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Attorneys for Plaintiff

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

ROGELIO VILLASENOR, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

IMIA, LLC, a Florida limited liability company;
and DOES 1 through 100,

Defendants.

Case No. 37-2024-00023535-CU-OE-CTL

*[Assigned for all purposes to the Hon.
Carolyn Caietti]*

**DECLARATION OF JOEL M.
GORDON IN SUPPORT OF
PLAINTIFF'S MOTION FOR
APPROVAL OF SETTLEMENT OF
CLAIMS BROUGHT UNDER THE
PRIVATE ATTORNEYS' GENERAL
ACT AND REASONABLE
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT PAYMENTS**

Date: February 27, 2026
Time: 10:30 a.m.
Dept.: C-70

Complaint filed: May 21, 2024
Trial Date: None Set

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I, JOEL M. GORDON, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Rogelio Villasenor (“Plaintiff”) in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I received a Bachelor of Arts degree from Washington University in St. Louis in 1997, and a Juris Doctor from the University Southern California in 2011. I was admitted to the California State Bar in November 2011. During law school, I externed for the Honorable Gregory W. Alarcon in the Los Angeles Superior Court and for the Federal Trade Commission in Los Angeles, where I assisted in the prosecution of civil fraud actions on behalf of consumers.

3. After graduating from law school, I worked for Kiesel Law, LLP, a plaintiff-side personal injury, mass tort, and consumer class action firm, from April 2013 until April 2016. From April 2016 until February 2020, I worked as an associate at the plaintiff's-side litigation firm, Cotchett Pitre & McCarthy LLP, representing plaintiffs in product liability, consumer and healthcare fraud, mass tort, and personal injury cases. From February 2020 until July 2023, I worked as an associate at the plaintiff's-side employment firm, Marlin & Saltzman LLP, representing employees in class wage-and-hour actions and PAGA actions against employers. Although non-exhaustive, the types of work I performed at these firms included: conducting client intakes; performing pre-filing research and analysis; drafting complaints; attending court hearings; corresponding with opposing counsel; drafting and responding to written discovery; preparing for and taking and defending depositions; analyzing payroll and timekeeping records and employee handbooks; drafting and opposing a variety of motions including motions for summary judgment, motions for remand, demurrers and motions to dismiss, motions to compel, and motions for certification; drafting mediation briefs and attending mediations; drafting long-form settlement agreements; and drafting motions for preliminary and final settlement approval.

4. Since July 2023, I have worked as an associate at my current firm, Haines Law

1 Group, APC. I am currently staffed on approximately forty (40) active wage and hour class actions
2 in which I play a significant role.

3 5. As counsel for Plaintiff, I have been closely involved in all aspects of this
4 litigation, including such tasks as: drafting the complaint, corresponding with opposing counsel;
5 analyzing payroll and timekeeping records and employee handbooks; drafting the mediation brief
6 and attending mediation; drafting the long-form settlement agreement; and drafting the motion
7 for approval. The details of the work completed in this case is set forth in the declaration of Sean
8 M. Blakely, filed concurrently herewith.

9 I declare under penalty of perjury under the laws of the State of California and the United
10 States that the foregoing is true and correct. Executed on January 30, 2026, at El Segundo,
11 California.

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Joel M. Gordon