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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

JOEL VILLALPANDO, an individual,

Plaintiff,

v.

RED SPARROW SERVICES, INC., a
California Corporation; AVREK LAW FIRM,
a Professional Law Corporation; MARYAM
PARMAN, an individual; DOES 1-10,
business entities, forms unknown; DOES 11-
20, individuals; and DOES 21-30, inclusive,

Defendants.

Case No.: 30-2020-01140620-CU-OE-CXC

**DECLARATION OF JOEL
VILLALPANDO IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION
FOR AN ORDER APPROVING
SETTLEMENT OF CLAIMS BROUGHT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT OF 2004**

Date: February 26, 2020

Time: 9:00 a.m.

The Hon. William Cluster

Dept. CX104

[Complaint filed: May 26, 2020]

1 **DECLARATION OF JOEL VILLALPANDO**

2 I, Joel Villalpando, hereby declare and state as follows:

3 1. I am a named Plaintiff in this lawsuit against Red Sparrow Services, Inc., Avrek
4 Law Firm, and Maryam Parman (“collectively Defendants”) and I submit this declaration in
5 support of my Unopposed Motion for Order Approving Settlement of Claims Brought Pursuant
6 to Private Attorneys General Act, Awarding Attorneys’ Fees, Costs, Enhancement Payment,
7 Reimbursement of Settlement Administration Expenses and Dismissing Action with Prejudice. I
8 am a competent adult and was employed by Defendants as an employee in California during the
9 relevant time period. I have personal knowledge of the facts set forth herein, and if called as a
10 witness to testify to them, I could and would do so competently.

11 2. I initially contacted my attorney Shalini Dogra, Esq. when I questioned the
12 employment practices of Defendants prior to commencing this lawsuit. I accepted the opportunity
13 to act as a lead representative on behalf of other aggrieved employees of Defendants in this action
14 whom I believed were being subjected to labor law violations so that I could help other employees
15 recover for what I believed were Defendants’ improper practices.

16 3. Specifically, I questioned Defendants’ policies of failing to properly compensate
17 me and Defendants’ other California employees (including intake specialists) for all hours
18 worked, including overtime hours worked, and failing to provide proper meal and rest breaks.
19 Through many discussions with my lawyers, and through my own research on the Internet, I
20 learned these practices and other practices may be illegal practices and Defendants’ employees
21 might have recourse for them.

22 4. By bringing this lawsuit, and throughout its course, I understood that I could
23 possibly earn a small payment if this case resolved itself favorably, but I also knew that I could
24 also be responsible for paying Defendants’ attorneys’ fees and costs if it did not. My goal in
25 bringing this lawsuit was to obtain a recovery on behalf of all employees who were subjected to
26 the same practices by Defendants, and even more importantly, to put an end to what I believed
27 were illegal practices on the part of Defendants. I believe I have achieved both through this
28 lawsuit and settlement.

1 5. I am very happy about the results of this litigation. I am satisfied that Defendants
2 are compensating other aggrieved employees for penalties that I believe we are due.

3 6. At the onset of this case, I spent time through multiple phone calls and in-person
4 meetings with my attorneys explaining what I understood to be Defendants' policies and practices
5 and how they were applied to other employees. I kept actively involved with the status of this
6 case throughout the litigation process, tracking the status of the case and participating as much as
7 possible. I also had subsequent meetings with my attorneys Shalini Dogra, Esq., Chantal Payton,
8 Esq., and Robert Torres, Esq.

9 7. While I have not maintained detailed time records of my activities in connection
10 with this litigation, I believe that have spent a total of approximately 10 hours assisting my
11 attorneys with the preparation of this case, doing work and investigation of the facts independent
12 from my attorneys, and gathering, organizing, and reviewing documents and information for this
13 lawsuit both before and during this case. In addition, I attended two separate mediations in an
14 effort to resolve this case, which totaled to about 16 hours of time.

15 8. I regularly communicated with my attorneys, often on at least a monthly basis to
16 track my case's status. I have taken an active involvement in this matter throughout its course.

17 9. Taking the initiative with this case was very risky for me, both professionally and
18 financially. I put principal first and took a tremendous risk by filing this lawsuit. I believe
19 pursuing this lawsuit may result in future reputational harm to me. There is a stigma associated
20 with suing one's former employer. I suspect I may be adversely affected when it comes to
21 obtaining future employment – employers who discover that I sued Defendants in a representative
22 action will likely avoid hiring me.

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1 10. My interests in bringing this lawsuit – for Defendants to change their labor practices
2 going forward and to compensate current and former employees for the claims in this case – are
3 the same as those of all other aggrieved employees similarly situated to me.

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

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7 Executed on this 01/21/2021 at Ontario, California.

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Joel Villalpando