

BUSH GOTTLIEB
801 North Brand Boulevard, Suite 950
Glendale, California 91203-1260

1 DANA S. MARTINEZ (SBN 205453)
dmartinez@bushgottlieb.com
2 BUSH GOTTLIEB, A Law Corporation
801 North Brand Boulevard, Suite 950
3 Glendale, California 91203-1260
Telephone: (818) 973-3200
4 Facsimile: (818) 973-3201

5 LAUREN MCDERMOTT (*Pro Hac Vice* to be Submitted)
lobpowell@gmail.com
6 ARTHUR R. TRAYNOR (*Pro Hac Vice* to be Submitted)
atraynor@mooneygreen.com
7 MOONEY, GREEN, SAINDON,
MURPHY & WELCH, P.C.
8 1920 L. Street, NW, Suite 400
Washington, DC 20036
9 Telephone: (202) 783-0010
Facsimile: (202) 783-6088

10 Attorneys for Plaintiffs
11

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

14 NICHOLAS ACEDO, DANIEL
ACKLEY, DEREK ADAIR, VICTOR
15 AGUILAR, JACK ALBERT, GEORGE
ANDERSON, MARK ANDERSON,
16 ANDRES ARAMBULA, ANTHONY
ARELLANO, ANTHONY ARRIAGA,
17 MIGUEL ARROYO, JEFFREY
ASHBURN, CHRISTOPHER ASHLEY,
18 BRIAN AVILA HERNANDEZ,
ANDREW BAKER, TIMOTHY BAKER,
19 GEOFF BALCHOWSKY, MICHAEL
BANDA, GREGORY BARBERA,
20 KENNETH BARONE, DANIEL
BARBERA, AMANTE BARTOLOME,
21 KYLE BAUERLEIN, JESSE BECK,
ADRIAN BEIGH-GACAD, ELLERY
22 BELTRAN, CHAD BENDANTI,
MATTHEW BERGERSON, SCOTT
23 BERNARD, ROBERT BETANCOURT,
NICHOLAS BIRNBAUM, MATIN
24 BLOUNT, MICHAEL BOCHEY, JOEY
BOJORQUEZ, JIMMY BORLAND,
25 KYLE BOUDREAU, DAMON
BOWDEN, CORY BOWER, BRIAN
26 BOYD, DAVID BRIEN, JOSHUA
BRINNON, EVAN BROOKS, ANDRE
27 BROWN, DREON BROWN, KYLE
BROWN, RYAN BROWN, BRIAN
28 BUEHLER, ETHAN BURLINGAME.

Case No. 2:23-cv-04482

**COMPLAINT FOR
DECLARATORY JUDGMENT,
COMPENSATION AND OTHER
RELIEF**

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801 North Brand Boulevard, Suite 950
Glendale, California 91203-1260

