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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF FRESNO**

PAFODAY KANU, individually, and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

GEIL ENTERPRISES, INC., a California
corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 23CECG05121

Honorable Lisa M. Gamoian
Department 403

**DECLARATION OF PAFODAY KANU IN
SUPPORT OF PLAINTIFF'S RENEWED
MOTION FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL. LABOR
CODE § 2698, *ET SEQ.*) SETTLEMENT
AGREEMENT AND AWARD OF
ATTORNEYS' FEES AND COSTS PAYMENT,
GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION COSTS**

Date: September 30, 2026
Time: 3:27 p.m.
Department: 403

Complaint Filed: December 13, 2023
Trial Date: None Set

DECLARATION OF PAFODAY KANU

I, **Pafoday Kanu**, hereby declare as follows:

1. I am over 18 years of age and a resident of Nevada. I am the named plaintiff in the above-captioned case. 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 Geil Enterprises, Inc. ("Defendant") from approximately November 2021 to approximately July 2023 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for several hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for many hours discussing my situation, representative action lawsuits under the Private Attorney General Act ("PAGA"), and what it meant to bring a PAGA Action and be a PAGA representative.

3. I have spent over several hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendant reviewing documents with my attorneys, providing information regarding the duties of aggrieved employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent many hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

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1 5. As far as the settlement is concerned, I was available to review documents and answer
2 any questions my attorneys had. I spent about several hours reviewing the settlement agreement and
3 asking questions and discussing the potential settlement with my attorneys before signing the settlement
4 agreement.

5 6. I believe that I have done everything that my attorneys have asked of me and have tried,
6 to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think
7 my efforts helped to get the result obtained in this case.

8 7. For my broader individual waiver and release of claims with a California Civil Code
9 Section 1542 waiver (set forth in Section 8(b) of the Settlement Agreement), the Settlement provides
10 for a General Release Fee in the amount of \$5,000.00, to be paid out of the Total Settlement Amount,
11 subject to Court approval. I respectfully request that the Court award me full payment of the General
12 Release Fee.

13 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

14 9. I have not entered into any undisclosed agreements, nor have I received any undisclosed
15 compensation in this case. The only compensation I will receive is whatever amount the Court awards
16 as a general release fee, as well as my share of the settlement as an aggrieved employee.

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

19 11/23/2025

20 Executed this ___ day of November 2025, at North Las Vegas, Nevada.

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23 Pafoday Kanu