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**SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE-CIVIL COMPLEX CENTER**

JOAQUIN SANTIBANEZ, and JORGE
MAZARIEGOS, as individuals and on behalf
of other similarly situated employees,

Plaintiff,

vs.

DANCHUK MANUFACTURING, INC., a
California corporation, and DOES 1-50,
inclusive,

Defendants.

) Case No.: 30-2020-01155466-CU-OE-CXC

) Assigned for all purposes to:
) Hon. Randall J. Sherman
) Dept. CX 105

) **DECLARATION OF PLAINTIFF JORGE**
) **MAZARIEGOS MOTION FOR**
) **PRELIMINARY APPROVAL OF**
) **PLAINTIFFS' CLASS ACTION**
) **SETTLEMENT**

) Case filed: August 17, 2020
) Trial date: TBD

**REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION SEEKING PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

1 I, Jorge Mazariegos, declare as follows:

2 1. I am over the age of eighteen and have personal knowledge of everything stated below
3 and could competently testify to these facts if sworn.

4 2. I submit this Declaration in support of the motion for preliminary approval of class action
5 settlement and class representative enhancement fee.

6 3. I worked for Defendants Danchuk Manufacturing, Inc., (referred to herein as
7 “Defendant”). As I worked for Defendant as an hourly worker during the class period. Through
8 my employment, I was committed to working hard. However, I realized during my employment I
9 was not provided with all of my Labor Code rights. After my employment ended with
10 Defendants, I determined that I would attempt to effectuate a change in Defendants’ practices
11 and policies through a representative action under the Private Attorney General Act and class
12 action.

13 4. After consulting with a law firm, I decided to file a Private Attorney General Action
14 claim and class action against Defendant. Given my earnings are fairly low, despite this, I still
15 decided to take the risk of filing this class action and losing this case that could have exposed
16 myself to certain attorneys’ fees and costs incurred by Defendant. I remain passionate about
17 vindicating the rights of my coworkers which outweighed the risk exposure to myself as I
18 believed that my co-workers deserved to be afforded their Labor Code rights.

19 5. Throughout this case, I appeared at my attorneys’ office to answer questions and
20 appeared telephonically as requested. I also searched and located any documents that were
21 requested by my attorney throughout this case.

22 6. My involvement with this case remained consistent from providing answers and
23 information to my attorneys, participating in the mediation and reviewing documents and
24 information retrieved by my attorney all in efforts to maximize the value of this case. Through
25 the litigation I made myself available to complete the settlement agreement and finalize the terms
26 of the settlement agreement and execute the settlement agreement.
27
28

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I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 10th day of September 2021 in Irvine, California.

Jorge Mazariegos, Declarant