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on behalf of himself and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

DANIEL ALVAREZ JR., an individual, on
behalf of himself and others similarly
situated,

Plaintiff,

vs.

CULINARY SERVICES OF AMERICA,
INC., a California corporation; FOX
STUDIO LOT LLC, a Delaware limited
liability

Defendants.

Case No.: 24STCV12720

CLASS ACTION

Assigned for All Purposes To:

Hon. Theresa M. Traber

Dept.: 1

**DECLARATION OF DANIEL ALVAREZ
JR IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA SETTLEMENT**

Date: February 04, 2026

Time: 08:30 a.m.

Original Complaint Filed: May 17, 2024

First Amended Complaint Filed: July 24, 2024

Trial Date: None Set

DECLARATION OF DANIEL ALVAREZ JR

I, DANIEL ALVAREZ JR, declare:

1. I am over the age of eighteen and I submit this Declaration in support of the Motion for Preliminary Approval of the Class Action and PAGA Settlement in this matter. I have personal knowledge of the facts herein, and if called as a witness I could and would competently testify to them.

2. I am currently a resident of Los Angeles, California. I worked as a non-exempt, hourly chef and cook placed at multiple of Defendants' facilities and locations in California as a nonexempt employee from approximately June 07, 2022, to the end of May, 2023. I retained the law firm of D.Law, Inc. to represent me in this class action lawsuit against Defendants for the alleged practices and violations as stated in the operative Complaint in this action.

3. I believe that I am similarly situated to all other Class Members who worked for Defendants during the Class Period and who were similarly affected by Defendants' policies and practices regarding Defendants' payment of minimum wages and overtime, meal periods, rest periods, provision of accurate wage statements, final payment of wages to terminated or resigned employees, reimbursement of business expenses, alleged violations of the unfair competition law, and alleged violations under the Private Attorney Generals Act. I believe my claims against Defendants are typical of the other Class Members because I believe the claims asserted in the operative Complaint are also shared by the other Class Members.

4. I understand that I am asking to be approved to serve as a Class Representative for the Settlement Class in this action, which I understand is defined as follows: all non-exempt culinary services workers hired directly by Fox who worked for Fox in California, as well as all non-exempt employees of CSS who provided culinary services to Fox in California, during the Class Period, which is May 17, 2020 to June 16, 2025.

5. I also understand there are approximately 547 similarly situated employees that satisfy the Class definition. I also understand that I am serving as a representative Plaintiff on behalf of other similarly situated aggrieved employees in California in connection with our class action claims and claims under Labor Code §§ 2698 *et seq.*, the Private Attorneys General Act

1 (“PAGA”) for penalties.

2 6. Additionally, I believe that my interests have been and continue to be aligned with
3 all Class Members, and I have been and am willing to continue to pursue the Class Members'
4 claims vigorously on our collective behalf. As a result, I firmly believe that I do not have any
5 interests that are adverse to the interests of the Class Members.

6 7. As a Class Representative, I believe I have maintained the best interests of the Class
7 Members. I have actively participated in this litigation and have been continuously apprised of the
8 progress of the case. I have provided documents and evidence to Class Counsel in support of the
9 class claims, I have provided Class Counsel with information about Defendants and about the
10 industry generally, reviewed documents, identified witnesses. I have also invested significant time
11 and efforts in performing my duties on behalf of the Class, including preparing for settlement
12 negotiations and speaking to witnesses. I have conferred with Class Counsel to discuss every
13 aspect of this case, consulted Class Counsel throughout the litigation, participated in the mediation
14 process, monitored the progress of the litigation with Class Counsel, and reviewed and signed the
15 Settlement Agreement. I devoted numerous hours of my time to all of the above tasks to vigorously
16 represent the interests of the Settlement Class.

17 8. I believe the Settlement obtained on behalf of the Settlement Class is fair and
18 reasonable in view of the facts, claims and the risk of going through further litigation in this case.

19 9. I entered into a separate individual agreement and provided a general release to
20 Defendants in connection with a Right to Sue Letter, and I am also requesting a Representative
21 Enhancement award and service payment from the Class settlement. In my opinion, the requested
22 award of \$5,000.00 is fair and reasonable given the risks I have taken, the tasks I have performed,
23 the time I have invested, and the real benefit which the Class Members will receive from this class
24 action. I view this settlement as fair and reasonable to all Class Members. I believe I have
25 diligently, adequately, and fairly represented the Class Members, and have not placed my interests
26 above any member of the class.

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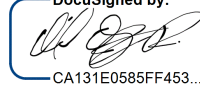
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1 10. I freely chose to champion the interests of the Class and freely accepted the risks
2 of being a Class Representative in a class action that could stigmatize me and, although unknown
3 at this time, may affect my future employability in this industry or any other industry. I also do not
4 believe my decision to accept the Settlement and proposed \$5,000.00 service payment or for my
5 general release compromised my duty to protect the interest of the Class. I also understand the
6 \$5,000.00 service payment is subject to the Court's approval and discretion. Furthermore, although
7 there is no record of such activity, I accepted the real risk of potentially being liable for the
8 opposing parties' costs and attorneys' fees if I were unsuccessful in this lawsuit.

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

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12 Executed this 8th day of December, 2025 at Los Angeles, California.

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DANIEL ALVAREZ JR