

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Alexandra Rose (SBN 329407)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

ELECTRONICALLY FILED
Superior Court of California
County of Sonoma
5/15/2023 10:49 AM
By: Lorena Deloza, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SONOMA

ISIDRA RAMIREZ, individually, and
on behalf of other aggrieved employees
pursuant to the California Private
Attorneys General Act,

Plaintiff,

vs.

EXCHANGE BANK, a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: SCV-266494

Honorable Bradford J. DeMeo
Department 17

**DECLARATION OF ISIDRA RAMIREZ IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LAB. CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEY'S FEES AND
COSTS, GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION
COSTS**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Lab.
Code § 2698, Et Seq.) Settlement Agreement
and Award of Attorney's Fees and Costs,
General Release Fee, and Settlement
Administration Costs; Declaration of
Plaintiff's Counsel (Edwin Aiwazian); and
[Proposed] Order and Judgment filed
concurrently herewith]

Date: 7/19/23

Time: 3:00

Department: 17

Complaint Filed: May 26, 2020

Trial Date: None Set

DECLARATION OF ISIDRA RAMIREZ

I, **Isidra Ramirez**, 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, and 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 Exchange Bank (“Exchange Bank”) from approximately September 2018 to approximately May 2019 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences at Exchange Bank and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Exchange Bank was held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **5 hours** discussing my situation, representative action lawsuits under the California Private Attorneys General Act (“PAGA”), and what it meant to bring a PAGA action.

3. I have spent over **16 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included providing documents concerning my employment with Exchange Bank, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Exchange Bank. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with 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 as I could. I spent at least **12 additional hours** speaking with my attorneys about the case, sending them

documents, identifying potential witnesses, and also describing policies, practices, and procedures of Exchange Bank.

5. On September 17, 2020, I attended a deposition that lasted approximately **2.5 hours**. I spent at least **3 hours** preparing for the deposition. After the deposition, I spent at least **1.5 hours** reviewing my testimony and discussing the contents of the deposition transcript with my attorneys.

6. As far as the settlement is concerned, I was available to review documents and answer any question my attorneys had. I spent about **2 hours** reviewing the settlement agreement and about **2 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

7. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case.

8. I respectfully request that the Court award me a general release fee in the amount of \$7,500.000 for my active participation in this case and broader release of claims. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

10. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is a general release fee, if approved by the Court, as well as my share of the settlement as an aggrieved employee.

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

Executed this ^{09/29/2} day of September 2022, at Santa Rosa, California.

Electronically Signed 2022-09-29 19:12:38 UTC - 50.204.18.110
Nitex AssureSign® 39bed9ea-b736-42e2-a369-af1e0185d070

Isidra Ramirez