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Attorneys for Plaintiff Silverio Perez
and all others similarly situated

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SILVERIO PEREZ, on behalf of
himself and all others similarly situated

PLAINTIFF,

V.

ECOLAB PRODUCTION LLC, a
Delaware Limited Liability Company;
and DOES 1 through 100, inclusive

DEFENDANTS.

Case No.: 5:24-cv-01954-SSS-SP

CLASS ACTION

**DECLARATION OF CASSANDRA
A. CASTRO IN SUPPORT OF
MOTION FOR APPROVAL OF
PAGA SETTLEMENT**

Date: September 11, 2026

Time: 2:00 p.m.

Courtroom: 2

[Honorable Sunshine S. Sykes]

Complaint Filed: July 24, 2024

FAC Filed: October 22, 2024

Date of Removal: September 12, 2024

**DECLARATION OF CASSANDRA A. CASTRO IN SUPPORT OF MOTION FOR
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DECLARATION OF CASSANDRA A. CASTRO:

I, Cassandra A. Castro, declare as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently. I am an attorney at The Myers Law Group, A.P.C. (“MLG”), counsel for the named Plaintiff Silverio Perez (“Plaintiff”), on behalf of himself and other similarly situated individuals, in the above-entitled action. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I could and would competently do so.

2. I graduated from Boston University School of Law in 2020. I am an active member in good standing with the State Bar of California. I was admitted to the State Bar of California on or about January 19, 2021. I am admitted to practice before the United States District Court – Northern, Central, Southern, and Eastern Districts of California; United States Ninth Circuit Court of Appeals; and all of California State Courts. During law school, I externed as a summer Law Clerk at The Myers Law Group, A.P.C and later worked at the firm as part of the State Bar of California’s Practical Training of Law Students (also known as Certified Law Student) program under the supervision of Attorney Jason Hatcher. In December 2020, I was admitted to practice under Cal. Rule of Court, Rule 9.49, as a Provisionally Licensed Lawyers under the supervision of David P. Myers. After being licensed on January 19, 2021, I worked as an associate attorney at The Myers Law Group, A.P.C. until December 16, 2022. At MLG, I focused solely on plaintiff-side employment matters, including wage and hour class actions and PAGA actions. I supported and helped litigate the certified class and/or collective actions of:

- *Alvarez, et al. v. City of Oxnard. See Alvarez v. City of Oxnard* (C.D. Cal. Dec. 17, 2020, No. CV 19-8044 PSG (JCx)) 2020 U.S.Dist.LEXIS

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250524 (granting preliminary collective FLSA certification); *Alvarez v. City of Oxnard* (C.D. Cal. Dec. 17, 2020, No. CV 19-8044 PSG (JCx)) 2020 U.S.Dist.LEXIS 250522 (granting class certification);

- *Feltzs v. Cox Communications Cal., LLC, et al.* The U.S. District Court Central District of California partially certified a class action on June 1, 2021. *Feltzs v. Cox Communs. Cal., LLC* (C.D. Cal. June 1, 2021, No. SACV 19-2002 JVS (JDEx)) 2021 U.S.Dist.LEXIS 146447. On or about August 1, 2022, the Honorable James V. Selna granted final approval of the class action settlement for the total amount of \$1,850,000.00. *See* Central District Case No. 18-cv-02136 at Dkt. 126.
- *Dunn v. Seasons Hospice & Palliative Care of California, Inc., et al.*, San Bernardino Superior Court Case No: CIVDS1824275. On or about July 21, 2022, the Honorable David S. Cohn granted final approval of the class action settlement for the total amount of \$800,000.00 and confirmed The Myers Law Group, A.P.C. – David P. Myers, Jason Hatcher, and Cassandra A. Castro as class counsel.
- *Lisa Miller v. Investment Concepts, Inc. (“ICI”)*, Santa Barbara Superior Court Case No. 19CV04672, as an attorney at The Myers Law Group, APC. On or about October 26, 2022, the Honorable James F. Rigali granted final approval of the class action settlement in the *ICI* matter for the amount of \$546,677.68 and confirmed David P. Myers, Jason Hatcher, Mordan J. Good, and Cassandra A. Castro of The Myers Law Group, A.P.C. as Class Counsel.

