

1 **BLUMENTHAL NORDREHAUG BHOWMIK**
2 **DE BLOUW LLP**

3 Norman B. Blumenthal (State Bar #068687)

4 Kyle R. Nordrehaug (State Bar #205975)

5 Aparajit Bhowmik (State Bar #248066)

6 2255 Calle Clara

7 La Jolla, CA 92037

8 Telephone: (858)551-1223

9 Facsimile: (858) 551-1232

10 Website: www.bamlawca.com

11 Attorneys for Plaintiff

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **COUNTY OF LOS ANGELES**

14 DAISY SUAREZ, on behalf of the State of
15 California, as a private attorney general,

16 Plaintiff,

17 vs.

18 HELIX ELECTRIC, INC., a Limited Liability
19 Company; and DOES 1 through 50, inclusive,

20 Defendants.
21

CASE NO.: 24TRCV00079

**DECLARATION OF DAISY SUAREZ IN
SUPPORT OF MOTION TO APPROVE
PAGA SETTLEMENT**

Hearing Date: September 23, 2026

Hearing Time: 9:30 a.m.

Reservation No. 966970542401

Judge: Alan B. Honeycutt

Dept.: E

Date Filed: January 8, 2024

Trial Date: Not set

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28 **DECLARATION OF DAISY SUAREZ IN SUPPORT OF MOTION TO APPROVE PAGA
SETTLEMENT**

1 I, Daisy Suarez, declare as follows:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration, and I am
3 making this declaration on behalf of myself, as a named plaintiff, and in support of the Motion to
4 Approve Private Attorneys General Act Settlement.

5 2. I worked in California as a non-exempt employee of Defendant Helix Electric, Inc.
6 (“Defendant”) from January of 2022 to April of 2023.

7 3. I retained my attorneys who are experienced in PAGA representative action litigation and
8 claims against employers for violations of the California Labor Code. I have no personal
9 relationship or family ties to my attorneys or any officer of the Court. I am not aware of having
10 any actual or potential conflicts of interest with another class member in this case nor am I aware
11 of having any actual or potential conflicts of interest with ILYM Group, Inc., the settlement
12 administrator.

13 4. I was subject to Defendant’s policies and practices that have been alleged as unlawful in
14 the Complaint and the PAGA notice sent to the Labor and Workforce Development Agency. For
15 example, I was not compensated for all my time worked, and I often did not receive compliant
16 meal and rest breaks which were late, interrupted or missed entirely.

17 5. In bringing this case for myself, the State of California, and the other employees, I
18 understood a lot of work would be required and I was willing to, and did, do the work to keep the
19 case moving forward. For instance, before the complaint was filed I spoke to my attorneys several
20 times and discussed how Defendant implemented its company policies and procedures. I also
21 assisted my attorneys in their investigation into my claims by providing them documents and
22 answering their questions. I reviewed the complaint before it was filed and after it was filed I was
23 given access to an electronic file sharing program that alerted me via email when important
24 documents were filed so that I could review them and keep up with the developments in the case. I
25 was informed that the Defendant had the right to take my deposition, and that the preparation and
26 deposition itself could take multiple days. Although my deposition was not taken, I feel I would
27 have been adequately prepared and comfortable to give testimony on my experiences.

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DECLARATION OF DAISY SUAREZ IN SUPPORT OF MOTION TO APPROVE PAGA
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6. My attorneys explained to me the risks and benefits of bringing a representative action. I understood that I took on the risk, both professionally and financially, in pursuing the case as a representative PAGA action.

7. A mediation took place on January 14, 2026, with Daniel J. Turner, Esq., a well-respected and experienced mediator. After the mediation the parties were able to come to an agreement to settle the action based on a mediator's proposal. I communicated with my attorneys regarding the terms of the settlement which was reached between the parties and understood that the recovery in this case was for the benefit of my fellow coworkers, not just for me, and therefore wanted the best possible result to be obtained for the aggrieved employees. I reviewed and signed the Memorandum of Understanding on February 16, 2026.

8. I have been actively involved with this lawsuit. Although I did not keep time records, I was in regular contact with my attorneys, reviewed court filings, and spent a significant amount of time on the issues presented during the lawsuit and in the settlement process. I estimate that I spent approximately 30-40 hours working on this case up until this point.

9. I reviewed the final PAGA Settlement Agreement and I believe it is fair and reasonable given the facts of the case.

10. I believe the \$10,000 Service Award I have requested is fair compensation for my efforts in support of this action and the risks I undertook.

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DECLARATION OF DAISY SUAREZ IN SUPPORT OF MOTION TO APPROVE PAGA
SETTLEMENT

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

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4 Executed on 07/23/2026, at Daisy suarez.
5 (city, state)

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7 Daisy Suarez (Jul 23, 2026 11:41:57 PDT)
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28 DECLARATION OF DAISY SUAREZ IN SUPPORT OF MOTION TO APPROVE PAGA
SETTLEMENT