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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

LES ARRIOLA, 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.

MULTI MECHANICAL INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

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

Plaintiff,

vs.

MULTI MECHANICAL, INC., a California
Corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. RIC2003696
(Consolidated with Case No. CVRI2104327)

Honorable Craig G. Riemer
Department 1

CLASS ACTION

**DECLARATION OF ARMANDO
ZUNIGA IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Alexandra Rose); Declaration of
Proposed Class Representative (Les Arriola);
Declaration of Defendant's Counsel
(Brandon L. Sylvia); Declaration of Proposed
Settlement Administrator (Michael Moore);
Declaration of Proposed Cy Pres Recipient
(Jose Padilla); Plaintiffs' Compliance Chart;
and [Proposed] Order filed concurrently
herewith]

Reservation No.:	157380024790
Date:	November 14, 2022
Time:	8:30 a.m.
Department:	1

Arriola Action Filed:	September 16, 2020
Zuniga Action Filed:	September 22, 2021
Trial Date:	None Set

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1 4. Throughout the case, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to
3 them as quickly as possible and gave them as much information as I could. I spent at least **14**
4 **additional hours** speaking with my attorneys about the case, identifying potential witnesses,
5 providing my attorneys with documents and information concerning the case, and also describing
6 policies, practices, and procedures of Multi-Mechanical.

7 5. As far as the settlement is concerned, I spent about **3 hours** reviewing the
8 settlement papers and about **3 hours** asking questions and discussing the potential settlement
9 with my attorneys before signing the settlement agreement.

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

13 7. I respectfully request that the Court award me an enhancement award in the
14 amount of \$7,500.00 for my active participation in this case. Taking into consideration the time
15 that I have dedicated to this case, I believe that this amount is reasonable.

16 8. I am not, and have never been, a named class or PAGA representative in any
17 other case, pending or closed.

18 9. I am not related to anyone associated with Lawyers *for* Justice, PC. Also, I do not
19 have any relationship with the proposed *cy pres* recipient California Rural Legal Assistance, Inc.

20 10. I have not entered into any undisclosed agreements, nor have I received any
21 undisclosed compensation in this case. The only compensation I will receive is whatever amount
22 the Court awards me as an enhancement award, as well as my share of the settlement as an
23 aggrieved employee.

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

26 8/30/2022

26 Executed this ____ day of August 2022, at Lomita, California.

27 A rectangular box containing a stylized electronic signature in black ink. Above the signature, the text "Electronically Signed" is visible. To the right of the signature, the date and time "2022-08-31 01:26:03 UTC - 172.58.16.137" are printed. Below the signature, the text "Nintex AssureSign®" is visible on the left, and a long alphanumeric hash "d5da026-eccb-4d6f-9670-a01016f3b87" is printed on the right.

28 Armando Zuniga