1 LEE BUSBY, DAVID BYRNE, SCOTT
 2 CABUNOC, ROCKY CAMARLINGHI,
 3 MICHAEL CAMPANA, ANTHONY
 4 CANATA, DUSTIN CANNISTRACI,
 5 RYAN CAPIRO, HARRISON CARL,
 6 JOSE CARREON, JOHN CARTON,
 7 WILLIAM CASE, JOSE CASTILLO,
 8 ALICIA CASTRO-ROHRER, GORDON
 9 CESAR, JONATHAN CENDEJAS,
 10 LOUIS CERDA, CHARLES
 11 CAHTTONG, MARK CHAVEZ,
 12 KAMERON CALRK, EVAN COLLADO,
 13 CHARLES COLLINS, WILLIAM
 14 COLLYER, DEAN COMER, FRANK
 15 CONRAD, ARTURO CONTRERAS,
 16 MICHAEL CONTRERAS, BRIAN
 17 COOK, BRIAN COONEY, DANIEL
 18 COOPER, DION COOPER,
 19 MILO COPE, ROBERT CORDOBES,
 20 JEFFREY CORDRAY, GARRETT
 21 CORLEY, CHAD CORONA,
 22 RAYMOND COVARRUBIAS, STEVEN
 23 CRANSKY, KERRY CRIVELLO,
 24 ABRAHAM CUERVO-MITCHELL,
 25 ARRAN DAHLBERG, SLATER
 26 DAVIES, MATTHEW DAVIS, ROBERT
 27 DEAN, ANDY DELAROSA, ROMAN
 28 DE LA TORRE, MIKE DENNIS,
 DOUGLAS DEYOUNG, . NICHOLAS
 DIEZ, MAX DINO, BRYAN
 DOMINGUEZ, CHASE DOUGHTY,
 TOWNER DOUGLAS, DAYVION
 DRUMWRIGHT, ROBERT DUBARRY,
 CASEY DUNN, CHRISTIAN ERAZO,
 MARK ESTRADA, NICHOLAS
 ESTRADA, DARIN EVANS, .
 MATTHEW EVISON, THADDEUS
 FARMON, MATTHEW FARRIS,
 DEREK FARROW, CURTIS
 FAULKNER, MICHAEL FINGER,
 VINCENT FOSTER, JONATHAN
 FOWLER, TIMOTHY FREEMAN JR.,
 OMAR FUENTES, RYAN FUETTE,
 TONY GAJ, ARTURO GALLARDO,
 RAYMOND GALLEGOS, JORDAN
 GAMMON, FELIX-EDMUND
 GAPUZAN, STEPHEN GARIBAY,
 CHRISTIAN GASSLER, QUINCY
 GATEWOOD, ADAM GATICA,
 RANDALL GAUL, CHRISTOPHER
 GELINAS, KEVIN GELINAS, CHRIS
 GENTRY, SEVAN GERARD, JACOB
 GIBSON, JOSHUA GILBERT, ROBERT
 GILMER, MATTHEW GODBY, FRANK
 GOMEZ. PABLO GOMEZ. ALFONSO

BUSH GOTTLIEB
801 North Brand Boulevard, Suite 950
Glendale, California 91203-1260

1 GONZALEZ, JACOB GONZALEZ,
 JAVIER GONZALEZ, JESSE
 2 GONZALEZ, STEVEN GONZALEZ,
 MATTHEW GOODRICH, ISRAEL
 3 ORTIZ GRAJEDA, BRANDON GRANT,
 GILLIAN GRIFFIN, RASHAD
 4 GRIGSBY, MARTIN GUERRERO,
 DANIEL GUTIERREZ, ROLAND
 5 GUTIERREZ, JAMES HALL, KYLE
 HALSTEAD, ORRIE HAMILTON,
 6 SHAUN HANNAN, MICHAEL
 HARTLEY, ROBERT HATFIELD,
 7 ANDREW HAUCK, CONNOR HAVRO,
 DARIN HEBERT, LEVI HENRY,
 8 ANTHONY HERNANDEZ, DAVID
 HERNANDEZ, RICHARD
 9 HERNANDEZ, KIMBERLY HERRING,
 BRANDON HILL, SCOTT HOBBS,
 10 CLAYTON HOGAN, CAMERON
 HOLLAND, PHILLIP HONG, BRIAN
 11 HOOVER, SAMUEL HOPWOOD,
 CHRISTOPHER HORST, BRYAN
 12 HOWARD, WYATT HOYT, HENRY
 HSIEH, CHRISTOPHER HUGHES,
 13 TOMAS HUNGERFORD, TYRONE
 HURST, CAYLIN HUXFORD, DENIS
 14 ILYAICH, SEAN ISAACSON, GARY
 IZQUIERDO, KEVIN JACOBS,
 15 MARCUS JACOBS, BRENNAN
 JANSEN, ALLEN JANZEN, PAUL
 16 JEREMICA, VICTOR JIMENEZ, RYAN
 JOHNSON, MICHAEL JONES, OLIN
 17 JONES, JR., WILLIAM JUN,
 ARMANDO JURADO, KRISTIAN
 18 KALEV, JASON KEENER, JOHN
 KELLERS II, ADONIS KELLY,
 19 CHARLES KELLY, CASEY
 KETELSLEGER, EHUD KIM, SAMUEL
 20 KIM, TIMOTHY KIMBALL, CHAD
 KISOW, ANTHONY KONG, THOMAS
 21 KUZMÍCZ, JONATHAN KURIPLA,
 EDGAR LAGUNAS, JUSTIN LAHR,
 22 DAVID LAKE, DAVID LANDON,
 LYNDSEY LANTZ, SERGIO LARA
 23 JARA, NATHAN LARGEN, RYAN
 LARSON, JASON LAWRENCE,
 24 HASSAON LAWS, SCOTT LAZAR,
 DENVER LEAMY, EDWIN LEANO,
 25 MATTHEW LEBLANC, MICHAEL
 LEON, KYLE LEVINDOFSKE,
 26 BRENDON LEW, GREGORY LEWIS,
 NICHOLAS LIFFERS, DOMINIC LILE,
 27 FERNANDO LINARES, DARREN
 LLOYD, ANDREW LOERA, BRIAN
 28 LOMELI, LONNIE LOPEZ, JR., JACOB

