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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
Dept. 15*

**DECLARATION OF PLAINTIFF
SABRINA N. BATRES IN SUPPORT OF
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

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

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I, Sabrina N. Batres, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Approval of PAGA Settlement.

2. I worked as a non-exempt employee for the defendants Wish Automotive, Inc. dba Nissan of Van Nuys, Wish Automotive II, Inc. dba Infiniti of Van Nuys, and Wish Automotive III, Inc. dba Nissan of Alhambra (collectively, "Defendants"), specifically defendant Wish Automotive II, Inc. dba Infiniti of Van Nuys, from approximately April 2022 through January 2023. I was paid on an hourly basis, earning \$16.50 per hour. At all times, I worked as a receptionist for defendant Wish Automotive II, Inc. dba Infiniti of Van Nuys. My job duties included, but were not limited to, answering/forwarding phone calls, making vehicle service appointments, and filling vehicle service reports.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

3. When I decided to become involved in this lawsuit as a private attorney general for the State of California, I understood that I was not only seeking civil penalties on behalf of myself and the State of California, but also for other aggrieved employees who worked for Defendants.

4. I was also made aware that being a private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a private attorney general, I might be responsible for some or all of Defendants' legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

5. I understood that there were risks involved in representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

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Notoriety and Personal Difficulties Encountered

6. As the named plaintiff, I am the face of the litigation. Additionally, a settlement letter will be mailed to approximately 539 current and former employees of Defendants. The settlement letter informs all of these employees that I filed a representative action against Defendants. Exposing myself to this kind of publicity creates a risk for my future career prospects, since current and former employees of Defendants may move to different companies within the industry or may know people at other companies within the industry who may not want to hire someone who sued an employer.

Amount of Time and Effort Spent and Duration of the Litigation

7. I have spent a substantial amount of time and effort on this litigation. My work on this case has included, among other things, gathering and providing my payroll records and other documents, discussing potential witnesses, assisting my attorneys oppose Defendants' motion(s) to compel arbitration, reviewing discovery information and data, assisting my attorneys prepare for mediation by discussing my claims and being on-call on the day of mediation should any questions or concerns arise, and participating in settlement discussions. After mediation, I remained actively involved by reviewing the settlement papers and regularly contacted my counsel for updates. I estimate that since I retained my counsel on January 2023 (nearly three years ago), I have spent approximately 40 hours on the activities described above and will spend an additional 1-3 hours wrapping up this action.

Personal Benefit Received as a Result of the Litigation

8. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, I have signed a general release. The other employees are only releasing their claim for civil penalties under PAGA as asserted in the lawsuit. I respectfully request that the Court grant a service payment of \$10,000.00.

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, at North Hollywood, California.

Signed by:

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 Sabrina N. Batres