

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Brian J. St. John (SBN 304112)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

RIGOBERTO PEREZ, individually, and on behalf of other members of the general public similarly situated; JEANNETTE BELLO, 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,

vs.

AC&A LLC, an unknown business entity;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 30-2018-01018729-CU-OE-CXC

Honorable Lon F. Hurwitz
Department CX103

CLASS ACTION

**DECLARATION OF RIGOBERTO PEREZ
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: September 9, 2023
Time: 1:30 p.m.
Department: CX103

Complaint Filed: September 14, 2018
FAC Filed: August 13, 2020
Jury Trial Date: None Set

DECLARATION OF RIGOBERTO PEREZ

I, Rigoberto Perez, 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.

2. I was employed by AC&A Enterprises, LLC ("AC&A") in an hourly-paid, non-exempt technician position from May 2014 to October 2015. I decided to seek legal advice about my work experiences with AC&A. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure AC&A 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 **8 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **6 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **15 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with AC&A, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from AC&A. 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 spent at least **12 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of AC&A. During the discovery phase of the litigation, I spent approximately **5 additional hours** reviewing AC&A's discovery

requests, locating documents, and providing documents and responses to my attorneys

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **3 hours** reviewing the settlement agreement and about **2 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court award me an incentive award in the amount of \$7,500.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

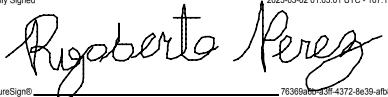
7. I am not related to anyone associated with Lawyers for Justice, PC.

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

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

03/01/2023

Executed this _____ day of March 2023, at Rialto, California.

Electronically Signed
2023-03-02 01:03:01 UTC - 107.198.188.197

Nintex AssureSign® 76369b9c-a28-4372-8e39-af8018af9351

Rigoberto Perez