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Attorneys for Plaintiff ILIANA REYES, on behalf of themselves and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA

ILIANA REYES, on behalf of herself and
all others similarly situated, and the general
public,

Plaintiff,

v.

FIRSTAMERICA AUTOMOTIVE, INC.,
a Delaware corporation; FIRSTAMERICA
AUTOMOTIVE, LLC, a Delaware
corporation; SONIC AUTOMOTIVE,
INC., a business entity of unknown form;
BEVERLY HILLS BMW, a business entity
of unknown form; ECHO PARK
AUTOMOTIVE, a business entity of
unknown form; and DOES 1 through 50,
inclusive,

Defendants.

Case No. C23-02820

[Assigned for all purposes to the Hon. Benjamin
Reyes II, Dept. 16]

**DECLARATION OF ILIANA REYES IN
SUPPORT OF PLAINTIFF’S UNOPPOSED
MOTION FOR FINAL APPROVAL OF
CLASS AND PAGA SETTLEMENT**

*[Filed concurrently with Notice of Motion and
Motion; Memorandum of Points and Authorities;
Declaration of David Keledjian; Declaration of
Kimberly Sutherland; Declaration of Eric Lietzow,
and [Proposed] Order]*

Date: June 10, 2026
Time: 9:00A.M.
Dept.: 16

Trial Date: None Set

DECLARATION OF ILIANA REYES

I, Iliana Reyes, declare:

1. I am over the age of eighteen and submit this Declaration in support of the Motion for Final Approval of the Class Action and PAGA Settlement Agreement (“Settlement Agreement”) entered into between me, on behalf of myself and all others similarly situated, the general public, and aggrieved employees, and Defendants FIRSTAMERICA AUTOMOTIVE, INC., FIRSTAMERICA AUTOMOTIVE, LLC, SONIC AUTOMOTIVE, INC., BEVERLY HILLS BMW, and ECHO PARK AUTOMOTIVE (hereinafter “Defendants”). I understand that I am submitting this Declaration in support of final Settlement approval in this action and my requested Class Representative Enhancement and Service Award of \$10,000.00. I have personal knowledge of the facts herein, and if called as a witness I could and would competently testify to them.

2. I was employed by Defendants during the relevant period as a non-exempt, hourly employee from May 2021 to November 2022. Being employed as a Document Specialist, my work duties included completing and processing financing paperwork for customers and doing registrations for purchased vehicles. From my experience, and the documents and information I have reviewed from this action, I believe Defendants’ policies are or were uniformly applied to all non-exempt, hourly employees of Defendants in California. I believe I have been similarly situated with the other Class Members as they have been defined in the Settlement Agreement.

3. I understand that I am asking to be approved to serve as the Class Representative for the Settlement Class in this action, which I understand is defined as all persons employed by Defendants, collectively or separately, and/or any staffing agencies and/or any other third parties in hourly, non-exempt positions in California during the Class Period, which is the period from August 1, 2021, through September 30, 2025.. I also understand that I am serving as the representative plaintiff on behalf of other similarly situated and aggrieved employees in California in connection with the class action and representative claims.

4. I retained the law firm of D.Law, Inc. to represent me in this class action lawsuit against Defendants for the alleged practices and violations as now stated in the operative Second

1 Amended Complaint.

2 5. The operative Complaint resulted from multiple conversations I had with my
3 attorneys and their staff regarding Defendants' policies and practices. I also understand that the
4 operative Complaint has alleged, among other things, that Defendants exerted pressure and job
5 production demands on me and the Class Members that required us to work off the clock for
6 substantially more hours than those we were scheduled to work, and Defendants failed to pay us
7 for all our hours worked or failed to pay them at the required overtime rate. I further understand
8 we have alleged that Defendants failed to provide us with meal periods and rest breaks as required
9 under California law.

10 6. I believe that I am similarly situated to all other Class Members and aggrieved
11 employees who worked for Defendants during the Class Period and who were similarly affected
12 by Defendants' policies and practices. I believe my claims against Defendants are typical of the
13 other Class Members, as the claims asserted in the operative Complaint and are also shared by the
14 other Class Members.

