

O'HAGAN MEYER LLP

KATHERINE C. DEN BLEYKER (SBN: 257187)

Email: kdenbleyker@ohaganmeyer.com

WILLIAM B. RICHARDS, JR. (SBN: 298552)

Email: wrichards@ohaganmeyer.com

KYLE W. THOMPSON (SBN: 343571)

Email: kthompson@ohaganmeyer.com

550 S. Hope Street, Suite 2400

Los Angeles, California 90071

Telephone: 213.647.0005

Facsimile: 213.647.1799

Attorneys for Defendant AAA Oil, Inc. dba California Fuels and Lubricants

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

JOHN MARGARITIS JR, individually, and
on behalf of all others similarly situated,

Plaintiff,

vs.

AAA OIL, INC. DBA CALIFORNIA
FUELS AND LUBRICANTS, a California
corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case Nos.:

30-2024-01383304-CU-OE-CXC (lead);

30-2024-01416794-CU-OE-CXC

*[Assigned for all purposes to: Hon. Randall J.
Sherman, Dept. CX103]*

**DECLARATION OF WILLIAM B.
RICHARDS, JR.**

1 I, William B. Richards, Jr., declare as follows:

2 1. I am an attorney duly admitted to practice in the State of California, and an attorney
3 with O'Hagan Meyer LLP, counsel of record for Defendant AAA Oil, Inc. dba California Fuels
4 and Lubricants ("Defendant") in the above-entitled Actions. The facts set forth herein are of my
5 own personal knowledge, and if sworn I could and would competently testify thereto.

6 2. On February 29, 2024, Plaintiff John Margaritis, Jr ("Plaintiff") filed a putative
7 wage and hour class action against Defendant in Orange County Superior Court, Case No. 30-
8 2024-01383304-CU-OE-CXC (the "Class Action"). On August 2, 2024, Plaintiff filed a separate
9 PAGA representative action against Defendant in Orange County Superior Court, Case No. 30-
10 2024-01416794-CU-OE-CXC (the "PAGA Action"). On November 15, 2024, the Class Action
11 and PAGA Action (collectively, the "Actions") were consolidated.

12 3. On October 18, 2024, Plaintiff and Defendant (collectively, the "Parties")
13 participated in a global mediation with neutral Lisa Klerman, Esq., and reached a tentative Class
14 Action and PAGA settlement thereat. The Parties prepared and finalized a long form Class Action
15 and PAGA Settlement Agreement (the "Agreement"), subject to Court approval.

16 4. On December 3, 2024, I executed the Agreement on behalf of Defense Counsel.

17 5. After making reasonable inquiry, I have not become aware since executing the
18 Agreement of any other class, representative, or other collective action in any court that asserts
19 claims similar to those asserted in these Actions.

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct and that this declaration was executed on December 16, 2025 in the
22 County of San Diego, California.

23

24

25

26

27

28


William B. Richards, Jr.