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Attorneys for Plaintiff

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

JUAN JUAREZ PEREZ, 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.

JUPITER, LLC, an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: RG20084193

Honorable Brad Seligman
Department 23

CLASS ACTION

**DECLARATION OF JUAN JUAREZ
PEREZ IN SUPPORT OF PLAINTIFF'S
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 (Selena Matavosian); Declaration of
Defendant (Dave Rowe); and [Proposed]
Order filed concurrently herewith]

Reservation ID: 938893576524
Date: May 2, 2023
Time: 9:15 a.m.
Department: 23

Complaint Filed: December 17, 2020
FAC Filed: January 12, 2021
Trial Date: None Set

DECLARATION OF JUAN JUAREZ PEREZ

I, **Juan Juarez Perez**, 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. 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 Jupiter, LLC (“Jupiter”) as an hourly-paid, non-exempt employee from approximately August 2015 to approximately March 2020. I decided to seek legal advice about my work experiences with Jupiter 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 Jupiter 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 **9 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **10 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 be a named plaintiff, class representative, and PAGA representative.

3. I have spent over **15 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Jupiter, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Jupiter. 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. 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 **9 additional hours** speaking with my attorneys about the case, identifying

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

3 5. As far as the settlement is concerned, I was available to review documents and
4 answer any questions my attorneys had. I spent about **3 hours** reviewing the settlement
5 agreement and about **2 hours** asking questions and discussing the potential settlement with my
6 attorneys before signing the settlement agreement.

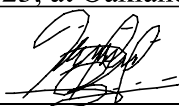
7 6. I believe that I have done everything that my attorneys have asked of me and have
8 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
9 and the State of California. I think my efforts helped to get the result obtained in this case, and
10 as a class and PAGA representative, I respectfully request that the Court award me a service
11 payment in the amount of \$7,500.00 for my active participation in this case. Taking into
12 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

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

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

20 Executed this ^{04/10/2023} ____ day of April 2023, at Oakland, California.

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22 Electronically Signed 2023-04-10 23:08:43 UTC - 172.58.86.118
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