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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—STANLEY MOSK COURTHOUSE**

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

Plaintiff,

vs.

B.W. HOTEL, LLC, an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV01299

Honorable Daniel S. Murphy
Department 32

**DECLARATION OF MARCIO RIBEIRO
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LABOR CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND
COSTS, SERVICE AWARD, AND
SETTLEMENT ADMINISTRATION
COSTS**

[Notice of Motion and Motion for Approval of
Private Attorneys General Act (Cal. Labor
Code § 2698, *Et Seq.*) Settlement Agreement
and Award of Attorneys' Fees and Costs,
Service Award, and Settlement Administration
Costs; Declaration of Plaintiff's Counsel
(Edwin Aiwazian); and [Proposed] Order and
Judgment filed concurrently herewith]

Reservation ID: 582948867182
Date: October 3, 2022
Time: 8:30 a.m.
Department: 32

Complaint Filed: January 12, 2021
Trial Date: None Set

DECLARATION OF MARCIO RIBEIRO

I, **Marcio Ribeiro**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case, and 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 Defendant B.W. Hotel, LLC ("B.W. Hotel") from approximately January 2012 to approximately March 2020 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences at B.W. Hotel and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure B.W. Hotel was held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost 6 hours discussing my situation, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a PAGA action.

3. Since becoming involved in this matter, I have spent over 17 hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included gathering and providing documents concerning my employment with B.W. Hotel, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other hourly, non-exempt employees, and helping develop a strategy as to what documents and information to obtain from B.W. Hotel. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with any additional information that I had obtained.

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