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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – NORWALK**

BRANDON MUNOZ individually, and on
behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

NORMAN WINDOW FASHIONS, an
unknown business entity; NORMAN
INTERNATIONAL SAN JOSE, LLC, a
California limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 20NWCV00279

Honorable Olivia Rosales
Department C

**DECLARATION OF BRANDON MUNOZ
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LABOR CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF PLAINTIFF'S COUNSEL
PAYMENT, SERVICE AWARD, AND
SETTLEMENT ADMINISTRATION
COSTS**

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

Date: August 26, 2021
Time: 10:30 a.m.
Department: C

Complaint Filed: May 14, 2020
Trial Date: None Set

DECLARATION OF BRANDON MUNOZ

I, **Brandon Munoz**, 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 Defendants Norman Window Fashions and Norman International San Jose, LLC ("Defendants") from approximately July 2017 to approximately March 2019 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences at Defendants 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 Defendants were 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 7 hours. Thereafter, I consulted with the attorneys at Lawyers for Justice, PC for almost 6 hours discussing my situation, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a PAGA action.

3. Since becoming involved in this matter, I have spent over 17 hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included gathering and providing documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other hourly, non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. 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. Throughout my involvement in this case, 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 14 additional hours speaking with my attorneys about the case, sending them documents, identifying potential witnesses, and also describing policies, practices, and procedures of Defendants.

5. I spent about 3 hours reviewing the settlement papers and about 2 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. 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.

7. I respectfully request that the Court approve and award me a service award in the amount of \$7,500.00 for my efforts and active participation in the case and broader release of claims. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

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

9. 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 service award, 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.

06/08/2021

Executed this ____ day of June 2021, at Carson, California.

Electronically Signed 2021-06-08 18:24:45 UTC - 172.56.16.175
AssureSign®  6a6e6955-7229-44b8-841b-ad41012aa026

Brandon Munoz