

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
Aparajit Bhowmik (State Bar #248066)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Email: Kyle@bamlawca.com
Website: www.bamlawca.com

Attorneys for Plaintiffs

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

FRANK TOWNS and STEVEN QUIRINO,
individually, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

CORE & MAIN LP, a limited partnership; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **37-2024-00006393-CU-OE-CTL**

**DECLARATION OF STEVEN QUIRINO
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
SETTLEMENT**

Hearing Date: April 3, 2026
Hearing Time: 1:30 p.m.

Judge: Hon. Katherine Bacal
Dept.: 63

Date Action Filed: February 13, 2024
Trial Date: Not set

DECLARATION OF STEVEN QUIRINO

I, Steven Quirino, declare as follows:

1. I am an individual over the age of 18 and am a named plaintiff in this matter. This declaration is submitted in support of preliminary approval of the proposed class action and PAGA settlement reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant Core & Main LP ("Defendant") from approximately December 2022 to January 2024. During my employment, I personally experienced the Labor Code violations alleged in this lawsuit. These violations included not receiving compliant meal periods; not receiving compliant rest periods; not receiving accurate itemized wage statements; and not being paid all wages due upon termination.

3. I believe the proposed settlement of \$500,000.00 is fair, reasonable, and adequate. The settlement provides substantial monetary relief to class members and addresses the Labor Code violations alleged in the lawsuit. It was reached after extensive negotiations with the help of an experienced wage and hour mediator, Tripper Ortman, following an all-day mediation on September 22, 2025.

4. I support my attorneys' request for fees. I believe the fee request of one-third (1/3) of the gross settlement amount of \$500,000.00, or approximately \$166,666.00, is fair and reasonable in light of the hours spent litigating this case.

5. I also believe that the attorneys' cost request of not to exceed \$20,000.00, exclusive of Settlement Administration Costs, is reasonable in light of the excellent work and favorable result my attorneys achieved for the members of the class. I believe that the attorneys' costs incurred to date are reasonable and have been necessarily incurred and paid to prosecute this action and achieve this result, including the costs of the mediator.

6. I understand my obligations as a class representative, which include representing the interests of all class members fairly and adequately, putting the interests of the class above my own personal interests, actively participating in the litigation process, staying informed about the progress of the case, and assisting my attorneys in providing information and evidence to support the claims.

7. I am not aware of any actual or potential conflicts between myself and the other Class Members, the Settlement Administrator (Apex Class Action), or the cy pres recipient (Legal Aid Society of San Diego). I am also unaware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

8. I have spent at least 20 hours working with my attorneys to litigate this case. This time has included providing detailed information about my employment experiences, participating in multiple phone interviews to discuss the case, reviewing and approving the documents filed in this action, gathering employment-related documents, and discussing settlement negotiations and terms.

9. I am an adequate representative of the class members in this case, and I have no claim that is antagonistic to the class. I believe I am adequate to represent all class members in the claims that are being certified on a conditional basis as a result of the settlement. My interests are the same as those of the other hourly employees, as all employees in the class were subject to the same policies and procedures at issue in this suit. I also believe my attorneys are adequate to represent the class. I have always been prepared and willing to remain a class representative through trial in this matter, if necessary.

10. As part of this class settlement and in exchange for the \$15,000.00 class representative service payment, I am executing a general release of all claims arising from my employment with Defendant. I have accepted the stigma of being a class representative in a class action labor dispute, which could affect my future employability with other employers in the same industry. Accordingly, I believe that a \$15,000.00 service payment is reasonable and fair.

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

Executed on March 5, 2026, at Perris, California.

Signed by:

Steven Quirino
STEVEN QUIRINO