From August 2023 to August 2025, I was a Senior Associate Attorney at Lavi & Ebrahimian, LLP, where my practice focused solely on wage and hour class actions, PAGA actions, and individual wage and hour matters. While at Lavi & Ebrahimian, I was confirmed as Class Counsel in several class and/or PAGA actions, including but

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1 not limited to the following actions: *Nunez v. E & T Foods, Inc.*, Los Angeles Superior
2 Court Case No. 21STCV22410 (Settlement Class Approved); *Raygoza v. Raven*
3 *Industries, Inc., et al.*, San Bernardino Superior Court Case No. CIVSB2211390
4 (Settlement Class Approved); *Stuart v. AIO Acquisition, Inc., et al.*, San Bernardino
5 Superior Court Case No. CIVSB2209113 (PAGA Settlement Approved in 2025,
6 billable rate of \$675/hr); *Minas et al. v. Panda Express, Inc. et al.*, Los Angeles
7 Superior Court Case No. 22STCV07753 (PAGA Settlement Approved in 2024,
8 billable rate of \$675/hr). I rejoined The Myers Law Group, A.P.C. in September 2025.

9 3. Plaintiff's counsel's one-third fee request of the common fund is fair and
10 reasonable given the time and labor required, the novelty and difficulty of the wage
11 and hour claims at-issue in this matter; the skill required to properly litigate a wage
12 and hour PAGA action of this type; a one-third percentage of the common fund is the
13 customary fee; the fact that MLG took this matter on under a contingency agreement;
14 the significant recovery obtained based on the claims alleged; the experience,
15 reputation and ability of the plaintiff's attorneys working on this case, and awards in
16 similar cases.

17 4. Plaintiff's Counsel believes that the proposed Settlement is fair,
18 reasonable, and adequate given the known facts and circumstances.

19 5. The entire proposed settlement and details of the settlement are set forth
20 in the Private Attorneys General Act Settlement Agreement and Release of Claims. A
21 true and correct copy is attached as **Exhibit 1**. The settlement in principle was reached
22 after a private mediation, which occurred after the parties had possessed sufficient
23 information and documentation to make an informed decision and conducted a
24 comprehensive review and analysis of the facts, potential damages, and legal issues
25 raised by the action. The private mediation took place on February 20, 2026, with
26 mediator Steve Pearl, Esq. The settlement negotiations at all times were at arm's-
27 length and noncollusive. In light of my experience in employment law and class and
28 PAGA action litigation, it is my opinion that the settlement is fair, reasonable, and

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1 adequate, given the uncertainty, risk, expense and delay associated with litigating the
2 action through the completion of the arbitration proceeding that challenges Plaintiff's
3 standing as an aggrieved employee, and subsequent trial, including the risks for
4 potential appeals.

5 6. Plaintiff and counsel conducted a comprehensive pre-mediation
6 investigation into the facts and legal issues raised herein. Plaintiff's investigation
7 included requesting and obtaining documents and information for the PAGA
8 Employees, that included data detailing the total number of aggrieved employees, total
9 number of pay periods, as well as payroll and timekeeping data (including a sampling)
10 and documents, Plaintiff's personnel file, and wage and hour policy documents, to
11 permit Plaintiff to prepare a damages model.

