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Attorneys for Plaintiff Maurice Mack,
on behalf of himself, all others similarly situated,
and the general public,

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

MAURICE MACK, on behalf of himself
and all others similarly situated and on
behalf of the general public,

Plaintiff,

v.

KOBO EVENTS LLC, a California
limited liability company, doing business
as 4DIAMOND EVENTS and
TITANIUM, and DOES 1 through 10,
inclusive,

Defendant.

Case No. 37-2024-00004372-CU-MC-CTL

Assigned to Hon. Robert Longstreth, Dept. C-65

**DECLARATION OF MAURICE MACK IN
SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: May 8, 2026

Time: 8:30 a.m.

Dept.: C-65

Complaint Filed: January 16, 2024

1 I, MAURICE MACK, hereby declare and state as follows:

2 1. I am the named Plaintiff in this lawsuit against Defendant KOBO EVENTS LLC,
3 doing business as 4DIAMOND EVENTS and TITANIUM (“Defendant”) and I submit this
4 declaration in support of Plaintiff’s Unopposed Motion for Preliminary Approval of Class and
5 Representative Action Settlement. I am a competent adult and worked for Defendant as a non-
6 exempt employee during the relevant time period. I have personal knowledge of the facts set forth
7 herein, and if called as a witness to testify to them, I could and would do so competently.

8 2. I contacted my current attorney when I questioned the employment practices of
9 Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a Class
10 Representative in a class action on behalf of other employees of Defendant whom I believed were
11 being subjected to labor law violations in addition to asserting individual wage, hour, and
12 termination-related claims.

13 3. Specifically, I questioned Defendant’s policies of failing to pay all minimum and
14 overtime wages due, failing to provide legally compliant meal and rest periods, failing to
15 reimburse necessary business expenses, failing to provide access to payroll and personnel records,
16 failing to timely compensate employees upon separation, and failing to issue its employees legally
17 compliant wage statements. Through many discussions with my lawyer, I learned these may be
18 illegal practices and Defendant’s employees might have recourse for them.

19 4. By bringing this lawsuit, and throughout its course, I have put the interests of the
20 class ahead of my own. I understood that I could possibly earn a small enhancement payment if
21 this case resolved itself favorably, but always knew that I could also be responsible for paying
22 Defendant’s attorneys’ fees and costs if it did not. My goal in bringing this lawsuit was to obtain
23 a recovery on behalf of myself and the class, and even more importantly, to put an end to what I
24 believed were illegal practices on the part of Defendant. I believe I have achieved both through
25 this lawsuit and settlement.

26 5. I am very happy about the results of this litigation. I am satisfied that Defendant is
27 compensating class members for penalties and interest that I believe we are due.
28

6. At the onset of this case, I spent time through numerous phone calls with my attorney explaining what I understood to be the policies and procedures of Defendant and how they were applied to me and others I worked with. During the course of this litigation, up through and following the settlement process, I kept actively involved with its status, tracking the status of the case and participating as much as possible.

7. While I have not maintained detailed time records of my activities in connection with this litigation, I believe that I have spent and will spend a total of approximately 20 hours assisting my attorney with the preparation of this case, and doing work and analysis independent from my attorney both before and during this case, including conducting an independent investigation of the facts.

8. Before this litigation commenced, and throughout its course, I have spent approximately 10 or more hours gathering, organizing, and reviewing documents and information for this lawsuit. I sifted through many of my own documents and reviewed information produced by Defendant as part of this case.

9. I have communicated with my attorney several times per month to track my case's status. I have taken an active involvement in this matter throughout its course.

10. This lawsuit will almost certainly result in reputational harm to me. There is a stigma associated with suing anyone, let alone your former employer. I will probably be adversely affected when it comes to obtaining future employment—employers who learn that I sued Defendant in a class action will likely avoid hiring me.

11. I do not believe that I have any conflicts with other members of the class. My interests in bringing this lawsuit—for Defendant to change its labor practices going forward and to compensate current and former employees—are the same as those of all other class members.

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

3 Executed on 03 / 17 / 2026 at San Diego, California.

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(mauricemack634@gmail.com) from evan@gaines.law
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