

1 LOEB & LOEB LLP
2 SARINA SALUJA (SBN CA253781)
3 ssaluja@loeb.com
4 SHEILA HANLEY (SBN CA345871)
5 shanley@loeb.com
6 10100 Santa Monica Blvd.
7 Suite 2200
8 Los Angeles, CA 90067
9 Telephone: 310.282.2000
10 Facsimile: 310.282.2200

Attorneys for Defendant, Crossing, Inc.

LOS ANGELES SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

BENNY ADAMS *et. al.*,

Plaintiff,

v.

CROSSING, INC. *et al.*,

Defendants.

Case No. 24STCV27904

Assigned to Judge Samantha P. Jessner
Dept. 7

DECLARATION OF BILLY BONILLA

Initial Complaint Filed: October 24, 2024

1 I, Billy Bonilla, hereby declare as follows:

2 1. I am the founder and Director of Operations at DataLab Analytics. I was engaged
3 as an expert for the Defendants in the above-referenced matter. I have analyzed extensive records
4 in the above-referenced matter. I have personal knowledge of the facts stated herein and, if called
5 and sworn as a witness, I could and would testify competently thereto.

6 2. I conducted the Workweek Audit of records provided to me by Defendants to
7 confirm whether the actual number of Workweeks exceeds the estimated 9,376 Workweeks by
8 more than 7%. Based on that audit, the current actual number of Workweeks does not exceed the
9 estimated 9,376 Workweeks by more than 7%.

10 I declare under the penalty under the laws of the State of California, that the foregoing is
11 true and correct

12 Executed this 1st day of July, 2026, Los Angeles, California.

13 Billy Bonilla

14 Billy Bonilla

1 **PROOF OF SERVICE**

2 **RE: *Benny Adams v. Crossing, Inc., et al.***
3 **Case No: 24STCV27904**
4 **LWDA Case No: LWDA-CM- 1058105 -24**

5 I am employed in the State of California, County of Los Angeles. I am over the age of 18 and
6 not a party to this action. My business address is 515 Pier Avenue, Hermosa Beach, CA 90254.

7 On **July 1, 2026**, I served true and correct copies of the following document(s) described as:

8 **DECLARATION OF BILLY BONILLA**

9 on the interested parties as follows:

10 Labor and Workforce Development Agency
11 800 Capital Mall, Suite 500
12 Sacramento, California 95814

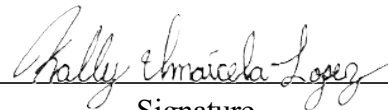
13 ☒ **BY ELECTRONIC SUBMISSION:** Complying with CAL. LAB. CODE §§ 2699(1)(4) and
14 2699.3, I caused true and correct copies of the documents to be served on the Labor and
15 Workforce Development Agency through its online platform at <https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>.

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

18 Executed on **July 1, 2026** at Hermosa Beach, California.

19 Kally Imaicela-Lopez

20 Type or Print Name

21 

22 Signature

1 **PROOF OF SERVICE**

2 **RE: *Benny Adams v. Crossing, Inc., et al.***
3 **Case No: 24STCV27904**

4 I am employed in the State of California, County of Los Angeles. I am over the age of 18 and
not a party to this action. My business address is 515 Pier Avenue, Hermosa Beach, CA 90254.

5 On **July 1, 2026**, I served true and correct copies of the following document(s) described as:

6 **DECLARATION OF BILLY BONILLA**

7 on the interested parties as follows:

8 Sarina Saluja, Esq.
9 ssaluja@loeb.com
10 **LOEB & LOEB LLP**
10100 Santa Monica Blvd, Suite 2200
Los Angeles, CA 90067

11 *Counsel for Defendants*
12 **CROSSING, INC.**
SILIANG DI

Richard Kim, Esq.
rkim@richkimlaw.com
Ian Nomura, Esq.
inomura@richkimlaw.com
LAW OFFICES OF RICHARD KIM, P.C.
6131 Orangethorpe Ave., Suite 370
Buena Park, CA 90620-4929
cc: Nathan Seong
nseong@richkimlaw.com

*Co-Counsel for Plaintiff and the Putative
Class*

14
15 [] **VIA MAIL (ENCLOSED IN A SEALED ENVELOPE):** I deposited the envelope(s) for
16 mailing in the ordinary course of business at Hermosa Beach, California. I am “readily
17 familiar” with this firm’s practice of collection and processing correspondence for mailing.
Under that practice, sealed envelopes are deposited with the U.S. Postal Service that same day
in the ordinary course of business with postage thereon fully prepaid at Hermosa Beach,
California.

18 [✓] **VIA CASE ANYWHERE:** Complying with California Rule of Court 2.251 and Code of Civil
19 Procedure § 1010.6, *et. seq.*, and in compliance with the Court’s Order Authorizing Electronic
20 Service, I caused true and correct copies of the documents to be served through Case Anywhere
at www.caseanywhere.com to the email address(es) of the person(s) identified above.

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

22 Executed on **July 1, 2026** at Hermosa Beach, California.

23
24 Kally Imaicela-Lopez

25 Type or Print Name

