

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo-Johnson (State Bar #343881)
Perssia Razma (State Bar #351398)
John L. Nitti (State Bar #330752)
Carolina Faccin (State Bar #340855)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
prazma@jcl-lawfirm.com
jnitti@jcl-lawfirm.com
cfaccin@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K Hom (State Bar #327243)
Jaclyn Joyce (State Bar #285124)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
shani@zakaylaw.com
jackland@zakaylaw.com
jaclyn@zakaylaw.com

Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ELISEO FUENTES, an individual, on behalf of
himself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

KLINE AUTOMOTIVE, INC., a Minnesota
corporation; RK Automotive, INC., a Minnesota
corporation; and DOES 1-50, Inclusive,

Defendants.

Case No. 24STCV15011

**DECLARATION OF ELISEO FUENTES IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: April 8, 2026

Time: 9:30 a.m.

Judge: Hon. David S. Cunningham III

Dept: 11

1 I, ELISEO FUENTES, declare as follows:

2 1. I am over the age of eighteen, a California resident, Plaintiff and a Proposed Class
3 Representative in the above-entitled matter. I am the lead Plaintiff in the above wage and hour class
4 action filed against Defendant Kline Automotive, Inc. ("Defendant Kline Automotive") and Defendant
5 RK Automotive, Inc. ("Defendant RK Automotive") (collectively, "Defendant" and/or "Defendants").

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

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

11 4. I was employed by Defendants as a non-exempt service technician, paid on an hourly basis
12 and/or a piece-rate basis, from January of 2023 to September of 2023. At all times during my
13 employment, I was denied legally compliant meal and rest periods, minimum wages, and overtime
14 compensation. Throughout my employment, I was subject to Defendants' policies and procedures.

15 5. Generally, my lawsuit claims that Defendants failed to provide compliant meal and rest
16 periods, failed to pay for all time worked, failed to reimburse necessary business expenses, failed to
17 furnish accurate itemized wage statements, and failed to pay all wages upon separation.

18 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
19 to represent because I was subject to the same alleged unlawful employment policies and practices at
20 issue in this action, including but not limited to, Defendants' failure to provide compliant meal and rest
21 periods, failure to pay for all time worked, failure to reimburse necessary business expenses, failure to
22 furnish accurate itemized wage statements, and failure to pay all wages upon separation. Factually,
23 Defendants' policies and practices apply class wide, and Defendants' liability can be determined by
24 facts common to all members of the Class.

25 7. Further, there is no conflict between my interests and the interests of the class that I am
26 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that I
27 was injured by the same company-wide policies and practices to which the proposed Class was subjected
28 and seek the same relief. I have already demonstrated my ability to advocate for the interests of the

1 Class by initiating this litigation, assisting my attorneys with the prosecution of this action, and
2 evaluating the proposed settlement to assure that it is fair.

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

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

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18 I declare under the penalty of perjury under the laws of the State of California that the foregoing
19 is true and correct. Executed 03/05/2026, at Los angeles (location/city), California.

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21 By:  Eliseo Fuentes (Mar 5, 2026 17:19:06 PST)

22 ELISEO FUENTES
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