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*Attorneys for Plaintiff MARIO FOSADOS,
individually, and on behalf of other members of
the general public similarly situated and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

MARIO FOSADOS, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiffs,

vs.

DREW CHAIN SECURITY CORP., a
California corporation; and DOES 1 through
25, inclusive,

Defendants.

Case No.: 24STCV00519

*Assigned for All Purposes to the Honorable
David S. Cunningham III, Dept. 11*

**DECLARATION OF PLAINTIFF MARIO
FOSADOS IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES AND COSTS,
GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION COSTS**

Date: May 20, 2025
Time: 11:00 a.m.
Dept: 11

Complaint Filed: January 8, 2024
FAC Filed: March 11, 2024
Trial Date: Not Set

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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-captioned case. 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.

3. Because I thought Defendant's practices may not be lawful, I decided to seek legal advice about my experiences working for Defendant 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 Defendant was held accountable for not properly compensating its 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 conferred with my attorneys regarding the case as part of my responsibilities as a class and PAGA representative. This process included searching for and providing documents concerning my employment with Defendant, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Defendant.

5. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained. I made myself available to answer any questions my attorneys had about Defendant's practices and treatment of its employees whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could.

6. I understood that in the event this matter did not settle and proceeded with trial, I would

1 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
2 responsibilities that are necessary for this lawsuit.

3 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
4 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
5 also understood there was a risk of losing any job and/or income due to the time that I would have to
6 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. Most
7 importantly, I believe that by pursuing this case, I have taken a significant risk because future
8 employers can easily find out that I sued my prior employer, and that may negatively impact my ability
9 to find employment within this industry – and even outside of it – in the future. In contrast, the other
10 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
11 that I took in bringing this action.

12 8. I reviewed the settlement agreement, discussed the settlement agreement with my
13 attorneys, and asked them questions before signing it.

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

17 10. I understand that any resolution of this lawsuit on a representative basis is subject to
18 court approval. At all times throughout the course of this litigation I have considered the interests of
19 the other aggrieved employees and put them before my own personal interests.

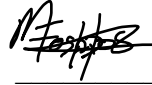
20 11. I understand that incentive or enhancement awards are discretionary and intended to
21 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the aggrieved
22 employees, the financial and/or reputational risk undertaken in bringing a PAGA action, and an
23 acknowledgment of the benefits resulting from the representative's actions. I believe my work in this
24 matter is meritorious on these points for the reasons set forth above.

25 12. I respectfully request that the Court approve and award me an Enhancement Payment
26 in the amount of \$5,000.00 for my efforts and active participation in the case and for the broader,
27 general release of all claims that I have or may have against Defendant in connection with the
28 settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount

1 is reasonable.

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

3 I declare under penalty of perjury under the laws of the State of California that the foregoing
4 is true and correct. Executed on 03/13/2025, at La Puente, California.

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