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Attorneys for Plaintiffs John Fuentes and Jason Sadik

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

JOHN FUENTES and JASON SADIK, on
behalf of all similarly situated persons and
aggrieved employees,

Plaintiff,

vs.

SO-CAL DOMINOIDS, INC., a Delaware
corporation; and DOES 1-50,

Defendants.

CASE NO.: 24CU019632C

[Assigned for all Purposes to the Hon. Loren
Freestone, Dept. C-64]

**DECLARATION OF JOHN FUENTES IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA
SETTLEMENT AND ENTRY OF
JUDGMENT**

1 I, John Fuentes, hereby state and declare as follows:

2 1. I am John Fuentes, a Plaintiff in this action. I am fully familiar with the facts,
3 pleadings and history of this matter. The following facts are within my own personal knowledge,
4 and if called as a witness, I could testify competently to the matters stated here.

5 2. My attorneys in this action are Nathan & Associates, APC and Kowalski
6 Employment Law, APC.

7 3. I was employed by Defendants So-Cal Dominoids, Inc. and Dominoids, Inc.
8 (“Defendants”) as a non-exempt employee from approximately 2009 to December 2023. I was an
9 hourly employee that did not receive bonuses in any position during my tenure with Defendants
10 and it is my understanding the same applied to at least all other non-exempt employees.

11 4. I represent a group of non-exempt aggrieved employees who are or were employed
12 by Defendants in the State of California.

13 5. From August 2023 to April 2024, I spent time having initial interviews with my
14 attorneys. As a part of the interviews, my attorneys requested that I provide them with the names
15 and telephone numbers of any persons with any witnesses or persons with knowledge due to the
16 length of my employment with Defendants. From what I understand, I was the longest tenured
17 employee employed by Defendants as a non-manager. I was able to collect approximately 30
18 names and numbers of individuals that I believed would support my claims. I either introduced
19 my attorneys to the witnesses in question or I first spoke with the person that I thought was
20 important to my case and then had my attorneys contact him/her. I had multiple follow up calls
21 with my attorney in order to help them with contacting individuals. These activities took me
22 approximately 42 hours.

23 6. I also spent reviewing the retainer agreement, searching for documents in my files,
24 garage, and on my computer in support of my claims, reviewing documents with my attorney, and
25 reviewing the initial complaint. These activities took me approximately 20 hours.

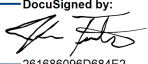
26 7. On January 15, 2025, I filed a First Amended Complaint. On May 28, 2025, I filed
27 the Second Amended Complaint. I spent approximately 2 hours reviewing the complaints.
28

8. I spent time reviewing documents produced by Defendants containing my employment file, and data/documents produced by Defendants in anticipation for the mediation and subsequent data and documents served by Defendants following mediation. I also answered several questions after my attorneys reviewed my expert's calculations and damage models. I spent approximately 15 hours on these activities.

9. I spent approximately 79 hours in total and based on dedicated to this case and the results achieved, I kindly request that the Court award me the award of \$7,500.00 as requested.

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

Executed on June 26, 2025, at Chula Vista, California.

DocuSigned by:

 261686096D684E2

John Fuentes