

Jennifer Douglas, SBN 172770
jdouglas@dpf-law.com
Angela A. Nelson, SBN 324445
anelson@dpf-law.com
DICKENSON, PEATMAN & FOGARTY PC
1500 First Street, Suite 200
Napa, CA 94559
Telephone: (707) 261-7000
Facsimile: (707) 340-7239

Attorneys for Defendant,
DOMAIN SERVICES, LLC

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF NAPA

ESQUIBEL ARIAS, an individual, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

DOMAIN SERVICES, LLC, a California
Limited Liability Company; and DOES 1 TO 50,

Defendants.

Case No. 24CV000298

**DECLARATION OF JENNIFER E.
DOUGLAS IN SUPPORT OF
DEFENDANT'S REPLY IN SUPPORT OF
ITS MOTION TO ENFORCE
SETTLEMENT AGREEMENT AND FOR
SANCTIONS AGAINST PLAINTIFF
ESQUIBEL ARIAS**

Date: September 10, 2025

Time: 8:30 a.m.

Place: 825 Brown Street, Department B
Napa, CA 94559

Hon. Cynthia P. Smith, presiding

Complaint filed: February 28, 2024

Trial Date: None

I, JENNIFER DOUGLAS, declare:

1. I am an attorney at law, duly licensed to practice before all of the courts of the State of California. I am a Partner at Dickenson Peatman & Fogarty, 520 Third Street, Suite 260, Santa Rosa, California, and one of the attorneys of record herein for Defendant DOMAIN SERVICES,

LLC (“Defendant”). I am over the age of eighteen years and am not a party to this action. If called to testify regarding the following matters, I could and would testify to the following facts based on my personal knowledge.

2. On March 18, 2024, I emailed Plaintiff’s counsel before Defendant was served with the initial Complaint filed on February 29, 2024, notifying counsel of the applicable Arbitration Agreement and class action waiver. Afterward, Plaintiff agreed to amend the Complaint to remove the class claims and add PAGA claims.

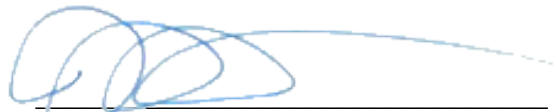
3. On April 4, 2024, Defendant and Plaintiff filed a joint stipulation to an extend Defendant’s responsive pleading deadline to permit Plaintiff with time to file the First Amended Complaint. The Parties acknowledged in the stipulation that Plaintiff would not pursue the class claims and instead would file an amended complete to solely allege PAGA penalties. A true and correct copy of the filed Stipulation is attached hereto as Exhibit 1.

4. On April 11, 2024, the Court Ordered the extension of Defendant’s responsive pleading deadline. A true and correct copy of the Court’s Order is attached hereto as Exhibit 2.

5. On July 30, 2024 Defendant and Plaintiff filed a joint Case Management Statement, which states in multiple places that Plaintiff seeks PAGA penalties, but makes no mention of any class claims.

6. On September 3, 2025 my office submitted the Memorandum of Understanding through the LWDA portal.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 3, 2025 at Santa Rosa, California.



Jennifer Douglas

EXHIBIT 1

FILED
4/4/2024 3:30 PM
Clerk of the Napa Superior Court
By: Lori Walker, Deputy

MELMED LAW GROUP P.C.

Megan E. Ross, (SBN 227776)

megan@melmedlaw.com

Hannah Becker, (SBN 345452)

hb@melmedlaw.com

1801 Century Park East, Suite 850

Los Angeles, California 90067

Phone: (310) 824-3828

Fax: (310) 862-6851

Attorneys for Plaintiff and the Putative Class

Jennifer Douglas, SBN 172770

jdouglas@dpf-law.com

Melissa Culp Granillo, SBN 265159

mgranillo@dpf-law.com

Angela Nelson, SBN 324445

anelson@dpf-law.com

DICKENSON PEATMAN & FOGARTY

1500 First Street, Suite 200

Napa, CA 94559

Telephone: (707) 524-7000

Facsimile: (707) 340-7239

Attorneys for Defendant Domain Services, LLC.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF NAPA**

ESQUIBEL ARIAS, an individual, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

DOMAIN SERVICES, LLC., a California
Limited Liability Company; and DOES 1 TO 50,

Defendants.

Case Number: 24CV000298

**Joint Stipulation and ~~Proposed~~ Order to
Extend Defendant's Responsive Pleading
Deadline**

Complaint Filed: February 29, 2024

Trial Date: None Set

JOINT STIPULATION

This stipulation is between Plaintiff Esquibel Arias (“Plaintiff”) and Defendant Domain Services, LLC. (“Defendant”) (collectively, the “Parties”), as follows:

WHEREAS, Plaintiff Esquibel Arias filed a class action Complaint (“Complaint”) against Defendant on February 29, 2024;

WHEREAS, on February 28, 2024, Plaintiff sent a Notice of Labor Code Violations and PAGA Penalties to the Labor & Workforce Development Agency via online submission, and served Defendants with the same;

WHEREAS, the Parties met and conferred regarding an Arbitration Agreement signed by Plaintiff which does not permit arbitration on a class-wide basis;

WHEREAS, after review and consideration, counsel for Plaintiff have agreed to arbitrate Plaintiff’s individual claims, but Plaintiff makes no admission as to the validity of the purported Arbitration Agreement;

WHEREAS, on March 27, 2024, counsel for Plaintiff advised counsel for Defendant that Plaintiff intends to dismiss the class action claims in the Complaint and file an amended complaint to allege a sole cause of action for civil penalties under the Private Attorneys General Act (PAGA) by May 3, 2024 (“FAC”).

