

Karen I. Gold (State Bar No. 258360)
kgold@blackstonepc.com
Noam Y. Reiffman (State Bar No. 299446)
nreiffman@blackstonepc.com
Marissa M. Mayhood (State Bar No. 334376)
mmayhood@blackstonepc.com
Sarah Pezeshkpour (State Bar No. 260240)
spezeshkpour@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff Edgar Corral and the class

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

EDGAR CORRAL, individually and on
behalf of similarly situated individuals and
members of the general public,

Plaintiff,

vs.

PENN ELCOM, INC., a California
corporation; OPTIMUM EMPLOYER
SOLUTIONS, LLC., a California limited
liability corporation; and DOES 1 through 25,
inclusive,

Defendants.

Case No.: 30-2023-01363928-CU-OE-CXC

Honorable Melissa R. McCormick
Department CX105

**DECLARATION OF PLAINTIFF
EDGAR CORRAL IN SUPPORT OF
MOION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT, ATTORNEYS' FEES AND
COSTS, ENHANCEMENT PAYMENT, AND
SETTLEMENT ADMINISTRATION
COSTS; MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT THEREOF**

Date: October 8, 2026
Time: 2:00 p.m.
Dept: CX105

Complaint Filed: November 17, 2023
FAC Filed: January 12, 2024
Trial Date: Not Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

9
0
1
2
3
4
5
6
7
8
9
20
21
22
23
24
25
26
27
28

28
29
30
31
32
33
34
35
36
37
38

24
25
26
27
28

1 6. I understood that in the event this matter did not settle and proceeded with trial, I would
2 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
3 responsibilities that are necessary for this lawsuit.

4 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
5 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
6 also understood there was a risk of losing any job and/or income due to the time that I would have to
7 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. Most
8 importantly, I believe that by pursuing this case, I have taken a significant risk because future
9 employers can easily find out that I sued my prior employer, and that may negatively impact my ability
10 to find employment within this industry – and even outside of it – in the future. In contrast, the other
11 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
12 that I took in bringing this action.

13 8. I reviewed the settlement agreement, discussed the settlement agreement with my
14 attorneys, and asked them questions before signing it. I also executed a separate agreement to settle
15 and resolve my individual claims with Defendant Penn Elcom, Inc.

16 9. I believe that I have done everything that my attorneys have asked of me and tried, to
17 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
18 I have spent approximately 45-50 hours participating in this case as described above. I believe my
19 efforts helped get the result obtained in this case.

20 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
21 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
22 throughout the course of this litigation I have considered the interests of the Class and put them before
23 my own personal interests.

24 11. I understand that incentive or enhancement awards are discretionary and intended to
25 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
26 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA
27 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
28 my work in this matter is meritorious on these points for the reasons set forth above.

1 12. I respectfully request that the Court approve and award me an Enhancement Payment
2 in the amount of \$7,500.00 for my efforts and active participation in the case. Taking into
3 consideration the time that I dedicated to this case, I believe that this amount is reasonable.

4 13. I am not related to anyone associated with Blackstone Law.

5 I declare under penalty of perjury under the laws of the State of California that the foregoing
6 is true and correct. Executed on 08/08/2025, at Eastvale, California.

7
8 

9 _____
10 Edgar Corral
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28