

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Alexandra Rose (SBN 329407)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

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 LES ARRIOLA 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
Plaintiff (Armando Zuniga); 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

DECLARATION OF LES ARRIOLA

I, **Les Arriola**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I one of the named plaintiffs in the above-captioned consolidated cases. 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 Multi-Mechanical, Inc. (“Multi-Mechanical”) from approximately February 2015 to approximately April 2017 and from approximately March 2018 to approximately March 2020 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences at Multi-Mechanical and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Multi-Mechanical paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **9 hours** discussing my situation, complex wage-and-hour class actions and representative action lawsuits under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **14 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as both a class representative and PAGA representative, which has included gathering documents concerning my employment with Multi-Mechanical, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Multi-Mechanical. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

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 **15**
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 **4 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 represent the class and seek relief for the aggrieved employees
12 and the State of California. I think my efforts helped to get the result obtained in this case, and
13 as a class and PAGA representative, I respectfully request that the Court award me an
14 enhancement award in the amount of \$7,500.00 for my active participation in this case. Taking
15 into consideration the time that I have dedicated to this case, I believe that this amount is
16 reasonable.

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

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

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

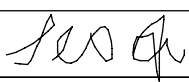
25 ///

26 ///

27 ///

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

3 Executed this ^{08/31/2022} day of August 2022, at North Hollywood, California.

4 
5 Electronically Signed: 2022-08-31 22:49:33 UTC - 166.196.79.35
Nintex AssureSign® c3648279-8d8e-4331-a7b5-a01016e08e

6 Les Arriola
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28