WHEREAS, Defendant’s responsive pleading deadline as to the Complaint is currently set for April 18, 2024;

WHEREAS, for reasons for judicial economy and efficient case management, the Parties agree to extend Defendant’s deadline to respond to Plaintiff’s FAC to 30 days after it is filed and served on Defendant to allow Plaintiff’s counsel time to file the FAC before Defendant is required to file a responsive pleading to the Complaint;

WHEREAS, this stipulation is entered into without prejudice to any claims or defenses that may be available at law or in equity to any party in this action.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, subject to the approval of the Court, as follows:

1 1. The Parties hereby agree and stipulate to extend the deadline for Defendant to respond
2 to the Complaint to June 10, 2024, or 30-days after service of Plaintiff's FAC, whichever comes later.

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4 Dated: April 3, 2024

MELMED LAW GROUP P.C.

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HANNAH BECKER

12 Attorneys for Plaintiff and the Putative Class

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15 Dated: April 3, 2024

DICKENSON, PEATMAN & FOGARTY

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JENNIFER E. DOUGLAS
MELISSA A. GRANILLO
ANGELA NELSON

23 Attorneys for Defendant Domain Services, LLC
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EXHIBIT 2

rec'd by eFile 4/4/24 lw

FILED

APR 11 2024

Clerk of the Napa Superior Court
By: Ala
Deputy

MELMED LAW GROUP P.C.

Megan E. Ross (SBN 227776)

megan@melmedlaw.com

Hannah Becker (SBN 345452)

hb@melmedlaw.com

1801 Century Park East, Suite 850

Los Angeles, California 90067

Phone: (310) 824-3828

Fax: (310) 862-6851

Attorneys for Plaintiff and the Putative Class

Jennifer Douglas, SBN 172770

jdouglas@dpf-law.com

Melissa Culp Granillo, SBN 265159

mgranillo@dpf-law.com

Angela Nelson, SBN 324445

anelson@dpf-law.com

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Napa, CA 94559

Telephone: (707) 524-7000

Facsimile: (707) 340-7239

Attorneys for Defendant Domain Services, LLC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF NAPA

ESQUIBEL ARIAS, an individual, on behalf of
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Defendants.

Case Number: 24CV000298

CP
[Proposed] Order to Extend Defendant's
Responsive Pleading Deadline

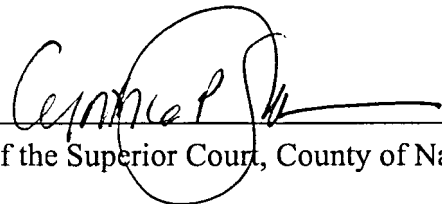
CPS
[PROPOSED] ORDER

Pursuant to the stipulation of the parties and good cause appearing, the Court orders as follows:

1. Defendant's responsive pleading deadline is extended to June 10, 2024, or 30 days after service of Plaintiff's FAC, whichever comes later.

IT IS SO ORDERED.

4/11/24



Judge of the Superior Court, County of Napa

PROOF OF SERVICE

I, the undersigned, certify that I am over age 18, and am not a party to this action, and am employed in the County of Sonoma, California. My business address is 1500 First Street, Suite 200, Napa, CA 94559.

On the date indicated below, I served the following document:

**DECLARATION OF JENNIFER E. DOUGLAS IN SUPPORT OF
DEFENDANT DOMAIN SERVICES LLC'S MOTION TO ENFORCE
SETTLEMENT AGREEMENT AND FOR SANCTIONS AGAINST
PLAINTIFF ESQUIBEL ARIAS**

on the person(s) below, as follows:

MATTHEW A HAULK ESQ JOSE M HERRERA ESQ HAULT & HERRERA LLP 100 PINE ST STE 1250 SAN FRANCISCO CA 94111 mhaulk@hhemploymentlaw.com jherrera@hhemploymentlaw.com (415) 745-3301 fax	<i>Attorneys for Plaintiff</i>
--	---------------------------------------

() PERSONAL SERVICE. I personally delivered the document(s) to the person(s) at the address(es) listed above. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the documents, in an envelope or package clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office, between the hours of nine in the morning and five in the evening. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not younger than 18 years of age between the hours of eight in the morning and six in the evening.

() U. S. MAIL. I enclosed the document(s) in a sealed envelope or package addressed to the person(s) at the address(es) listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

() BY OVERNIGHT DELIVERY. I enclosed the document(s) in an envelope or package provided by an overnight delivery carrier and addressed to the person(s) at the address(es) above. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

(XX) BY ELECTRONIC SERVICE. I caused a copy of the document(s) to be sent to the person(s) at the electronic notification address(es) listed above pursuant to CCP §1010.6. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 3, 2025 at Napa, California.

/s/ Katie Napolitano
Katie Napolitano