

B. James Fitzpatrick (SBN: 129056)
 Laura L. Franklin (SBN: 282642)
FITZPATRICK & SWANSTON
 555 S. Main Street
 Salinas, CA 93901
 Telephone: (831) 755-1311
 Facsimile: (831) 755-1319

Larry W. Lee (SBN: 228175)
DIVERSITY LAW GROUP, P.C.
 515 S. Figueroa Street, Suite 1250
 Los Angeles, CA 90071
 Telephone: (213) 488-6555
 Facsimile: (213) 488-6554

Attorneys for Plaintiff, the Class, and Aggrieved Employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

REBECCA PINEDA, as an individual and on
 behalf of all others similarly situated,

Plaintiffs,

vs.

IPPOLITO INTERNATIONAL L.P.; and
 DOES 1 through 50, inclusive,

Defendants.

Case No. 20CV001851

**DECLARATION OF REBECCA PINEDA
 IN SUPPORT OF PLAINTIFF'S MOTION
 FOR FINAL APPROVAL OF CLASS
 ACTION SETTLEMENT**

Date: February 22, 2022

Time: 8:30 a.m.

Dept.: 15

Complaint Filed: July 10, 2020

DECLARATION OF REBECCA PINEDA

I, Rebecca Pineda, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

1 2. I worked for Defendant Ippolito International L.P. (“Defendant”) from in or about
2 July 14, 2014, until on or about April 3, 2020.

3 3. During my employment with Defendant, the wage statements provided to me
4 identified only the “Check Date” and “Period Ending Date,” while failing to specify a pay period
5 start date, in violation of Labor Code § 226(a)(6).

6 4. During the pendency of this lawsuit, I was required to provide assistance to my
7 attorneys, including discussing the lawsuit with my attorneys and providing them with
8 documents and information. Throughout this case, I have continuously been kept apprised of the
9 status of this case. I estimate that I spent approximately 20 hours in connection with the
10 assistance/prosecution of the claims in this lawsuit. This includes the following:

11 • Numerous telephonic/email discussions with my counsel regarding the case and
12 throughout the pendency of the case;

13 • Searching for and providing various documents relating to my claims, including
14 looking through and searching for my wage statements and letters and documents provided to me
15 by Defendant;

16 • Reviewing various files and pleadings in this case, including my PAGA letter, the
17 complaint, the Settlement Agreement, and my declarations in this case.

18 5. I understand that this action was brought on behalf of other similarly situated
19 employees of Defendant, and that I am acting as a representative for the Class. As the Class
20 Representative, I understand that it is my responsibility to act in the best interests of the Class
21 and not my own. I agree that I will not put my own interests ahead of that of the Class.
22 Moreover, I am not aware of any conflicts that exist between my interests and the interests of the
23 Class that would impair or affect my ability to serve as representative for the Class.

24 6. I have and continue to be willing to assist in the investigation of this matter as
25 well as make myself available for deposition, trial, or any further proceedings in this matter as
26 required to represent the interests of the Class. I also understand my duties and responsibilities
27 to the proposed Class and will carry out those duties as necessary.

8 9. I also understood that filing this lawsuit is a public record and I accepted that
9 burden. As such, I risked my future employment in order to bring this action. Moreover, this
10 lawsuit, which is a public record, is something that potential employers can look into, and which
11 may cause a negative impact of my employment prospects.

15 11. I also executed a general waiver of any and all claims, known and unknown,
16 including a waiver of California Civil Code § 1542, which I understand was not required of other
17 Class Members.

20 Executed on this ²⁶ day of January, 2022, at ^{Salinas}, California.

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