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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**
10

11 GENE KELLEY, individually, and on behalf
12 of other members of the general public
similarly situated,

13 Plaintiff,

14 v.

15 CALIFORNIA PROTECTION AND
16 INVESTIGATION SERVICES, INC., a
California corporation; and DOES 1 through
17 10, inclusive,

18 Defendants.
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Case No.: 24STCV31470
Assigned to: Hon. Laura Seigle

**DECLARATION OF GENE KELLEY IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: February 17, 2026
Time: 9:00 a.m.
Dept: 17

Complaint Filed: November 27, 2024
Trial Date: None Set

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1 8. After CPIS terminated my employment, I was not paid for owed premium pay from
2 my tenure at CPIS.

3 9. I have reviewed the operative complaint, remained available to assist during
4 mediation on August 14, 2025, and I have fully cooperated with my attorneys to litigate this case.
5 I am familiar with the issues in this case and understand that I am suing CPIS on behalf of other
6 current and former non-exempt employees employed by CPIS from November 27, 2020 through
7 October 13, 2025. These current and former employees are and were similarly situated to me for
8 minimum wages for all hours worked, overtime pay, premium pay, inaccurate wage statements,
9 and related penalties.

10 10. Additionally, I understand that I am suing CPIS on a representative basis for
11 penalties related to minimum wages for all hours worked, overtime pay, premium pay, and
12 inaccurate wage statements under the Private Attorneys General Act, which allows this action to
13 recover civil penalties on behalf of myself, other aggrieved employees of CPIS, and the State of
14 California.

15 11. My interests as the named plaintiff in this litigation are not adverse to the interests
16 of the other non-exempt employees. My interests are the same as the interests of other non-exempt
17 employees because we were all subject to the same policies and practices, which were company-
18 wide. I have always kept the best interests of the other non-exempt employees in mind while
19 performing my duties as a named plaintiff in this action. I do not have any conflicts with other
20 non-exempt employees that would hinder my ability to act as a class representative. Therefore, I
21 believe I will adequately represent other class members.

22 12. I am not aware of any other pending matter or action asserting claims that will be
23 extinguished or affected by the settlement.

24 13. I have no interest or relationship, financial or otherwise, with ILYM Group, Inc.,
25 the Settlement Administrator.

26 14. I have no financial or other relationship or any involvement in the governance or
27 work of the proposed *cy pres* recipient, Legal Aid at Work.

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15. As part of the settlement, I will be releasing all claims I may have against Defendant, which is broader than the release applicable to other class members. In light of this broader release, the time and effort I have invested in the case, the risks I undertook, and my role in helping secure a settlement, I respectfully request an enhancement payment (“Class Representative Service Payment”) in the amount of \$5,000.00, subject to the Court’s approval.

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

Executed this 12/08/2025, at Los Angeles, California.

Gene Kelley
Gene Kelley (Dec 8, 2025 15:04:46 PST)

Gene Kelley

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