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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

JONATHAN QUENGA, as an individual, and on
behalf of all others similarly situated,

Plaintiff,

v.

SCORPION SERVICES, INC., a California
corporation; and DOES 1 through 100, inclusive,

Defendant.

Case No.: CIVSB2417682

*[Assigned for all purposes to the Hon.
Wilfred J. Schneider, Jr., Dept. S32]*

**DECLARATION OF GREGORY K.
OKADA IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

Date: September 15, 2026
Time: 8:30 a.m.
Dept.: S32

Complaint Filed: May 28, 2024
FAC Filed: August 5, 2024
SAC Filed: November 20,
2025
Trial Date: None Set

1 I, GREGORY K. OKADA, declare as follows:

2 1. I graduated from the University of California College of the Law, San Francisco
3 (formerly known as University of California, Hastings College of the Law) in 2022 with a
4 Concentration in Social Justice Lawyering. I was awarded Best Oral Argument in my Legal
5 Research and Writing II class and was also a member of the Pro Bono Society. I am and always
6 have been a member in good standing of the bar of the State of California and am admitted to
7 practice in this Court. I have personal knowledge of the facts stated in this declaration and could
8 testify competently to them if called upon to do so.

9 2. I began my career as an associate attorney at the Legal Aid Foundation of Los
10 Angeles (“LAFLA”), where I litigated unlawful detainers, defending impoverished tenants from
11 eviction.

12 3. In March 2023, I voluntarily resigned from LAFLA to pursue an opportunity at
13 Abramson Labor Group to enter employment law. After settling over \$1,000,000.00 for my
14 clients with an average settlement value below \$10,000, I chose to join Lavi & Ebrahimian, LLP
15 in order to hone my trial court litigation skills. There, I worked in wage-and-hour class action,
16 including cases against Trader Joe’s, ABM Industries, Apple American Group LLC, and the
17 Penske Corporation.

18 4. I joined Stansbury Brown Law, PC in March of 2026.

19 5. I am intimately aware of the facts of this case, which I had been involved with
20 throughout my tenure at Stansbury Brown Law, PC, and I believe that the proposed Settlement
21 is a reasonable and fair result for the Settlement Class.

22 6. As required by the Court’s order granting preliminary approval, my detailed time
23 records are attached as **Exhibit A**. My time records are comprised of both contemporaneous
24 recording of time records and time entries made after the fact. Due to inadvertence, I occasionally
25 did not input my time contemporaneously, but I have subsequently reviewed the case file and my
26 email communications to approximate the hours worked. Because this reconstruction captures
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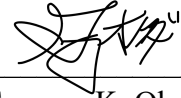
1 only work that left a record in the file or in correspondence, it is a conservative estimate of the
2 time actually spent.

3 7. I have incurred 14.4 hours of billable time on this matter. My contributions
4 included drafting the Final Approval motion, drafting and editing declarations accompanying the
5 Final Approval motion, being available to attend hearings and conferences, and contributing to
6 weekly case reviews where this matter was discussed.

7 8. The following is a non-exhaustive list of wage and hour class actions in which I
8 have played a significant role in prosecuting the litigation and which have received final
9 approval: *Francisca Zenaida Chavez v. Universal Labor Solutions, Inc., et al*, Case No.
10 VCU311659, Superior Court of California, County of Tulare, Honorable Nathan D. Ide presiding
11 (attorney approved as class counsel and granted final approval of settlement in a Class and PAGA
12 representative action on behalf of current and former employees of farming operation growing
13 and harvesting agricultural commodities); *Graciano Macias Rios v. Tri Iest Dairy Management,*
14 *LLC*, Case No. MCV092553, Superior Court of California, County of Madera, Honorable
15 Michael J. Jurkovich presiding (attorney approved as PAGA counsel in a PAGA representative
16 action on behalf of current and former employees of a dairy operation growing and harvesting
17 agricultural commodities for unpaid wages, meal and rest period violations, and derivative
18 violations); *Domingo Munoz v. A&B Labor, Inc., et al*, Case No. 24CU0156, Superior Court of
19 California, County of Kings, Honorable Robert S. Burns presiding (attorney approved as class
20 counsel and granted final approval of settlement in a Class and PAGA representative action on
21 behalf of current and former employees of a farming operation growing and harvesting
22 agricultural commodities); *Leticia Abarca v. Vertical Foods, LLC*, Case No. VCU313255,
23 Superior Court of California, County of Tulare, Honorable David C. Mathias presiding (attorney
24 approved as class counsel and granted final approval of settlement in a Class and PAGA
25 representative action on behalf of current and former employees of a fruit growing and packing
26 company).

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

3 Executed on August 19, 2026, at Los Angeles, California.

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Gregory K. Okada
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EXHIBIT A

CASE	DATE	TIME	ACTIVITY
Quenga v. Scorpion Services, Inc.	08-13-26	2.6	Drafted and revised Proposed Order for Final Approval
Gregory K. Okada Timesheet	08-14-26	6.7	Drafted and revised Final Approval Motion and Declarations
	08-17-26	4.1	Drafted and revised Final Approval Motion and Declarations
	08-21-26	1.0	Reviewed final approval motion.
	TOTAL	14.4	Hourly Fees = \$508 (Laffey) * 14.4 = \$7,315.20