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Attorneys for Plaintiff MARIA MARTINEZ, on behalf of herself,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF kern

MARIA MARTINEZ on behalf of
herself, all others similarly situated, and
on behalf of the general public,

Plaintiff,

vs.

TIM HOFER, INC.; ENVIRONMENT
CONTROL CENTRAL CAL, INC.; and
DOES 1-100,

Defendants.

Case No. BCV-24-101779

**DECLARATION OF COLETTE MAHON
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT, CONDITIONAL
CERTIFICATION, APPROVAL OF CLASS
NOTICE, SETTING OF FINAL
APPROVAL HEARING DATE**

Date: May 29, 2026

Time: 8:15 a.m.

1
2 I, Colette Mahon, declare:

3 1. I am a member of the bar of the State of California and an attorney at Lawyers for
4 Employee and Consumer Rights ("LFEER"). I make this declaration of personal, firsthand
5 knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

6 2. LFEER is a law firm dedicated to protecting the rights of employees in the
7 workplace. We are dedicated to the prosecution of wage and hour and wrongful termination
8 matters in state and federal courts, and before various arbitration tribunals.

9 3. My firm and I handle exclusively employee-side employment cases which involve
10 violations of the California Labor Code and Industrial Welfare Commission Wage Orders, such
11 as wage and hour class actions and cases alleging violations of the Private Attorneys General Act
12 of 2004 ("PAGA").

13 4. LFEER is currently involved in litigation in over fifty (50) PAGA and class cases.

14 5. My firm has been granted class certification in both state and federal courts.

15 6. All services were performed by Plaintiff's Counsel on a contingent basis with no
16 guarantee of any payment. Had the litigation continued, the Defendant would undoubtedly have
17 mounted an aggressive defense. A defeat on the merits would have foreclosed the possibility of
18 any remuneration for Plaintiff's Counsel's time and effort.

19
20 I hereby declare under penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct.

22
23 Dated: May 5, 2026

**LAWYERS FOR EMPLOYEE AND
CONSUMER RIGHTS**

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26 Colette Mahon, Esq.
27 Attorneys for Plaintiff MARIA MARTINEZ
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