

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Sean M. Blakely (SBN 264384)
sblakely@haineslawgroup.com
Alexandra R. McIntosh (SBN 320904)
amcintosh@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE**

LUCIANO JIMENEZ, as an individual, and
on behalf of all others similarly situated,

Plaintiff,

vs.

ARCADIA CHAIR COMPANY, INC., a
California Corporation; and DOES 1 through
100,

Defendants.

Case No. 30-2020-01175920-CU-OE-CXC

*[Assigned for all purposes to the Hon. Lon
F. Hurwitz, Dept. CX-103]*

**DECLARATION OF PLAINTIFF
LUCIANO JIMENEZ IN SUPPORT OF
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: February 16, 2024
Time: 1:30 p.m.
Dept.: CX-103

Complaint Filed: December 23, 2020
Trial Date: None set

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1 potential Settlement Class members. I also provided information and documents to my attorneys
2 to assist them in mediation and negotiating the Settlement. I also spent time preparing for my
3 deposition in this case, and my full day deposition was taken on April 8, 2022. I also provided a
4 declaration in support of the Motion for Class Certification, and spent time reviewing and
5 discussing the Settlement Agreement as well as other documents from my attorneys, and
6 reviewing my own records for documents that would be potentially relevant to the case. In total,
7 I estimate that I have spent approximately 60-65 hours in connection with this case since I first
8 retained HLG in 2020.

9 5. When I retained HLG and decided to pursue this case, I understood it could benefit
10 former and current employees of Arcadia by helping to recover unpaid wages, meal and rest
11 period premiums, and other penalties on their behalf. I also knew there was a risk I could be liable
12 for Arcadia's costs if we lost the case. I also understood that filing a lawsuit is a public record.
13 However, I accepted those risks because I wanted Arcadia to pay its current and former employees
14 properly and to provide them proper breaks. As far as I am aware, I have no actual or potential
15 conflicts with any of the Settlement Class members.

16 6. As part of the proposed Settlement, and in exchange for my requested
17 enhancement payment, I have also agreed to a full release of claims related to my employment
18 with Arcadia that extends beyond the release of claims applicable to other Settlement Class
19 members.

20 7. I understand that my attorneys will request that the Court approve an enhancement
21 payment of \$15,000 for my efforts on behalf of the Settlement Class members, as well as my full
22 release of claims. I believe this amount is reasonable based on the amount of time and effort I
23 have devoted to this case, the amount of time that has passed since my lawsuit was first filed in
24 December 2020, as well as the risks I have undertaken as a class representative, as described
25 above. This proposed enhancement payment is not contingent upon me supporting the proposed
26 Settlement.

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1 I declare under penalty of perjury under the laws of the State of California and the United
2 States that the foregoing is true and correct. Executed on January 11, 2024 at
3 Paramount, California.

Luciano Jimenez

Luciano Jimenez (Jan 11, 2024 18:35 PST)

Luciano Jimenez

2024-01-08 Arcadia - Decl of Pltf Jimenez ISO Settlement (FINAL) (002)

Final Audit Report

2024-01-12

Created:	2024-01-10
By:	Karla Islas (kisl@haineslawgroup.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAh0jyMlda82IVnXWeiTGkuJTib7ov3l-

"2024-01-08 Arcadia - Decl of Pltf Jimenez ISO Settlement (FINAL) (002)" History

-  Document created by Karla Islas (kisl@haineslawgroup.com)
2024-01-10 - 7:30:12 PM GMT
-  Document emailed to Luciano Jimenez (adolfo.jmnz@gmail.com) for signature
2024-01-10 - 7:30:15 PM GMT
-  Email viewed by Luciano Jimenez (adolfo.jmnz@gmail.com)
2024-01-12 - 2:33:04 AM GMT
-  Document e-signed by Luciano Jimenez (adolfo.jmnz@gmail.com)
Signature Date: 2024-01-12 - 2:35:14 AM GMT - Time Source: server
-  Agreement completed.
2024-01-12 - 2:35:14 AM GMT