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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
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

*[Assigned for all purposes to the Hon. Laura A.
Seigle, Dept. 17]*

**DECLARATION OF HEATHER DAVIS
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

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

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

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1. I am an attorney duly licensed to practice law before all courts of the State of California. I am a Partner with Protection Law Group, LLP, attorneys of record for Plaintiff Alberto Navas (“Plaintiff”). I have personal knowledge of the facts stated herein and if called as a witness I could and would competently testify thereto.

2. I am a duly licensed attorney and have been a member of the Colorado State Bar since 1998, the California State Bar since 2005, and the Arizona State Bar since 2007. I graduated from the University of Denver School of Law in 1998, and I am licensed to practice before all courts of the State of California and Colorado as well as the State of Arizona and District Courts throughout the country.

4. During my employment with Littler Mendelson, P.C., I continued my practice of employment law and was responsible for and defended dozens of complex class actions involving some of the largest representative and class actions brought under the California Labor Code, including meal and rest break violations, overtime, minimum wage claims, off-the-clock work, and other related wage claims. My practice included the management of dozens of class actions. My management of these cases included taking and defending hundreds of depositions and interviewing hundreds of putative class members as well as drafting extensive state, federal and appellate briefing on hundreds of wage and hour issues involving class actions.

5. During my employment at Littler Mendelson, I played a significant role in the class actions for which I was responsible. In particular, I was often in charge of leading the strategy of the cases and drafting all of the briefs. I received a wide-array of wage and hour class action experience performing the following types of tasks: drafting demurrers; motions to strike and/or dismiss; removing actions from state court to federal court; drafting and responding to

1 written discovery; drafting and opposing discovery related motions; arguing discovery related
2 motions; drafting motions to consolidate related matters; interviewing putative class members and
3 obtaining declarations in connection with class certification; drafting oppositions to motions for
4 class certification; drafting motions for decertification following class certification; conducting
5 exposure analyses to assess the strengths and weaknesses of asserted claims, the likelihood of
6 prevailing at class certification and potential damages resulting from such claims; drafting
7 mediation briefs; serving as the primary contact to in-house counsel; deposing plaintiff and
8 putative class members; deposing retained expert witnesses; and defending the depositions of
9 corporate witnesses. In short, I played an integral role in all aspects of litigation from the inception
10 of a matter through and beyond class certification.

11 6. During my practice in other jurisdictions and continuing today, I have been
12 primarily devoted to working in employment law and on complex class action and representative
13 litigation and multi-plaintiff work.

14 7. Protection Law Group, LLP is a law firm specifically devoted to the representation
15 of employees against employers in California involving claims relating to violations of the
16 California Labor Code, including claims for failure to pay all wages owed, failure to pay overtime
17 premiums, failure to any meal and rest premiums and failure to provide accurate wage records.
18 The practice of employment law is a very specific, narrow field which requires diligence in an
19 ever-evolving field of substantive and procedural law.

20 8. Although not exhaustive, below is a representative list of several of the wage and
21 hour class actions that I performed substantial work on while I was an attorney with Littler
22 Mendelson, including, but not limited to: *Villacres v. ABM Industries, Inc.*, 189 Cal.App.4th 562
23 (2010); *Brizuela v. Copart, Inc.*, CIVRS11101592, (San Bernardino Superior Court class action
24 settlement); *Augustus v. ABM Industries, Inc.*, BC336416, 2 Cal. 5th 257 (2016); *Tagaki v. United*
25 *Airlines*, 2:11-CV9191 (Central District class action settlement); *Babasa v. Comerica, Inc.*, 3:11-
26 CV00595; *Leyva v. Medline Industries, Inc.* 5:11-cv-00164 (Central District); *Blue v. Coldwell*
27 *Banker Residential Brokerage Co.*, BC417335, (Los Angeles Superior Court, class action
28 settlement); and *Acosta v. Texwood Industries, Inc.*, 2:07-cv-03237-DDP-PLA (Central District

1 class action settlement).