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801 North Brand Boulevard, Suite 950
Glendale, California 91203-1260

1 LOVEJOY, RYAN LOZANO, SCOTT
 2 LUFT, MICHAEL MACDOWELL,
 3 FELIX MAGANA, MICHAEL
 4 MAGISTRADO, CHRISTOPHER
 5 MALRAY, MICHAEL MAND AHL,
 6 AARON MANN, FERNANDO MARIN,
 7 MIGUEL MARQUEZ, TANNER
 8 MARSEY, ADAM MARTIN, TIMOTHY
 9 MARTIN, ERIC MARTINEZ,
 10 FRANCISCO MARTINEZ, STEVEN
 11 MARTINEZ, JASON MASS, JOHN
 12 MCCORD, MICHAEL MCGRADY,
 13 PETER MCKINNEY, BRYAN MEDINA,
 14 CHASE MENDENHALL, MORCUS
 15 MESSIHA, DAVID METCHIKOFF,
 16 HILARION MEZA, DEREK MILLER,
 17 TYLAR MILLER, ANDREW MOLINAR,
 18 DONTA MONTGOMERY, MATTHEW
 19 MOON, DANIEL MOORE, DAVID
 20 MORALES, GABRIEL MORENO,
 21 JUSTIN D. MORGAN, JUSTIN DA.
 22 MORGAN, NIMA MORTAZAVI,
 23 ANDREW MOTT, ROBERT MULLER,
 24 TISA MURPHY, JACOB MURRELL,
 25 MATTHEW NAVARRO, ERIC
 26 NEVAREZ, JOHN NGO, JABARI
 27 NICHOLS, ALEXANDER NIELSEN,
 28 JOHN NORTON, MARIO NUNEZ,
 ADAM OCAMPIAN, JEFFERY
 OCHOA, MICHAEL OESER, JESUS
 OROZCO, ERNEST ORRANTE, DAVID
 OSEGUERA, JESUS PADILLA, IAN
 PALLARES, JOSEPH PAMBIANCO,
 SERGIO PARRA, ZACHARY PATTON,
 DAVID PAULS, JOSE PAZ, BLAKE
 PEARSON, MICHAEL PELLEGRINI,
 JOSHUA PERELLI-MINETTI,
 EDUARDO PEREZ, JOSE PEREZ,
 LUKE PETERMAN, TIMOTHY PIDO,
 SCOTT PIKE, ANGELO PITILLO,
 JAMES PITILLO, LEV POLESCHYK,
 CHRISTOPHER POLGAR, GARRET
 POTTER, COLEMAN PRICHARD,
 ALEXANDER PRINCE, MICHAEL
 PUGLIESE, TYLER PUGMIRE,
 CHADWICK QUALLEY, BRYAN
 QUICK, RYAN QUIGLEY,
 CHRISTOPHER QUINLAN, BRIAN
 RANKIN, MATTHEW RAPOZA,
 TAYLOR RAPPAPORT, JASON
 REKHOPF, JEREMY RENNIE, CHAD
 REYES, ERICK REYES, ZACH
 REYNOLDS, LOUIS RICHARD,
 JAVIER RIVERA, RANDY RIVERA,
 JOE ROBLES. RUDY ROCHA. DAVID

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801 North Brand Boulevard, Suite 950
Glendale, California 91203-1260

