

1 AARON A. BUCKLEY (SBN 202081)
aaron.buckley@quarles.com
2 NORA J. STEINHAGEN (SBN 338969)
nora.steinhagen@quarles.com
3 **QUARLES & BRADY LLP**
101 West Broadway, Ninth Floor
4 San Diego, California 92101-8285
Telephone: 619-237-5200
5 Facsimile: 619-615-0700

6 Attorneys for Defendant ACES 2020 I, LLC
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF ALAMEDA, HAYWARD HALL OF JUSTICE**
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12 DANIELA ARBELAEZ ACEVEDO and
MYRELLA THOMAS, as individuals, and on
13 behalf of themselves and on behalf of all
persons similarly situated,

14 Plaintiffs,

15 v.

16 ACES 2020 I, LLC, a Limited Liability
17 Company; and DOES 1 through 50, inclusive,

18 Defendants.
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Case No. 24CV061880

ASSIGNED FOR ALL PRE-TRIAL
PURPOSES TO
HON. VICTORIA KOLAKOWSKI
DEPARTMENT 518

**DECLARATION OF LUKE JANA IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL**

Date: December 12, 2024
Time: 2:30 p.m.

Action Filed: January 30, 2024
Trial Date: Not Set

21 I, Luka Jana, declare as follows:

22 1. I have personal knowledge of the following facts and, if called as a witness, could
23 and would testify competently thereto.

24 2. Since July of 2014, I have been General Counsel at ACES, 2020 LLC, doing
25 business in California as ACES 2020, I, LLC ("ACES"), the Defendant in the above-entitled
26 action. I am the executive officer for ACES primarily responsible for handling and managing
27 ACES' response to this litigation.

28 3. As General Counsel, I am familiar with the financial and professional relationships

1 that ACES has with other entities. I am also familiar with the claims alleged in all California-
2 based lawsuits in which ACES has been named as a Defendant in which ACES has been properly
3 served.

4 4. The Parties have selected ILYM Group, Inc. to serve as the settlement
5 administrator in this action. I am not aware of any actual or potential conflicts of interest between
6 ACES and ILYM Group, Inc.

7 5. I am not aware of any other pending matter or action asserting claims that will be
8 extinguished or adversely affected by this Settlement other than the following matters: *Allen v.*
9 *ACES 2020 I, LLC*, Case No. C23-00916, pending in the Superior Court for the County of Contra
10 Costa; *Williams v. ACES 2020 LLC*, pending in the Superior Court for the County of Los Angeles,
11 Case No. 24LBCV01031; *Lopez v. ACES ABA*, pending with the Department of Industrial
12 Relations, Case No. WC-CM-879476; and *Shenouda v. ACES 2020, I, LLC*, pending with the
13 Department of Industrial Relations, Case No. WC-CM-931894.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.

16 Executed on this 11th day of November, 2024, at San Diego, California.

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19 _____
20 Luke Jana
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