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Attorneys for Plaintiff CARLOS DANILO ESCOBAR RIVAS,
as an individual and on behalf of all employees similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

CARLOS DANILO ESCOBAR RIVAS, as an
individual and on behalf of all employees
similarly situated,

Plaintiff,

v.

FOUR SEASONS TREE CARE INC., a
California corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 24CU015430C

Assigned for all purposes to Hon. Judy S. Bae,
Department C-62

**DECLARATION OF CARLOS DANILO
ESCOBAR RIVAS IN SUPPORT OF
PLAINTIFF'S MOTION FOR AN ORDER
APPROVING SETTLEMENT OF CLAIMS
BROUGHT PURSUANT TO THE PRIVATE
ATTORNEY GENERAL'S ACT OF 2004**

Date: July 10, 2026
Time: 9:10a.m.
Courtroom: Dept.-C-627
Judge: Hon. Judy S. Bae

Complaint Filed: October 7, 2024
Trial: None Yet Set

DECLARATION OF CARLOS DANILO ESCOBAR RIVAS

I, CARLOS DANILO ESCOBAR RIVAS, declare as follows:

1. I am an individual over the age of 18 and am a named plaintiff in this matter against Defendant **FOURS EASONS TREE CARE INC.** ("Defendant"). This declaration is submitted in support of approval of the Settlement Agreement reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant as an hourly-paid, non-exempt employee from January 17, 2019 to September 30, 2024.

3. When I worked for Defendant, I was subjected to the same labor code claims involving off the clock, meal breaks, rest breaks, wage statements, failure to reimburse necessary business expenses and failure to pay all wages due as all other employees.

4. I have been actively involved in this case since I first retained Tunyan Law, APC. I have had many discussions with counsel regarding Defendant's wage and hour policies, my claims in this case, litigation strategy, potential witnesses, updates on how the case was proceeding, and how I could help the case. For example, I remained in regular communication with my attorneys regarding mediation discovery and settlement discussions that the parties had during the course of litigation and mediation. I also provided information and documents to my attorneys to assist them in preparing the case. I also spent time reviewing and discussing the Settlement Agreement as well as other documents from my attorneys, and reviewing my own records for documents that would be potentially relevant to the case. In total, I estimate that I have spent more than 25 hours of my time in connection with this case since I first retained Tunyan Law, APC.

5. I understand that this lawsuit could benefit my former co-workers, other Defendant's employees, and the State of California by helping to recover civil penalties on their behalf as a result of the alleged violations described above. I also understood that I was filing this case as an "aggrieved employee" on behalf of myself and my fellow "aggrieved employees" as well as the State of California. I do not believe that I have any conflicts with Aggrieved Employees included in this proposed Settlement and the selected administrator.

6. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to search for information online these days, I understood I would face an increased risk that future employers would discover information about this lawsuit online and had a negative reaction to learning that I sued an employer. This may make it harder for me to obtain future employment or change jobs for a better opportunity.

7. I believe that the Settlement obtained on behalf of the aggrieved employees and the State of California is fair and reasonable in view of the issues and risks involved with the case. As part of the proposed Settlement, for my role prosecuting this action and effort in advancing the interests of other aggrieved employees and for a general release of all claims related to my employment with Defendant that extends beyond the release of PAGA claims applicable to other aggrieved employees and beyond wage-and-hour claims, I understand that my attorneys will request that the Court approve the payment of \$10, 000.00 to me as a service award and this settlement. Based on the time, risk, stress, sacrifice of signing of a general release, and the great outcome of this case, I believe that the requested service award for me is fair and reasonable.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed 10/16/2025 | 10:33 PM PDT , at Escondido, California.

Firmado por:

593AC9EC80E745D...
CARLOS DANILO ESCOBAR RIVAS

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of
6 18 and not a party to the within action; my business address is 535 N Brand Blvd. Suite 285,
7 Glendale, California 91203.

8 On the date indicated below, I served the document described as: **DECLARATION OF CARLOS**
9 **DANILO ESCOBAR RIVAS IN SUPPORT OF PLAINTIFF'S MOTION FOR AN ORDER**
10 **APPROVING SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO THE PRIVATE**
11 **ATTORNEY GENERAL'S ACT OF 2004** on the interested parties in this action by sending a true
12 copy thereof to interested parties as follows and as stated on the attached service list:

13 Matthew Sgnilek
14 MSgnilek@ohaganmeyer.com
15 Demi Flores
16 dflores@ohaganmeyer.com
17 Maysa Saeed
18 msaeed@ohaganmeyer.com
19 Nolinnda Hing
20 nhing@ohaganmeyer.com
21 Matthew Torres
22 mtorres@ohaganmeyer.com
23 **O'HAGAN MEYER**
24 4695 MacArthur Ct., Suite 900
25 Newport Beach, California 92660
26 Telephone: (949)942-8500
27 Direct 949-942-8502

28 ***Attorneys for Defendant FOUR SEASONS TREE CARE INC.***

19 [✓] **BY E-MAIL:** I hereby certify that this document was served from Glendale, California,
20 by e-mail delivery on the parties listed herein at their most recent known e-mail address
21 or e-mail of record in this action.

22 [✓] **BY ELECTRONIC SERVICE:** Based on an agreement of the parties to accept
23 electronic service, I caused the documents to be sent to the persons at the electronic
24 service addresses listed above via electronic mail. I did not receive an error message.

25 I declare under penalty of perjury under the laws of the State of California that the
26 above is true and correct.

27 Executed on December 1, 2025, at Glendale, California.

28 _____
Natalia Zevallos
Name

Natalia Zevallos
Signature