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Attorneys for Plaintiff JUAN ESCOBEDO,
individually, and on behalf of Aggrieved
Employees pursuant to the California
Private Attorneys General Act

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

JUAN ESCOBEDO, individually, and on
behalf of Aggrieved Employees pursuant to
the California Private Attorneys General Act,

Plaintiffs,

vs.

BLOCK TOPS, INC., a California corporation;
and DOES 1 through 25, inclusive,

Defendants.

Case No.: 30-2023-01356309-CU-OE-CXC

*Assigned for all purposes to Hon. Randall J.
Sherman, Dept. CX105*

**DECLARATION OF JUAN ESCOBEDO IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT AND
AWARD OF ATTORNEYS' FEES AND
COSTS AND SETTLEMENT
ADMINISTRATION COSTS**

Date: June 20, 2025

Time: 10:00 a.m.

Department: CX105

Reservation ID: 74505867

Complaint Filed: October 13, 2023

Trial Date: None Set

DECLARATION OF JUAN ESCOBEDO

I, Juan Escobedo, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-entitled action. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Block Tops, Inc. ("Block Tops") as an hourly-paid, non-exempt Installation and Fabrication Assistant from approximately February 2016 through October 2022.

3. During my employment, I questioned whether Block Tops was paying its employees correctly and I believed that I, along with other employees, were not being allowed to take meal and rest breaks lawfully, among other things. I wanted to take steps to make sure Block Tops was held accountable for not properly compensating its employees for all hours worked, not providing employees with lawful meal and rest breaks, not reimbursing employees for business expenses, and other related violations.

4. Because I thought the practices at Block Tops may not be lawful, I decided to seek legal advice about my work experiences at Block Tops and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Block Tops was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

5. I have regularly communicated with my attorneys regarding the case and in order to fulfill my responsibilities as a PAGA representative. I have searched for and provided documents concerning my employment with Block Tops, reviewed documents with my attorneys and answered their questions, provided information and guidance regarding the duties of other hourly-paid and/or non-exempt employees, and helped determine what other documents and information they could

1 obtain from Block Tops. I routinely checked in with my attorneys and their staff to make sure that
2 they had all of my current information so that they could always reach me, and to provide any
3 additional information that I had obtained.

4 6. I was always available to answer any questions my attorneys had and to speak and meet
5 with my attorneys whenever they needed me. I responded to them as quickly as possible and gave
6 them as much information as I could. I described Block Tops's policies, practices, and procedures
7 and helped my attorneys prepare for and participate in mediation.

8 7. I believe that I have done everything that my attorneys have asked of me and tried, to
9 the best of my ability, to seek relief for the Aggrieved Employees and the State of California. I think
10 my efforts helped to get the result obtained in this matter.

11 8. I reviewed the settlement agreement in this matter and discussed it with my attorneys
12 before I signed it. I also executed a separate agreement to settle and resolve my individual claims with
13 Block Tops.

14 9. I understand that Blackstone Law, APC and Hinden & Breslavsky, APC will share
15 attorneys' fees in this matter. I agreed to this in writing. I understand that the amount of attorneys'
16 fees will not increase as a result of this fee sharing.

17 10. I am not related to anyone associated with Blackstone Law, APC or Hinden &
18 Breslavsky, APC.

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

21 Executed on 3-4-25 at Lynwood, California

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23 JUAN ESCOBEDO

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