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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

CHRISTIAN WIRTH, BRANDON TREIBER,
GIANCARLO MONROY, 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;

Plaintiffs,

vs.

MB2 RACEWAY, INC., a California
corporation; MB2 RACEWAY T.O., INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 20STCV22600

Honorable Elihu M. Berle
Department 6

CLASS ACTION

**DECLARATION OF GIANCARLO
MONROY IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action and
PAGA Settlement; Declaration of Proposed
Class Counsel (Ryan Slinger); and
[Proposed] Order filed concurrently
herewith]

Date: May 24, 2024
Time: 10:00 a.m.
Department: 6

Complaint Filed: June 11, 2020
FAC Filed: January 13, 2021
Trial Date: None Set

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1 them as much information and identified as many documents as I could. I spent at least **8**
2 **additional hours** speaking with my attorneys about the case, identifying potential witnesses,
3 providing my attorneys with documents and information concerning the case, and also
4 describing policies, practices, and procedures of Defendants.

5 5. During the discovery phase of the litigation, I spent approximately **5 hours**
6 reviewing Defendants' discovery requests, locating documents, and providing documents and
7 information to my attorneys in connection with the responses to the discovery requests.

8 6. As far as the settlement is concerned, I was available to review documents and
9 answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement
10 agreement and about **4 hours** asking questions and discussing the potential settlement with my
11 attorneys before signing the settlement agreement.

12 7. I believe that I have done everything that my attorneys have asked of me and have
13 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
14 and the State of California. I think my efforts helped to get the result obtained in this case, and
15 as a class and PAGA representative, I respectfully request that the Court award me a service
16 payment in the amount of \$5,000.00 for my active participation in this case. Taking into
17 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

19 9. I have not entered into any undisclosed agreements, nor have I received any
20 undisclosed compensation in this case. The only compensation I will receive is whatever amount
21 the Court awards as a service payment, as well as my share of the settlement as a class member
22 and as an aggrieved employee.

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

25
26 Executed this 30th day of April 2024, at Newbury Park, California.

27 The signature block contains a stylized cursive signature of Giancarlo Monroy. Above the signature, the text "Electronically Signed" is on the left and "2024-05-01 01:51:53 UTC - 76.176.240.96" is on the right. Below the signature, "NitroX AssureSign®" is on the left and "9ac31a9b-c4fa-409a-87d2-b162014806c0" is on the right.

28 Giancarlo Monroy