15 7. From the beginning of my involvement in this case and prior to filing the initial
16 Complaint, my attorneys informed me about what it meant to be a Class Representative. I
17 understood that I was expected to represent the other employees' interests, placing them ahead of
18 my own. I signed an acknowledgment of my duties as a Class Representative at the outset of this
19 action.

20 8. I believe that my interests have been and continue to be aligned with all Class
21 Members, and I have been and am willing to continue to pursue the Class Members' claims
22 vigorously on our collective behalf. As a result, I believe I do not have any interests that are
23 adverse to the interests of the Class Members.

24 9. I understood it was my responsibility to actively participate in the lawsuit to
25 safeguard the interests of other Class Members and to ensure that my interests were not in conflict
26 with those of the other employees. I did so to the best of my ability, and I believe I have
27 maintained the best interests of the Class Members. I have actively participated in this litigation,
28 the arbitration proceedings, and have been updated on the progress of the case. I have provided

documents to Class Counsel in support of the class claims and spent many hours discussing my claims and information regarding my employment by Defendants. I have also invested significant time and efforts in performing my duties on behalf of the Class, including during the initial complaint drafting process, in response to informal discovery before mediation, speaking with Class counsel about other witnesses and answering questions in connection with the mediation, and throughout the preliminary and final Settlement approval process. I have also committed a significant amount of time to the arbitration proceedings, including on responding to discovery regarding my individual wage-and-hour as well as PAGA claims.

10. I have spent time communicating with Class Counsel to receive answers to my questions or updates on the case progression. I estimate I have devoted approximately at least **78 hours** of my time to this action and vigorously representing the interests of the Settlement Class, including by performing the following:

- a. Researching the issues and claims I could bring against Defendants and talking to my attorneys about initiating this action;
- b. Being interviewed in detail by my counsel regarding the working conditions we operated under for Defendants, and particularly my experiences and the policies and practices that applied to my employment and the employment of the other similarly situated employees;
- c. Searching for and gathering relevant documents in my possession and providing them to my attorneys, including for discovery purposes in arbitration, and reviewing all documents produced by Defendants;
- d. Speaking with and informing my attorneys of the identities of potential witnesses and Class Members and responding to questions from Class Members and counsel and from Defendants in discovery in preparation for mediation;
- e. Preparing for the mediation session and reviewing settlement-related documents and working with counsel to execute the Memorandum of Understanding and the final versions of the Settlement Agreement. I have also worked with counsel in connection with the motion for preliminary and final approval of the Settlement Agreement in drafting this Declaration and will also do so as necessary in connection with final approval; and

1 f. Regularly receiving and responding to correspondence and phone calls from
2 my attorneys regarding the claims and case status and then the Settlement and other related
3 documents.

4 11. I have chosen to serve as a class representative despite my concerns about how my
5 role in this class action may adversely affect my prospects for future employment given that this
6 class action and the settlement is public information accessible by prospective employers.

7 12. I took a huge risk by coming forward to help with this class action. If I had lost the
8 case and also been ordered to pay Defendants' litigation costs, it would have been financially
9 devastating to me. I was willing to agree to a release of my wage claims because it helped the
10 parties agree to the Settlement, which I believe is an excellent result for the Class I have committed
11 to represent.

12 13. I have reviewed with my counsel the Settlement Agreement we have negotiated
13 with Defendants in this action on behalf of the Class Members. I agreed to the terms because I
14 believe the Settlement is fair and reasonable.

15 14. In my opinion, the requested Class Representative Service Payment of \$10,000.00
16 is fair and reasonable given the risks I have taken, the tasks I have performed, the time I have
17 invested, and the real benefit which the Class Members will receive from this class action.

18 15. I understand my requested \$10,000.00 enhancement and service award is subject to
19 the Court's final approval and discretion, and I respectfully request that the Court approve the
20 award and approve me to serve as the Class Representative for Settlement purposes.

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

23 Executed this 12th day of May 2026, at Pasadena, California.

24
25  Signed by:
26 Iliana Reyes
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