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**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 MIREYA TORRES
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

DECLARATION OF MIREYA TORRES

I, **Mireya Torres**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs 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.

2. I was employed by Williams Lea, Inc., (“Williams Lea”) as an hourly-paid employee from approximately October 2018 to approximately April 2019. I decided to seek legal advice about my work experiences with Williams Lea. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Williams Lea was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. 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 **14 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **9 hours** discussing 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 eventually, a PAGA representative.

3. I have spent over **16 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Williams Lea, reviewing documents with my attorneys and answering their questions, and providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Williams Lea. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. 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 and identified as many documents as I could. I

1 spent at least **13 additional hours** speaking with my attorneys about the case, identifying
2 potential witnesses, providing my attorneys with documents and information concerning the
3 case, and also describing policies, practices, and procedures of Williams Lea. During the
4 discovery phase of the litigation, I spent approximately **8 additional hours** reviewing Williams
5 Lea's discovery requests.

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

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

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

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

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

24 Executed this ^{08/03/2022} ____ day of August 2022, at Santa Ana, California.

25 Electronically Signed 2022-08-03 19:32:49 UTC - 107.127.21.28
26 *Mireya Torres*
Hintex AssureSign® a7317a61-4002-4555-aa18-aea6011147e4

27 Mireya Torres
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