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

Date: January 23, 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 eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the lead named Plaintiff in the
4 above wage and hour class action filed against MITCHELL REPAIR INFORMATION COMPANY,
5 LLC., a Delaware limited liability company and SNAP-ON INCORPORATED, a Delaware corporation
6 Incorporated (hereafter, collectively "Mitchell").

7 2. This declaration is being submitted in support of Plaintiff's motion for Preliminary
8 Approval of Class and PAGA Action Settlement.

9 3. I believe that I am, have been and will continue to represent the interests of the class
10 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
11 to represent.

12 4. I worked for Mitchell as a non-exempt employee, paid on an hourly basis, in San Diego,
13 California from September 2020 to November 2024. At all times during my employment, I was
14 classified by Defendant as a non-exempt employee, paid on an hourly basis, and was entitled to legally
15 compliant meal and/or rest periods and minimum, regular and overtime wages for all hours worked.
16 Throughout my employment, I was subject to Mitchell's written policies and procedures.

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

20 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
21 to represent because I was subject to the same alleged unlawful employment policies and practices at
22 issue in this action, including but not limited to, Mitchell's failure to provide meal and rest breaks,
23 failure to reimburse employees for mandatory business expenses, and failure to timely pay all wages
24 due upon separation of employment. Factually, Mitchell's policies and practices apply class wide, and
25 Mitchell's liability can be determined by facts common to all members of the Class.

26 7. Further, there is no conflict between my interests and the interests of the class that I am
27 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that

1 I was injured by the same company-wide policies and practices to which the proposed Class was
2 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
3 of the Class by initiating this litigation, undertaking extensive class document evaluation, and
4 evaluating the proposed settlement to assure that it is fair.

5 8. I understood at the time that I filed this action, that as a Class Representative, I owed a
6 duty to the putative class members to faithfully prosecute this action with their best interests at the
7 forefront of every decision. I understood that I could not make any decision in this action for the sole
8 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
9 sacrifice my personal best interests for the benefit of the interests of the putative class members.
10 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
11 relief for my former co-workers for what I perceived to be Mitchell's unlawful wage and hour
12 practices. I believe that I faithfully executed the duties of a Class Representative throughout this
13 litigation and will continue to do until this litigation is fully and finally resolved.

14 9. I believe that the proposed settlement before the Court is fair, reasonable and adequate,
15 and made in the best interest of the Class Members. Consequently, I respectfully, and humbly, ask the
16 Court to grant preliminary approval of the Settlement and all of its terms.

17 I declare under the penalty of perjury under the laws of the State of California that the foregoing
18 is true and correct. Executed on 12/22/2025 (date), in San Diego, (city)
19 California.

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21 By: 
22 LOUIS CARABETTA
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