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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

RICARDO RAMIREZ, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

VICTORY DESIGN, INC. DBA DESIGNING
MANUFACTURING INSTALLATION, a
California corporation; and DOES 1 through
100, inclusive;

Defendants.

Case No.: CIVDS2019970
[Consolidated with Case No. CIVSB2100178]

Honorable Joseph T. Ortiz
Department S-17

CLASS ACTION

**DECLARATION OF RICARDO
RAMIREZ IN SUPPORT OF
PLAINTIFF'S NOTICE OF MOTION
AND MOTION FOR FINAL APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT, ATTORNEYS' FEES
AND LITIGATION COSTS, AND
ENHANCEMENT PAYMENT**

Date: April 1, 2025
Time: 1:30 p.m.
Department: S-17

Class Action Filed: September 21, 2020
PAGA Action Filed: January 8, 2021
Trial Date: None Set

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1 attorneys and their staff to make sure that they had all of my most current information and any
2 additional information that I had obtained.

3 4. Throughout the cases, I was available to answer any questions my attorneys had,
4 and available to speak and meet with my attorneys whenever they needed me. I responded to
5 them as quickly as possible and gave them as much information and identified as many
6 documents as I could. I spent at least **8 additional hours** speaking with my attorneys about the
7 cases, identifying potential witnesses, providing my attorneys with documents and information
8 concerning the cases, and also describing policies, practices, and procedures of Victory Design.

9 5. As far as the settlement is concerned, I was available to review documents and
10 answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement-related
11 agreement and about **1 hour** asking questions and discussing the potential settlement with my
12 attorneys before signing the settlement agreement.

13 6. I believe that I have done everything that my attorneys have asked of me and have
14 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
15 and the State of California. I think my efforts helped to get the result obtained in the Actions,
16 and as a class and PAGA representative, I respectfully request that the Court award me an
17 enhancement award in the amount of \$7,500.00 for my active participation in the cases. Taking
18 into consideration the time that I have dedicated to the cases, I believe that this amount is
19 reasonable.

20 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

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1 8. I have not entered into any undisclosed agreements, nor have I received any
2 undisclosed compensation in the cases. The only compensation I will receive is whatever
3 amount the Court awards as an enhancement award, my share of the settlement as a class
4 member and as an aggrieved employee, and payment from Victory Design in connection with a
5 contemplated separate confidential individual settlement and general release agreement.

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

8 Executed this ^{08/05/2024} day of July 2024, at Adelanto, California.

Electronically Signed

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Ricardo Ramirez