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Attorneys for Plaintiff VICENTE LOPEZ-GOMEZ,  
on behalf of himself, all others similarly situated,  
and on behalf of the general public.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**IN AND FOR THE COUNTY OF SAN DIEGO**

VICENTE LOPEZ-GOMEZ, on behalf of  
himself, all others similarly situated, and  
on behalf of the general public,

Plaintiffs,

v.

SOUTHLAND PAVING, INC.; and  
DOES 1-100,

Defendants.

Case No. 37-2024-00025020-CU-OE-CTL

[Consolidated with Case No. 24CU001095C]

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

Date: March 20, 2026

Time: 8:30 a.m.

Dept.: C-74

1 I, Colette Mahon, declare:

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

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

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

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

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

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

18 7. I believe that the settlement amount of \$1,250,000 is a reasonable and fair settlement  
19 amount.

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

22  
23 Dated: October 6, 2025

**LAWYERS FOR EMPLOYEE AND  
CONSUMER RIGHTS**

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26 Colette Mahon, Esq.  
27 Attorneys for Plaintiff VICENTE LOPEZ-GOMEZ  
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