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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

LYDELL BURSTON, QUINTIN BAKER,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

Sekisui Diagnostics, LLC,

Defendants.

Case No. 37-2024-00006729-CU-OE-NC

**DECLARATION OF QUINTIN BAKER IN
SUPPORT OF MOTION FOR
ATTORNEYS' FEES, COSTS, AND
INCENTIVE AWARD**

I, QUINTIN BAKER, declare as follows:

2. Except as otherwise indicated, I have personal knowledge of all matters set forth in this
herein and, if called upon as a witness, could and would competently testify thereto if called upon to
do so as a witness.

4. I started working for Defendant in California as a Material Handler I in 2018. I was promoted in 2019, 2020, and 2021 to the position of Material Handler Lead. I still work for Defendant.

6. When I first spoke with counsel, I believed that Defendant had not provided me with adequate breaks. After counsel explained potential wage and hour violations to me, they provided me with information regarding class actions, how they work, and what my duties would be as a class representative. I agreed to serve as a class representative in this case so that I could seek to recover wages and penalties on behalf of myself and other employees like me.

8. I have spent more than 40 hours of my time in connection with this case to date. The activities I have performed have included, but have not been limited to: obtaining legal counsel, numerous telephone conversations with my attorneys, gathering documents from my employment with Defendant for my attorneys, reviewing documents with my attorneys and assisting them in developing the claims in this case, assisting my attorneys in preparing for multiple rounds of mediation, participating telephonically in multiple full day mediation session, being actively involved in the

1 settlement process to ensure a fair result for the Class as a whole, and spending time carefully
2 reviewing the Settlement, and other case related documents on my own and with my attorneys to make
3 sure that Settlement and the other work my attorneys performed are in the best interests of the Class.

4 9. I also understand that my attorneys are submitting an application to this Court for an
5 Incentive Award to compensate me for my unique contributions to the success of this action in the
6 amount of \$12,500. I believe this amount is fair and reasonable compensation for my efforts in this
7 case and the risks I have taken in pursuing a fair recovery for the Class.

8 10. The payment to me of the Incentive Award of \$12,500 is also not equal to the harm to
9 my future career prospects that this case may cause me. There is now a public record - this publicly
10 filed lawsuit - that I served as a class representative in a wage and hour case. My involvement in this
11 case has also already been publicized to my former co-workers and will be publicized to them again
12 if this Court approves the Settlement. If one searches Quintin Baker Sekisui on Google, five of the top
13 eight results concern this lawsuit. This may impact my chances of getting a job with prospective
14 employers.

15 11. Further, before I filed this case, my counsel also advised me of the possibility that, if
16 the case was lost, I could have been ordered to pay Defendant's costs, which easily could have totaled
17 tens of thousands of dollars by the end, if not even more.

18 12. Additionally, while I cannot say they are directly related, I have suffered some adverse
19 impacts on my employment following my bringing this lawsuit. Shortly after its filing in 2024, I sought
20 an intracompany job transfer, but had my request denied. I also was demoted in March 2025 to
21 Material Handler IV. In April 2025, I applied for but was passed over for a Warehouse Supervisor
22 position despite my qualifications and excellent reviews at the company. Despite this, I still do not
23 regret bringing this action to advocate on behalf of my fellow employees.

24 13. Finally, I understand that the release of claims I have entered into by virtue of this
25 Settlement prevents me from bring any claims against Defendant and that the release I am entering
26 into is much broader than that of the Class Members I represent.

27 I declare under the penalty of perjury of the laws of the State of California that the foregoing
28 is true and correct to the best of my knowledge.

7/16/2025

Executed on July __, 2025 at San Diego, California.


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QUINTIN BAKER
Declarant

eSignature Details

Signer ID:	snbck2odozpm1sVKQBwowxtY
Signed by:	Quintin J Baker
Sent to email:	bakerjquntin@icloud.com
IP Address:	104.28.111.146
Signed at:	Jul 16 2025, 12:33 pm PDT