

Roxana E. Verano, Esq – State Bar No. 186837
roxana@landeggeresq.com
Evelyn Zarraga, Esq. – State Bar No. 296835
evelyn@landeggeresq.com
LANDEGGER VERANO & DAVIS, ALC
15760 Ventura Boulevard, Suite 1200
Encino, California 91436
Telephone: (818) 986-7561
Facsimile: (818) 986-5147

Attorneys for Defendant, Academy Valet Parking Service, Inc.
and Academy Valet Parking LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

CESAR CANDO, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

vs.

ACADEMY VALET PARKING SERVICE,
INC., a California Corporation; and DOES 1-50,
Inclusive,

Defendant.

CASE NO. 22STCV21833
ASSIGNED FOR ALL PURPOSES TO THE
HON. MAREN E. NELSON, DPT. 17

CLASS ACTION AND PAGA

**DECLARATION OF ROXANA E.
VERANO, ESQ. IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

DISCOVERY CUT-OFF: None
MOTION CUT-OFF: None
TRIAL DATE: None

CASE FILED: July 6, 2022

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4
5
6
7
8
9
10

11
12

13
14
15
16
17

18
19
20
21
22
23

24

25

26

27

6. Paragraph 8 of the Settlement Agreement provides Defendants' Class Size Estimates and related Escalator Clause. As of the date of this declaration, the number of Total Workweeks during the Class Period continues to be at or below 8,076 Total Workweeks. Since the Class Period ends on June 23, 2023, a date prior to the execution of the Settlement Agreement, the number of 8,076 Total Workweeks will remain the same through the settlement process of this action. As such, the following language in Paragraph 8 of the Settlement Agreement is not triggered and the Class Period end date will remain June 23, 2023, "Alternatively, Defendants may, at its sole discretion, opt to cut off the Class and PAGA Periods when 8,076 Workweeks are reached in lieu of additional payments."

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing facts are true and correct.

Executed on September 27, 2023, at Encino, California.

Rodriguez

ROXANA VERANO