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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

SABRINA N. BATRES, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

WISH AUTOMOTIVE II, INC. DBA INFINITI
OF VAN NUYS, a California corporation; and
DOES 1 through 10, inclusive,

Defendants.

Case No. 23STCV19968 (Lead)
Consolidated for all purposes with
Case No. 23STCV28137

*[Assigned for All Purposes To Hon. Timothy P.
Dillon, Judge; Dept. 15]*

**DECLARATION OF J. FELIX ROSAS
CORDOVA IN SUPPORT OF MOTION
FOR ORDER APPROVING
SETTLEMENT PURSUANT TO
CALIFORNIA LABOR CODE
PRIVATE ATTORNEYS GENERAL
ACT AND RENDERING JUDGMENT**

Date : January 26, 2026
Time : 10:00 a.m.
Dept. : 15

DECLARATION OF J. FELIX ROSAS CORDOVA

I, J. Felix Rosas Cordova, declare as follows:

1. I am over 18 years of age and a resident of California. I am the PAGA representative in this action, and I have personal knowledge of the facts stated herein and if called as a witness I could and would competently testify thereto.

2. I was employed by Defendant Wish Automotive II, Inc., d/b/a Infiniti of Van Nuys (“Defendant”) as an hourly-paid, non-exempt employee (“Defendants”) as a non-exempt employee from approximately May 26, 2020 to January 5, 2025.

3. I agreed to act as a named plaintiff in a representative PAGA matter and bring this case against Defendants as an Aggrieved Employee. I wanted to take steps to make sure that Defendants were held accountable for their unlawful wage and hour practices.

4. As part of becoming a PAGA representative, I understood that I have a fiduciary duty to the other Aggrieved Employees and State of California. My duties were explained to me by my attorneys. I understood that in representing the interests of the other Aggrieved Employees and the State of California, I must consider their interests above my own interest in this case. I was also aware that serving in these roles required me to monitor the progress of the lawsuit, and actively participate as necessary or required, including possibly responding to discovery and giving deposition and trial testimony. I understood that I might have to miss time from work in order to perform these duties. I still agreed to serve as PAGA representative in order to seek redress for labor code violations suffered by myself and other aggrieved employees

5. Since becoming involved in this matter, I have spent significant time meeting with my attorneys at E&L, LLP, regarding the case and fulfilling my responsibilities as a PAGA representative. I have had numerous discussions with my attorneys regarding Defendants’ policies, practices and procedures, as well as my experiences generally working for Defendants. I have also provided my attorneys with documents concerning my employment with Defendants, reviewed documents with my attorneys, and helped develop a strategy as to what documents and information to obtain from Defendants.

1 6. Throughout my involvement in this case, I have routinely checked-in with my
2 attorneys and their staff to monitor the status of the case. As the case moved forward, I
3 provided further information regarding Defendants' policies, practices, and procedures. I had
4 several conferences and telephone calls with my attorneys throughout the case. I have been
5 available to answer any questions my attorneys had and have promptly responded whenever my
6 attorneys contact me or needed additional information. In addition, I assisted my attorneys in
7 preparing for the mediation in this action, made myself available to answer any questions during
8 the course of mediation, and discussed issues related to the settlement of this action. I kept in contact
9 with my attorneys throughout the mediation and settlement process and provided additional
10 information when my attorneys reached out to me. I will continue to actively participate in this
11 lawsuit and monitor the case until it is finalized.

12 7. When the case settled, I reviewed the PAGA Settlement ("Settlement") and
13 discussed its terms with my attorneys. I believe the Settlement is fair and reasonable in light of the
14 issues presented by this case.

15 8. I believe I took on a substantial risk in agreeing to serve as the PAGA representative
16 despite being made aware that there was no certainty regarding the outcome of the case. These risks
17 included the risk of imposition of costs if the case did not prevail. I was also aware that the lawsuit
18 was public along with my name for future employers, and could affect my future employment
19 opportunities and my ability to secure a job in the future. Despite being made aware of this risks
20 and the fact that there was no certainty regarding the outcome of the case, I still agreed to act as a
21 representative plaintiff for the benefit of all aggrieved employees and in order to hold Defendant
22 accountable for its wage and hour practices. I have not yet suffered any adverse consequence as a
23 result of this lawsuit, but neither have I yet received any benefit for representing the State of
24 California and other Aggrieved Employees, nor for the help I provided my attorneys.

25 9. I believe that I have done everything that my attorneys have asked of me and have
26 tried, to the best of my ability, to represent the Aggrieved Employees and State of California. I think
27 my efforts helped get the result obtained in this case. In addition, as part of the Settlement
28

Agreement, I am agreeing to a general release of all my claims against Defendants which is much more extensive than the limited release of PAGA claims by the Aggrieved Employees and State of California. I therefore respectfully request that the Court award me the Representative Payment in the amount of \$10,000.00 to recognize my active participation in this case. I believe that the requested payment is fair and reasonable in light of the time I have spent on this case and the risk I assumed in acting as a PAGA representative.

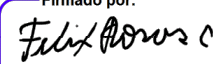
10. I have not entered into any undisclosed agreements, and I have not received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an Enhancement Payment, as well as my share of the settlement fund as an aggrieved employee.

11. I am not related to anyone associated with E&L, LLP.

12. Based on the foregoing, I therefore request that the Court grant approval of the Settlement.

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

Executed on 11/25/2025, in the City of _____, Mexico.

Firmado por:

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 J. Felix Rosas Cordova