

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Max W. Gavron (State Bar No. 291697)
Kwanporn “Mai” Tulyathan (State Bar No. 316704)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com
kagnew@diversitylaw.com
mgavron@diversitylaw.com
ktulyathan@diversitylaw.com

Attorneys for Plaintiffs and the Class

(Additional Counsel on Following Page)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

JALON STANLEY, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

NORTH STAR EMERGENCY
SERVICES INC.; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 24CV082930

**DECLARATION OF JOSHUA FALAKASSA
IN SUPPORT OF PLAINTIFFS’ MOTION
FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 19, 2026

Time: 2:30 P.M.

Dept.: 21

Reservation No.: 924738831245

Action Filed: July 10, 2024

Trial Date: None Set

1 William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com

2 **Polaris Law Group**

3 501 San Benito Street, Suite 200

4 Hollister, CA 95023

(831) 531-4214

(831) 634-0333 facsimile

5 **BOKHOUR LAW GROUP, P.C.**

6 Mehrdad Bokhour, Esq., CA Bar No. 285256

7 *mehrdad@bokhourlaw.com*

8 1901 Avenue of the Stars, Suite 520

Los Angeles, California 90067

Tel: (310) 975-1493; Fax: (310) 675-0861

9 **FALAKASSA LAW, P.C.**

10 Joshua S. Falakassa, CA Bar No. 295045

11 *josh@falakassalaw.com*

12 1901 Avenue of the Stars, Suite 520

Los Angeles, California 90067

Tel: (818) 456-6168; Fax: (888) 505-0868

13 Attorneys for Plaintiffs and the Putative Class

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I, Joshua Falakassa, say and declare, as follows:

1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California, and I am the principal of Falakassa Law, P.C., and I serve as attorney of record on behalf of Plaintiffs and the Putative Class.

2. I am familiar with the file in this matter, and if called as a witness, I could and would competently testify to the following facts of my own personal knowledge.

3. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement.

4. I have been a member, in good standing, of the State Bar of California since 2013. I am admitted to practice before all California state courts and the United States District Court of California for the Northern, Central District, and Eastern Districts. I have litigated class action and Private Attorney General Act (“PAGA”) representative action cases in various courts across California.

5. I am a 2013 graduate from the University of California, Berkeley, School of Law (“Boalt Hall”), where I completed courses in Labor Law, Employment Discrimination, and Labor/Employment arbitration. During law school, I served as a summer associate at Sanford, Wittels, and Heisler LLP, a boutique plaintiffs’ side employment law firm focusing on FMLA wage and hour class action litigation and other public interest lawsuits. As a second-year law student, I served as a summer associate at the San Francisco office of Littler Mendelson, P.C. I aided employers in defending wage and hour class action lawsuits filed under California and federal law.

6. From August 2018 to January 2019, I was an associate at the Paul Haines Law Group, where I actively managed a caseload of more than 50 class and representative PAGA action lawsuits in California and federal courts.

7. Thereafter, as principal of Falakassa Law, P.C., I have handled nearly 100 employee vs. employer litigation matters, including more than 40 class action wage/hour and PAGA cases. Over the last few years, my practice has almost entirely consisted of representing employees, the majority of which has included class action and representative action wage and hour matters. In total, I have

1 handled upwards of 90 class action and representative action wage/hour cases.

2 8. I was selected as a “Super Lawyer Rising Star” in Employment Litigation during the
3 years 2017 through 2024, a distinction that is reserved for the top 2.5 % of lawyers in the practice
4 area. I have also been recognized by Topverdicts.com for achieving Top 20 and Top 50 wage and
5 hour class and/or PAGA action settlements in California in 2021-2024.

6 9. My office has undertaken substantial efforts in investigating and prosecuting the
7 matter. These efforts have directly contributed to the creation of a significant settlement fund for
8 the benefit of the Class. Throughout the litigation, we have diligently advanced the claims,
9 including engaging in substantive and informed negotiations with Defense counsel. These
10 exchanges enabled both sides to assess the strengths and weaknesses of their respective positions,
11 ultimately facilitating a fair and reasonable resolution.

12 10. These efforts have directly contributed to the creation of a significant settlement
13 fund for the benefit of the Class.

