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Attorneys for Plaintiff and the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CRYSTAL MARTINEZ RAMIREZ, an
individual, on behalf of herself and others
similarly situated

PLAINTIFF,

v.

SP PLUS CORPORATION; and DOES 1 thru
50, inclusive,

DEFENDANTS.

CASE NO. BC614253

[Case Assigned for All Purposes to Hon.
Howard L. Halm, Dept. 53]

**DECLARATION OF CRYSTAL
MARTINEZ RAMIREZ IN SUPPORT OF
FINAL APPROVAL OF CLASS
SETTLEMENT**

Date: 4/16/2019

Time: 8:30 A.M.

Dept.: 53

Reservation ID: 917587802704

Complaint Filed: 3/18/2016

DECLARATION OF CRYSTAL MARTINEZ RAMIREZ

I, CRYSTAL MARTINEZ RAMIREZ, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the Named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant SP PLUS CORPORATION ("SP Plus" or "Defendant")

3. In this action, on behalf of myself and all other Class Members, I allege that SP Plus failed to issue accurate itemized wage statements and failed to reimburse expenses in violation of Labor Code § 226(a) and § 2802.

4. I have worked to actively represent the other Class Members and their interests.

5. I first researched experienced attorneys who were equipped to handle this matter.

6. Once retained, I compiled relevant information and documents from my employment to assist my attorneys in litigating this case.

7. My work in connection with this matter includes providing information to my attorneys regarding the nature of the work at SP Plus; meeting with and staying in regular contact with my attorneys to discuss the status of the case and the theories of liability; responding promptly to my attorneys' communication regarding this matter; and reviewing, analyzing, and discussing settlement documents with my attorneys to ensure the proposed settlement is fair and reasonable and in the best interests of settling Class Members.

8. I am prepared to continue assisting with this litigation and am committed to achieving the best possible results for the Class.

9. I believe that the proposed settlement obtained on behalf of the Class is fair and reasonable in light of the issues involved in this case.

10. I believe that I have fairly represented the absent Class and herein request that the Court finally approve this settlement and confirm me as Class Representative. I have always kept the Class Members interests at heart in this litigation.

11. I am not aware of any conflicts of interest that prevent me from being confirmed as

1 Class Representative in this lawsuit. I am not related in any way to my attorneys or to any other
2 member of the firm that is representing me. I have no business dealings or other involvement
3 beyond this lawsuit and this representation. I have not been promised any money or inducement
4 to serve as Class Representative in this action.

5 12. It is my opinion that the settlement agreement provides for a fair and adequate
6 enhancement for me as a Class Representative, in the amount of \$5,000. I believe that this is fair
7 and reasonable in light of all of the work that I have performed in my role as Class Representative.
8 As Class Representative, I have actively participated in all stages of the litigation, as detailed
9 above, and have always maintained the best interests of the Class while performing my Class
10 Representative duties.

11 13. It is also my opinion that the Class Representative enhancement is fair, reasonable,
12 and adequate because, in addition to the many hours spent participating in the prosecution of this
13 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
14 were unsuccessful in this lawsuit. Likewise, I risk the potential stigma of being a Class
15 Representative in a class action dispute.

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

18 Executed this 3/11/2019 [date] at Santa ana [location], California.

19
20 
21 _____
CRYSTAL MARTINEZ RAMIREZ

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 2, 2019, I served all interested parties in this action the following documents described as **DECLARATION OF CRYSTAL MARTINEZ RAMIREZ IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Spencer C. Skeen
Tim L. Johnson
Jesse C. Ferrantella
Nikolas T. Djordjevski
OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
4370 La Jolla Village Drive, Suite 990
San Diego, CA 92122
Attorneys for Defendants SP Plus Corporation,
Standard Parking Corporation IL, SP Plus Property Management, Inc.,
SP Plus Security Services, Inc.
Via Personal Service

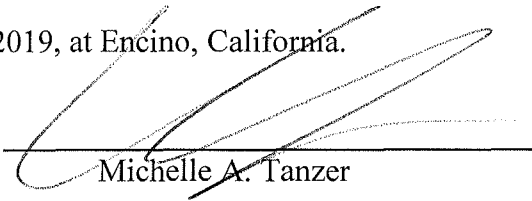
PROOF OF SERVICE LIST CONTINUED ON NEXT PAGE

☐ (BY MAIL) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Encino, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ (BY PERSONAL SERVICE) I caused such envelope to be delivered to On-Call Legal, our process server who will cause it to be delivered by personal service to the offices of the addressee.

☒ (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 2, 2019, at Encino, California.


Michelle A. Tanzer

1 **PROOF OF SERVICE LIST CONTINUED**
2 **Related Case No. BC660410**
3 **Re Martinez v. Standard Parking – Case No. BC614253**
4

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26 Attorneys for Plaintiff Sarah Huda
27 **Via Personal Service**
28