

Adam Rose (210880)
adam@starrlaw.com

Manny Starr (319779)
manny@frontierlawcenter.com

FRONTIER LAW CENTER
23901 Calabasas Road, #1084
Calabasas, CA 91302
Telephone: (818) 225-9040
Facsimile: (818) 225-9042

Janelle Carney (201570)
janelle@janellecarneylaw.com
JANELLE CARNEY – ATTORNEY AT LAW
14758 Pipeline Ave., Suite E
Chino Hills, CA 91709

Attorneys for Plaintiff
David Llamas

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO

DAVID LLAMAS, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

SAN DIEGO SUNRISE MANAGEMENT
COMPANY, INC., and DOES 1 to 100,

Defendants.

Case No.: 37-2023-00044344-CU-OE-CTL

**DECLARATION OF DAVID LLAMAS
IN SUPPORT OF COURT APPROVAL
OF PAGA SETTLEMENT**

Action filed: October 12, 2023

1 I, David Llamas, declare:

2 1. I am the Plaintiff in this action. The following is based on my personal knowledge,
3 and if called as a witness, I would and could competently testify.

4 2. I was employed as an hourly non-exempt Maintenance Technician by Defendant
5 from approximately October 2021 through December 2023

6 3. During the pendency of this case, I spent time with my attorneys discussing the
7 nature of my complaints and the state of my case. I have assisted in the prosecution of this case by
8 reviewing my own documents with the attorneys, identifying witnesses, reviewing documents from
9 my attorneys, and answering discovery while the case was in arbitration. I participated in the
10 mediation of this case telephonically and only gave my approval to settle after being fully informed
11 by my counsel.

12 4. I understood that this action was being prosecuted on behalf of the State of
13 California as a private attorney general, on my behalf, and for other aggrieved employees. During
14 the pendency of this lawsuit, I was required to provide assistance to my attorneys, including
15 frequently discussing the case with them and providing them with information. I have spent a
16 significant amount of time discussing this matter with my attorneys on many occasions and
17 explaining my understanding of the company's policies and practices, as well as reviewing
18 Defendant's produced documents. Further, I was involved in the negotiations that led to the
19 settlement. I also reviewed and signed the Settlement Agreement, and this Declaration. Throughout
20 this nearly two-year old case, I have continuously been kept apprised of the case status and was
21 willing to take this matter to trial after my individual arbitration.

22 5. I was aware that the mere filing of the action and participation could jeopardize my
23 future employability.

24 6. I am aware and have been aware from the inception of the case, that there is the risk
25 that if I did not win, then I could be liable for Defendant's costs. I accepted that risk.

26 7. I understood from the inception of the case that a representative lawsuit could take
27 longer than an individual action and I accepted that burden.
28

8. I believe that the settlement is fair, adequate, and reasonable for the aggrieved employees and the State of California. I am proud of the result and accomplishment of this lawsuit given the procedural posture of this case and the likelihood of recovery at trial.

9. I support my attorneys' request for fees as I believe the attorney fee request of \$49,000.00 to be reasonable in light of the excellent work and favorable result my attorneys achieved for me and the aggrieved employees. I understand that the attorneys are requesting to be awarded attorneys' fees of 35% of the gross settlement fund of \$140,000.00. The request of 35% is fair and reasonable especially in light of the work performed and the excellent result received. I also understand that my lawyers from Janelle Carney – Attorney at Law, APC and Frontier Law Center have spent not less than 57.90 hours on the case. I recognize that the attorneys will spend more time on this case throughout the final distribution over the course of the next few months. I agree that my attorneys' fee request of \$850.00 an hour for Janelle Carney of Janelle Carney Attorney at Law, APC, \$650.00 an hour for Manny Starr, and \$850.00 an hour for Adam Rose of Fronter Law Center; are fair and reasonable hourly rates that I agreed upon when I retained counsel. I further support my attorneys' request for reimbursement of all costs of up to \$12,000.00. Accordingly, I do believe that the attorneys' costs request of a maximum amount of up to \$12,000.00 should be approved as reasonable and necessary.

10. I signed a Joint Prosecution Agreement approving the following fee split between my counsel's firms:

<u>Attorney</u>	<u>Percentage of Fee Award</u>
Janelle Carney – Attorney at Law APC	50%
Frontier Law Center	50%

11. Based on the excellent result, I reiterate my full support for the entirety of the settlement and request that the Court enter the proposed Approval Order.

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

Executed on 9/4/2025

DocuSigned by:

David Llamas

David Llamas

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

I am employed in the County of San Bernardino, State of California. I am over the age of eighteen (18) and not a party to the within action; my business address is 14758 Pipeline Avenue, Suite E, Second Floor, Chino Hills, CA 91709-6025.

On September 9, 2025, I served the foregoing document described as:

DECLARATION OF DAVID LLAMAS IN SUPPORT OF COURT APPROVAL OF PAGA SETTLEMENT

on INTERESTED PARTIES in this action as stated below:

David Nusz
O'HAGAN MEYER
4695 MacArthur Ct., Ste 900
Newport Beach, CA 92660
dnusz@ohaganmeyer.com
slopez@ohaganmeyer.com

Manny Starr, Esq.
manny@frontierlawcenter.com
Adam Rose
adam@frontierlawcenter.com
eservice@frontierlawcenter.com
FRONTIER LAW CENTER
6200 Canoga Ave., Suite 470
Woodland Hills, CA 91367

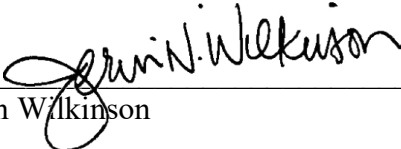
Matthew Sullivan
O'HAGAN MEYER
3200 Park Center Dr., Suite 700
Costa Mesa, CA 92626
msullivan@ohaganmeyer.com

XX BY E-MAIL: I electronically served the above-mentioned document to each of the above recipients at their respective e-mail addresses. My e-address is: Jerin@JanelleCarneyLaw.com

California Labor & Workforce Development Agency
Via Online Filing
<http://www.dir.ca.gov/private-attorneys-general-act/private-attorneys-general-act.html>

Executed on September 9, 2025, at Chino Hills, California.

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



Jerin Wilkinson