14 11. Given the inherent risks of continued litigation, including contested legal and factual
15 issues, Plaintiffs’ counsel believes the proposed Settlement is fair, reasonable, and adequate. The
16 Settlement was the product of arm’s-length negotiations between experienced counsel, facilitated
17 by an experienced mediator, and was reached following an appropriate and thorough exchange of
18 relevant information and documents. Accordingly, Plaintiffs respectfully request that the Court
19 grant preliminary approval of the Settlement, conditionally certify the proposed Class under Code
20 of Civil Procedure § 382 for settlement purposes, approve the proposed Class Notice, appoint
21 Plaintiffs’ counsel as Class Counsel, appoint the Settlement Administrator, and schedule a hearing
22 for final approval of the Settlement.

23 12. The Settlement is the result of extensive, arm’s-length negotiations between the
24 Parties, facilitated by an experienced mediator with expertise in wage-and-hour class actions. While
25 the negotiations were conducted cordially and professionally, they were also adversarial and entirely
26 non-collusive. The resolution achieved is the product of significant time, effort, and advocacy by both
27 Parties and their counsel.

28 13. Although Plaintiffs and Class Counsel were confident in the strength of their claims

1 and believed that class certification could be achieved, they also recognized the inherent risks, costs,
2 and complexity of continued litigation. These risks included the potential for adverse rulings at class
3 certification, summary judgment, trial, or on appeal, which could delay or eliminate recovery for
4 Class Members.

5 14. Moreover, had Defendant prevailed on any of their asserted defenses, Class Members
6 may have received little or no monetary relief. In light of these considerations, Plaintiffs and Class
7 Counsel believe the Settlement represents an excellent result under the circumstances.

8 15. The Settlement provides for fair and proportionate payments to each Settlement Class
9 Member based on the number of Compensable Workweeks worked during the Class Period. As
10 described above, Plaintiffs and their counsel conducted a diligent investigation of the claims and
11 defenses on behalf of the Class to maximize recovery while avoiding the additional expense and delay
12 associated with protracted litigation.

13 16. After carefully evaluating the significant risks of continued litigation and weighing
14 them against the certainty and benefits of the proposed compromise as set forth in the Settlement
15 Agreement, Plaintiffs and their counsel believe the Settlement is fair, reasonable, and in the best
16 interest of the Class.

17 17. My law office brought substantial experience and judgment to bear in negotiating the
18 Settlement. As detailed herein, counsel engaged in comprehensive informal discovery, investigation,
19 sampling, and expert analysis to ensure informed decision-making throughout the process. This
20 included review and evaluation of a significant volume of documents, including Defendant's policies
21 and procedures, personnel files, wage statements, and time records. Counsel also performed extensive
22 analysis and extrapolation of the class-wide data produced by Defendant to assess potential damages
23 and evaluate the strength of the claims.

24 18. Based on my experience litigating wage-and-hour matters, including complex class
25 and PAGA actions, I believe that Class Counsel are all well qualified to evaluate the merits of the
26 class claims and the viability of Defendant's defenses in this action. In our professional judgment,
27 the recovery provided to each Class Member under the Settlement is fair, reasonable, and adequate.
28 Settlement at this stage serves the best interests of the Class by providing meaningful compensation

1 while avoiding the delays and uncertainties of continued litigation, including class certification, trial,
2 and potential appeals.

3 19. Plaintiffs' counsel, as well as Defendant's counsel, fully endorse the terms and
4 conditions of the Settlement as set forth in the above-mentioned Settlement Agreement.

5 20. Of course, the Settlement Amount represents a compromise figure, taking into account
6 the various risks surrounding class certification and the merits of Defendant's asserted defenses.

7 21. For the foregoing reasons, it is respectfully requested that the Court grant preliminary
8 approval of the Settlement as being fair, reasonable, and in the best interests of the Class, as well as
9 preliminarily approve the requested attorneys' fees and costs and Service Award to the Class
10 Representative.

11 22. In compliance with California Rules of Professional Conduct section 1.5.1, Plaintiffs
12 and their counsels entered into a Joint Prosecution Agreement with their counsel of record. The JPA
13 governs the division of responsibilities and attorneys' fees among counsel, and Plaintiffs provided
14 informed written consent after full disclosure.

15 I declare under penalty of perjury under the laws of the state of California that the foregoing
16 is true and correct on this 22nd day of April 2026, in Los Angeles, California.

17 */s/ Joshua Falakassa*
18 By: _____
19 Joshua Falakassa, Esq.
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