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Attorneys for Plaintiffs
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

WILLIAM MORENO, LIZBETH GONZALEZ
 VELAZQUEZ, SARAH SANDOVAL,
 MUSTAFA ALKARKHI, JACOB TERRY, and
 RALPH HERNANDEZ, individually, and on
 behalf of all others similarly situated,

Plaintiffs,

v.

ABC PHONES OF NORTH CAROLINA, INC.
 DBA VICTRA, a North Carolina corporation;
 and DOES 1 through 10, inclusive,

Defendants.

Case No.: 23STCV31717
 Related Case No.: 24STCV09415
 Related Case No.: 24STCV12066

*[Assigned for All Purposes to the Hon. Elihu
 M. Berle, Dept. 6]*

**DECLARATION OF WILLIAM
 MORENO IN SUPPORT OF
 PLAINTIFFS' MOTION FOR
 PRELIMINARY APPROVAL OF CLASS
 ACTION AND PAGA SETTLEMENT**

Preliminary Approval Hearing:

Date: April 22, 2026
 Time: 9:00 a.m.
 Dept: 6

Action Filed: December 28, 2023

DECLARATION OF WILLIAM MORENO

I, William Moreno, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of the Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Defendant ABC Phones of North Carolina, Inc. DBA Victra (hereinafter “ABC Phones”) as an hourly paid non-exempt employee from approximately December 2022 to approximately May 2023.

3. Based on my experience and knowledge of ABC Phones’ wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on behalf of myself as well as other hourly paid non-exempt employees of ABC Phones.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to those of other hourly-paid non-exempt employees of ABC Phones. I believe we were all subject to the same employment policies and practices while working for ABC Phones.

5. I do not have any conflicts with other hourly paid non-exempt employees of ABC Phones that would interfere with my ability to represent them. I believe I will adequately represent the other hourly paid non-exempt employees at ABC Phones.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly paid non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by ABC Phones’ company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by ABC Phones.

7. I have always kept the best interests of the other hourly paid non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly paid non-exempt employees by initiating this lawsuit, searching for and providing

documents to my attorneys, providing information to my attorneys, keeping in regular contact with my attorneys regarding the status of the case, meeting with my attorneys regarding the claims, making myself available the day of mediation in case questions or issues arose during the mediation, and reviewing the settlement agreement to make sure it was fair.

8. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

9. I do not have any actual or potential conflicts of interest with Class Members or the proposed Settlement Administrator, Phoenix Settlement Administrators.

10. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by this Settlement.

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

Executed on 2/27/2026 at El Monte, California.
(City name)

Signed by:



William Moreno