12 7. In reaching the proposed Settlement, Plaintiff and Class Counsel's
13 negotiation efforts took into consideration relevant factors such as the size of the
14 PAGA Employees, the information and documents obtained, the experiences of
15 Plaintiff, Defendant's projected liability, the expense of continued litigation, the
16 uncertainty inherent in litigating complex matters, Defendant's policies including its
17 compensation practices, potential appeals, and Defendant's defenses. Counsel further
18 thoroughly reviewed and analyzed the information, documents and data obtained in
19 connection with Plaintiff's claims. Based on my experience handling similar claims,
20 I am of the opinion that the settlement represents a favorable resolution for the LWDA
21 and the PAGA Employees for Defendant's alleged violations without the further
22 expense and uncertainty and risk of further litigation. This proposed settlement is fair
23 and reasonable and comparable to similar settlements involving these types of claims.

24 8. Based on review and analysis of the information and documentation
25 obtained in this action, Plaintiff's counsel estimates that Defendant's reasonable
26 PAGA exposure here is approximately \$2,614,880.00 (approximately 27% of
27 Defendant's maximum 100% violation rate exposure of \$9,559,200.00). As further
28 outlined in the Motion, the Settlement fund of \$550,000.00 is an excellent result for

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1 the LWDA and PAGA Employees and is a sum that is fair and reasonable based on
2 Defendant's reasonable exposure, Defendant's asserted defenses, the Court's
3 discretion to reduce civil penalties, and in light of the risks that the Arbitrator may
4 determine that Plaintiff is not an aggrieved employee representative of his alleged
5 claims.

6 9. Attached hereto as **Exhibit 2**, is a true and correct copy of Plaintiff's July
7 12, 2024 PAGA Notice provided to the LWDA.

8 10. Attached hereto as **Exhibit 3** is a true and correct copy of the bid quote
9 from Phoenix Settlement Administrators estimating administration costs in this matter
10 of an amount not-to-exceed \$5,400.00 for the 365 aggrieved employees.

11 11. On or about July 21, 2025, Plaintiff initiated arbitration for his individual
12 wage and hour claims and individual PAGA claims with the American Arbitration
13 Association ("AAA"), Case No. 01-25-0003-4104.

14 12. I believe that the representative service award of \$15,000 for Plaintiff
15 Silverio Perez, is fair, reasonable, and adequate. Plaintiff was instrumental in
16 providing information throughout the litigation and through the mediation, and was
17 vigilant to ensure fairness to the aggrieved employees. Plaintiff took on the risk of
18 stigma for filing a class action and representative action lawsuit. Plaintiff signed a
19 Duties of Class Action Representative document indicating that he understood the
20 risks and obligations of acting as a class representative. Plaintiff has spent significant
21 time prosecuting this case, most notably providing documents and information to
22 counsel, discussing his experience with counsel, participating in mediation, reviewing
23 settlement documents, and providing consistent support to counsel. There are few
24 individuals that are willing to act as a representative in these types of actions as a
25 result of potential negative impact on employment prospects. Plaintiff is signing a
26 general release as part of this settlement, which will prevent Plaintiff from proceeding
27 with and/or potentially recovering unpaid wages and penalties for the alleged
28 individual wage and hour violations in his AAA Arbitration proceeding. There is no

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1 doubt that without Plaintiff's hard work, diligence, and willingness to assume a large
2 financial and reputational risk, there would have been no recovery in this case. There
3 was ample risk to the Plaintiff in filing the lawsuit as employers often retaliate or make
4 it very difficult for a person to obtain subsequent employment.

5 13. Based on a maximum individual estimated pay period count of 76 pay
6 periods during the PAGA Period, the estimated highest Individual PAGA Payment is
7 \$574.33. Based on a minimum pay period count of one (1) pay period, the estimated
8 lowest Individual PAGA Payment is \$7.56.

9 14. On August 3, 2026, I telephonically met and conferred with counsel for
10 Defendant, Shareef Farag, pursuant to Local Rule 7-3 regarding Plaintiff's Motion for
11 Approval of PAGA Settlement. Defendant does not oppose the filing of this Motion.

12
13 I declare under penalty of perjury under the laws of the State of California and
14 the United States of America that the foregoing is true and correct.

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16 Date: August 14, 2026

/s/Cassandra A. Castro

Cassandra A. Castro

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