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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

JOVANI OROZCO, individually, on behalf of
all others similarly situated, the State of
California, and other aggrieved persons,

Plaintiff,

v.

SIERRACIN/SYLMAR CORPORATION, a
California corporation; and DOES 1 through
10, inclusive,

Defendant.

Case No.: 23STCV26564

*[Assigned for all purposes to the Hon Theresa
M. Traber, Dept. 1]*

**DECLARATION OF GARVIN BROWN
OF ILYM GROUP, INC. REGARDING
SETTLEMENT ADMINISTRATION AND
ESCALATOR CLAUSE**

Complaint filed: October 30, 2023

FAC filed: February 14, 2024

Trial date: None set

1 I, Garvin Brown, declare as follows:

2 1. I am a resident of the United States of America and am over the age of 18. I am a
3 Case Manager for ILYM Group, Inc., (herein after referred to as “ILYM Group”), the professional
4 settlement services provider who has been retained by the Parties’ Counsel and subsequently
5 appointed by the Court to serve as the Settlement Administrator for the above captioned, *Jovani*
6 *Orozco v. Sierracin/Sylmar Corporation* matter. I am authorized to make this declaration on behalf
7 of ILYM Group and myself. I have personal knowledge of the facts herein, and, if called upon to
8 testify, I could and would testify competently to such facts.

9 2. ILYM Group has extensive experience in administering Class Action Settlements,
10 including direct mail services, database management, claims processing and settlement fund
11 distribution services for Class Actions ranging in size from 26 to 4.5 million Settlement Class
12 Members.

13 3. On August 10, 2026, ILYM Group received the class data file from Counsel for
14 Defendant, which contained the name, social security number, last known mailing address, hire and
15 termination dates, and the number of Class Workweeks and PAGA Pay Periods worked for each
16 Class Member and Aggrieved Employee. The data file was uploaded to our database and checked
17 for duplicates and other possible discrepancies. The Class List contained 750 Class Members and
18 616 Aggrieved Employees.

19 4. The class data file consisted of records from May 5, 2019 – June 30, 2025.

20 5. Class Members will receive a proportional share of the Net Settlement Amount
21 through individual settlement payments, based on the number of Workweeks worked during the
22 Class Period. The Net Settlement Amount is the amount remaining after deduction of the Court-
23 approved payments from the Gross Settlement Amount for Class Counsel Fees and Litigation
24 Costs, the Class Representative Service Payments, LWDA Payment and the Claims Administration
25 Fees to ILYM Group, e.g.,

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Gross Settlement Amount	\$830,000.00
Attorney's Fees	\$276,666.67
Attorney's Costs	\$30,000.00
Service Payment	\$10,000.00
ILYM Group Fees	\$15,000.00
LWDA	\$37,500.00
Aggrieved Employees	\$12,500.00
Net Settlement Amount	\$448,333.33

6. The total number of Workweeks worked by Class Members is 116,719. Defendant has elected to shorten the Class Period, so the Escalator Clause is not triggered.

7. ILYM Group calculated the new Class Period date to be May 5, 2019 – May 18, 2025, with a total Class Period workweek count of 114,134.

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 to the best of my knowledge and that this Declaration was executed this 17th day of August 2026, at Tustin, California.

Garvin Brown

GARVIN BROWN