

COHELAN KHOURY & SINGER

Michael D. Singer (SBN 115301)

msinger@ckslaw.com

Jeff Geraci (SBN 151519)

jgeraci@ckslaw.com

605 C Street, Suite 200

San Diego, CA 92101

Telephone: (619) 595-3001

Facsimile: (619) 595-3000

LEBE LAW, APLC

Jonathan M. Lebe (SBN 284605)

jon@lebelaw.com

Zachary Gershman (SBN 328004)

zachary@lebelaw.com

777 S. Alameda Street, Second Floor

Los Angeles, CA 90021

Telephone: (213) 358-7046

Attorneys for Plaintiffs BENIYAM KEBEDE, ALAIN TSAI,
and MONICA I. PAZMINO, individually and on behalf of
all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

BENIYAM KEBEDE, ALAIN TSAI, and
MONICA I. PAZMINO, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

WRIKE, INC.; and DOES 1 through 25,
inclusive

Defendants.

Case No. 20CV366599

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Patricia M. Lucas
Department 3

CLASS ACTION

**DECLARATION OF MONICA I. PAZMINO IN
SUPPORT OF MOTION FOR AN ORDER
GRANTING PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: December 1, 2021

Time: 1:30 p.m.

Dept: 3

Judge: Hon. Patricia M. Lucas

Complaint filed: May 13, 2020

Trial date: Not set

1 I, Monica I. Pazmino, declare as follows:

2 1. I am a named Plaintiff / Class Representative in the above-captioned lawsuit. I have
3 personal knowledge of the matters in this declaration, and could competently testify if called as a
4 witness, except as to the matters stated upon information and belief, and as to those matters, I
5 believe them to be true.

6 2. I have and will continue to adequately represent the interest of all Class Members.
7 I understand the proposed Class is made up of an estimated 220 of Wrike's California
8 commissioned employees who were employed at any time from April 6, 2016 to March 31, 2021.

9 3. I was employed by Wrike as a Senior Account Manager from October 2019 to
10 April 2020. During my employment, I was classified as an exempt employee and was
11 compensated on a salary plus commissions basis. I would regularly work more than 40 hours in a
12 workweek, but was not paid overtime wages.

13 4. After I stopped working for Wrike, I retained the Lebe Law offices, and later the
14 law firm of Cohelan Khoury & Singer. I agreed to become a class representative to represent
15 others who experienced similar violations working at Wrike as I did.

16 5. When I decided to become a class representative, I understood that I was not only
17 seeking compensation for myself, but also for others who worked for Wrike. I understood it may
18 have been possible to pursue an individual lawsuit or make a claim with the Labor
19 Commissioner's office and possibly receive compensation sooner. I agreed to do this for the other
20 employees who may not have been aware of their rights, or were afraid to complain to the
21 Company. I understood that a lawsuit could continue for years and require my time and attention
22 during that time. I was made aware that as a representative working on behalf of the Class, I was
23 taking the risk of being responsible for some or all Wrike's legal costs in the case if we lost.

24 6. I was informed my deposition may likely be taken, and that the preparation and the
25 deposition itself could take multiple days. My deposition was not taken, but I feel I would have
26 been adequately prepared based on my review of documents and conversations with my attorneys.

27 7. My attorney discussed the mediation scheduled on March 24, 2021 with me to
28 prepare a brief and obtain information to use in negotiations. I also made myself available by

1 telephone that day for questions by my attorneys.

2 8. After a settlement was reached, a settlement agreement was sent to me to review
3 and sign. After discussing it with the other class representatives, we signed it. As part of the
4 settlement, I agreed to give a general release of all claims against Wrike arising from my
5 employment.

6 9. Throughout my participation in the case, I have kept in constant contact with my
7 attorneys to obtain updates and status reports on the case and settlement.

8 10. I took my duties and responsibilities as a class representative, seriously and have
9 done all the work asked of me by my attorneys, including staying in regular contact with them.

10 11. Because of this case and risks I accepted when agreeing to bring this case as a class
11 action, there will be around 220 others who are currently or formerly employed by Wrike that are
12 eligible receive Settlement payments.

13 12. I believe the \$10,000 service payment requested is fair and reasonable to
14 compensate me for coming forward on behalf of the Class and doing the following: (1) agreeing to
15 put my name on this lawsuit and be an active participant; (2) facing possible stigma and prejudice
16 for having been a plaintiff in a lawsuit against my former employer; (3) risking a judgment for
17 Wrike's legal costs if we had lost the case; (4) being available by telephone the day of mediation;
18 (5) reviewing and signing the Settlement Agreement and providing this declaration; (6) spending
19 numerous hours speaking to my attorneys, answering questions, and providing information; and
20 (7) the time I spent working on this case is time lost from being with family and friends, and
21 pursuing other interests.

22 I declare under the penalty of perjury under the laws of the State of California the
23 foregoing is true and correct and this declaration is executed October 19, 2021 in Lathrop,
24 California.

25 Monica Pazmino
26 Monica I. Pazmino
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