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Attorneys for Plaintiff JOSE BARAJAS, 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 LOS ANGELES

JOSE BARAJAS on behalf of himself,
all others similarly situated, and on
behalf of the general public,

Plaintiffs,

v.

BENNETT ENTERPRISES, A
CALIFORNIA LANDSCAPE
CONTRACTING CORPORATION; and
DOES 1-100,

Defendants.

Case No. 24STCV12791

*[Assigned for All Purposes to the
Hon. Carolyn B. Kuhl; Dept. 12]*

**DECLARATION OF COLETTE MAHON
IN SUPPORT OF PLAINTIFF JOSE
BARAJAS' MOTION FOR FINAL
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT**

Date: August 6, 2026
Time: 10:30 a.m.

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

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

21
22 Dated: July 13, 2026

**LAWYERS FOR EMPLOYEE AND
CONSUMER RIGHTS**

23
24 

25 Colette Mahon, Esq.

26 Attorneys for Plaintiff JOSE BARAJAS, on
27 behalf of himself, all others similarly
28 situated, and on behalf of the general public