

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Annabel Blanchard (SBN 258135)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

JASON BEINBRECH, 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.

MATTHEWS INTERNATIONAL
CORPORATION., an unknown business entity;
and DOES 1 through 100, inclusive,

Defendants.

Case No. CIVSB2226992

Honorable Joseph T. Ortiz
Department S17

CLASS ACTION

**DECLARATION OF JASON
BEINBRECH IN SUPPORT OF
PLAINTIFF'S 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 (Annabel Blanchard); and
[Proposed] Order filed concurrently
herewith]

Date:

Time:

Department: S17

Complaint Filed: November 30, 2022

Trial Date: None Set

DECLARATION OF JASON BEINBRECH

I, **Jason Beinbrech**, 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 Matthews International Corporation (“Defendant” or “Matthews International”) as an hourly-paid, non-exempt employee from approximately September 1993 to approximately July 2019. I decided to seek legal advice about my work experiences with Matthews International. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Matthews International was held accountable for not paying their employees for all hours worked and non-compliant meal 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 **10 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **11 hours** discussing 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 **14 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Matthews International, 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 Matthews International. 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. I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I

1 spent at least **18 additional hours** speaking with my attorneys about the case, identifying
2 potential witnesses, providing my attorneys with documents and information concerning the
3 case, and also describing policies, practices, and procedures of Matthews International.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about **5 hours** reviewing the settlement
6 agreement and about **6 hours** asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
10 and the State of California. I think my efforts helped to get the result obtained in this case, and as
11 a class and PAGA representative, I respectfully request that the Court award me an enhancement
12 award in the amount of \$10,000.00 for my active participation in this case. Taking into
13 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

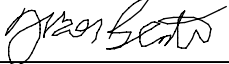
14 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as an enhancement award as well as my share of the settlement as a class
18 member and as an aggrieved employee.

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

21 10/23/2023

Executed this ____ day of October 2023, at Pinon Hills, California

22 
23 Electronically Signed 2023-10-24 00:07:57 UTC - 68.190.245.121
Hintex AssureSign® 9dca407-dc98-4f2a-9b31-b0a4017dfu20

24 Jason Beinbrech
25
26
27
28