

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Janardana Burns (SBN 337696)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

ALEX SCOTT, LASHAWN PARKER,
individually, and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiffs,

vs.

ABC SECURITY SERVICE, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: RG20061358

Honorable James Reilly
Department 25

**DECLARATION OF LASHAWN
PARKER IN SUPPORT OF
PLAINTIFFS' MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LAB. CODE §
2698, ET SEQ.) SETTLEMENT
AGREEMENT AND AWARD OF
ATTORNEYS' FEES AND COSTS,
GENERAL RELEASE, AND
SETTLEMENT ADMINISTRATION
COSTS**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Lab.
Code § 2698, Et Seq.) Settlement Agreement
and Award of Attorneys' Fees and Costs,
General Release, and Settlement
Administration Costs; Declaration of
Plaintiffs' Counsel (Edwin Aiwazian);
Declaration of Plaintiff (Alex Scott); and
[Proposed] Order and Judgment filed
concurrently herewith]

Date: February 8, 2023
Time: 3:00 p.m.
Department: 25

Complaint Filed: May 12, 2020
FAC Filed: July 14, 2020
Trial Date: None Set

DECLARATION OF LASHAWN PARKER

I, **LaShawn Parker**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case, and I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant ABC Security Service, Inc. ("ABC Security") from approximately May 2018 to approximately October 2019 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences at ABC Security and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Edwin Aiwarzian. I wanted to do whatever I could to make sure ABC Security was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative wage-and-hour lawsuits on my own and did some research into the leading employment law firms in California for approximately 10 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 5 hours discussing my situation, representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff and PAGA representative.

3. I have spent over 15 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with ABC Security, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from ABC Security. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible, gave them all the information I had, and identified as many documents as I could. I spent at least 12 additional hours speaking with my attorneys about the

case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing the policies, practices, and procedures of ABC Security.

5. As far as the settlement is concerned, I was available to review the settlement documents and answer any questions my attorneys had. I spent about 4 hours reviewing the settlement agreement and about 4 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to represent the aggrieved employees. I think my efforts helped to get the results obtained in this case.

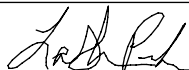
7. I respectfully request that the Court approve and award me a General Release Fee in the amount of \$7,500.00 for my active participation in this case and broader release of claims. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

8. I am not related to anyone associated with Lawyers *for* Justice, PC.

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is a General Release Fee, if approved by the Court, as well as my share of the settlement as an aggrieved employee.

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

Executed this ^{01/10} day of January 2023, at Richmond, California.

Electronically Signed 2023-01-10 21:39:51 UTC - 172.58.33.14

Nintex AssureSign® 224b1b6-23cc-4782-9dbb-a18501649d71

LaShawn Parker