1 RODRIGUEZ, DENNIS RODRIGUEZ,
 2 JEFFERY RODRIGUEZ, RAYMOND
 3 RODRIGUEZ, TOM RODRIGUEZ,
 4 MICHAEL RÓMO, DON ROPRIGHT,
 5 JAMES ROWE, RÓGER RUBIO, ADÁM
 6 RUSSO, SHANNON SAFFO, MICHAEL
 7 SAFRAN, ADALBERTO SALAZAR,
 8 SERGIO SANCHEZ, JEREMY
 9 SANDIFORD, CHARLES SANDOR,
 10 MICHAEL SANDOVAL, JASON
 11 SCHMITZ, PAUL SCHORI, JONATHAN
 12 SCULLY, MICHAEL SEERS, JASON
 13 SHELTON, JON SHIBUYA, CRAIG
 14 SHUBSDA, BRIAN SIMON, JULIAN
 15 SINGELAKIS, AUSTIN SMITH,
 16 BRANDON SMITH, DANIEL SMITH,
 17 JEFFREY SMITH, BENJAMIN
 18 SPEAKMAN, MATTHEW SPENCE,
 19 WILLIE SPENCER, SETH SPRINGER,
 20 NATHAN STANTON, TREVOR
 21 STEPAN, ERIC STEPHENS, STEVEN
 22 STERN, MARK STEVENSON, EDWIN
 23 STILES, CRAIG STUDENKA, KEITH
 24 SZALONEK, HUGO TADEO, ANDREW
 25 TALLEY, PATRICK TAMRAZIAN,
 26 MARIO TARGONI, JUSTIN TAYLOR,
 27 EDUARDO TELLEZ, ANTHONY
 28 TEMPLE, THEK, BRIAN THIEBOLD,
 EDDIE TIBURCIO, KONGRIT
 TIENGERD, FALÓ TIUMALU,
 RHONIE TÓPINIO, ADRIAN TORRES,
 PHIL TRAN, DOUGLAS TRINIDAD,
 MANVEL TRTRYAN, ANTHONY
 TUBBS, CLINT TULL, DANIEL
 VALDES, MACKENZIE
 VANDERGEEST, VAN GERPEN,
 SAMANTHA VANHOOSER,
 JONATHAN VARGAS, RICARDO
 VASQUEZ AGUILAR, MICHAEL
 VAVRIN, PETE VEGA, OMAR
 VELASQUEZ, ANTHONY VERDECIA,
 ROBERT VILLA, JON PATRICK
 VILLAPANDO, JASON
 VILLEGGIANTE, MICHAEL
 VINEYARD, VOELKER, JARED
 VOELTZ, NATHAN VONDERHARR,
 PRESTON VOWELS, MICHAEL
 WALTON, CHRISTOPHER WAN,
 MATTHEW WASCHAK, MITCHELL
 WASSERMAN, CHRISTOPHER
 WATSON, THOMAS WENG, JAMES
 WESTLAND, BRANDON WILE,
 STEVEN WILLIAMS, KENNETH
 WILSON, SCOTT WISCHNACK,
 SCOTT WISE, JEROME WOODCOCK.

1 ROBERT WYATT, PETER YAKAS,
2 WESTLEY YOSHIMURA, ROMAN
3 ZAVALA, JUAN ZEPEDA, STEPHEN
4 ZIEMER, CARLOS ZUNIGA.

5 Plaintiffs,

6 vs.

7 CITY OF LOS ANGELES,

8 Defendants.

9 **Preliminary Statement**

10 1. Plaintiffs are current or former employees of the Defendant City of Los
11 Angeles, California, and bring this action on behalf of themselves and other
12 employees similarly situated. This is an action for declaratory judgment under 28
13 U.S.C. §§ 2201 and 2202 and for compensation and other relief under the Fair Labor
Standards Act of 1938, as amended, 29 U.S.C. § 201, et seq. (hereafter “FLSA”).

14 **Jurisdiction and Venue**

15 2. This Court has jurisdiction over this action pursuant to 29 U.S.C. §
16 216(b), 28 U.S.C. § 1331, and 28 U.S.C. § 1337.

17 3. This Court is the appropriate venue for this action pursuant to 28 U.S.C.
18 1391(b).

19 **Parties**

20 4. Plaintiffs are employees or former employees of the Defendant City of
21 Los Angeles. They were employed at the Los Angeles Fire Department, which is
22 located in the Central District of California. Plaintiffs were at all times material to
23 this action employed in the activity of a public agency, as defined by 29 U.S.C. §
24 203(s)(1)(C).

