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

JAZZMIN CORTEZ, individually, and on
behalf of other aggrieved employees pursuant to
the California Private Attorneys General Act;

Plaintiff,

vs.

MILLARD MALL SERVICES, INC., an
Illinois corporation; and DOES 1 through 25,
inclusive,

Defendants.

Case No. CVRI2104010

Honorable Eric Keen
Department 6

**DECLARATION OF JAZZMIN CORTEZ IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT AND
AWARD OF ATTORNEYS' FEES AND
COSTS AND SETTLEMENT
ADMINISTRATION COSTS**

Reservation ID: 621873577694
Date: October 31, 2024
Time: 8:30 a.m.
Dept.: 1

Complaint Filed: September 2, 2021
Trial Date: Not Set

DECLARATION OF JAZZMIN CORTEZ

I, Jazzmin Cortez, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-entitled action. 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 Defendant Millard Mall Services, Inc. ("Millard Mall") as an hourly-paid, non-exempt Assistant Project Manager from approximately August 2019 to February 2020 at the Galleria at Tyler, a shopping mall in Riverside, California.

3. During my employment, I questioned whether Millard Mall was paying its employees correctly and I believed that I, along with other employees, were not being allowed to take meal and rest breaks lawfully, among other things. I wanted to take steps to make sure Millard Mall was held accountable for not properly compensating its employees for all hours worked, not providing employees with lawful meal and rest breaks, not reimbursing employees for business expenses, and other related violations.

4. As a result, I decided to seek legal advice about my experience working for Millard Mall and to obtain information about filing a lawsuit to redress these grievances. In that regard, I contacted Blackstone Law, APC and spoke with their attorneys to gain a better understanding of what it meant to bring a lawsuit under the California Labor Code Private Attorneys General Act of 2004 ("PAGA"). After speaking with them, I decided to retain Blackstone Law, APC to proceed with my individual claims and the representative action pursuant to PAGA.

5. I have regularly communicated with my attorneys regarding the case and in order to fulfill my responsibilities as a PAGA representative. I have searched for and provided documents concerning my employment with Millard Mall, reviewed documents with my attorneys and answered their questions, provided information and guidance regarding the duties of other hourly-paid and/or non-exempt employees, and helped determine what other documents and information they could obtain from Millard Mall. I routinely checked in with my attorneys and their staff to make sure that they had all of my current information so that they could always reach me, and to provide any additional information that I had obtained.

6. I was always available to answer any questions my attorneys had and 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 as I could. I described Millard Mall's policies, practices, and procedures and helped my attorneys prepare for and participate in mediation.

7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several reasons. First, I understood that if I lost, I would potentially have to pay the costs incurred in the lawsuit. I also understood there was a risk of losing any current job and/or income due to the time that I would have to spend fulfilling my responsibilities in this matter. Most importantly, I believe that by pursuing this case, I have taken a risk because potential future employers can easily find out that I sued my prior employer, and that may negatively impact my ability to find employment within this industry – and even outside of it – in the future. In contrast, the other employees who will be receiving money from this lawsuit did not have to file a claim or take the risks that I took in bringing this action.

8. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the Aggrieved Employees and the State of California. In total, I have spent approximately 25 to 30 hours participating in this matter as described above. I think my efforts helped to get the result obtained in this matter.

9. I reviewed the settlement agreement in this matter and discussed it with my attorneys before I signed it. I have also executed a separate agreement to settle and resolve my individual claims with Millard Mall.

10. I am not related to anyone associated with Blackstone Law, APC.

11. I am not, and have never been, a named plaintiff in any other PAGA case, pending or closed.

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

Executed on 08/19/2024 at Riverside, California



Jazzmin Cortez