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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; VAHI, 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 JESSY
VARGAS IN SUPPORT OF PLAINTIFFS'
MOTION FOR APPROVAL OF
REPRESENTATIVE SETTLEMENT**

1 I, JESSY VARGAS, declare as follows:

- 2 1. I am over the age of eighteen and a party to this action. I have personal knowledge of the
3 facts set forth herein, and if called as a witness, I could and would competently testify
4 thereto.
- 5 2. I am the named representative plaintiff in this action brought pursuant to the Private
6 Attorneys General Act of 2004 ("PAGA"), California Labor Code section 2698, et seq., on
7 behalf of myself, the State of California, and other current and former aggrieved employees
8 of Defendants.
- 9 3. I was employed by Defendants from approximately September 2019 through March 2022 in
10 California as a non-exempt employee. During my employment, I was subject to Defendants'
11 policies and practices that I believe violated California wage and hour laws.
- 12 4. Based on my experience, Defendants failed to properly provide legally compliant meal and
13 rest periods, failed to pay all wages owed (including minimum wages and overtime), failed
14 to reimburse business expenses, and failed to provide accurate wage statements. I also
15 experienced off-the-clock work and other practices that I understood were unlawful.
- 16 5. I brought this case not only on my own behalf, but also on behalf of other aggrieved
17 employees who were subjected to the same or similar unlawful practices. I understood that
18 this action was intended to enforce California labor laws and recover civil penalties on behalf
19 of the State of California and affected employees.
- 20 6. From the outset, I understood that serving as a representative plaintiff carried
21 responsibilities. I understood that I was acting as a proxy for the State of California and other
22 employees, and that I was required to act in their best interests, even where doing so might
23 not maximize my individual recovery.
- 24 7. I actively participated in this litigation. My involvement included, but was not limited to:
25 Communicating with my attorneys regarding the facts of my employment and Defendants'
26 practices; providing documents and information to support the claims in this case; Assisting
27 counsel in understanding workplace practices and identifying violations; Reviewing
28 pleadings and case developments; Staying informed about the status of the case and

- 1 participating in discussions regarding strategy and resolution.
- 2 8. I devoted approximately 23 hours to assisting with this case.
- 3 9. I understood that by stepping forward and allowing my name to be used in this lawsuit, I
- 4 was taking on potential risks, including reputational harm, potential difficulty obtaining
- 5 future employment, and the stress associated with litigation.
- 6 10. I also understood that this case could take years to resolve and that there was no guarantee
- 7 of recovery. Despite these risks, I chose to proceed in order to help enforce California labor
- 8 laws and recover penalties for other employees who may not have had the ability or resources
- 9 to pursue claims on their own.
- 10 11. Throughout this case, I remained committed to achieving a fair and reasonable outcome for
- 11 all aggrieved employees. I evaluated the proposed settlement with that goal in mind.
- 12 12. I believe the proposed PAGA settlement is fair, reasonable, and adequate in light of the risks
- 13 of continued litigation, including the uncertainty of prevailing on the merits, potential
- 14 defenses, and the time and expense required to proceed further.
- 15 13. I support the requested service award because of the time, effort, and risks I undertook in
- 16 representing the interests of other employees and the State of California.
- 17 14. I respectfully request that the Court approve the PAGA settlement and grant the requested
- 18 service award.

19 I declare under penalty of perjury under the laws of the State of California that the foregoing is true

20 and correct.

21 Executed on 4/14/2026, 2026, at downey, California.

22 Jessy Vargas

23 Jessy Vargas (Apr 14, 2026 18:37:57 PDT)

24 Jessy Vargas

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2026.4.7 Plaintiff Jessie Vargas Declaration

Final Audit Report

2026-04-15

Created:	2026-04-14
By:	Theresa Dobrash (theresa@seligsonlaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAYuLTBmJAoOkmLrdrTXkbj0fsawVNjCRB

"2026.4.7 Plaintiff Jessie Vargas Declaration" History

-  Document created by Theresa Dobrash (theresa@seligsonlaw.com)
2026-04-14 - 10:17:35 PM GMT
-  Document emailed to Jessie Vargas (jvrgseft80@gmail.com) for signature
2026-04-14 - 10:17:39 PM GMT
-  Email viewed by Jessie Vargas (jvrgseft80@gmail.com)
2026-04-15 - 1:36:58 AM GMT
-  Document e-signed by Jessie Vargas (jvrgseft80@gmail.com)
Signature Date: 2026-04-15 - 1:37:57 AM GMT - Time Source: server
-  Agreement completed.
2026-04-15 - 1:37:57 AM GMT