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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

LOUIS CARABETTA, an individual, on behalf
of himself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

MITCHELL REPAIR INFORMATION
COMPANY, LLC, a Delaware limited liability
company; SNAP-ON INCORPORATED, a
Delaware corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 37-2024-00020244-CU-OE-CTL

**DECLARATION OF LOUIS CARABETTA
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: June 26, 2026

Time: 1:30 p.m.

Judge: Hon. Katherine Bacal

Dept.: C-63

1 I, Louis Carabetta, 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 Plaintiff's Motion for
4 Final Approval of Class Action and PAGA Settlement. I have personal knowledge of all the facts stated
5 herein. I could and would competently testify under oath to these facts in court if requested to do so.

6 2. I retained Class Counsel in January 2024 and filed the lawsuit in April 2024. I filed the
7 case on behalf of myself and on behalf of all individuals who currently or formerly worked for Mitchell
8 Repair Information Company, LLC and Snap-On Incorporated (collectively, "Defendants" or
9 "Mitchell") as an hourly non-exempt employee in California at any time during the Class Period.

10 3. I worked for Defendants as a non-exempt employee, paid on an hourly basis, from
11 September 2020 to November 2024. At all times during my employment, I was paid on an hourly basis
12 and was entitled to legally compliant meal and/or rest periods, and minimum, regular and overtime
13 wages for all hours worked. Throughout my employment, I was subject to Defendants' written policies
14 and procedures.

15 4. Generally, my lawsuit claims that Defendants failed to pay for all hours worked, failed to
16 provide meal and rest breaks, failed to reimburse employees for mandatory business expenses, and failed
17 to timely pay all wages due upon separation of employment.

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

23 6. During these conversations, I learned about my responsibilities as a plaintiff in the lawsuit
24 and as a proposed Class Representative. I understood that pursuing this action as a class action rather
25 than merely seeking my individual claims substantially increased the risk to me. Those risks included
26 the possibility of being held liable for Defendants' attorneys' fees and costs in a complex class action if
27 I lost the case. I also understood that as a Class Representative, I would be under increased scrutiny by
28 the attorneys and the Court because I needed to prove that I was an adequate class representative.

1 Further, I understood that I would lose some autonomy over my individual claims, that I could not make
2 decisions for my sole benefit and that I needed to make every litigation decision with the best interests
3 of the Settlement Class in mind.

4 7. I also understood that pursuing this litigation created a very public record of my grievances
5 with Defendants which produced the risk that a future employer could hold it against me that I sued a
6 former employer.

7 8. I also knew that I was making a sacrifice in that I could have pursued my claims only on
8 an individual basis, likely obtaining a recovery greater than the portion of the class settlement I stand to
9 receive from this settlement. My attorneys explained to me that the net settlement value of my individual
10 claims may be greater than my ultimate recovery from the net class settlement amount.

11 9. Notwithstanding these risks and sacrifices, I decided to go through with the case because
12 I believed violations occurred and most employees would not know what their rights were and even if
13 they did, they would be apprehensive to file a lawsuit against their employer for fear of retaliation.

14 10. During the lawsuit I communicated on a regular basis with my attorneys. I reviewed status
15 updates from my attorneys and court filings on a regular basis, and spoke to my attorneys on the phone
16 because I wanted to keep up with developments in the case which I understood was one of my duties as
17 a class representative.

18 11. **Review and Approval of Settlement:** Mediation was held on July 31, 2025. Even though
19 I could not attend, I was available by telephone to speak with my attorneys and did speak with them
20 regarding the mediation before and after it took place. I was very satisfied with the terms of the
21 settlement that was agreed to by the parties. I reviewed and signed the Memorandum of Understanding
22 on September 5, 2025, and when the settlement papers were ready, I again spoke with my attorneys and
23 reviewed the settlement agreement which I signed on October 3, 2025.

24 12. **Participation:** Since I retained Class Counsel over two years ago, I have been actively
25 involved with this class action lawsuit performing the duties described above. While I did not keep
26 formal time records, I was in regular contact with my attorneys, attended hearings, reviewed important
27 court filings, participated in discovery, including preparing for and having my deposition taken, and
28

1 spent considerable time on the issues presented during the litigation and in the settlement process. I
2 estimate that I spent approximately 40-50 hours working on this case.

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

8 14. Ultimately, I believe I did the right thing in pursuing this case on behalf of the class who
9 now stand to receive substantial monetary payments as a result of this case and settlement. I also believe
10 that the requested Service Award in the amount of \$10,000.00 from the settlement is fair compensation
11 for (1) the work I performed, (2) the sacrifices made not pursuing this case individually, and (3) the risks
12 I undertook.

13 15. In light of all the time and effort I have spent on this case, the sacrifice I have made, the
14 risks I undertook by suing a former employer, the exposure to being responsible for paying Defendants'
15 costs in the event we did not win the case, and in light of the size of the settlement, I believe the request
16 for \$10,000.00 as a service award is fair and reasonable.

17 16. Further, I have reviewed the terms of the Settlement, including the monetary terms. I
18 support my attorneys' application for a payment of a Class Counsel Award in the amount of
19 \$361,666.67, comprised of \$326,666.67 (one-third of the Gross Settlement Amount) and up to \$35,000
20 for reimbursement of actually incurred litigation expenses.

21
22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct. Executed on 06/01/2026 (Date), at San Diego (City), California.

24
25 By:  Hauserpleinty Carabetta (Jun 1, 2026 10:33:48 PDT)

26 LOUIS CARABETTA