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Attorneys for Plaintiff
PEDRO PABLO DIAZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

PEDRO PABLO DIAZ, an individual on behalf
of himself and all similarly situated aggrieved
employees,

Plaintiff.

-vs.-

K&K FOODS MGMT, INC., a California
corporation; SYED KAISER SHERE, an
individual; SANNA SHERE ANDREWS, an
individual; FARAZ SHERE, an individual;
SOHAIB SHERE, an individual; and DOES 1
through 100, inclusive,

Defendants

Case No. 30-2024-01437801-CU-OE-CXC

**DECLARATION OF PLAINTIFF PEDRO
PABLO DIAZ IN SUPPORT OF
MOTION FOR AN ORDER APPROVING
SETTLEMENT UNDER CALIFORNIA
LABOR CODE PRIVATE ATTORNEYS
GENERAL ACT AND ENTERING
JUDGMENT (LABOR CODE § 2698 ET
SEQ.)**

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I, PEDRO PABLO DIAZ, declare as follows:

1. I am over eighteen years of age and if called as a witness, I could and would competently testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above PAGA claim filed against K&K FOODS MGMT, INC., a California corporation; SYED KAISER SHERE, an individual; SANNA SHERE ANDREWS, an individual; FARAZ SHERE, an individual; SOHAIB SHERE, an individual (hereinafter collectively “Defendants”).

2. This declaration is being submitted in support of Plaintiff’s motion for an Order Approving Settlement Under California Labor Code Private Attorneys General Act and Entering Judgment (Labor Code § 2698 Et Seq.)

3. I worked for Defendants as an hourly, non-exempt employee starting in or around March 2024 through September 2024 as a cook. At all times during my employment, I earned an hourly wage and was entitled to legally compliant meal and/or rest periods, and minimum, regular and overtime wages for all hours worked. Throughout my employment, I was subject to Defendants’ written policies and procedures.

4. Generally, my lawsuit claims that Defendants failed to pay for all time worked, including overtime wages, failed to provide compliant meal and rest periods, failed to furnish accurate itemized wage statements, and failed to pay all wages upon separation failure, and seeks PAGA penalties for the alleged violations.

5. I spent a lot of time assisting my lawyers in this case. I conducted interviews, provided information regarding my employment, discussed potential witnesses, helped with my lawyers’ investigation of the case, helped analyze wage claims, and assisted with preparing for mediation. I also participated in the mediation. Accordingly, my attorneys are requesting an enhancement payment for my services.

6. I believe that the proposed settlement before the Court is fair, reasonable, and adequate, and made in the best interest of the aggrieved employees. Consequently, I respectfully ask the Court to grant approval of the Settlement and all of its terms.

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I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed October 7, 2025, at Perris, California.

City

Signed by:


By: F07CFFA710C7409...
Pedro Pablo Diaz