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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – NORWALK**

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

Plaintiff,

vs.

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

Defendants.

Case No.: 20NWCV00662

Honorable Olivia Rosales
Department C

**DECLARATION OF ELISEO
NAVARRETE IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL
OF PRIVATE ATTORNEYS GENERAL
ACT (CAL. LABOR CODE § 2698, *ET
SEQ.*) SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND
COSTS, GENERAL RELEASE PAYMENT,
AND SETTLEMENT ADMINISTRATION
COSTS**

[Notice of Motion and Motion for Approval of
Private Attorneys General Act (Cal. Labor
Code § 2698, *Et Seq.*) Settlement Agreement
and Award of Attorneys' Fees and Costs,
General Release Payment, and Settlement
Administration Costs; Declaration of Plaintiff's
Counsel (Edwin Aiwazian); and [Proposed]
Order and Judgment filed concurrently
herewith]

Reservation ID: 335375409357
Date: January 19, 2022
Time: 1:30 p.m.
Department: C

Complaint Filed: November 19, 2020
Trial Date: None Set

DECLARATION OF ELISEO NAVARRETTE

I, **Eliseo Navarrete**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case, and 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 Jarrow Industries, Inc. ("Jarrow Industries") from approximately August 2019 to approximately June 2020 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences at Jarrow Industries and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Jarrow Industries was held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost 7 hours discussing my situation, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a PAGA action.

3. Since becoming involved in this matter, I have spent over 19 hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included gathering and providing documents concerning my employment with Jarrow Industries, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other hourly, non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Jarrow Industries. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with any additional information that I had obtained.

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1 4. Throughout my involvement in this case, I was available to answer any questions
2 my attorneys had, and available to speak and meet with my attorneys whenever they needed me.
3 I responded to them as quickly as possible and gave them as much information as I could.
4 I spent at least 16 additional hours speaking with my attorneys about the case, sending them
5 documents, identifying potential witnesses, and also describing policies, practices, and
6 procedures of Jarrow Industries.

7 5. I spent about 3 hours reviewing the settlement papers and about 2 hours asking
8 questions and discussing the potential settlement with my attorneys before signing the settlement
9 agreement.

10 6. I believe that I have done everything that my attorneys have asked of me and tried,
11 to the best of my ability, to seek relief for the aggrieved employees and the State of California.
12 I think my efforts helped to get the result obtained in this case.

13 7. I respectfully request that the Court approve and award me a general release
14 payment in the amount of \$8,500.00 for my efforts and active participation in the case and
15 broader release of claims. Taking into consideration the time that I dedicated to this case, I
16 believe that this amount is reasonable.

17 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

18 9. I have not entered into any undisclosed agreements, nor have I received any
19 undisclosed compensation in this case. The only compensation I will receive is a general release
20 payment, if approved by the Court, as well as my share of the settlement as an aggrieved
21 employee.

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

24 11/23/2021

25 Executed this ____ day of November 2021, at Los Angeles, California.

26 
27 Electronically Signed 2021-11-23 23:05:33 UTC - 76.168.95.30
28 AssureSign® 482e29bc-196c-4931-9dea-ade9012b7f54

Eliseo Navarrete