

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

2255 Calle Clara

La Jolla, CA 92037

Telephone: (858) 551-1223

Facsimile: (858) 551-1232

Colette Mahon, Esq. (SBN 304745)

cmahon@lfecr.com

LAWYERS FOR EMPLOYEE AND CONSUMER RIGHTS

3500 West Olive Avenue, Third Floor

Burbank, California 91505

Telephone: (323) 375-5101

Facsimile: (323) 306-557

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF VENTURA

MATTHEW KAUFMAN, an individual, on
behalf of himself and on behalf of all
persons similarly situated,

Plaintiff,

vs.

JOHNSON CONTROLS FIRE
PROTECTION LP, a Limited Partnership;
and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: 2024CUOE028051

**DECLARATION OF COLETTE MAHON
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Date: September 16, 2026

Hearing Time: 1:30 p.m.

Judge: Hon. Charmaine H. Buehner

Dept: 44

Date Filed: August 15, 2025

Trial Date: Not set

DECLARATION

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3 I, Colette Mahon, declare:

4 1. I am a member of the bar of the State of California and an attorney at Lawyers for
5 Employee and Consumer Rights ("LFEER"). I make this declaration of personal, firsthand
6 knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

7 2. LFEER is a law firm dedicated to protecting the rights of employees in the
8 workplace. We are dedicated to the prosecution of wage and hour and wrongful termination
9 matters in state and federal courts, and before various arbitration tribunals.

10 3. My firm and I handle exclusively employee-side employment cases which involve
11 violations of the California Labor Code and Industrial Welfare Commission Wage Orders, such
12 as wage and hour class actions and cases alleging violations of the Private Attorneys General Act
13 of 2004 ("PAGA").

14 4. LFEER is currently involved in litigation in over fifty (50) PAGA and class cases.

15 5. My firm has been granted class certification in both state and federal courts.

16 6. All services were performed by Plaintiff's Counsel on a contingent basis with no
17 guarantee of any payment. Had the litigation continued, the Defendant would undoubtedly have
18 mounted an aggressive defense. A defeat on the merits would have foreclosed the possibility of
19 any remuneration for Plaintiff's Counsel's time and effort.

20
21 I hereby declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct.

23
24 Dated: August 18, 2026

**LAWYERS FOR EMPLOYEE AND CONSUMER
RIGHTS**

26
27 

28 Colette Mahon, Esq.
Attorneys for Plaintiff MATTHEW KAUFMAN

DECLARATION