
12 claims and defenses; engaging in meet-and-confer efforts; participating in mediation preparation
13 and negotiations; and drafting and reviewing settlement-related documents. Each of these tasks
14 required the exercise of professional judgment and experience in wage-and-hour class action
15 litigation. The time expended was reasonable and necessary to effectively prosecute the claims
16 and to achieve the favorable result obtained for the Settlement Class.

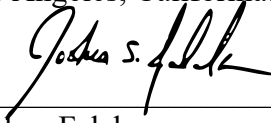
17 15. The outcome of this case was far from certain. I undertook this matter on a
18 contingency basis, assuming the risk that no recovery would be obtained. In doing so, my firm
19 also helped advanced litigation costs, including filing fees, court costs, research expenses, and
20 mediation fees. There was no guarantee that these costs would be recovered, and we bore that risk
21 throughout the litigation.

22 16. Based on my experience, a fee award of one-third of the common fund is consistent
23 with the benchmark typically applied in California class actions, including those approved by
24 California courts. In accordance with the Settlement Agreement, Class Counsel seeks an award of
25 one-third of the Settlement Amount, which is fair and reasonable in light of the results achieved
26 and the risks undertaken.

27 17. The requested fee is justified by the favorable result obtained for the Settlement
28 Class Members, including the immediate monetary recovery and the strong support for the
Settlement demonstrated by the Class. Notably, Defendant does not oppose the requested fee.

1 18. In compliance with California Rules of Professional Conduct section 1.5.1, Plaintiffs
2 entered into a Joint Prosecution Agreement with their counsel of record. The JPA governs the
3 division of responsibilities and attorneys' fees among counsel, and Plaintiffs provided informed
4 written consent after full disclosure.

5 I declare under penalty of perjury under the laws of the state of California that the foregoing
6 is true and correct on this 7th day of May 2026, in Los Angeles, California.

7
8 By: 
9 Joshua Falakassa

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