

David Mara, Esq. (230498)
dmara@maralawfirm.com
Jill Vecchi, Esq. (299333)
jvecchi@maralawfirm.com
MARA LAW FIRM, PC
2650 Camino Del Rio North, Suite 302
San Diego, California 92108
Telephone: (619) 234-2833
Facsimile: (619) 234-4048

Colette Mahon, Esq. (304743)
cmahon@lfecr.com

LAWYERS FOR EMPLOYEE AND CONSUMER RIGHTS
3500 West Olive Avenue, Third Floor
Burbank, California 91505
Telephone: (323) 486-5101
Facsimile: (323) 306-5571

Attorneys for Plaintiff CASSANOVA TIGER, on behalf of herself,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

CASSANOVA TIGER on behalf of
himself, all others similarly situated, and
on behalf of the general public,

Plaintiffs,

v.

GRAVES 6 INC. dba PREFERRED
PLUMBING & DRAIN; and DOES 1-
100,

Defendants.

Case No. 24CV081513

**DECLARATION OF COLETTE MAHON,
ESQ. IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT, CONDITIONAL
CERTIFICATION, APPROVAL OF CLASS
NOTICE, SETTING OF FINAL
APPROVAL HEARING DATE**

Date: January 13, 2025

Time: 2:30pm

Judge: Hon. Somnath Raj Chatterjee

Dept: 21

1 I, Colette Mahon, declare:

2 1. I am a member of the bar of the State of California and an attorney at Lawyers for
3 Employee and Consumer Rights (“LFECR”). I make this declaration of personal, firsthand
4 knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

5 2. LFECR is a law firm dedicated to protecting the rights of employees in the
6 workplace. We are dedicated to the prosecution of wage and hour and wrongful termination
7 matters in state and federal courts, and before various arbitration tribunals.

8 3. My firm and I handle exclusively employee-side employment cases which involve
9 violations of the California Labor Code and Industrial Welfare Commission Wage Orders, such
10 as wage and hour class actions and cases alleging violations of the Private Attorneys General Act
11 of 2004 (“PAGA”).

12 4. LFECR is currently involved in litigation in over fifty (50) PAGA and class cases.

13 5. My firm has been granted class certification in both state and federal courts.

14 6. Former lead attorney, Sabrina Sanders received her Juris Doctorate in 2003 from
15 Golden Gate University, School of Law. She has been admitted to the State Bar of California
16 since December 2004. Prior to being licensed, she served as a research attorney for the Los
17 Angeles Superior Court. Due to her academic background, which focused on employment law,
18 she was assigned as the research attorney to handle complex employment class action cases
19 throughout Los Angeles County.

20 7. Ms. Sanders served as LFECR’s managing attorney from 2016 through 2025. Since
21 2004, she had been engaged in litigation. She has served as lead counsel on hundreds of
22 employment cases and tried cases in State courts, resulting in verdicts in favor of all her clients.
23 Much of her practice has been dedicated to litigating labor and employment disputes, with the
24 last 10 years exclusively dedicated to representing employees on claims against their employers
25 on a contingency.

1 8. Former lead attorney on this matter, Peter Horton, graduated from California
2 Western School of Law and was admitted to practice law in California in December 2003. Mr.
3 Horton has practiced in State and Federal courts since being admitted to practice law.

4 9. All services were performed by Plaintiff's Counsel on a contingent basis with no
5 guarantee of any payment. Had the litigation continued, the Defendant would undoubtedly have
6 mounted an aggressive defense. A defeat on the merits would have foreclosed the possibility of
7 any remuneration for Plaintiff's Counsel's time and effort.

8 10. I believe that the settlement amount of \$400,000 is a reasonable and fair settlement
9 amount.

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

12
13 Dated: December 15, 2025

**LAWYERS FOR EMPLOYEE AND
CONSUMER RIGHTS**

14
15 

16 _____
17 Colette Mahon, Esq.
18 Attorneys for Plaintiff CASSANOVA TIGER
19
20
21
22
23
24
25
26
27
28