

Justin Lo (SBN#: 280102)
justin@caworklawyer.com
Berkeh Alemzadeh (SBN#: 324834)
beyonca@caworklawyer.com
WORK LAWYERS, PC
22939 Hawthorne Blvd. Suite 202
Torrance, CA 90505
Telephone: (424) 355-8535
Facsimile: (424) 355-8335

Kevin Mahoney (SBN: 235367)
kmahoney@mahoney-law.net
MAHONEY LAW GROUP, APC
249 East Ocean Boulevard, Suite 814
Long Beach, CA 90802
Phone No.: (562) 590-5550 Facsimile No.: (562) 590-8400

Attorney for Plaintiff SOLEDAD MARRON, as an individual and on behalf of all similarly situated employees,

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

RENEE J. MONTOYA, CINDY L.
BRAKEBILL, JACOB R. MONTOYA and
SOLEDAD MARRON, as individuals and on
behalf of all others similarly situated,

Plaintiffs,

v.

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

CASE NO.: 20STCV37581

[Related Case No. 20STCV34614]

CLASS ACTION

[Assigned for all purposes to the Hon. Maren Nelson in Dept. 17]

**AMENDED DECLARATION OF
BERKEH ALEMZADEH IN SUPPORT
OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

HEARING INFORMATION:

DATE: March 23, 2022

TIME: 9:00 a.m.

DEPT: 17

ACTION FILED: September 11, 2020

TRIAL DATE: None set

I, Berkeh Alemzadeh, declare as follows:

2. I am the associate attorney at Work Lawyers PC and counsel of record, along with Kevin Mahoney of Mahoney Law Group, APC, for Plaintiff SOLEDAD MARRON (“Plaintiff”) in the case of *Marron v. Remo, Inc. et al.*, DOES 1 through 50, pending in the Superior Court of the State of California, County of Los Angeles, and designated as Case No. 20STCV37581.

EXPERIENCE AS COUNSEL IN CLASS ACTIONS

6. I have been counsel of record for numerous wage and hour class action matters in the Los Angeles, Orange County, San Francisco, and San Mateo Superior Courts, as well as the United States District Court for the Central District of California and the Northern District of California. Some examples of cases where I have served as counsel of record include: *Arciniega v. Protective Industries Inc. et al.*, Los Angeles Superior Court, Case No.: 19STCV08558; *Arteaga Reyes v. Dorel Gaboras dba Today's Construction*, Orange County Superior Court, Case No.: 30-2019-01049881-CU-OE-CXC; *Baltazar v. Ameri-Kleen*, Santa Cruz Superior Court, Case No.: 19CV02685; *Bermejo v. Laboratory Corporation of America, dba LabCorp*, United States District Court, Central District of California, Case No.: 2:20-cv-05337-DMG-SK; *Hernan v. Lopez Inc. dba Red's BBQ & Grillery*, Ventura Superior Court, Case No.: 56-2021-005550003-CU-OE-VTA; *Hernandez v. OneSource Medical Diagnostics, LLC et al.* Orange County Superior Court, Case No.: 30-2020-01140807-CU-OE-CXC; *Hilario v. Marspring Corp. et al.*; Los Angeles

1 Superior Court, Case No.: 19STCV26229; *Jimenez v. Tinco Sheet Metal Inc.* Los Angeles Superior
2 Court, Case No.: 19STCV26229; *Lopez v. Dunweizer Fabrication, Inc. et al.*, Los Angeles
3 Superior Court, Case No.: BC717333; *Lozano v. Q-Flex, Inc.*, Orange County Superior Court,
4 Case No.: 30-2020-01140853-CU-OE-CXC; *Montejano v. Gul Food Management, Inc.*, San
5 Francisco Superior Court, Case No.: CGC-19-577248; *Madero v. Presbyterian Intercommunity*
6 *Hospital*, Los Angeles Superior Court, Case No.: 19STCV39032; *Morales v. Kamran Staffing Inc.*
7 *et al.*, Los Angeles Superior Court, Case No.: BC706903; *Noble v. Affordable Animal Torrance,*
8 *Inc. et al.*, Los Angeles Superior Court, Case No.: 19STCV10409; *Padilla v. Alta Dena Certified*
9 *Dairy, LLC et al.*, United States District Court, Central District of California, Case No.: 2:19-cv-
10 05020-MWF(RAOx); *Pantoja Trujillo/Santos v. Uma Enterprises, Inc.*; Los Angeles Superior
11 Court, Case No.: 19STCV36863; *Riffel v. The Regents of the University of California*, United
12 States District Court, Northern District of California, Case No.: 5:19-cv-07489-EJD; *Riffel v.*
13 *University of Southern California*, United States District Court, Northern District of California,
14 Case No.:5:19-cv-08466-EJD; *Rivera v. Total Airport Services, LLC*, Los Angeles Superior Court,
15 Case No.: 19STCV32847; *Robinson/Cockrill v. Independent Pet Partners Holdings, LLC*, United
16 States District Court, Central District of California, Case No.: 2:19-cv-10929-AB-SK; *Roman*
17 *v. Tacos El Gavilan, Inc. et al.*, Los Angeles Superior Court, Case No.: BC653410; *Rosales v. IDT*
18 *America, Corp. et al.*, Los Angeles Superior Court, Case No.: 19STCV01581; *Tavira v. La*
19 *Michoacana All-Natural Fruit Inc. et al.*, Los Angeles Superior Court, Case No.: 19STCV22136;
20 *Zapata v. Shelter Clean Services, Inc.* Los Angeles Superior Court, Case No.: 19STCV09738.

21 7. Neither Plaintiff nor our firm has any known conflicts of interest with any putative
22 class members.

23 8. Neither myself or my firm has any financial interest and/or involvement with the
24 proposed *cy pres* recipient Legal Aid at Work.

25 9. I believe that the Settlement Amount of nine hundred thousand dollars
26 (\$900,00.00) provides a fair recovery to the class for the alleged claims and easily falls within
27 the range of reasonableness, considering all risk factors and potential defenses in matter. Prior to
28 mediation, I along with my co-counsel from Mahoney Law Group, APC were able to review

1 Defendant's records including a sampling provided and have our expert review the data to
2 determine the potential liability in this case. I attended the mediation and was able to assess the
3 value of the case along with the strength and weakness of the case. As a result, I do believe that
4 the settlement is fair and reasonable.

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

7 Dated this 22th day of February 2022, at Irvine, California.

8
9
10 

11 _____
12 Berkeh Alemzadeh, Esq.
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28