

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 himself,
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,

Plaintiff,

vs.

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

Defendants.

Case No. 24CV081513

**DECLARATION OF COLETTE MAHON
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS AND
PAGA ACTION SETTLEMENT**

Reservation ID: 783227536287

Date: July 14, 2026

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

18
19 I hereby declare under penalty of perjury under the laws of the State of California that the foregoing
20 is true and correct.

21
22 Dated: June 16, 2026

**LAWYERS FOR EMPLOYEE AND
CONSUMER RIGHTS**

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Colette Mahon, Esq.
26 Attorneys for Plaintiff CASSANOVA TIGER
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