

Miriam L. Schimmel (State Bar No. 185089)
mschimmel@blackstonepc.com
Joana Fang (State Bar No. 309623)
jfang@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
Jared C. Osborne (State Bar No. 335968)
josborne@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff BRANDON GESTON ,
individually, and on behalf of Aggrieved
Employees pursuant to the California
Private Attorneys General Act

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF FRESNO

BRANDON GESTON , individually, and on
behalf of Aggrieved Employees pursuant to
the California Private Attorneys General Act,

Plaintiffs,

vs.

FRTO LLC, a California Limited Liability
Company; FRGM LLC, a California Limited
Liability Company; and VWOC LLC, a
California Limited Liability Company; and
DOES 1 through 25, inclusive,

Defendants.

Case No.: 24CECG01292

Honorable Lisa Gamoian
Department 403

**DECLARATION OF BRANDON GESTON
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA SETTLEMENT
AND AWARD OF PAGA COUNSEL FEES
PAYMENT, PAGA COUNSEL LITIGATION
EXPENSES PAYMENT, AND
ADMINISTRATION EXPENSES PAYMENT**

Date: May 7, 2025
Time: 3:30 p.m.
Department: 403

Complaint Filed: March 25, 2024
Trial Date: None Set

DECLARATION OF BRANDON GESTON

I, Brandon Geston, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-entitled action. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by one or more of the Defendants FRGM LLC, FRTO LLC, and CLVW LLC (collectively, "Defendants") as an hourly-paid and/or non-exempt Vehicle Salesperson from approximately June 2022 through December 2023.

3. Because I thought the practices at Defendants may not be lawful, I decided to seek legal advice about my work experiences at Defendants and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendants were held accountable for not properly compensating their employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly communicated with my attorneys regarding the case and in order to fulfill my responsibilities as a PAGA representative. I have searched for and provided documents concerning my employment with Defendants, reviewed documents with my attorneys and answered their questions, provided information and guidance regarding the duties of other hourly-paid and/or non-exempt employees, and helped determine what other documents and information they could obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my current information so that they could always reach me, and to provide any additional information that I had obtained.

5. I was always available to answer any questions my attorneys had and to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could. I described Defendants' policies, practices, and procedures and

helped my attorneys prepare for and participate in mediation.

6. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the Aggrieved Employees and the State of California. I think my efforts helped to get the result obtained in this matter.

7. I reviewed the settlement agreement in this matter and discussed it with my attorneys before I signed it. I also executed a separate agreement to settle and resolve my individual claims with Defendants.

8. I am not related to anyone associated with Blackstone Law, APC.

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

Executed on 03/28/2025 at Fresno, California

Brandon Geston

Brandon Geston