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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

REINA CASAS, individually, and on behalf of
other Aggrieved Employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

THE RUSSELL FISCHER PARTNERSHIP, LP,
a California Corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 30-2023-01366717-CU-OE-CXC

Honorable Melissa R. McCormick
Department CX105

**DECLARATION OF REINA CASAS IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LABOR CODE § 2698,
ET SEQ.) SETTLEMENT AGREEMENT**

Reservation ID: **74897167**
Date: October 8, 2026
Time: 2:00 PM
Department: CX105

Complaint Filed: December 11, 2023
Trial Date: None Set

DECLARATION OF REINA CASAS

I, Reina Casas, hereby declare as follows:

1. I am over 18 years of age and a resident of California. 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 The Russell Fischer Partnership, LP (“Defendant”) from approximately May 2023 to approximately June 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 paid me and other employees what was owed to us and 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 approximately 2 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 4 hours discussing my situation, representative action lawsuits under the Private Attorney General Act (“PAGA”), and what it meant to bring be a PAGA representative.

3. I have spent over 20 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 hourly-paid and non-exempt 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 reviewed and helped to respond to formal discovery requests that were propounded by Defendant and I prepared for and sat for a deposition that lasted almost five hours. I was also 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.

5. As far as the settlement is concerned, I was available to review documents and answer any

1 questions my attorneys had. I spent about 2 hours reviewing the settlement agreement and asking
2 questions and discussing the potential settlement with my attorneys before signing the settlement
3 agreement.

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

7 7. For my time, work, and risk in prosecuting this case, the Settlement provides for an
8 Enhancement Payment in the amount of \$5,000.00, to be paid out of the Gross Settlement Amount,
9 subject to Court approval. I respectfully request that the Court award me full payment of the Enhancement
10 Payment.

11 8. I am not related to anyone associated with Sweeny Law, PC or Lawyers *for* Justice, PC.

12 9. I have not entered into any undisclosed agreements, nor have I received any undisclosed
13 compensation in this case. The only compensation I will receive is whatever amount the Court awards as
14 an Enhancement Award, as well as my share of the settlement as an Aggrieved Employee, which is
15 estimated to be approximately \$5.01.

16 10. My attorneys have agreed to split fees awarded by the Court or generated as a result of
17 this case, and I have given written consent to that fee split.

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

20 Executed this 8th day of July 2026.

21
22  as (Jul 8, 2026 15:09:50 PDT)

23 _____
24 Reina Casas
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