2 9. Since opening my firm, I have served as lead counsel or co-class counsel in several
3 wage and hour class and/or representative actions seeking wages and penalties owed on behalf of
4 employees for which final approval of the settlement or class certification has been granted,
5 including, but not limited to the following:

- 6 • *Holzer v. Wedbush Securities, Inc.*, BC 550462 (Los Angeles Superior Court wage
7 and hour class action certifying class of independent contractors and appointing
8 Protection Law Group, LLP as class counsel);
- 9 • *White v. Windy Pizza Plus, LLC*, BC593377 (Los Angeles Superior Court wage and
10 hour class action certifying class of all non-exempt employees and appointing
11 Protection Law Group, LLP as class counsel);
- 12 • *Morera v. Continental Assets Mgmt.*, BC502003 (Los Angeles Superior Court wage
13 and hour class action appointing Protection Law Group, LLP as class counsel in
14 settlement);
- 15 • *Fong et al. v. Regis Corporation*, 3:13-cv-13-04497-VC (United States District Court,
16 Northern District of California, wage and hour class action settlement and
17 appointment Protection Law Group, LLP as class counsel in settlement);
- 18 • *Espinoza v. Financial Partners Credit Union*, BC502165 (Los Angeles Superior Court
19 wage and hour Class action appointing Protection Law Group, LLP as class counsel
20 in settlement);
- 21 • *Kesheshian, et al v. S. Cal. Logistics*, BC557981 (Los Angeles Superior Court wage
22 and hour class action appointing Protection Law Group, LLP as class counsel in
23 settlement);
- 24 • *Sampson v. 24 HR Homecare LLC*, BC586019 (Los Angeles County Superior Court
25 wage and hour class action);
- 26 • *Glenn v. Decron Properties Corp.*, BC578035 (Los Angeles Superior Court wage and
27 hour class action appointing Protection Law Group, LLP as class counsel in
28 settlement);

- 1 • *Torres v. Auto Rescue et al.*, RIC1509900 (Riverside County Superior Court wage and
2 hour class action appointing Protection Law Group, LLP as class counsel in
3 settlement);
- 4 • *Kashanian v. Plus Labs, Inc.*, 2016-1-CV-294231 (Santa Clara County Superior Court
5 wage and hour class action appointing Protection Law Group, LLP as class counsel in
6 settlement);
- 7 • *Cadena v. Tetra Property Management*, 257425 (Tulare County Superior Court wage
8 and hour class action appointing Protection Law Group, LLP as class counsel in
9 settlement);
- 10 • *Drayton v. Hollywood Park Casino*, BC593935 (Los Angeles Superior Court wage
11 and hour class action appointing Protection Law Group, LLP as class counsel in
12 settlement);
- 13 • *Khan v. FPI Management, Inc.*, JCCP4819 (Los Angeles Superior Court wage and
14 hour class action appointing Protection Law Group, LLP as class counsel in
15 settlement);
- 16 • *Byrd v. Masonite Corp.*, 5:16-cv-00035-JGBKK (United States District Court, Central
17 District of California appointing Protection Law Group, LLP as class counsel in
18 settlement);
- 19 • *Hadrick v. Woodmont Real Estate Serv., et al.*, CIV530405 (San Mateo County
20 Superior Court wage and hour class action appointing Protection Law Group, LLP as
21 class counsel in settlement);
- 22 • *Utterbach v. Daylight Transport, LLC et al.*, BC600994 (Los Angeles Superior Court
23 wage and hour class action appointing Protection Law Group, LLP as class counsel in
24 settlement);
- 25 • *Eiden v. Olive & June*, BC654685 (Los Angeles Superior Court wage and hour class
26 action appointing Protection Law Group, LLP as class counsel in settlement);
- 27 • *Lemus v. Slater Inc.*, CIVDS1703633 (San Bernardino Superior Court wage and hour
28 class action appointing Protection Law Group, LLP as class counsel in settlement);

