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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
05/24/2021 at 10:24:00 AM
Clerk of the Superior Court
By E- Filing, Deputy Clerk

6 Attorneys for Plaintiff Guillermo Valenzuela,
individually, and on behalf of all other similarly
7 situated current and former employees of Defendants

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN DIEGO**

10
11 GUILLERMO VALENZUELA,
individually, and on behalf of all other
12 similarly situated current and former
employees of Defendants,

13
14 Plaintiffs,

15 vs.

16 NU LINE TECHNOLOGIES, LLC, a
California corporation; and DOES 1 through
17 10, inclusive,

18 Defendants.
19

CASE NO.: 37-2020-00015352-CU-OE-CTL

[Assigned to Hon. Keri Katz, Dept. C-74]

**DECLARATION OF GUILLERMO
VALENZUELA**

Hearing: Motion for Preliminary
Approval of Class Action Settlement

Date: June 11, 2021
Time: 8:30 a.m.
Dept: C-74

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1 8. I am committed to championing the claims and rights of the Class that Defendant
2 violated, and will continue to stand up for the best interests of the Class. In acting as a class
3 representative, I have always acted in the best interests of the Class, and have not placed my own
4 personal interests above the interests of the Class.

5 9. I am familiar with the work that has been done in litigating this Action and have
6 kept myself informed about the discovery and settlement negotiations conducted in this case, and
7 have actively participated in all stages of the case.

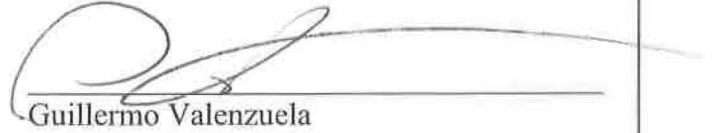
8 10. I believe that the requested Class Representative Payment of Seven Thousand Five
9 Hundred Dollars (\$7,500.00) is fair and reasonable in light of the time I have spent on this case,
10 and the risk I assumed in acting as a class representative. In acting as a class representative, I
11 have adequately and fairly represented the Class, and have spent numerous hours working on this
12 Action. Specifically, I have: (a) had numerous meetings with my attorneys, Rastegar Law Group,
13 APC in person and telephonically, before, during and after the filing and settlement of this Action;
14 (b) provided my attorneys with information and documentation regarding my wage claims; (c)
15 informed my attorneys of other employees who experienced the same wage and hour violations I
16 did; (d) assisted my attorneys in preparing for the mediation in this Action and discussed issues
17 related to the potential settlement of this Action; (e) participated in the mediation in this matter; (f)
18 provided information to assist in settlement negotiations; and (g) approved the Settlement that was
ultimately achieved.

19 11. I will continue to actively participate in this matter until it is finalized. I will
20 continue to oversee progress of this case on behalf of myself and the other Class Members by
21 regularly communicating with my attorneys and keeping updated about the progress of the case, to
22 pass on information to and answer questions from Class Members, to inform my attorneys of any
23 new developments or other information relevant to the suit, and to participate in decisions
24 considering the handling of the suit.

25 12. I believe that the Settlement obtained on behalf of the Class is fair and reasonable in light
26 of the issues presented by this case. I, therefore, request that the Court grant approval of the
27 Settlement.

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

3 Executed on Thursday, May 13, 2021, at TORRANCE, California.
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7 Guillermo Valenzuela
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