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**SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE—CIVIL COMPLEX CENTER**

SERGIO ECHEVERRIA, as an individual and)
on behalf of other similarly situated employees,)

Plaintiff,
vs.

STATEK CORPORATION, a California
corporation,

Defendants

CASE NO: 30-2021-01192372-CU-OE-CXC

Assigned for all purposes to:
Judge Lon F. Hurwitz
Dept. CX103

**DECLARATION OF SERGIO
ECHEVERRIA IN SUPPORT OF
MOTION FOR ORDER APPROVING
SETTLEMENT UNDER CALIFORNIA
LABOR CODE SECTION 2699 ET SEQ**

Hearing Date: April 7, 2023

Hearing Time: 1:30 p.m.
Department: CX103

Case filed: March 30, 2021
Trial date: TBD
Reservation No.

1 I, Sergio Echeverria, declare as follows:

2 1. I currently reside in California. I am over the age of eighteen and have personal
3 knowledge of everything stated below and could competently testify to these facts if sworn.

4 2. I submit this Declaration in support of the motion for approval of Private Attorney
5 General Act claims and enhancement fee.

6 3. I worked for Defendants. I worked for Defendants as an hourly worker. While working
7 for Defendants, I worked very hard and felt that I was not being treated like a valued worker.
8 After my employment ended with Defendants, I determined that I would attempt to effectuate a
9 change in Defendants' practices and policies through a representative action under the Private
10 Attorney General Act. After consulting with a law firm, I decided to file a class action and
11 representative action claim against Defendants. I would consider myself a lower wage hourly
12 worker but despite this I still decided to take the risk of filing this representative action and risk
13 losing this case that could have exposed myself and my family to certain attorneys' fees and
14 costs incurred by Defendants. However, my passion to vindicate the rights of my coworkers
15 outweighed the risk exposure to myself and my family as I believed that my co-workers deserved
16 to be treated fairly in the eyes of the law.

17 4. Throughout this case, I was required to answering questions during several interviews
18 by my attorney and the staff either in person or via telephone related to the case, and locating and
19 submitting documents to my attorney in support of the claims.
20

21 5. Throughout this litigation, I made myself available for a full-day mediation. This
22 mediation ended with a mediator's proposal. During the mediation, I remained involved and
23 provided information and details about Defendants practices and policies in support of the
24 representative action claims so that the claims could be maximized for the aggrieved employees.
25 I also made myself available to complete the settlement agreement and finalize the terms of the
26 settlement agreement and execute the settlement agreement.
27
28

6. In this litigation, I was committed throughout the entire process to ensure that the private attorney general act members were treated fairly. I would estimate that I devoted approximately 50 hours to the prosecution and resolution of these claims.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 1st 2023 in California.

Sergio Echeverria

Sergio Echeverria, Declarant