- 1 • *Deluna v. Amerit Fleet Solutions et al.*, CIVDS1721564 (San Bernardino Superior
2 Court wage and hour class action appointing Protection Law Group, LLP as class
3 counsel in settlement);
- 4 • *Stone v. Universal Protection Services*, AAA Case No. 01-15-0002-7497 (American
5 Arbitration Association wage and hour class action appointing Protection Law Group,
6 LLP as class counsel in settlement on behalf of class of 75,000+ putative class
7 members)
- 8 • *Commick v. Prometheus Real Estate Group*, CIV531264 (San Mateo Superior Court
9 wage and hour class action appointing Protection Law Group, LLP as class counsel in
10 settlement);
- 11 • *Martinez v. AMRO Fabricating Corp.*, BC681938 (Los Angeles Superior Court wage
12 and hour class action appointing Protection Law Group, LLP as class counsel in
13 settlement);
- 14 • *Ramirez v. Western National Properties*, BC639319 (Los Angeles Superior Court
15 wage and hour class action appointing Protection Law Group, LLP as class counsel in
16 settlement);
- 17 • *Hernandez v. Access Dental Plan et. al*, 34-2017-00220944 (Sacramento Superior
18 Court wage and hour class action appointing Protection Law Group, LLP as class
19 counsel in settlement);
- 20 • *Fernandez v. Sumitomo Rubber North America, Inc.*, CIVDS1803211 (San
21 Bernardino Superior Court wage and hour class action appointing Protection Law
22 Group, LLP as class counsel in settlement);
- 23 • *Gomez v. Fairway Staffing Services, Inc.*, BC689771 (Los Angeles Superior Court
24 wage and hour class action appointing Protection Law Group, LLP as class counsel in
25 settlement);
- 26 • *Fuentes v. Communications Test Design, Inc.*, CIVDS1802427 (San Bernardino
27 Superior Court wage and hour class action appointing Protection Law Group, LLP as
28 class counsel in settlement);

- 1 • *Hartline v. Senior Operations, LLC*, BC697665 (Los Angeles Superior Court wage
2 and hour class action appointing Protection Law Group, LLP as class counsel in
3 settlement);
- 4 • *Carrozzella v. Basalite Concrete Products, LLC*, 34-2014-00220214 (Sacramento
5 Superior Court wage and hour class action appointing Protection Law Group, LLP as
6 class counsel in settlement);
- 7 • *Howey v. Battery Systems, Inc.*, 2026114 (Stanislaus Superior Court wage and hour
8 class action appointing Protection Law Group, LLP as class counsel in settlement);
- 9 • *Correa v. Cashbak, LLC*, BC723845 (Los Angeles Superior Court wage and hour class
10 action appointing Protection Law Group, LLP as class counsel in settlement);
- 11 • *Lemus v. Cass Construction*, 37-2017-00028180 (San Diego Superior Court wage and
12 hour class action appointing Protection Law Group, LLP as class counsel in
13 settlement);
- 14 • *Sales v. J.S. International Shipping Corp.*, 18CIV05048 (San Mateo Superior Court
15 wage and hour class action appointing Protection Law Group, LLP as class counsel in
16 settlement);
- 17 • *Aparicio v. Advantage Painting*, CIVDS2013809 (San Bernardino County Superior
18 Court approving PAGA Settlement);
- 19 • *Rodriguez v. TheRealReal, Inc.*, CGC-19-574661 (San Francisco County Superior
20 Court approving PAGA Settlement);
- 21 • *Parm v. Think Together*, CIVDS1823659 (San Bernardino County Superior Court
22 approving PAGA Settlement);
- 23 • *Casey-Neith v. Pacific Union Financial*, 30-2018-01014980 (Orange County Superior
24 Court approving PAGA Settlement);
- 25 • *Wallace v. Alvarado Restaurant Group, LLC*, 20STCV26260 (Los Angeles County
26 Superior Court approving PAGA Settlement);
- 27 • *Adams v. West Marine Products, Inc.*, 19CIV00436 (San Mateo Superior Court wage
28 and hour class action appointing Protection Law Group, LLP as class counsel in

settlement); and

- *Coronel, et al. v. CMH Manufacturing, Inc., et al.*, RIC2003070 (Riverside County Superior Court approving PAGA Settlement).

