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Attorneys for Plaintiff and the Putative Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

MARCUS TAYLOR, on behalf of himself and all others similarly situated,

Plaintiff,

v.

RODCO REDDING, LP, a California Limited Partnership; and DOES 1-50, inclusive.

Defendant.

CASE NO.: CGC-24-618334

DECLARATION OF JOSHUA FALAKASSA IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

HEARING INFORMATION

Date: December 22, 2026
Time: 9:00 a.m.
Dept.: 304

Date approved by Dept. 304 Clerk

DECLARATION OF JOSHUA FALAKASSA

I, Joshua Falakassa, say and declare as follows:

1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California, and I am the principal of Falakassa Law, P.C., and I serve as attorney of record, along with The Bokhour Law Group, P.C., for Plaintiff Marcus Taylor ("Plaintiff") and the Putative Class.

2. I am familiar with the file in this matter, and if called as a witness, I could and would competently testify to the following facts of my own personal knowledge. I submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

3. I have been a member, in good standing, of the State Bar of California since 2013. I am admitted to practice before all California state courts and the United States District Court of California for the Northern, Central District, and Eastern Districts. I have litigated class action and Private Attorney General Act ("PAGA") representative action cases in various courts across California.

4. I am a 2013 graduate from the University of California, Berkeley, School of Law ("Berkeley Law"), where I completed courses in Labor Law, Employment Discrimination, and Labor/Employment arbitration. During law school, I served as a summer associate at Sanford, Wittels, and Heisler LLP, a boutique plaintiffs' side employment law firm focusing on FMLA wage and hour class action litigation and other public interest lawsuits. As a second-year law student, I served as a summer associate at the San Francisco office of Littler Mendelson, P.C. I aided employers in defending wage and hour class action lawsuits filed under California and federal law.

5. From August 2018 to January 2019, I was an associate at the Paul Haines Law Group, where I actively managed a caseload of more than 50 class and representative PAGA action lawsuits in California and federal courts.

6. Thereafter, as principal of Falakassa Law, P.C., I have handled well over 100 employee vs. employer litigation matters. Over the last few years, my practice has almost entirely consisted of representing employees, the majority of which has included class action and representative action wage and hour matters. In total, I have handled upwards of 90 class action and representative action wage/hour cases.

7. I was selected as a "Super Lawyer Rising Star" in Employment Litigation during the years 2017 through 2026, a distinction that is reserved for the top 2.5 % of lawyers in the practice area. I have also been recognized by Topverdicts.com for achieving Top 1, Top 20 and Top 50 wage and hour class and/or PAGA action settlements in California in 2021-2025.

8. Following contested but productive negotiations, Plaintiff and Rodco Redding, LP entered into the Class Action and PAGA Settlement Agreement ("Agreement"). The Settlement resolves the wage and hour claims asserted in the Action in exchange for Rodco's payment of a nonreversionary Gross Settlement Amount of $325,000, in addition to the employer share of payroll taxes on the Wage Portions of the Individual Class Payments.

9. Subject to Court approval, the Gross Settlement Amount will fund Class Counsel Fees Payment of up to $108,333.33, Class Counsel Litigation Expenses Payment of up to $25,000, Administration Expenses Payment of up to $7,500, a Class Representative Service Payment of up to $10,000, and $20,000 in PAGA Penalties. Of the PAGA Penalties, $13,000 will be paid to the LWDA and $7,000 will be distributed to PAGA Members. The estimated Net Settlement Amount is $154,166.67.

10. Rodco estimates that the Class consists of approximately 1,410 Class Members who worked approximately 54,391 Workweeks during the Class Period. The Net Settlement Amount will be distributed to Participating Class Members based on their respective Workweeks. Based on the estimated Class size, the average Individual Class Payment is approximately $109.34 before applicable withholdings, although actual payments will vary according to each Participating Class Member's Workweeks.

11. The Settlement is non-reversionary and does not require a claim form. Each Participating Class Member will automatically receive an Individual Class Payment. Each PAGA Member will automatically receive an Individual PAGA Payment regardless of whether the PAGA Member requests exclusion from the class portion of the Settlement.

12. In my opinion, the Settlement is fair, reasonable, and adequate and is in the best interests of the Class and PAGA Members. Plaintiff requests that the Court preliminarily approve the Settlement, conditionally certify the Class for settlement purposes, appoint Plaintiff as Class

Representative, appoint Bokhour Law Group, P.C. and Falakassa Law, P.C. as Class Counsel, approve the Class Notice and notice procedures, appoint ILYM Group, Inc. as the Administrator, and schedule the Final Approval Hearing.

13. As further detailed in the accompanying Declaration of Mehrdad Bokhour in Support of Plaintiff's Motion for Preliminary Approval, Plaintiff estimates the risk-adjusted value of the claims at $1,286,692.65, consisting of $275,000 for business expense reimbursement, $406,980 for waiting time penalties, $195,229.80 for meal period claims, $325,382.85 for rest period claims, $64,100 for wage statement claims, and $20,000 for PAGA Penalties.

14. The $325,000 Gross Settlement Amount represents approximately 25% of the total risk-adjusted value of the claims. In my opinion, this is a substantial recovery, especially given the risks, expenses, and delays of continued litigation.

15. The Settlement resulted from serious, informed, adversarial, and arm's length negotiations. Although Plaintiff and Class Counsel believe the claims have merit, they recognize the risks of adverse rulings on certification, summary judgment, trial, damages, and appeal. The Settlement provides immediate and meaningful relief while avoiding those risks.

16. The Settlement allocates Individual Class Payments according to the number of Workweeks worked during the Class Period. This formula reasonably accounts for the relative duration of each Participating Class Member's employment during the Class Period.

17. Class Counsel accepted this Action on a contingency basis and advanced the litigation expenses. Plaintiff will request Class Counsel Fees Payment not exceeding $108,333.33 and Class Counsel Litigation Expenses Payment not exceeding $25,000. The requests will be supported by the evidence submitted with the motion for final approval.

18. Plaintiff executed a fee division agreement providing that any approved Class Counsel Fees Payment will be allocated 50% to Bokhour Law Group, P.C. and 50% to Falakassa Law, P.C.

19. For these reasons, I respectfully request that the Court grant preliminary approval of the Settlement, conditionally certify the Class for settlement purposes, approve the Class Notice and notice procedures, make the requested appointments, and schedule the Final Approval Hearing.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct on this 23rd day of October 2026, in Los Angeles, California.

By: _____
Joshua Falakassa, Esq.