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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

EARL URIZAR, 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,

v.

INLAND KENWORTH US INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 20STCV30676

Honorable Kenneth R. Freeman
Department SSC14

CLASS ACTION

**DECLARATION OF EARL URIZAR IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES, COSTS, AND ENHANCEMENT
PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Payment; Declaration of Class Counsel (Edwin
Aiwazian); Declaration of Settlement
Administrator (Jarrod Salinas); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: March 29, 2022
Time: 11:00 a.m.
Department: SSC14

Complaint Filed: August 12, 2020
Trial Date: None Set

DECLARATION OF EARL URIZAR

I, **Earl Urizar**, 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. This declaration and its contents are not intended to waive any mediation, settlement, or any attorney-client communication privileges or confidentiality.

2. I was employed by Defendant Inland Kenworth US Inc. ("Inland Kenworth") in an hourly-paid, non-exempt position from approximately March 2019 to June 2019. I decided to seek legal advice about my work experiences with Inland Kenworth and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Inland Kenworth paid me and other employees what was owed to us for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. 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 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 4 hours to discuss 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. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a class representative, and also, if class certification were to be obtained, what my duties and responsibilities would be in that event.

3. I have spent over 14 hours meeting with my attorneys and fulfilling my responsibilities as a class representative in this case, which included gathering documents concerning my employment with Inland Kenworth, reviewing documents with my attorneys,

1 answering their questions, providing guidance and information regarding the work performed by
2 other non-exempt employees at Inland Kenworth, and helping develop a strategy as to what
3 documents and information to obtain from Inland Kenworth. I frequently checked in with my
4 attorneys and their staff to make sure that they had my most current information and any additional
5 information that I had obtained.

6 4. Throughout the case, I was available to answer any questions my attorneys had,
7 and available to speak and meet with them whenever they needed me. I responded to my
8 attorneys as quickly as possible and gave them as much information and identified as many
9 documents as I could. I spent at least 12 additional hours speaking with my attorneys about the
10 case, identifying potential witnesses, providing my attorneys with documents and information
11 concerning the case, and also describing policies, practices, and procedures of Inland Kenworth.

12 5. As far as the settlement is concerned, I was available to review documents and
13 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
14 documents and about 3 hours asking questions and discussing the potential settlement and
15 amended settlement paperwork with my attorneys before signing the settlement papers.

16 6. I understand that a settlement has been reached in my case and what my duties and
17 responsibilities are as a class representative. For example, I am aware that if the settlement is
18 granted preliminary approval, the Court will certify a class for settlement purposes, and likely
19 appoint me as the representative of the class and my attorneys as counsel for the class. I also
20 understand that my duties will include checking in on, monitoring, and conferring with my
21 attorneys and counsel for the class to facilitate the notice and settlement administration process,
22 and to provide information that the Court needs to assess whether the settlement is fair, reasonable,
23 and adequate. Further, if any individuals who are potential class members contact me, I will take
24 steps to have them referred to the Court-appointed settlement administrator so that these
25 individuals may receive the necessary information and notice they may be eligible to receive in
26
27
28

1 connection with the settlement and contemplated final approval hearing.

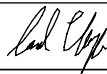
2 7. I believe that I have done everything that my attorneys have asked of me and have
3 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
4 obtained in this case, and as a class and PAGA representative, I respectfully request that the Court
5 award me an enhancement payment in the amount of \$7,500.00 for my active participation in this
6 case. Taking into consideration the time that I have dedicated to this case, I believe that this
7 amount is reasonable.

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

9 9. I have not entered into any undisclosed agreements, nor have I received any
10 undisclosed compensation in this case. The only compensation I will receive is whatever amount
11 the Court awards as an enhancement payment, as well as my share of the settlement fund as a class
12 member.
13

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

16 Executed on 08/14/2021, at Rosemead, California.

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19  Electronically Signed 2021-08-15 06:09:28 UTC - 172.56.16.164
AssureSign® 32088e59-6e13-4b78-ba28-ad83000aa034

20 Earl Urizar