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Attorneys for Plaintiff

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

LIBRADO SARCENO, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

REGULUS GROUP LLC, an unknown
business entity; TRANSCENTRA, an
unknown business entity; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 34-2018-00234541-CU-OE-GDS

Honorable David I. Brown
Department 53

CLASS ACTION

**DECLARATION OF LIBRADO
SARCENO IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Edwin Aiwazian); and [Proposed]
Order filed concurrently herewith.]

Date:
Time:
Department: 53

Complaint Filed: June 11, 2018
FAC Filed: June 1, 2020
Jury Trial: None Set

DECLARATION OF LIBRADO SARCENO

I, **Librado Sarceno**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. 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 Regulus Group, LLC (“Regulus”) in an hourly-paid, non-exempt position from approximately February 2000 to December 2015. I decided to seek legal advice about my work experiences with Regulus and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwazian. I wanted to do whatever I could to make sure Regulus paid me and other employees what was owed to us for all of the hours we worked and non-compliant meal periods and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 7 hours. Thereafter, I further consulted with the attorneys at Lawyers *for* Justice, PC for 8 hours to discuss my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and PAGA representative.

3. I have spent over 18 hours meeting with my attorneys and fulfilling my responsibilities as a class representative in this case, which included gathering documents concerning my employment with Regulus, reviewing documents with my attorneys and answering their questions about my employment with Regulus, providing guidance regarding the work performed by non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Regulus. I frequently checked in with my attorneys and their staff to make sure that they had my most current contact information and any additional information about Regulus that I had obtained.

4. Throughout the case, I was available to answer any questions my attorneys had, and available to speak and meet with them whenever they needed me. I responded to my attorneys as quickly as possible and gave them as much information and identified as many

documents as I could. I spent at least 11 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 Regulus's policies, practices, and procedures.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 3 hours reviewing the settlement documents and about 3 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement papers.

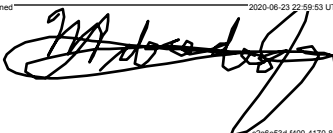
6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me an enhancement award in the amount of \$7,500.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

8. I have not entered into any agreements in this case that have not been disclosed with the Court, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member.

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

Executed on June 23, 2020, at Duarte, California.

Electronically Signed
2020-06-23 22:59:53 UTC - 172.58.23.213

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Librado Sarceno