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Attorneys for SAKEENA BEGUM, on behalf of herself,
all others similarly situated, and on behalf of the general public

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

FRANCISCO ARROYO MORA on
behalf of herself, all others similarly
situated, and on behalf of the general
public,

Plaintiffs,

v.

STERLING PLUMBING, INC; and
DOES 1-100,

Defendants.

Case No. 30-2024-01371468-CU-OE-CXC

*[Assigned for All Purposes to the
Honorable Layne H. Melzer]*

**DECLARATION OF COLETTE MAHON,
ESQ., IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

1 I, Colette Mahon, declare:

2 1. I am a member of the bar of the State of California and an attorney at Lawyers for
3 Employee and Consumer Rights (“LFEER”). I make this declaration of personal, firsthand
4 knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

5 2. LFEER is a law firm dedicated to protecting the rights of employees in the
6 workplace. We are dedicated to the prosecution of wage and hour and wrongful termination
7 matters in state and federal courts, and before various arbitration tribunals.

8 3. My firm and I handle exclusively employee-side employment cases which involve
9 violations of the California Labor Code and Industrial Welfare Commission Wage Orders, such
10 as wage and hour class actions and cases alleging violations of the Private Attorneys General Act
11 of 2004 (“PAGA”).

12 4. LFEER is currently involved in litigation in over fifty (50) PAGA and class cases.

13 5. My firm has been granted class certification in both state and federal courts.

14 6. Sabrina Sanders received her Juris Doctorate in 2003 from Golden Gate University,
15 School of Law. She has been admitted to the State Bar of California since December 2004. Prior
16 to being licensed, she served as a research attorney for the Los Angeles Superior Court. Due to
17 her academic background, which focused on employment law, she was assigned as the research
18 attorney to handle complex employment class action cases throughout Los Angeles County.

19 7. Ms. Sanders has served as LFEER’s managing attorney since 2016. Since 2004, she
20 has been engaged in litigation. She has served as lead counsel on hundreds of employment cases
21 and tried cases in State courts, resulting in verdicts in favor of all her clients. Much of her practice
22 has been dedicated to litigating labor and employment disputes, with the last 10 years exclusively
23 dedicated to representing employees on claims against their employers on a contingency.

24 8. Former lead attorney on this matter, Peter Horton, graduated from California
25 Western School of Law and was admitted to practice law in California in December 2003. Mr.
26 Horton has practiced in State and Federal courts since being admitted to practice law.

27 9. All services were performed by Plaintiff’s Counsel on a contingent basis with no
28 guarantee of any payment. Had the litigation continued, the Defendant would undoubtedly have

1 mounted an aggressive defense. A defeat on the merits would have foreclosed the possibility of
2 any remuneration for Plaintiff's Counsel's time and effort.

3 10. I believe that the settlement amount of \$79,766.66 is a reasonable and fair settlement
4 amount.

5 I hereby declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct.

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8 Dated: February 4, 2026

**LAWYERS FOR EMPLOYEE AND
CONSUMER RIGHTS**

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11 _____
12 Colette Mahon, Esq.
13 Attorneys for Plaintiff FRANCISCO ARROYO
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