25 5. Plaintiffs named in this action have each executed and hereby file with
26 the Court a written consent to become a party plaintiff in this action, as provided by
27 29 U.S.C. §§ 216(b) and 256. Plaintiffs’ written consents are attached hereto as
28 Exhibit A. If an additional similarly situated employee wishes to become a party

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1 plaintiff, his or her consent will be filed with this Court.

2 6. Defendant is the City of Los Angeles, California, which has a principal
3 place of business in the Central District of California. Defendant City of Los Angeles
4 is an “employer,” as defined by 29 U.S.C. §203(d), an “enterprise” as defined by 29
5 U.S.C. §203(r), and a “public agency,” as defined by 29 U.S.C. §203(x).

6 **Facts**

7 7. Each Plaintiff is or was employed by the Defendant at the Los Angeles
8 Fire Department (“LAFD”) as a rotational dual trained fire fighter/paramedic or dual
9 trained fire fighter/Emergency Medical Technician (“EMT”).

10 8. As rotational fire fighters, Plaintiffs are assigned on a shift-by-shift
11 basis to either a fire engine or ambulance.

12 9. At all times material to this action, each Plaintiff is or was assigned to
13 work shifts on an ambulance.

14 10. At all times material to this action, the majority of Plaintiffs primarily
15 worked on an ambulance and are or were infrequently assigned to work on a fire
16 engine.

17 a) By way of example, in the last three years at least one Plaintiff
18 has worked full time for over six months assigned to an
19 ambulance and was never in that time assigned to work on a fire
20 engine.

21 b) By way of another example, in the last three years at least one
22 Plaintiff has worked full time for over six months assigned to
23 work on an ambulance for all but the two and one-half shifts he
24 was assigned to a fire engine.

25 c) Upon information and belief, the majority of Plaintiffs work no
26 more than (and frequently fewer than) two shifts assigned to a
27 fire engine in any given 27-day period and for the remainder of
28 the shifts is assigned to work on an ambulance.

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1 d) Upon information and belief, all Plaintiffs have been restricted
2 to serving only on an ambulance for the two years immediately
3 following their acquisition of a paramedic certification.

4 11. Upon information and belief, at all times material to this action each
5 Plaintiff is or was assigned to platoon duty when assigned to work on an ambulance,
6 whereby he or she is assigned to one of three shifts: A, B, or C. During the course of
7 a nine (9) day period, Plaintiffs are assigned a day on, followed by a day off,
8 followed by a day on, followed by a day off, followed by a day on, followed by four
9 days off. The schedule is repeated every nine (9) days and routinely causes Plaintiffs
10 to work over 40 hours in a workweek.

11 12. At all times material to this action, when assigned to work on an
12 ambulance Plaintiffs do not engage in fire suppression or other fire protection
13 activities as defined by Section 203(y) of the FLSA and 29 C.F.R. § 553.210.

14 13. Defendant applies a 27-day work period under section 207(k) of the
15 FLSA to Plaintiffs when calculating their FLSA overtime pay. 29 U.S.C. § 207(k).

16 14. At all times material to this action, Defendant has failed and refused to
17 provide Plaintiffs with overtime compensation for time worked above 40 hours in a
18 workweek, thereby violating 29 U.S.C. §207(a) of the FLSA.

19 15. Upon information and belief, Defendant and its agents are aware of the
20 requirements of the FLSA and are further aware that the 207(k) exemption does not
21 apply to exempt hours an employee works on an ambulance, during which time the
22 employee has no responsibility to engage in fire suppression.

23 **Failure to Pay Overtime for All Hours Worked In Excess of Forty Hours in a**
24 **Workweek in Violation of the FLSA**

25 16. Plaintiffs hereby incorporate by reference paragraphs one (1) through
26 fifteen (15) in their entirety as if restated herein.

27 17. Employees covered by the FLSA are entitled to overtime compensation
28 at the rate of one and one-half times their regular rate of pay for all hours worked in

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1 excess of the maximum hours set forth in 29 U.S.C. § 207.

