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*Attorneys for Plaintiffs*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES**

PAUL MACIAS and JULIANNA PADILLA,  
as individuals, on behalf of themselves and all  
other aggrieved employees,

Plaintiffs,

vs.

TEAM CAR CARE, LLC, a Delaware limited  
liability company, TEAM CAR CARE WEST,  
LLC, a Delaware limited liability company,  
and DOES 2 through 100,

Defendants.

CASE NO. 24STCV03864

*[Case assigned for all purposes to the Hon.  
Steve Cochran, Dept. 16]*

**DECLARATION OF PLAINTIFF PAUL  
MACIAS IN SUPPORT OF MOTION FOR  
SETTLEMENT APPROVAL OF CLAIMS  
BROUGHT UNDER THE PRIVATE  
ATTORNEYS GENERAL ACT,  
REASONABLE ATTORNEYS' FEES AND  
COSTS, AND REPRESENTATIVE  
ENHANCEMENT PAYMENT**

Date: December 11, 2025  
Time: 9:00 a.m.  
Dept: 16

Action Filed: February 15, 2024  
Trial Date: None Set

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I, PAUL MACIAS, 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 approval of the proposed settlement (“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 Defendants Team Car Care, LLC, and Team Car Care West, LLC (“Defendants”) as a Service Technician from approximately August 2022 until approximately August 2023. My job duties consisted of servicing vehicles, changing oil, and interacting with customers.

3. Throughout my employment with Defendants, Defendants' managers would contact me while I was off the clock, both before and after my scheduled shifts, by calling my personal cell phone and sending text messages, including messages regarding customer interactions, instructions related to my job duties, and information about store performance. Defendants never compensated me for this time spent working off the clock. Defendants also never reimbursed me for having to use my personal cell phone, despite requiring me to use my personal cell phone for work purposes.

4. Additionally, Defendants frequently required me to skip my meal periods or take meal periods after I had completed five hours of work in order to complete work duties, and if I was provided with a meal period, they were regularly interrupted by Defendants before I had taken a full 30 minutes. Defendants also did not authorize or permit me to take all of my 10-minute rest periods. Throughout my employment with Defendants, I earned bonus payments, including a retention bonus. While Defendants did occasionally pay me meal period premium payments, these premium payments were paid at my base rate of pay, even when I earned a bonus during the same time period. Similarly, Defendants also paid my sick pay wages at my base rate of pay, even if I earned a bonus during the same time period that my sick pay wages were paid. Finally, my attorneys helped me submit a records request to Defendants, but Defendants did not provide my personnel or payroll records within 21 days of the date my request was submitted.

5. I brought this lawsuit because I felt that Defendants were not following the law, and I wanted Defendants to comply with the law and treat their employees fairly. I feel that I have taken on a greater burden than any of Defendants' other employees because I have been actively involved in the litigation every step of the way since it was first filed, and because it is my name that is attached to the lawsuit. Although I was aware of the risks of attaching my name to a publicly filed lawsuit, I chose to move forward with the case anyway. Through my efforts, Defendants have agreed to a settlement that will benefit current and former employees of Defendants, and I believe that I should be compensated for carrying the burden of this litigation for the benefit of the other employees and the State of California.

6. I have been actively involved in this case since before it was even filed. Among other things, I searched for and produced relevant documents for use in the lawsuit, provided factual information to my attorneys, had many phone calls with my attorneys to discuss the claims and legal issues in the lawsuit and Defendants' practices, assisted my attorneys to help them prepare for mediation, made myself available throughout the full-day mediation to answer factual questions raised by the mediator, reviewed and assisted my attorneys in finalizing the settlement agreement, and otherwise assisted my attorneys in moving this case towards resolution. I estimate that I have spent approximately 25 to 30 hours in total on these activities.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on 07/31/25 , at 10:30 a.m. .

Paul Macias

Paul Macias (Jul 31, 2025 10:33:48 PDT)

Paul Macias