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17 (Additional Counsel on Following Page)

18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

20 STEPHEN BROUGH and EDGAR
21 BECERRA, individuals, on behalf of
22 themselves and others similarly situated,

23 **PLAINTIFFS,**

24 **v.**

25 GLOBAL PARATRANSIT, INC.; REZA
26 NASROLLAHY, an individual; and DOES 1
27 to 50, inclusive,

28 **DEFENDANTS.**

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

JUN 11 2019

Sherri R. Carter, Executive Officer/Clerk
By: Tanya Herrera, Deputy

Case No. BC616177; *Related Case* BC619163
[Case Assigned for All Purposes to Hon.
Carolyn B. Kuhl]

**DECLARATION OF DAVID DEASON IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

*[Filed concurrently with Declaration of Ari J.
Stiller and Proposed Order]*

Date: July 3, 2019
Time: 10:00 a.m.
Dept.: SSC - 12

Trial Date: None Set
Complaint Filed: April 7, 2016

**DECLARATION OF DAVID DEASON IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

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1 CU-OE-CXC (unpaid minimum wage and meal period class action); *Esparza vs. Two Jinn, Inc.*,
2 *et al.*, USDC Case No. SACV09-00099 AG(RNBx) [unpaid overtime class action disputing
3 application of the Retail Sales Commission exemption under the FLSA]; *Flowers, et al. v. HSBC*
4 *Auto Finance, Inc., et al.*, Case No. 07CV 2146 MMA ["off the books" overtime class action
5 with Rule 23 state law and FLSA claims]; *Rico v. Chick's Sporting Goods*, Case No. BC 297826
6 [retail overtime exemption class action]; *Santa Ana v. Eurostar, Inc.*, Case No. BC310739; *Jue v.*
7 *Crawford & Company*, Case No. CV03-7014 RGK (FMOx) [Surveillance investigator overtime
8 class action]; *Bernal v. International Reupholstery Corporation of America*, Case No. EDCV 04-
9 01272VAP (SGLx) [national FLSA overtime class action]; *Anchondo v. Facticon Incorporated*,
10 Case No. SACV04-1453 [500+ putative class member national overtime class action under the
11 FLSA]; *Wonsch v. Facticon Incorporated*, Case No. 06CC00053 [Non-reimbursed employment
12 related expenses and overtime class action]; *Anchondo vs. Hospital Inventories Specialists, Inc.*,
13 Case No. BC375250; *Broce v. The Spearmint Rhino Companies Worldwide, Inc., et al.* SBCSC
14 Case No. 1320074; and *Samora v. Make it Work, Inc., et al.* OCSC Case No. 1320074.

15 9. In addition to the work done under the Deason & Archbold name, the partners of
16 Deason & Archbold have fully litigated and settled numerous wage and hour actions while
17 working for their previous employer, including several wage and hour class actions with
18 hundreds of class members against large employers such as the Los Angeles Police Department,
19 the City of Los Angeles; the County of San Bernardino, and Jamba Juice.

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct. Executed this 10th day of June, 2019 at Huntington Beach,
22 California.

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24 

25 David Deason
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1 (PROOF OF SERVICE)

2 [CCP 1013(a)(3)]

3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18
5 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite
6 1200, Encino, California 91436.

7 On June 11, 2019, I served all interested parties in this action the following documents
8 described as **DECLARATION OF DAVID DEASON IN SUPPORT OF MOTION FOR**
9 **PRELIMINARY APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof
10 enclosed in a sealed envelope addressed as follows:

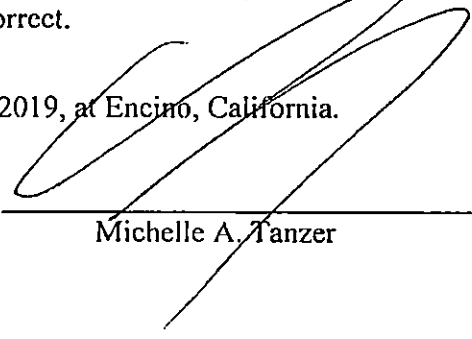
11 SEE ATTACHED PROOF OF SERVICE MAILING LIST
12 (CONT. NEXT PAGE)

13 [XX] (BY MAIL) I am "readily familiar" with the firm's practice of collection and processing
14 correspondence for mailing. Under that practice it would be deposited with U.S. postal
15 service on that same day with postage fully prepaid at Encino, California in the ordinary
16 course of business. I am aware that on motion of the party served, service is presumed
invalid if postal cancellation date or postage meter date is more than one day after date of
deposit for mailing in affidavit.

17 [XX] BY ELECTRONIC MAIL THROUGH CASE ANYWHERE: On interested parties set
18 forth on the attached service list.

19 [XX] (STATE) I declare under penalty of perjury under the laws of the State of California that
20 the above is true and correct.

21 Executed on June 11, 2019, at Encino, California.

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23 _____
24 Michelle A. Tanzer
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PROOF OF SERVICE MAILING LIST

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