

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Annabel Blanchard (SBN 258135)
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 LOS ANGELES – SPRING STREET COURTHOUSE

JENNY GARRIDO, individually, and on behalf of other members of the general public similarly situated; JUAN RIVAS, FRANKIE BETANCOURT, JESSE ORTIZ, 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;

Plaintiffs,

vs.

ACORN ENGINEERING COMPANY, a California Corporation; MORRIS GROUP INTERNATIONAL, an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No. 19STCV36680

Honorable Carolyn B. Kuhl
Department SSC12

CLASS ACTION

DECLARATION OF JUAN RIVAS 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 (Annabel Blanchard); Declarations of Proposed Class Representatives (Jenny Garrido, Frankie Betancourt, and Jesse Ortiz); and [Proposed] Order filed concurrently herewith]

Date:
Time:
Department: SSC12

Complaint Filed: October 15, 2019
FAC Filed: February 11, 2021
Trial Date: None Set

DECLARATION OF JUAN RIVAS

I, **Juan Rivas**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. 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 Acorn Engineering (“Acorn”) as an hourly-paid employee from approximately September 2015 to April 2020. I decided to seek legal advice about my work experiences with Acorn. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Acorn was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour 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 **8 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to join the lawsuit and be a named plaintiff, class representative, and PAGA representative.

3. I have spent over **19 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Acorn, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly-paid employees, and helping develop a strategy as to what documents and information to obtain from Acorn. 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.

4. Throughout my involvement with the Action, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **18 additional hours** speaking with my

1 attorneys about the case, identifying potential witnesses, providing my attorneys with documents
2 and information concerning the case, and also describing policies, practices, and procedures of
3 Acorn.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about **5 hours** reviewing the settlement
6 agreement and about **3 hours** asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
10 and the State of California. I think my efforts helped to get the result obtained in this case, and as
11 a class and PAGA representative, I respectfully request that the Court award me a service award
12 in the amount of \$10,000.00 for my active participation in this case. Taking into consideration
13 the time that I have dedicated to this case, I believe that this amount is reasonable.

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

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as a service award, as well as my share of the settlement as a class member and
18 as an aggrieved employee.

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

11/29/2022

21 Executed this date _____, at Rowland Heights,
22 California.

23  2022-11-30 03:13:04 UTC - 107.77.228.108
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24 Juan Rivas