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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

RICARDO BETANCOURTH and ALBERTO
NAVAS, as individuals and on behalf of all
others similarly situated and as aggrieved
employees and Private Attorney General,

Plaintiffs,

vs.

ECOLOGY AUTO PARTS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 24STCV27258

*[Case assigned for all purposes to the Hon.
Laura A. Seigle, Dept. SSC-17]*

**DECLARATION OF KRISTOPHER N.
TAYYEB IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: May 22, 2026
Time: 9:00 a.m.
Dept.: SSC-17

Complaint Filed: October 17, 2024
Trial Date: None Set

1 I, KRISTOPHER N. TAYYEB, declare as follows:

2 1. I am an associate with Haines Law Group, APC, and co-counsel for the named
3 Plaintiffs Ricardo Betancourth (“Plaintiff Betancourth”) and Alberto Navas (“Plaintiff Navas”)
4 (collectively, “Plaintiffs”) and the proposed Settlement Class in the above-captioned matter. I am
5 a member in good standing of the bar of the State of California and am admitted to practice in
6 this Court. I have personal knowledge of the facts stated in this declaration and could testify
7 competently to them if called upon to do so.

8 2. I received a Bachelor of Arts degree from the University of California, Davis in
9 2012, and a Juris Doctor from the University of California, Los Angeles School of Law in 2015.
10 I was admitted to the California State Bar in February 2018.

11 3. After graduating from law school, I worked as an associate for The Cowan Law
12 Firm from February 2018 until approximately December 2021, primarily practicing plaintiff-side
13 employment law. From January 2022 through July 2025, I worked as an associate at the
14 plaintiff’s-side litigation firm, The Berenji Law Firm, representing employees in class wage-and-
15 hour actions, PAGA actions, and individual wrongful termination actions against employers.
16 Although non-exhaustive, the types of work I performed at these firms included: conducting client
17 intakes; performing pre-filing research and analysis; drafting complaints; attending court
18 hearings; corresponding with opposing counsel; drafting and responding to written discovery;
19 preparing for and taking and defending depositions; analyzing payroll and timekeeping records
20 and employee handbooks; drafting and opposing a variety of motions including motions for
21 summary judgment, demurrers and motions to dismiss, motions to compel, and motions for
22 certification; drafting mediation briefs and attending mediations; drafting motions for preliminary
23 and final settlement approval; and second- and third chairing jury trials.

24 4. Since August 2025, I have worked as an associate at my current firm, Haines Law
25 Group, APC. I am currently staffed on approximately thirty (30) active wage and hour class
26 actions in which I play a significant role.

27 5. As counsel for Plaintiffs, I have been closely involved in all aspects of this
28 litigation, including such tasks as: corresponding with opposing counsel; analyzing payroll and
timekeeping records and employee handbooks; drafting the mediation brief and attending

1 mediation; drafting the long-form settlement agreement; and drafting the motion for preliminary
2 approval. The details of the work completed by Class Counsel in this case are set forth in the
3 declaration of Sean M. Blakely, filed concurrently herewith.

4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct. Executed on April 16, 2026, at El Segundo, California.

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