

**HAINES LAW GROUP, APC**  
Paul K. Haines (SBN 248226)  
phaines@haineslawgroup.com  
Sean M. Blakely (SBN 264384)  
sblakely@haineslawgroup.com  
Liam A. Hall (SBN 358204)  
llhall@haineslawgroup.com  
2155 Campus Drive, Suite 180  
El Segundo, California 90245  
Tel: (424) 292-2350  
Fax: (424) 292-2355

Attorneys for Plaintiff

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

ISABELLE ESCARCEGA, as an individual  
and on behalf of all other aggrieved  
employees,

Plaintiff,

vs.

BRIDGESTONE RETAIL OPERATIONS,  
LLC; a Delaware limited liability company;  
and DOES 1 through 100,

Defendants.

Case No. 24STCV23201

*[Assigned to the Hon. Steve Cochran, Dept.  
306]*

**DECLARATION OF ISABELLE  
ESCARCEGA IN SUPPORT OF  
MOTION FOR APPROVAL OF  
SETTLEMENT OF CLAIMS  
BROUGHT UNDER THE PRIVATE  
ATTORNEYS' GENERAL ACT**

Date: January 8, 2027  
Time: 9:00 a.m.  
Dept.: 306

Complaint Filed: September 9, 2024  
Trial Date: None set

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I, ISABELLE ESCARCEGA, declare as follows:

1. I am an individual over the age of 18 and am the named plaintiff in this matter.

This declaration is submitted in support of approval of the Settlement Agreement (“Settlement”) reached in this case. 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 worked for Defendant Bridgestone Retail Operations, LLC (“Defendant”) from approximately April 2023 through April 30, 2025. I was employed by Defendant as an hourly non-exempt employee in the position of “Sales and Service Specialist.” During my employment with Defendant, I was subject to Defendant’s wage and hour policies and practices at issue in this action.

3. During my employment with Defendant, I recorded my hours worked through Defendant's electronic timeclock. Although I believe the timeclock recorded my hours worked to the minute, it is my understanding Defendant rounded and/or shaved down my hours worked, resulting in me not being paid for all hours I worked. Furthermore, I also often did not always receive a meal period until after the end of my fifth hour of work and my meal periods were often interrupted and less than a full 30 minutes due to work demands. Furthermore, my meal period premiums were incorrectly paid at the base hourly rate of pay despite my receipt of various incentive payments, bonuses and other pay. In addition, I was required to use my cell phone as part of my job, however, Defendant did not always reimburse me for these expenses. As a result of these violations, it is my understanding that Defendant did not issue accurate wage statements or pay me all final wages owed when I stopped working for Defendant.

4. When I filed this lawsuit, I understood that it could benefit my former coworkers, other employees currently employed by Defendant, and the State of California by helping to recover penalties on their behalf as a result of the alleged violations described above. I also understood that I was filing this case as an "aggrieved employee" on behalf of myself and my fellow "aggrieved employees" as well as the State of California.

5. When I filed this lawsuit, I knew there was a risk I could be liable for Defendant's

1 costs if we lost the case. I also understood that filing a lawsuit is a public record. However, I  
2 accepted those risks so that I could help recover penalties on behalf of Defendant's employees  
3 and the State of California. Even though I assumed these risks, to date, I have not suffered any  
4 actual adverse consequences because I filed this lawsuit.

5 6. I have been actively involved in this case since it started in 2024. Without waiving  
6 the attorney-client privilege, I have had many phone conversations and meetings with my  
7 attorneys throughout this case to discuss Defendant's wage and hour policies and practices,  
8 identify potential witnesses, and discuss case strategy. I also gathered and reviewed documents  
9 for use in the lawsuit and reviewed relevant documents with my attorneys and assisted in the  
10 mediation process. I estimate that I have spent approximately 35-40 hours performing these  
11 activities in order to help the case.

12 7. I understand that my attorneys will request that the Court approve a representative  
13 enhancement payment of \$5,000.00 for my efforts on behalf of the aggrieved employees and the  
14 State of California. I believe this amount is reasonable based on the amount of time and effort I  
15 have devoted to this case and the risks I have undertaken as a representative. My support for the  
16 Settlement is not contingent on me receiving this representative enhancement payment.

17 I declare under penalty of perjury under the laws of the State of California and the United  
18 States that the foregoing is true and correct. Executed on July 14, 2026 at West Covina,  
19 California.

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Isabelle Escarcega (Jul 14, 2026 17:49:07 PDT)  
Isabelle Escarcega