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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

MARIA SANCHEZ and PAUL WILLIAMS,
individually, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

MISSION BAY MANAGEMENT, LLC, a
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

CASE NO.: **37-2024-00013022-CU-OE-CTL**

**DECLARATION OF CHANDLER C.
ROTH**

Hearing Date: October 31, 2025

Hearing Time: 1:30 p.m.

Judge: Hon. Katherine Bacal

Dept.: 63

Date Action Filed: March 20, 2024

Trial Date: Not set

DECLARATION OF CHANDLER C. ROTH

1 I, CHANDLER C. ROTH, declare as follows:

- 2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, a senior trial attorney at Gomez Trial Attorneys, and one of the attorneys of
4 record for the Plaintiffs and the putative class in the above-entitled action. I have personal
5 knowledge of the facts set forth below, and if called to testify, I could and would do so
6 competently.
- 7 2. I submit this Declaration in support of Plaintiffs' Motion for Preliminary Approval of the
8 Class Action and PAGA Settlement (the "Preliminary Approval Motion"), which is filed
9 concurrently herewith.

10 **The Settlement Is Fair, Reasonable, And Adequate And Should Be Granted Preliminary**

11 **Approval**

- 12 3. I am not aware of any conflicts of interest between my firm, its attorneys, my co-counsel's
13 firms and attorneys, and Plaintiffs or any other Class Member.
- 14 4. As outlined in the accompanying declarations and supporting documents submitted
15 concurrently, the Class Action and PAGA Settlement Agreement ("Settlement") represents
16 a fair, reasonable, and adequate resolution of the claims in this case. I fully support this
17 Settlement, as it serves the best interests of Plaintiffs.
- 18 5. To ensure that the Class received the strongest and most effective representation possible,
19 my firm strategically partnered with Blumenthal Nordrehaug Bhowmik De Blouw LLP,
20 respected colleagues with whom we have successfully collaborated on numerous cases.
21 Their experience in class action and PAGA litigation brought invaluable expertise to this
22 case, further strengthening our ability to advocate for the Class. Their extensive
23 background in wage and hour litigation, combined with their deep understanding of the
24 complexities involved in prosecuting large-scale class and representative actions, played a
25 critical role in advancing this case toward a successful resolution.
- 26 6. Given our extensive experience handling wage and hour class actions, my co-counsel and I
27 are well-qualified to assess the strength of the class claims and the viability of Defendants'

28 DECLARATION OF CHANDLER C. ROTH

1 defenses. In our judgment, this Settlement achieves a fair, reasonable, and adequate
2 outcome for the Class.

3 **Plaintiffs' Counsel Is Experienced in Employment & Wage and Hour Litigation**

- 4 7. I earned my Bachelor of Arts from the University of Colorado, Boulder, in 2017 and my
5 Juris Doctor from the University of San Diego, School of Law in 2020.
- 6 8. I am the Director of Employment Litigation at Gomez Trial Attorneys, a distinguished and
7 diversified law firm that was established in 2005. My firm has consistently delivered
8 outstanding results for Plaintiffs across a wide range of legal matters, including
9 Employment, Personal Injury, and Class Actions.
- 10 9. As seasoned litigators, my team has handled numerous employment matters, representing
11 employees in wage and hour disputes, wrongful termination cases, harassment, retaliation,
12 and discrimination claims, and various other employment-related matters both in state and
13 federal courts.
- 14 10. Since being admitted to the bar, I have handled a broad spectrum of cases. I have gained
15 extensive experience litigating employment matters, personal injury cases, and class
16 actions. I have worked on behalf of both Plaintiffs and Defendants, advising on legal
17 compliance and assisting in the resolution of various workplace disputes.
- 18 11. I have had class action litigation experience, mostly in the area of employment class
19 actions. I have experience in cases involving labor code violations and wage and hour
20 claims. I have litigated similar wage and hour cases against other employers on behalf of
21 employees. My firm has been approved as class counsel in California courts previously. It
22 is this level of experience that enabled my firm to undertake the instant matter.
- 23 12. Based on the history of this case and given our firm's extensive experience as class and
24 representative action employment and wage and hour litigators, it is my view that the
25 settlement is fair, reasonable, and adequate, and in the best interest of the Class.
- 26 13. I have no conflicts of interest with the Class Representatives.
- 27 14. I have not previously represented Defendants in any matter.

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DECLARATION OF CHANDLER C. ROTH

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct. Executed this 2nd day of October 2025, at San Diego, California.

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4 /s/ Chandler C. Roth

5 Chandler C. Roth, Esq.
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DECLARATION OF CHANDLER C. ROTH