

Todd M. Friedman (SBN 216752)
Adrian R. Bacon (SBN 280332)
Meghan E. George (SBN 274525)
Thomas E. Wheeler (SBN 308789)
LAW OFFICES OF TODD M. FRIEDMAN, P.C.
21031 Ventura Blvd, Suite 340
Woodland Hills, CA 91364
Phone: 323-306-4234
Fax: 866-633-0228
tfriedman@toddfllaw.com
abacon@toddfllaw.com
mgeorge@toddfllaw.com
twheeler@toddfllaw.com

Attorneys for Plaintiff
FATIMA ALMAZAN on behalf of ANALI ALMAZAN

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

FATIMA ALMAZAN on behalf of decedent
ANALI ALMAZAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

BOTANX, LLC, and DOES 1 to 50, inclusive,
Defendants.

Case No. 30-2020-01122459-CU-OE-CXC

**DECLARATION OF FATIMA ALMAZAN
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF FATIMA ALMAZAN

I, FATIMA ALMAZAN, declare as follows:

1. I am the named plaintiff and class representative in this action against Defendant BOTANX, LLC, ("Defendant") on behalf of my deceased father Anali Almazan; and am represented by the Law Offices of Todd M. Friedman, P.C.

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.

3. I understand that, as a class representative, I have certain duties and responsibilities to the class and believe that I have fairly represented the interests of all class members during the entire course of this case.

4. My father Anali Almazan worked for Defendant in California from at least January 2016 through February 5, 2019.

5. When he first spoke with counsel, I believed that Defendant had not provided me with adequate wages. 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 he agreed to serve as a class representative in this case so that he could seek to recover wages and penalties on behalf of himself and other employees like himself.

6. After his passing, I decided to take over as Plaintiff in this case in place of my father Anali Almazan and retained the Law Offices of Todd M. Friedman, P.C. to do so. They explained to me what my duties would be as class representative and I agreed to undertake those duties. I thought continuing the work that my father Anali Almazan had begun to obtain relief for not only himself but his colleagues for many years was a meaningful way to honor his legacy.

7. I have considered the interests of the Class just as I would consider my own interests, have put the interests of the Class before my own interests by retaining experienced counsel and carefully considering the impact that the Settlement in this case would have on them, and understand that the Settlement in this case is subject to this Court's approval to ensure that it is in the best interest of the Class as a whole. I have no conflicts with the Class.

8. Including travel time, I have spent more than 30-40 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, reviewing documents from my father's 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

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

5 9. I also understand that my attorneys are submitting an application to this Court for an
6 Incentive Award to compensate me for my unique contributions to the success of this action in the
7 amount of \$10,000. I believe this amount is fair and reasonable compensation for my efforts as well
8 as my father Anali Almazan's prior efforts in this case and the risks I have taken in pursuing a fair
9 recovery for the Class. Further, before I substituted into this case, my counsel advised me of the
10 possibility that, if the case was lost, I could have been ordered to pay Defendant's costs, which easily
11 could have totaled tens of thousands of dollars by the end, if not even more.

12 10. Finally, I understand that the release of claims I have entered into by virtue of this
13 Settlement prevents my father's estate from bringing any claims against Defendant in the future and
14 that the release I am entering into is much broader than that of the Class Members I represent. This
15 will include claims he had for a potential wrongful termination, which he gave up in order to bring
16 this case as a class action on behalf of his fellow employees.

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

19 11/12/2022

20 Executed on November ___, 2022 at Orange, California.

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DocuSigned by:

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FATIMA ALMAZAN
Declarant