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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
JOAQUIN SANTIBANEZ MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Case filed: August 17, 2020
Trial date: TBD

1 I, Joaquin Santibanez, 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. While
8 working for Defendant, I worked very hard, especially when I worked above five and six hours
9 and not able to take all of my entitled meal breaks and rest breaks. After my employment ended
10 with Defendants, I determined that I would attempt to effectuate a change in Defendants'
11 practices and policies through a representative action under the Private Attorney General Act and
12 class action.

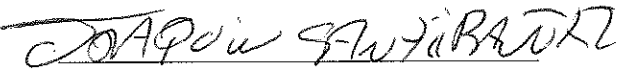
13 4. After consulting with a law firm, I decided to file a Private Attorney General Action
14 claim and class action against Defendant. I would consider myself a low wage hourly worker but
15 despite this I still decided to take the risk of filing this class action and losing this case that could
16 have exposed myself to certain attorneys' fees and costs incurred by Defendant. However, my
17 passion to vindicate the rights of my coworkers outweighed the risk exposure to myself as I
18 believed that my co-workers deserved to be treated fairly in the eyes of the law.

19 5. Throughout this case, I was required to appear at my attorneys' office, answering
20 questions during several interviews by my attorney and his staff either in person or via telephone
21 related to the case, and locating and submitting documents to my attorney in support of the
22 claims.
23

24 6. I remained involved and provided information and details about Defendant's practices
25 and policies in support of the class claims so that the claims could be maximized for the class
26 members. Through the litigation I made myself available to complete the settlement agreement
27 and finalize the terms of the settlement agreement and execute the settlement agreement.
28

1 7. In this litigation, I was committed throughout the entire process to ensure that the class
2 members were treated fairly.
3

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