Brian J. Mankin, Esq. [CSB No. 216228]
*brian@lmlfirm.com*
Peter J. Carlson, Esq. [CSB No. 295611]
*peter@lmlfirm.com*
LAUBY, MANKIN & LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

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| FELIPE RAYGOZA, individually, on a representative basis, and on behalf of all others similarly situated;<br><br>Plaintiff,<br><br>vs.<br><br>TECTA AMERICA SOUTHERN CALIFORNIA INC., a California Corporation; and DOES 1 through 20, inclusive;<br><br>Defendants. | Case No.: CVRI2501103<br>*[Assigned to Hon. Harold Hopp, Dept. 1, for all purposes]*<br><br>**DECLARATION OF PETER J. CARLSON, ESQ., IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT** |

I, Peter J. Carlson, state and declare:

1. I am an attorney duly licensed to practice law in the State of California and am a senior associate at Lauby, Mankin & Lauby LLP, attorneys of record for Plaintiff. I am fully familiar with the facts of this case and submit this declaration in support of Plaintiff's Motion for Preliminary Approval. The matters set forth herein are based upon my personal knowledge and, if called upon as a witness, I could and would give competent testimony with respect to the matters contained herein.

2. For the sake of brevity, this declaration does not discuss the settlement itself, the procedural background of the litigation, the claims and investigation by my firm, and why the

settlement is fair and reasonable. Those topics are covered in detail in the concurrently filed Declaration of Brian Mankin. This declaration simply provides information requested by the court as to why I am adequate class counsel.

**QUALIFICATION OF COUNSEL**

3. I graduated from the University of Oregon School of Law in May 2013 and have been a member, in good standing, of the State Bar of California since January 2014. I am licensed to practice before all courts of the State of California and am admitted to practice in the United States District Court for the Central District of California and have litigated cases in various courts and counties throughout California, including successful briefing and argument in the Court of Appeal.

4. I began working at Fernandez & Lauby LLP (the predecessor of Lauby, Mankin & Lauby LLP) in March 2016 and, since that time, my practice has consisted solely of representing employees. The vast majority of my cases have been litigated as class actions, representative PAGA actions, or a combination of the two.

5. I have been the handling attorney on over 215 class action and/or representative PAGA actions. And, on these cases, myself and/or my firm have been appointed Class Counsel on over half of these cases and have helped negotiate settlements totaling over $150,000,000 for my clients, the employees, and the State of California.

6. I was the handling attorney for the second largest PAGA-only settlement in California's history – a $12.5 million-dollar court approved settlement, which followed extensive litigation, summary adjudication and writs to the CA Supreme Court against a Fortune 50 company (*Garcia v. Macy's*, San Bernardino Superior Court Case No. CIVDS1516007).

7. I have tried two major class and PAGA cases against Fortune 100 companies, both of which were appealed. In 2018, I was the handling attorney on a PAGA-only case in Orange County where my firm succeeded on a motion for summary adjudication and litigated through trial to obtain a $425,000 judgment for over 1,600 aggrieved employees. Also, in 2019, I was the handling attorney for my firm on a class action against Walmart, where we obtained class certification on behalf of over 5,000 employees. After extensive litigation, the matter went

to trial, and the jury returned a verdict of approximately $6.1 million on the meal period claims.

8. Additionally, I have handled approximately 6 cases for which we received class certification orders following contested certification motions concerning similar claims.

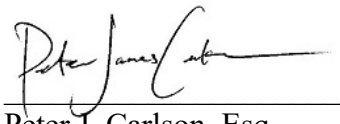
9. In 2022, 2023, and 2024, I was also selected as a Super Lawyers Rising Star.

**CONCLUSION**

10. As set forth above, I have litigated over 215 class and representative actions, have successfully resolved many of those cases, with many still pending that will resolve in the future.

11. For these reasons, as well as the facts and information presented in the concurrently filed Declaration of Brian J. Mankin, it is respectfully requested that the Court: (1) grant preliminary approval of the settlement as being fair, reasonable, and in the best interests of the class, (2) appoint Plaintiff as the Class Representative, (3) appoint Brian J. Mankin and Peter Carlson of Lauby, Mankin & Lauby LLP as Class Counsel, and (4) preliminarily approve the requested attorneys' fees, costs, and enhancement payment to the Class Representative.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 8, 2026, at Riverside, California.

By: 

Peter J. Carlson, Esq.