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Attorneys for Defendants
DPEP, INC.; PEDDER AUTO MANAGEMENT LLC; PEDDER
AUTOMOTIVE, LLC; and PEDDER NISSAN, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE (HISTORIC COURTHOUSE)

THERESA MADRIGAL, on behalf of
herself and all others similarly situated, and
the general public,

Plaintiff,

v.

DPEP, INC., a California corporation;
PEDDER AUTO MANAGEMENT LLC, a
California corporation; PEDDER
AUTOMOTIVE, LLC, a California
corporation; PEDDER NISSAN, LLC, a
California corporation; LAKE ELSINORE
CHRYSLER DODGE JEEP RAM, LLC, a
20 business entity of unknown form; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO. CVRI2400722

Assigned For All Purposes To:

**Judge: Harold Hopp
Dept.: 1**

**DECLARATION OF MARGARET BYRNE
IKEDA, ESQ. RE: MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENT**

Date of Filing: February 6, 2024
Trial Date: None Set

DECLARATION OF MARGARET BYRNE IKEDA, ESQ.

I, MARGARET BYRNE IKEDA, ESQ., hereby declare:

1. I am an attorney, duly licensed to practice law before all courts of the State of California. I am Of Counsel at Berger Treglia, PLC, counsel of record for Defendants DPEP, INC.; PEDDER AUTO MANAGEMENT LLC; PEDDER AUTOMOTIVE, LLC; and PEDDER NISSAN, LLC.

1 2. I have personal knowledge of all matters contained in this declaration and, if
2 called upon to do so, could and would competently testify as follows.

3 3. Pursuant to this Court's Class Action Case Management Order #1 filed February
4 26, 2024 section G.3.b., I am aware of a previously settled class, representative or other
5 collective action in any other court or in this or any other jurisdiction that asserts claims similar
6 to those asserted in this action on behalf of a class or group of individuals some or all of whom
7 would also be members of the class defined in this action.

8 4. *Clark v. Pedder Nissan, LLC*, Riverside County Superior Court, Case No.
9 CVR12303231 is a class action and PAGA matter. The Motion for Final Approval of Class
10 Action Settlement was approved on August 12, 2025. This class action matter involved claims
11 of wage and hour violations and concerned only Defendant Pedder Nissan, LLC. This class
12 action involved some of the same individuals alleged in the present matter. As such, in
13 negotiating settlement those individuals were excluded from the final settlement calculations.

14 5. There is no other matter that I am aware of that asserts similar claims to those
15 asserted in this action.

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

18 Executed on March 23, 2026, in the City of Mission Viejo, California.

19
20 
21 _____
Margaret Byrne Ikeda