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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **IN AND FOR THE COUNTY OF ALAMEDA**

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

16 Plaintiffs,

17 v.

18 GRAVES 6 INC. DBA PREFERRED
19 PLUMBING & DRAIN; AND DOES 1-
20 100,

21 Defendants.

Case No. 24CV081513

**DECLARATION OF PLAINTIFF
CASSANOVA TIGER IN SUPPORT OF
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, Cassanova Tiger, hereby declare under penalty of perjury as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could
3 and would competently testify thereto, except as to those matters stated upon information
4 and belief, and as to those matters, I believe them to be true.
- 5 2. I am the named Plaintiff and Class Representative in the above-captioned lawsuit, and I
6 submit this declaration in support of settlement approval.
- 7 3. I worked for Defendant Graves 6 Inc., dba Preferred Plumbing & Drain ("Preferred") as a
8 non-exempt employee in California from around September 21, 2024 to about January 8,
9 2024.
- 10 4. Since becoming a class representative, I have diligently worked on this case. I always
11 answered phone calls from my attorneys or called them back promptly when they called.
- 12 5. On many occasions, I spoke with my attorneys for case related purposes. I assisted my
13 attorneys in investigating the case and reached out to them on numerous occasions to
14 provide them with information about my time at Preferred that I thought might help the
15 case.
- 16 6. I also looked for any paperwork or documents, like my paystubs, from my employment
17 with Preferred to provide to my attorneys.
- 18 7. I was aware that, at some point in this case, I would have my deposition taken. I knew that
19 the deposition could take a full day and that I may have to meet with my attorneys prior
20 to my deposition. I was at all times ready and willing to sit for my deposition.
- 21 8. Although I did not attend either of the two mediations in person, I was available on the
22 phone for all the negotiations, which I was kept apprised of and assisted in. I was also
23 apprised of the settlement discussions that occurred after the mediations. I gave my
24 consent to settle with Preferred for the settlement amount of \$400,000. I completely and
25 carefully reviewed the settlement agreement. I then signed the settlement agreement.
- 26 9. I estimate that I spent approximately 30 hours or more on tasks like speaking with my
27 attorneys, searching for documents, and reviewing the settlement documents.

1 10. In light of the work I performed in this case and the duties associated with being a class
2 representative in a case of this magnitude, I believe the \$5,000 class representative service
3 payment is reasonable. I understand that this additional payment is not guaranteed and is
4 subject to Court approval.

5 11. I have and will continue to adequately represent all of the interests of the class. With my
6 status as class representative, I will treat the interests of the Class above my interests.

7 12. My claims are typical of the Class Members because I am similarly situated to all current
8 and former non-exempt employees who worked for Preferred in California at any time
9 during the Class Period. Thus, my interests are the same as all members of the proposed
10 Class.

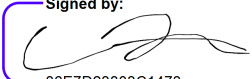
11 13. I recognize that any resolution of this matter must be approved by the Court in terms of
12 whether the settlement is fair and reasonable, and that I am obligated to protect the
13 interests of all of class members for the Class Period.

14 I declare under penalty of perjury under the laws of the State of California that all the
15 foregoing is true and correct.

16 Dated: 6/9/2026

17 By: _____

Signed by:


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Cassanova Tiger