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Attorneys for Plaintiff and the aggrieved employees

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

WISSAM SAAB, an individual, on behalf of
the State of California, as a private attorney
general,

PLAINTIFF,

v.

FAB4 LLC DBA VAN NUYS CHRYSLER
DODGE JEEP RAM; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

CASE NO. 24STCV21636

[Case Assigned for All Purposes to Hon.
Alison Mackenzie in Dept. 55]

**DECLARATION OF WISSAM SAAB IN
SUPPORT OF MOTION FOR
REPRESENTATIVE ACTION
SETTLEMENT**

Date: May 7, 2026

Time: 8:30 AM

Dept.: 55

Complaint Filed: August 26, 2024

Trial Date: April 27, 2026

Reservation No.553389334064

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3 **DECLARATION OF WISSAM SAAB**

4 I, Wissam Saab, state and declare as follows:

5 1. I am a competent adult, over the age of eighteen, and a named Plaintiff in the above-
6 captioned matter. The following is based upon my personal knowledge, and if called as a witness,
7 I could and would testify competently thereto.

8 2. I am a former employee of Defendant FAB4 LLC DBA VAN NUYS CHRYSLER
9 DODGE JEEP RAM (“Defendant”) as a sales representative.

10 3. I brought this lawsuit, on behalf of myself and all other aggrieved employees,
11 against Defendant because I believe that Defendant did not pay all wages/overtime, failed to
12 provide compliant meal/rest periods, failed to reimburse business-related expenses, provide
13 accurate itemized wage statements, and failed to pay all wages due at the time of
14 resignation/termination to me and other employees.

15 4. I understand that I am representing other employees and I believe that I am able to
16 represent them well.

17 5. I first researched experienced attorneys who are very experienced with these types
18 of lawsuits. Once retained, I compiled relevant documents from my employment to assist my
19 attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims
20 in this lawsuit. The lawsuit was filed on August 26, 2024.

21 6. Throughout the litigation, I have provided my attorneys with helpful information
22 for this lawsuit and for the Settlement as needed. Additional work in connection with this matter
23 includes providing information to my attorneys regarding my employment with Defendant, staying
24 in regular contact with my attorneys to discuss the status of the case, responding promptly to my
25 attorneys’ various communications regarding this matter, making myself available for a full-day
26 mediation on October 31, 2025; and reviewing and analyzing the settlement agreement and
27 settlement papers to ensure the settlement was fair and reasonable and in the best interests of the
28 aggrieved employees.

1 7. Although I did not keep contemporaneous time records, I estimate the total time
2 spent in connection with this matter is approximately 10-15 hours.

3 8. I have worked to actively represent the other aggrieved employees and their
4 interests.

5 9. I have always kept the aggrieved employees interests at heart in this litigation.

6 10. I am prepared to continue assisting with this litigation and am committed to
7 achieving the best possible results for the aggrieved employees.

8 11. I believe that the settlement obtained on behalf of the aggrieved employees is fair
9 and reasonable in light of the issues involved in this case. As mentioned above, I reviewed and
10 discussed the Settlement Agreement with my attorneys and asked them questions about it to ensure
11 that I understood its terms and what it would mean for all of the aggrieved employees.

12 12. I believe that I have fairly represented the absent aggrieved employees and request
13 that the Court finally approve this settlement and confirm me as Plaintiff.

14 13. I am not aware of any conflicts of interest that prevent me from being confirmed as
15 named Plaintiff in this Lawsuit. I am not related in any way to my attorneys or to any other member
16 of the firm that is representing me. I have no business dealings or other involvement beyond this
17 lawsuit and this representation. I have not been promised any money or inducement to serve as
18 named Plaintiff in this Lawsuit.

19 14. It is my opinion that the settlement agreement provides for a fair and adequate
20 enhancement for me as a named Plaintiff, in the amount of \$5,000.00. I believe that this is fair and
21 reasonable in light of all of the work that I have performed in my role as Plaintiff. As named
22 Plaintiff, I have actively participated in all stages of the litigation, as detailed above, and have
23 always maintained the best interests of the aggrieved employees while performing my named
24 Plaintiff duties.

25 15. It is also my opinion that the Enhancement Payment is fair, reasonable, and
26 adequate because, in addition to the many hours spent participating in the prosecution of this case,
27 I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we were
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1 unsuccessful in this Lawsuit. Likewise, I risk the potential stigma of being an aggrieved employee
2 in a representative action labor dispute, which may affect my future employability.

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

5 Executed this 6 day of April, 2026 at Valencia, California.
6 (City)

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9 Wissam Saab
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 10, 2026, I served all interested parties in this action the following documents described as: **DECLARATION OF WISSAM SAAB IN SUPPORT OF MOTION FOR REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

CALLAHAN THOMPSON SHERMAN & CAUDILL LLP

Robert W. Thompson

RThompson@ctsclaw.com

Jack T. Ritchie

jritchie@ctsclaw.com

Tina Hopper

thopper@ctslaw.co

2601 Main Street, Suite 800

Irvine, CA 92614

Attorneys for Defendant

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 10, 2026, at West Hollywood, California.



Taylor Gregg