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Attorneys for Plaintiff SISILIA LEALAO and all others similarly situated

[Additional Counsel on following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

SISILIA LEALAO, an individual; on behalf of
herself and all others similarly situated and the
general public,

Plaintiffs,

v.

U.S. AVIATION SERVICES CORP., a Nevada
corporation; and DOES 1 to 100, inclusive,

Defendants.

Case No. 24STCV03049

[Assigned for All Purposes to:
The Hon. Samantha P. Jessner, Dept. 7]

**Declaration of Brandon Rivas in Support of
Plaintiffs' Motion for Final Approval of Class
Action Settlement**

Date: October 1, 2025

Time: 1:45 p.m.

Dept: 7

Declaration of Brandon Rivas

I, Brandon Rivas, declare as follows:

1. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I am one of the named Plaintiffs in this action. On or around on January 24, 2024, the Class Action Complaint entitled *Brandon Rivas v. U.S. Aviation Services Corp.*, Case No. CIVSB2403694, was filed in the Superior Court of California, County of San Bernardino, on behalf of me, and individuals who are or were employed by Defendants as non-exempt employees in California during the Class Period.

3. On February 5, 2024, Sisilia Lealao filed a putative class action complaint in Los Angeles County Superior Court, entitled *Sisilia Lealao v. U.S. Aviation Corp.*, Case No: 24STCV03049.

4. On March 21, 2024, Bryan Ragone filed a putative class action complaint in San Bernardino County Superior Court, entitled *Bryan Ragone v. U.S. Aviation Services Corp.*, et al., Case No. CIVSB2409463.

5. All three actions are now pending before this Court, with combined claims, for the purpose of obtaining final approval of a global settlement between the Parties.

6. During my employment with Defendant, I was not paid all minimum and overtime wages owed, authorized or permitted off-duty rest periods or paid missed rest period premiums, provided all compliant meal periods or paid missed meal period premiums, reimbursed for business expenses, issued accurate wage statements, and did not receive all of my wages due during and upon termination of my employment.

7. I understand that, as a Class Representative, I have a duty to look out for and protect the interest of the Class as a whole. I do not believe, nor do I have any reason to believe, that my interests in this lawsuit are in conflict or in any way antagonistic to the interests of those of my fellow Class Members. I had no conflicts of interest with the Class Members whom I am seeking to represent in this case. Given the various defenses asserted by Defendant, I believe, along with my attorneys, that the global settlement obtained is fair and reasonable to the Class.

1 8. I understand that my counsel exchanged informal discovery and information with
2 Defendant's counsel before attending an all-day mediation and ultimately reaching a settlement. The
3 settlement seeks to resolve this case on a class-wide basis for *all individuals who are or were*
4 *employed by Defendants as non-exempt employees in California during the Class Period (the "Class"*
5 *or "Class Members")*. I understand that the Settlement is in the non-reversionary amount of
6 **\$705,000.00**, and that all Class Members who do not opt out of the Settlement will release their wage
7 and hour claims as alleged in the complaint.

8 9. Besides my fiduciary duties as a class representative, I also understand that as the
9 PAGA representative, I stand in the shoes of the State of California in seeking PAGA penalties for
10 the alleged Labor Code violations.

11 10. As a named Plaintiff in this action, I provided significant assistance to Plaintiffs'
12 Counsel in this case. Among other things, I participated in several lengthy interviews and phone
13 conferences over a period lasting several months, searched for and produced a significant amount of
14 relevant documents, reviewed pleadings in the case, reviewed documents and data provided by
15 Defendant, communicated about the case with Class Members, kept in contact with my attorney
16 regarding the status of the case, and was available during the all-day mediation. My efforts in bringing
17 this case were instrumental in securing the favorable terms of the Settlement Agreement, which will
18 provide monetary compensation in the total amount of **\$705,000.00** to the Class of at least **489** current
19 and former employees of Defendant.

20 11. I also understand that, for the Class Members who did not opt out of this Settlement
21 after receiving notice and a period of time to opt-out in writing, they will all receive a pro rata
22 percentage of the net settlement amount. It is my understanding that the results here are comparable
23 with other class settlements involving similar claims in California, and seems fair and reasonable to
24 me.

25 12. Notably, as part of the Settlement Agreement, I have entered into a general release of
26 all my claims against Defendant which is significantly broader than the release being given by the
27 members of the Class. This is one additional reason justifying my service award. This case also
28 involved risks for me, such as the risk of having to pay costs if we lost. I also recognized the risk that

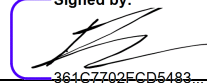
by putting my name on a lawsuit, I might gain a reputation that would make it harder for me to find employment in the industry in which I work. Others were afraid to bring forth the claims that I brought in this case, but I disregarded those fears and proceeded to bring this Class Action. Disregarding the significant risks, both financial and reputational, I pursued this case on behalf of the Class to a successful resolution and settlement.

13. In summary, over the course of this litigation I have spent a significant amount of time conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement and related documents. By agreeing to bring my case, I formally accepted the responsibilities of representing the interests of all class members. I also agreed to provide Defendant with a general release of claims arising out of my employment.

14. As noted, it is my understanding that based upon my efforts as a named Plaintiff in this action there is something called an Incentive or Service Award. In conclusion, I respectfully request that the Court grant this incentive or service award to me in the amount of \$7,500.00 for the reasons stated above and for my service to the Class.

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

Executed on 9/3/2025 in Ontario, California.

Signed by:

 364C7702FCD5483...

Brandon Rivas