

Tuvia Korobkin, Esq. (SBN 268066)
tuvia@marqueelaw.com
Neil M. Larsen, Esq. (SBN 276490)
neil@marqueelaw.com
Alex Purcell (SBN 347862)
alex@marqueelaw.com
MARQUEE LAW GROUP, A.P.C.
9100 Wilshire Boulevard, Suite 445 East Tower
Beverly Hills, California 90212
Tel: (310) 275-1844
Fax: (310) 275-1801

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

MARLON MONTENEGRO, on behalf of
himself, the State of California, and all
Aggrieved Employees,

Plaintiff,

vs.

TED JONES FORD, INC. dba KEN GRODY
FORD, a California corporation; KEN GODY
REDLANDS LLC dba KEN GRODY FORD
REDLANDS, a California limited liability
company; and DOES 1 through 100, Inclusive,

Defendants.

Case No. CIVSB2433434

REPRESENTATIVE ACTION

*[Assigned for all purposes to the
Hon. Christian Towns, Dept. S-26]*

**DECLARATION OF MARLON
MONTENEGRO IN SUPPORT OF
APPROVAL OF SETTLEMENT OF
CLAIMS BROUGHT UNDER THE
PRIVATE ATTORNEYS GENERAL ACT**

Date: September 23, 2026

Time: 8:30 a.m.

Dept.: S-26

Complaint Filed: November 5, 2024

Trial date: None Set

DECLARATION OF MARLON MONTENEGRO

I, MARLON MONTENEGRO, declare as follows:

1. I am an individual over the age of 18 and am the named plaintiff in this matter against Defendants Ted Jones Ford, Inc. dba Ken Grody Ford and Ken Grody Redlands LLC dba Ken Grody Ford Redlands ("Defendants"). This declaration is submitted in support of approval of the proposed settlement of claims brought under the Private Attorneys General Act ("Settlement") reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I am a former employee of Defendants, where I worked as a non-exempt employee from approximately October 2015 until approximately June 2024.

3. While working for Defendants, I believe that I was not paid all wages owed. While working for Defendants, I also was not provided all of my meal periods, I was not provided all of my rest periods, and I was not reimbursed for the required use of my cell phone. As a result, I understand that I was not provided accurate wage statements and was not paid all wages owed to me at the end of my employment.

4. When I first discussed this case with my attorneys and agreed to move forward with this case, I understood that this lawsuit could benefit other employees by helping to recover civil penalties on their behalf. I knew that filing a lawsuit carries risk, including the risk of being responsible for Defendants' costs if the case were lost. But I accepted this risk because I wanted to vindicate my and other employees' rights. Even though I understood that filing a lawsuit is a public record, I accepted that burden in order to help other employees.

5. Perhaps more importantly, I accepted a big risk that news of this lawsuit could potentially impact my ability to secure other work. I accepted the risk that news of this lawsuit and settlement, which is a public matter, may spread to potential future employers and impact my future job prospects. But I took on this case and the risks that came with it, because I believed that it was the right thing to do and would greatly help other employees.

6. I have been actively involved in this case since I first had discussions with my attorneys at Marquee Law Group about a potential representative action back in August 2024. I

1 have had many discussions with my attorneys throughout this case to discuss Defendants' policies
2 and practices, identify potentially helpful documents and witnesses, and discuss case strategy. I
3 spent significant time searching my own documents, and I also spent time reviewing the
4 Settlement and other documents with my attorneys. I estimate I have spent at least 30-35 hours
5 on this case from the time I first spoke with my attorneys regarding this case until the present.

6 7. As part of the proposed Settlement, I understand that my attorneys will request
7 that the Court approve a service award of \$10,000 for my efforts on behalf of other employees. I
8 believe this amount is reasonable based on the amount of time and effort I have devoted to this
9 case as well as the risks I have undertaken as the named plaintiff.

10 I declare under penalty of perjury under the laws of the state of California that the
11 foregoing is true and correct, and this declaration was executed by me on 04/22/2026.

12
13 
14 Marlon Montenegro (Apr 21, 2026 14:17:46 PDT)
15 Marlon Montenegro
16
17
18
19
20
21
22
23
24
25
26
27
28