

San Luis Obispo Superior Court

By: 
Tamara Wickstrom, Deputy Clerk

Anthony P. Raimondo (SBN 200387)
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Attorney for Plaintiffs Pablo Torres Santiago, Misael De La Cruz, Roman Nazario Nolasco, Luis Nazario, and Isaac Nazario, individually and on behalf of other individuals employed under similar circumstances and facts.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO**

PABLO TORRES SANTIAGO, individually
and on behalf of other individuals employed
under similar circumstances and facts.

Plaintiffs,

vs.

JAMES A. QUAGLINO, INC., DBA
QUAGLINO ROOFING, JOE SOTO, an
individual, and DOES 1 through 20,
inclusive,

Defendants.

CASE NO.: 24CV-0553

(Assigned to the Hon. Craig B. Van Rooyen)

**DECLARATION OF ANTHONY P.
RAIMONDO IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENTS**

Date: ~~TBD~~ 2/19/2026

Time: ~~TBD~~ 9:00 am

Dept: 2

I, Anthony P. Raimondo, declare as follows:

1. I have personal knowledge of the information set forth herein and if called to do so, I could and would testify competently to the facts set forth below.

2. I am Of Counsel for Plaintiffs Pablo Torres Santiago, Misael De La Cruz, Roman Nazario Nolasco, Luis Nazario, and Isaac Nazario (hereinafter referred to as the "Plaintiffs"). I was retained by Deason Law, P.C. on June 4, 2024, to act as Of Counsel for the prosecution of a class action against Defendants James A. Quaglino, Inc. doing business as Quaglino Roofing), and its former supervisor Joe Soto.

EX. A.2: DECLARATION OF ANTHONY P. RAIMONDO IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENTS

1 3. I am an attorney licensed and admitted to practice law before the courts
2 of the State of California and Oregon. I was initially licensed to practice law in 1999
3 in California. My current hourly billing rate for complex employment discrimination
4 plaintiff cases is \$600.00 per hour.

5 4. I have been specializing in labor and employment law since 2001, and
6 have been lead counsel in both individual and class action matters for both plaintiff
7 and defense clients.

8 4. Together, lead attorney Dax B. Deason at Deason Law, P.C. and myself
9 have decades of experience in handling labor and employment cases on behalf of
10 employers and employees in a variety of civil litigation matters, which have included
11 class actions and collective actions relating to wage and hour and discrimination laws
12 under both state and federal laws, sexual harassment, PAGA actions, retaliation,
13 whistleblower cases, FMLA, disability discrimination, assault and battery torts,
14 negligent hiring and retention, wrongful termination, and numerous other employment
15 claims on both sides of the bar. Some of my more notable cases include *Arias v. Angelo*
16 *Dairy*, *Sengrath v. Audeamus*, *Villanueva v. Urology Associates of Central California,*
17 *Inc.*, and *Santiesteban v. Setton Pistachio of Terra Bella*. I have handled dozens of
18 class action cases and have spoken throughout California at conferences concerning
19 issues of labor and employment law. I am certified by the California Division of Labor
20 Standards Enforcement to teach continuing education to farm labor contractors,
21 focusing on labor and employment laws.

22 5. We have represented and will continue to represent the best interests of
23 the class of workers in this case.

24 6. On April 30, 2025, I participated in a full-day mediation with the
25 Plaintiffs, Dax B. Deason, defense counsel, their representatives, insurers, and with
26 private mediator Abe Melamed, from Signature Resolutions. After a 13-hour
27 mediation, the parties settled. Before the settlement was agreed to, I provided advice
28 and counsel to Dax B. Deason and the plaintiffs about the pros and cons of settlement.

DECLARATION OF ANTHONY P. RAIMONDO IN SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND PAGA SETTLEMENTS

1 7. In my opinion, in light of all known facts and circumstances, the
2 settlement with Defendants for the consideration and on the terms set forth in the Class
3 Action Settlement Agreement is fair, reasonable, and adequate, and in the best interests
4 of the class of affected workers. While the workers in this case could likely obtain a
5 larger verdict by going to trial, the \$1,975,000.000 settlement is an excellent recovery
6 that will provide significant compensation to the affected workers. In my experience
7 the average recovery per affected class member is significantly above what is
8 ordinarily obtained in these types of cases.

9 8. This settlement is particularly beneficial to workers in that it provides
10 substantial recovery for the civil rights violations suffered by the workers and fair
11 compensation for the wage and hour violations. In light of the atmosphere of
12 intimidation that existed in their workplace, it is unlikely that the class members would
13 have obtained a remedy through individual litigation.

14 I declare under penalty of perjury of the laws of the State of California that the
15 foregoing is true and correct. Executed August 25, 2025 at Myrtle Point, Oregon.

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18 Anthony Peter Raimondo, Declarant
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