

John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
Eugene Zinovyev (SBN 267245)
ezinovyev@wilshirelawfirm.com
John Brown (SBN 233605)
jbrown@wilshirelawfirm.com
Gabriella Solé (SBN 346164)
gabriella.sole@wilshirelawfirm.com
Courtney M. Miller (SBN 327850)
courtney.miller@wilshirelawfirm.com
Lisa B. Iturriaga (SBN 339678)
lisa.iturriaga@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

BRANDON LEE SMITH, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

SAN DIEGO COUNTRY ESTATES
ASSOCIATION; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 37-2024-00025729-CU-OE-CTL

*[Assigned for All Purposes to the Hon. Evan
P. Kirvin, Dept. C-69]*

**DECLARATION OF PLAINTIFF
BRANDON LEE SMITH IN SUPPORT
OF PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Action Filed: May 31, 2024

DECLARATION OF BRANDON LEE SMITH

I, Brandon Lee Smith, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Defendant San Diego Country Estates Associates (“SDCEA”) as an hourly-paid non-exempt employee from approximately August 2023 to approximately November 2023.

3. Based on my experience and knowledge of SDCEA’s wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid non-exempt employees of SDCEA.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to those of other hourly-paid non-exempt employees of SDCEA. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid non-exempt employees at SDCEA.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by SDCEA’s company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by SDCEA.

7. I have always kept the best interests of the other hourly-paid non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid non-exempt employees by initiating this lawsuit, providing documents and

1 information to my attorneys, keeping in regular contact with my attorneys regarding the status of
2 the case, and reviewing the settlement agreement to make sure it was fair.

3 8. I will continue to actively participate in this lawsuit as necessary and will continue
4 to make myself available to assist in this case moving forward as needed.

5 9. I have no actual or potential conflicts of interest with Class Members or the
6 proposed Administrator, ILYM Group Inc.

7 10. I am not aware of any other pending matter or action asserting claims that will be
8 extinguished or adversely affected by this Settlement.

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

11 Executed on 10/13/2025, at Ramona, California.

12 DocuSigned by:
13 *Brandon Lee Smith*
14 65A093DEFEFB4CE...

15
16
17
18
19
20
21
22
23
24
25
26
27
28
Brandon Lee Smith