10. I am fully familiar with the legal and factual issues in the Action and have specific experience litigating complex wage and hour actions as class actions, including employment cases as set forth above.

11. The Settlement presented here only resulted after having engaged in extensive informal discovery and investigation and is the product of hard-fought litigation and extensive arms' length negotiations. In my opinion as an experienced class counsel, the Settlement is fair, reasonable, adequate, and in the best interests of the Class, Aggrieved Employees, and State of California.

THE PROPOSED SETTLEMENT IS FAIR ADEQUATE AND REASONABLE

12. My office filed Plaintiff Navas' original complaint against Ecology Auto Parts on or about June 16, 2025, *Navas v. Ecology Auto Parts, Inc. et al.* Los Angeles Superior Court Case No. 25STCV172397.

13. Shortly after the filing of this complaint my office agreed to attend mediation with Defendant and the Plaintiff in this matter, the separately filed action, *Betancourth v. Ecology Auto Parts, Inc. et al.* Los Angeles Superior Court Case No. 24STCV27258

14. Based on my experience as Class Counsel, and my office's review of the information provided at and prior to mediation, I believe that the proposed settlement is fair adequate and reasonable.

15. Prior to mediation my office, along with my co-counsel with the Haines Law Group received substantial informal discovery including Defendant's relevant wage and hour policies during the class period, a sampling of time and payroll records for the putative class members, and key data points regarding the size and composition of the class.

16. After substantial review of these documents, the Parties participated in a full day mediation with Steven G. Mehta, Esq. during which the Parties debated the strengths and weaknesses of the alleged claims and Defendant's potential defenses.

1 17. Following mediation, the Parties accepted a proposal made by the mediator to
2 resolve this matter for a Gross Settlement Amount of \$2,895,000.00. Based on the information
3 reviewed and the strengths and weaknesses of the alleged claims, I believe this amount represents
4 a fair adequate and reasonable resolution of the claims alleged against Defendant.

5 **REQUESTED ATTORNEYS FEES AND FEE SHARING AGREEMENT**

6 18. Plaintiff's Counsel request attorneys' fees in the amount of 35% of the Gross
7 Settlement Amount or \$1,013,250.00. This amount is reasonable based upon the substantial time
8 and effort that has been spent on this matter by both my firm and my co-counsel with Haines Law
9 Group, APC. The requested attorneys' fees are within the range typically granted in connection
10 with approval of a class action and PAGA Settlement and notice of the requested fee award will
11 be disclosed to the Class.

12 19. My office and my co-counsel with Haines Law Group, APC have entered into a
13 written fee sharing agreement with respect to any attorneys' fees recovered in this matter and to
14 Plaintiffs' have provided their written consent to such agreement.

15 **ENHANCEMENT PAYMENT**

16 20. I would request that the Court grant preliminary approval of an enhancement
17 payment in the amount of \$10,000.00 to Plaintiff Alberto Navas.

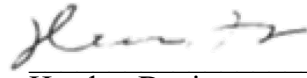
18 21. Mr. Navas has meaningfully participated in this litigation and invested substantial
19 time and effort in order to help reach the settlement achieved here. Mr. Navas held extended
20 discussions with my office, searched for and reviewed documents, and made himself available
21 whenever my office had questions or needed additional information.

22 22. In addition to the substantial time Mr. Navas has spent assisting my office as part
23 of this litigation, Mr. Navas has also agreed to enter into a general release of all claims he may
24 have against Defendant. This release is broader than that entered into by the other class members.

25 23. Accordingly, I would request that an enhancement payment for Mr. Navas of at
26 least \$10,000.00 be preliminarily approved the Court.

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

3 Executed on April 14, 2026.

4 
Heather Davis