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Attorneys for Plaintiffs

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

MIREYA TORRES, IDREES HOLLIS,
CHRISTOPHER GARCIA, CHUMANI
BROWN, 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.

WILLIAMS LEA, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 20STCV04508

Honorable Kenneth R. Freeman
Department SSC14

CLASS ACTION

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

Hearing Date: December 15, 2022
Time: 10:00 a.m.
Department: SSC-14

Complaint Filed: February 4, 2020
FAC Filed: July 29, 2022
Trial Date: None Set

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1 possible and gave them as much information and identified as many documents as I could. I
2 spent at least **13 additional hours** speaking with my attorneys about the case, identifying
3 potential witnesses, providing my attorneys with documents and information concerning the
4 case, and also describing policies, practices, and procedures of Williams Lea.

5 5. As far as the settlement is concerned, I was available to review documents and
6 answer any questions my attorneys had. I spent about **4 hours** reviewing the settlement
7 agreement and about **3 hours** asking questions and discussing the potential settlement with my
8 attorneys before signing the settlement agreement.

9 6. I believe that I have done everything that my attorneys have asked of me and have
10 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
11 and the State of California. I think my efforts helped to get the result obtained in this case, and
12 as a class and PAGA representative, I respectfully request that the Court award me an
13 Enhancement Payment in the amount of \$12,500.00 for my active participation in this case.
14 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
15 reasonable.

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

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

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

23 Executed this 4 day of August 2022, at Cypres, California.

24
25 

26 Christopher Garcia