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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES**

11 JOSE CORTEZ, as an aggrieved employee
pursuant to the Private Attorneys General Act
12 (“PAGA”), on behalf of the State of California
and other aggrieved employees,

13 Plaintiff,

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15 vs.

16 B & V ENTERPRISES, INC., a California
corporation; and DOES 1 through 10, inclusive,

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18 Defendants.
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Case No. 20STCV44113

Assigned to the Hon. Wendy Chang

**DECLARATION OF JOSE CORTEZ IN
SUPPORT OF MOTION FOR COURT
APPROVAL OF PAGA SETTLEMENT**

Date: August 13, 2024

Time: 8:30 a.m.

Place: Department 36

Filing Date: November 16, 2020

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1 available to appear in court, if necessary.

2 7. I understood that I needed to maintain awareness of the status and progress of the
3 lawsuit.

4 8. My attorneys provided me with a draft of the Complaint for my review and approval. I
5 closely reviewed the Complaint to ensure accuracy and completeness. Following the filing of the
6 Complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly contacted
7 my attorneys to stay current on the status of the litigation, and to discuss my attorneys' progress in
8 prosecuting the claims.

9 9. I have worked to the best of my ability to prosecute this action on behalf of the LWDA,
10 always considering the interests of the LWDA just as I would consider my own interests. I believe
11 PAGA actions are an important tool to assure compliance with the Labor Code.

12 10. Since initiating this lawsuit until now, I have kept aware of the status of the lawsuit and
13 provided my attorneys with information used by them in the litigation. I have spent large amounts of
14 time and effort pursuing my claims and the claims of the other employees from the time I retained my
15 attorneys to the present date.

16 11. I have carefully reviewed the terms of the proposed settlement. My attorneys explained
17 the specifics of how the settlement would work and I accepted the settlement only after I had spent time
18 evaluating the proposed outcome to assure that it was fair. Based on my attorneys' evaluation and
19 recommendation, and my own review, I believe the settlement is fair and reasonable in light of PAGA's
20 policies and purposes.

21 12. In summary, over the course of this litigation I have spent a significant amount of time
22 conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement
23 and related documents. I estimate that I have spent between 35 and 45 hours assisting my attorneys in the
24 prosecution of this lawsuit.

25 13. Throughout this case, I have not sought individual benefits from the lawsuit. Rather, I
26 maintained this lawsuit because I wanted to hold Defendant accountable for its unlawful conduct. I
27 believe that I have fulfilled my responsibilities, and I will continue to fulfill those responsibilities, to the
28 best of my ability, until the conclusion of the case.

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14. I am committed to this case and will continue to make myself available as needed in the settlement process.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on [Date] 6/21/24, at [City] _____, California.

Jose Cortez *Jose Cortez*