2 18. At all times material to this action, Plaintiffs have worked hours in
3 excess of the hourly levels specified in the FLSA, 29 U.S.C. § 207(a). As a result, at
4 all times material to this action, the Plaintiffs were entitled to overtime compensation
5 at a rate of not less than one and one-half times their regular rate of pay for the hours
6 they have worked in excess of 40 hours per workweek. 29 U.S.C. § 207(a).

7 19. At all times material to this action, Defendant has failed and refused to
8 provide Plaintiffs with overtime compensation at a rate of one and one-half times
9 their regular rate of pay for the hours they have worked in excess of 40 hours per
10 workweek, thereby violating 29 U.S.C. § 207(a).

11 20. Specifically, in violation of 29 U.S.C. § 207(a), Defendant has paid the
12 Plaintiffs based on its erroneous classification of Plaintiffs as employees invariably
13 engaged in fire protection activities under 29 U.S.C. § 207(k) and 29 C.F.R. Part 533,
14 even for shifts they are assigned to an ambulance.

15 21. Defendant employs firefighter/paramedic employees who, unlike
16 Plaintiffs and similarly situated employees, work exclusively on ambulances. At all
17 times material to this action, Defendant has not classified such employees as engaged
18 in fire protection activities under 29 U.S.C. § 2017(k) and 29 C.F.R. Part 553 and has
19 paid and continues to pay them overtime compensation for all hours worked in
20 excess of forty (40) hours in a workweek.

21 22. Defendant's failure and refusal to provide Plaintiffs overtime pay at the
22 proper rate for the hours they have worked in excess of 40 hours per workweek for
23 shifts worked on an ambulance, as required by the FLSA, wrongly deprives them of
24 the overtime compensation that has been due to them at all times material to this
25 action.

26 23. As a result of Defendant's willful violation of the FLSA, overtime
27 compensation has been unlawfully withheld by Defendant from Plaintiffs for which
28 Defendant is liable pursuant to 29 U.S.C. §§ 216(b) and 255, together with an

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1 additional amount as liquidated damages, interest, reasonable attorneys’ fees, and the
2 costs of this action.

3 24. As a result of Defendant’s willful and purposeful violation of the FLSA,
4 there have become due and owing to Plaintiffs an amount that has not yet been
5 precisely determined. The employment and work records for the Plaintiffs are in the
6 exclusive possession, custody and control of Defendants and the Plaintiffs are unable
7 to state at this time the exact amount owing to them. Defendant is under a duty
8 imposed by the FLSA, 29 U.S.C. § 211(c), and the regulations of the United States
9 Department of Labor, to maintain and preserve payroll and other employment
10 records with respect to Plaintiffs and other employees similarly situated from which
11 the amount of Defendant’s liability can be ascertained.

12 **Prayer for Relief**

13 WHEREFORE, each Plaintiff requests from the Court the following relief:

14 A A declaratory judgment declaring that the Defendant has willfully,
15 recklessly, unreasonably, wrongfully, and with lack of good faith, violated its statutory
16 and legal obligations, and deprived each Plaintiff of his or her rights, protections and
17 entitlements under federal law, as alleged herein;

18 B. An order for a complete and accurate accounting of all the compensation
19 to which each Plaintiff is entitled;

20 C Judgment against Defendant awarding each Plaintiff monetary damages
21 in the form of back pay compensation, liquidated damages equal to his or her unpaid
22 compensation, plus pre-judgment and post-judgment interest;

23 D Reasonable attorneys’ fees and the costs and disbursement of this action;
24 and

25 E. Such other and further relief as the Court deems proper.

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Demand for a Jury Duty

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiffs hereby respectfully request a trial by jury on all claims presented in this Complaint.

DATED: June 7, 2023

LAUREN MCDERMOTT
(Pro Hac Vice to be Submitted)
ARTHUR R. TRAYNOR
(Pro Hac Vice to be Submitted)
MOONEY, GREEN, SAIDON, MURPHY &
WELCH, P.C.

By: /s/ Lauren McDermott
LAUREN MCDERMOTT
Attorneys for Plaintiffs

DATED: June 7, 2023

DANA S. MARTINEZ
BUSH GOTTLIEB, A Law Corporation

By: /s/ Dana S. Martinez
DANA S. MARTINEZ
Attorneys for Plaintiffs

BUSH GOTTLIEB
801 North Brand Boulevard, Suite 950
Glendale, California 91203-1260

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