

BIBIYAN LAW GROUP, P.C.

David D. Bibiyan (SBN 287811)

david@tomorrowlaw.com

Vedang J. Patel (SBN 328647)

vedang@tomorrowlaw.com

1460 Westwood Boulevard

Los Angeles, California 90024

Tel: (310) 438-5555; Fax: (310) 300-1705

Attorneys for Plaintiff, JAIME ZAMORA FIDEL,
on behalf of himself and all others similarly situated and aggrieved

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

JAIME ZAMORA FIDEL, as an individual,
and on behalf of all other aggrieved employees
under the Labor Code Private Attorneys'
General Act of 2004,

Plaintiff,

v.

DICK BROWNING, INC., a California
corporation; CERRITOS DODGE, INC.,
a California corporation; VICTORVILLE
NISSAN, INC., a California corporation;
HIGH DESERT AUTOS, I NC., a
California corporation; DAV, INC., a
California corporation; VAHL, INC., a
California corporation; AUTO SQUARE
AUTOS, INC., a California corporation;
TRIANGLE MOTORS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: 24STCV11259

[Assigned for All Purposes to the Hon. Maurice
A. Leiter in Dept. 54]

**DECLARATION OF PLAINTIFF JAIME
ZAMORA FIDEL IN SUPPORT OF
PLAINTIFFS' MOTION FOR
APPROVAL OF REPRESENTATIVE
SETTLEMENT**

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

- 2
- 3
- 4
- 5

6
7

8
9
0
1
2
3

4
5
6
7
8
9

$$\begin{matrix} 0 \\ 1 \\ 2 \end{matrix}$$

3
4
5

6
7

1 pay for not being provided with the opportunity to take full, uninterrupted 10-minute rest periods,
2 either.

3 8. Before and during the course of litigation, I was actively involved in assisting my
4 attorneys to support the wage and hour claims asserted. My involvement began before the initial
5 complaint was filed wherein, I provided first-hand knowledge and documentation as to Defendants'
6 practices, its ownership and corporate structure, and their wage and hour policies and practices.

7 9. Part of the information I relayed was with regard to Defendants' timekeeping policies
8 and practices and their meal and rest period policies and practices.

9 10. I provided them with all the documentation provided to me by Defendants during my
10 employment.

11 11. I assisted in reviewing time and payroll records with my attorneys and informed them
12 of Defendants' employment policies and whether those policies matched Defendants' practices.

13 12. My attorneys called me to ask me questions over several times throughout the
14 litigation, and I contacted my attorneys several times to stay updated on the case and offer my
15 assistance on any matters I could be helpful with. I was also available for mediation by telephone,
16 during which I was available to be called to answer the questions posed by the mediator regarding
17 the asserted claims, as well as arguments raised by Defendants. In addition, I worked with my
18 attorneys over the next several weeks after mediation to understand and execute a long form
19 settlement agreement.

20 13. Over the past few months since the mediation has been resolved, I have stayed in
21 touch with my attorneys to ensure that there was no undue delay in payment for other similarly
22 aggrieved employees for whom I brought this Action.

23 14. I believe that, through the present, I have spent at least 27 hours in connection with
24 this matter, which included time spent having preliminary calls with my attorneys; doing an intake
25 with my attorneys; time spent searching for documents relating to my employment; time spent
26 reading and understanding the Settlement Agreement; time spent answering calls to discuss
27 Defendants' timekeeping, pay, meal and rest periods, and to review time and payroll records; time
28 spent discussing with my attorneys' Defendants' policies and practices; time spent on-call at

1 mediation; and time spent checking in on the status of the case, among other things. I also spent
2 time preparing this declaration to support Plaintiffs' Motion for Approval of Representative Action
3 Settlement.

4 15. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
5 rights of other employees who suffered from the same unfair wage practices. I felt that current
6 employees might not want to share their experiences with Defendants since they feared losing their
7 jobs. This is certainly understandable as I, too, have to provide for myself and others.

8 16. By bringing this lawsuit, I have put the interests of the other similarly aggrieved
9 employees ahead of my own.

10 17. I understood that I could possibly earn a small enhancement if this case is resolved
11 favorably. I also knew that I could face retaliation from Defendants and backlash from former
12 coworkers who are loyal to Defendants.

13 18. I have also had to provide a general release of claims and a waiver of rights under
14 California Civil Code Section 1542 to Defendants as part of the settlement. My understanding, in
15 addition, is that if I brought this case individually, I may have earned more compensation
16 individually and on a much quicker timeline than the timeline to resolve this Action.

17 19. My goal in bringing this lawsuit was to obtain a recovery on behalf of the similarly
18 aggrieved employees, and, even more importantly, to put an end to what I believe are illegal
19 practices on the part of Defendants. I believe I have achieved both through this lawsuit and
20 settlement.

21 20. I understand the obligations of adequately representing the non-exempt, hourly paid
22 employees of the Defendants.

23 21. I understand the substantial burden I will have to undertake in order to represent the
24 non-exempt, hourly paid employees of the Defendants.

25 I declare under penalty of perjury under the laws of the State of California that the foregoing
26 is true and correct this 04/06/2026, at Los Angeles, California.

27 Jaime Zamora Fidel

28 JAIME ZAMORA FIDEL