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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

ABRAHAM MALDONADO, individually, and
on behalf of all others similarly situated, and on
behalf of the State of California and other
aggrieved persons,

Plaintiff,

v.

ROTOLO CHEVROLET, INC., a California
Corporation; and DOES 1 through 100,
inclusive,

Defendant.

Case No.: CIVSB2435646
Assigned to: Hon. Michael A Sachs, Dept. S28

Complaint Filed: November 27, 2024
FAC Filed: May 1, 2025
Trial Date: Not set

PAGA REPRESENTATIVE ACTION

**DECLARATION OF ABRAHAM
MALDONADO IN SUPPORT OF
MOTION TO APPROVE PAGA
SETTLEMENT**

I, Abraham Maldonado, declare as follows:

2. I am the named Plaintiff in this action filed pursuant to the Private Attorneys General Act (“PAGA”) and submit this declaration in support of Motion to Approve PAGA Settlement. Because I believe I have provided invaluable assistance during the course of this case, I am hopeful that the Court will approve my request of a \$10,000.00 service payment for my role as the PAGA Representative.

3. I am a former employee of Defendant Rotolo Chevrolet, Inc. (“Defendant”). I worked for Defendant from approximately September 2024 approximately November 2024 as hourly paid non-exempt or hourly paid employee. Throughout the entirety of my employment, I was subject to Defendant’s policies and practices that have been alleged as unlawful in the complaint.

4. I filed this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, I was not provided all of my meal and rest breaks, and I was not reimbursed for all business expenses. While working for Defendant, my coworkers and I were asked to work long hours because of the amount of work, sometimes without taking meal and rest breaks and without receiving compensation for all hours worked. I also observed my co-workers working long hours without taking breaks. Furthermore, my co-workers and I were not reimbursed for all of our business expenses.

5. By representing other aggrieved employees in this lawsuit, I hoped that I might be able to change Defendant's policies to better protect the working conditions of my co-workers. I also understood it was my duty as the PAGA Representative to represent the State of California and other aggrieved employees, know about the lawsuit, help my attorneys, and keep updated on the case.

6. Prior to commencing this case, I provided Wilshire Law Firm, PLC with a detailed account of the facts related to my employment with Defendant. Additionally, I provided my

1 counsel with documentation in the form of pay statements that applied to my employment with
2 Defendant. Based on my conversations, my attorneys and I were able to identify instances when I
3 was not paid correctly.

4 7. I have invested a lot of personal time and energy while this lawsuit has been
5 pending. I made it a priority to be actively involved because I wanted to do everything I can to
6 assist my attorneys in prosecuting this case. I regularly communicated with my attorneys and their
7 staff to discuss updates on the case and to provide my attorneys with additional information.

8 8. I spent multiple hours looking for documents that my attorneys asked me to provide
9 to help this case.

10 9. I also made myself available during the mediation for this case and I kept in regular
11 contact my attorneys before and after the mediation to ensure that any questions the attorneys had
12 could be answered.

13 10. I also reviewed documents filed in this case, including the settlement-related
14 documents.

15 11. I believe the settlement is a good settlement and I would recommend that the Court
16 approve it because I believe that this settlement is fair, adequate, and reasonable in view of PAGA's
17 purposes. I am glad that I had the opportunity to represent the State of California and the aggrieved
18 employees in this lawsuit and that I was able to recover penalties through a settlement for the
19 aggrieved employees. I have also observed my attorneys' work throughout this case and I believe
20 they have been thorough, diligent, prompt, courteous, and professional.

21 12. I estimate that I spent **at least 52 hours on this case** since I first contacted Wilshire
22 Law Firm, PLC.

23 13. I did not make the decision to file this representative action lightly. I was concerned
24 by the attention a lawsuit, and especially a representative action, would attract. My name would
25 be associated with a lawsuit that I filed against my former employer and I am mindful that future
26 employers might find out that I sued a former employer, which could hurt my employability. In a
27 competitive job market, this factor may weigh heavily against me.
28

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14. Standing up for myself and the rights of others was not an easy decision, and I am relieved that this case is coming to an end.

15. I respectfully request that the Court award me a \$10,000.00 service payment. I am receiving no additional compensation other than the compensation provided for in the settlement. Based on my involvement in this case and the benefits provided to workers of Defendant, I can say I helped represent the other workers who may have been too afraid to say anything to management because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care about helping my fellow co-workers.

16. Although I continue to fear that employers may find out that I participated in this lawsuit and hold it against me, I felt that important rights were at stake that hurt myself and other employees.

17. I have no conflicts of interest with any aggrieved employee or the Settlement Administrator, Phoenix Settlement Administrators, Inc.

18. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

I declare under penalty of perjury, under the laws of the State of California and the United States of America, that the foregoing is true and correct.

Executed on 6/3/2026 at Hesperia, California.

Signed by:

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Abraham Maldonado