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Attorneys for Plaintiffs JAVIER MARIN and MARIA ELENA PACE and the Class
(Additional counsel on following page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN

ANGELICA PEPPER, JAVIER MARIN,
MARIA ELENA PACE, MATTHEW
SHACHNO, and IVAN MARTINEZ,
individually, and on behalf of all others
similarly situated,

Plaintiffs,

v.

RIDGECREST SHS PAYROLL, LLC, a
California limited liability company;
DRIFTWOOD HOSPITALITY
MANAGEMENT II, LLC, a Delaware limited
liability company; 8757 MV PAYROLL,
LLC, a California limited liability company;
and DOES 1 through 10, inclusive,

Defendants.

Case No.: BCV-23-103603

*Assigned for All Purposes to Honorable
Bernard C. Jr. Barmann in Division H*

**DECLARATION OF EDWARD W. CHOI
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

ADDITIONAL COUNSEL FOR PLAINTIFF

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Attorneys for Plaintiffs MATTHEW SHACHNO and IVAN MARTINEZ and the Class

1 I, Edward W. Choi, declare as follows:

2 1. I am an individual over the age of 18. I am one of the attorneys of record for
3 Plaintiffs ANGELICA PEPPER, JAVIER MARIN, MARIA ELENA PACE, MATTHEW
4 SHACHNO, and IVAN MARTINEZ (hereinafter referred to as “Plaintiffs”). I have personal
5 knowledge of the facts set forth below and if called to testify I could and would do so
6 competently.

7 2. Based on their own independent investigations and evaluations, the Parties and
8 their respective counsel are of the opinion that settlement for the consideration and on the terms
9 set forth in the Class Action and PAGA Settlement Agreement (“Agreement”) are fair,
10 reasonable, and adequate and is in the best interests of the Class and Defendants in light of all
11 known facts and circumstances and the expenses and risks inherent in litigation.

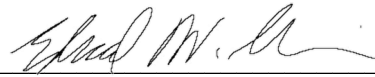
12 **ATTORNEY EXPERIENCE**

13 3. I am one of the primary attorneys on this matter. My qualifications are as
14 follows: I received my *Juris Doctorate* degree from UCLA Law School in 2000. Upon
15 graduation, I joined the law firm of Lee & Associates in Los Angeles, California as an associate.
16 I started my own practice in October 2004.

17 4. During the course of my practice, I have primarily represented consumers and
18 obtained millions of dollars in recovery for my clients. I have handled numerous wage and hour
19 cases during my career. I have been certified as class counsel and granted final approval in
20 *Choi, et al. v. Midway International Inc., et al.* LASC Case No. BC394495; *Lee v. The Men’s*
21 *Wearhouse, Inc., et al.* Alameda Superior Court Case No. RG09461973; *Garcia, et al. v. RGIS,*
22 *LLC, et al.* LASC Case No. BC 425624; *Choi v. Mazda, et al.* LASC Case No. BC 391638;
23 *Cabrera v. Frazee, et al.* LASC Case No. BC 440309; *Vo, et al. v. The Party Staff, et al.* OCSC
24 Case No. 30-2011-00444836-CU-OE-CXC; *Oh, et al. v. Best Coach Technologies, Inc., et al.*
25 LASC Case No. BC 462848; *Rawley v. Freedom Mortgage, Inc.* Orange County Superior Court
26 Case No. 30-2014-00724164-CU-OE-CXC; *Mendez v. Stevenson Restaurant, Inc.* LASC Case
27 No. BC536766; *Castro v. Continental Airlines*, USDC Central District Case No. 2:14-CV-
28 00169-SVW-AGR; *Barreras v. Michaels Stores, Inc.* USDC – Northern District Case No. C12-

1 04474 PJH, *Dynabursky v. AlliedBarton Security Services, LP, et al.*, SACV 12-02210 JST
2 (RNBx), *Brown v. CVS Caremark, et al.* United States District Court, Central District, Case
3 No.: 2:15-cv-07631-JFW-PJW; *Wu v. General Nutrition* Orange County Superior Court Case
4 No. 30-2012-00593759-CU-OE-CXC; and *Smeir v. Credit Union of Southern California, Inc.*
5 San Bernardino Superior Court Case No. CIVDS1700559.

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7 I declare under penalty of perjury that the foregoing is true and correct. Executed this on
8 the day of April 22, 2026, at Los Angeles, California.

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12 Edward W. Choi, Esq.
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