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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JOSEPH GONZALEZ, KEVIN CLEMENTE,
JAMES HARDEN, and GHAZI SANKARI
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiff,

v.

OREMOR AUTOMOTIVE GROUP, LLC;
OREMOR EUROPEAN, LLC D/B/ A
MERCEDES BENZ OF EL CAJON; ROMERO
AUTOMOTIVE, INC.; OREMOR
DEVELOPMENT, LLC; OREMOR
FINANCIAL SERVICES, LLC; OREMOR OF
CAPISTRANO, LLC; OREMOR OF
FONTANA, LLC; OREMOR OF FRESNO,
LLC; OREMOR OF GLENDALE, LLC;
OREMOR OF ITALY II, LLC; JEEP
CHRYSLER OF ONTARIO, INC.; OREMOR
OF ONTARIO EN, LLC; OREMOR OF
ONTARIO JCDR, LLC; OREMOR OF
RIVERSIDE RC, LLC; OREMOR OF
RIVERSIDE, LLC; OREMOR OF TEMECULA
LX LLC; OREMOR OF TEMECULA, LLC;
OREMOR OF TUSTIN, LLC; OREMOR OF
VICTORVILLE, LLC; OREMOR OF
WOODLAND HILLS, LLC; OREMOR
ONTARIO DODGE, INC.; ROMERO
MOTORS, LLC; OREMOR MANAGEMENT
& INVESTMENT COMPANY; ROMERO
MOTORS CORPORATION; J.
MCCULLOUGH CORP; UNITED

Case No. 37-2024-00019752-CU-OE-CTL

**DECLARATION OF JAMES HARDEN IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT**

Date: August 14, 2026

Time: 9:00a.m.

Judge: Hon. Michael D. Washington

Dept.: C-73

1 RECOVERY, INC.; ACQUIRECORP'S
2 NORWALK AUTO AUCTION; and DOES 1
3 through 50, inclusive,

4 Defendants.

5 **ZAKAY LAW GROUP, APLC**

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22 Attorneys for Plaintiffs

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1 I, James Harden, declare as follows:

2 1. I am over the age of eighteen, a California resident, Plaintiff and Proposed Class
3 Representative in the above-entitled matter. I submit this declaration in support of Plaintiffs' Motion
4 for Final Approval of Class Action and PAGA Settlement and in support of Plaintiffs' Motion for
5 Attorneys' Fees, Litigation Costs, and Service Payments. I have personal knowledge of all the facts
6 stated herein. I could and would competently testify under oath to these facts in court if requested to
7 do so.

8 2. I retained Class Counsel in January 2025 and filed the First Amended Complaint in the
9 instant action in September 2025. I filed the case on behalf of myself and a class of all non-exempt
10 employees who worked for Oremor Automotive Group, LLC, Oremor European, LLC dba Mercedes
11 Benz of El Cajon, Romero Automotive, Inc., Oremor Development, LLC, Oremor Financial Services,
12 LLC, Oremor of Capistrano, LLC, Oremor of Fontana, LLC, Oremor of Fresno, LLC, Oremor of
13 Glendale, LLC, Oremor of Italy II, LLC, Jeep Chrysler of Ontario, Inc., Oremor of Ontario EN, LLC,
14 Oremor of Ontario JCDR, LLC, Oremor of Riverside RC, LLC, Oremor of Riverside, LLC, Oremor of
15 Temecula LX LLC, Oremor of Temecula, LLC, Oremor of Tustin, LLC, Oremor of Victorville, LLC,
16 Oremor of Woodland Hills, LLC, Oremor Ontario Dodge, Inc, Romero Motors, LLC, Oremor
17 Management & Investment Company, Romero Motors Corporation, J. McCullough Corp., United
18 Recover, Inc., and Aquirecorp's Norwalk Auto Auction (hereinafter, "Defendants") in California at
19 any time between the period beginning August 23, 2022, to June 20, 2025.

20 3. I worked for Defendants from October 2019 to approximately October of 2025, as a non-
21 exempt employee. Throughout my employment, I was subject to Defendants' written policies and
22 procedures contained in, among other documents, the "Team Member Handbook."

23 4. I filed the case because I believed my rights as an employee were violated by Defendants
24 and also the rights of other employees that worked for Defendants. Among other claims, I believe
25 Defendants failed to pay me for all hours worked, failed to provide legally compliant meal and rest
26 periods, failed to reimburse for required business expenses, and failed to provide accurate itemized
27 wage statements.

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1 5. Before I initiated the case as a Plaintiff and Class Representative, I spoke at length with
2 my attorneys. We discussed my work experience and how company policies were applied to me and
3 other employees. I provided the attorneys with the documents they requested. We reviewed the
4 documents together and asked and answered many questions regarding my experience working for
5 Defendants, the litigation process, and about class actions generally.

6 6. I decided to go through with the case because I believed violations occurred and most
7 employees would not know what their rights are and even if they did, they would be apprehensive to
8 file a lawsuit against their employer for fear of retaliation.

9 7. **Review and Approval of Settlement:** Mediation was held on March 28, 2025. Even
10 though I could not attend, I was available by telephone to speak with my attorneys and did speak with
11 them regarding the mediation before it took place, as well as during the mediation itself. I also spoke
12 with my attorneys after the mediation and discussed the mediator's proposal, which was ultimately later
13 accepted. I am satisfied with the terms of the settlement that was agreed to by the parties. I reviewed
14 and signed the settlement papers when they were ready. I signed them on October 7, 2025. I then spoke
15 with my attorneys, reviewed, and signed the Amended Class Action and PAGA Action Settlement
16 Agreement on February 3, 2026.

17 8. **Participation:** Since I retained Class Counsel approximately Seventeen months ago, I
18 have been actively involved with this class action lawsuit performing the duties described above. While
19 I did not keep formal time records, I was in regular contact with my attorneys, attended hearings,
20 reviewed important court filings, and spent considerable time on the issues presented during the
21 litigation and in the settlement process. I estimate that I spent approximately 25 hours working on this
22 case.

23 9. Also, my attorneys explained to me that the settlement process involved a two-step
24 review by the Court to determine whether the settlement was fair before ordering that the settlement be
25 funded and paid. I knew this process also involved notifying all class members of the settlement terms
26 and of their rights to make a claim for their settlement share, to opt out of the settlement or to object to
27 the settlement.

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10. Ultimately, I believe I did the right thing in pursuing this case on behalf of the class who now stand to receive substantial monetary payments as a result of this case and settlement. I also believe that the requested Service in the amount of \$10,000 from the settlement is fair compensation for (1) the work I performed, (2) the sacrifices made not pursuing this case individually, and (3) the risks I undertook.

11. In light of all the time and effort I have spent on this case, the sacrifice I have made, the risks I undertook by suing a former employer, the exposure to being responsible for paying Defendants' costs in the event we did not win the case, and in light of the size of the settlement, I believe the request for \$10,000 as a Service Payment is fair and reasonable.

12. Further, I support my attorneys' application for Attorneys' Fees and Litigation Costs in the amount of \$358,333.33, comprised of \$308,333.33 for Attorneys' Fees (one-third of the Gross Settlement Amount) and up to \$50,000.00 for reimbursement of actually incurred Litigation Costs.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 07/16/2026, at Riverside, California.

By: JAMES HARDEN (Jul 16, 2026 15:51:12 PDT)

JAMES HARDEN