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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]*

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

Date: July 12, 2024
Time: 1:30 p.m.
Dept.: CX-103

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

DECLARATION OF LUCIANO JIMENEZ

I, LUCIANO JIMENEZ, declare as follows:

1. I am an individual over the age of 18 and am the named plaintiff in this matter.

This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case with Defendant Arcadia Chair Company, Inc. (“Arcadia”). I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. This declaration supplements the declaration I submitted on January 17, 2024 in support of the Motion for Preliminary Approval of Class Action Settlement.

3. In December 2020, I decided to pursue this action as a named plaintiff and class representative. I believe that by agreeing to be the named plaintiff and class representative, I have taken on a greater burden and risk than the other Settlement Class members. Specifically, by agreeing to be a class representative, I knew there was a chance I would be deposed in this case, would have to respond to formal discovery requests, and would have to search for and produce relevant documents. I also knew that I would be required to appear at trial and testify during trial, if there was a trial in this case, and that I was signing up for a much larger time commitment towards the case than any other Settlement Class members. I also understood that filing this action was public record, and therefore future employers would be able to search my name and know that I have sued a former employer. I also understood that as a named plaintiff and class representative, there was a risk that I could be responsible for Arcadia’s costs if we lost the case. I accepted those risks because I wanted Arcadia to pay its current and former employees properly and to provide them with proper meal and rest breaks.

4. Since I first retained my attorneys in December 2020, I estimate that I have spent approximately 60 hours in total on activities in connection with this case. These activities include:

Task	Time Spent on Task
Multiple intake interviews with attorneys and staff; search for documents relating to my employment with Arcadia and provide them to my attorneys; discussing retainer agreement with my attorneys;	6.5 hours

1	reviewing retainer agreement documents.	
2	Telephone calls with attorneys and staff regarding drafting and filing	3.0 hours
3	of initial complaint against Arcadia.	
4	December 2021 Mediation. Pre-mediation calls with my attorneys to	11.0 hours
5	discuss mediation and strategy. Remained available throughout the	
6	day of mediation for telephone calls with my attorneys and staff.	
7	Telephone calls following mediation regarding next steps and	
8	litigation strategy.	
9	Deposition preparation meetings with my attorneys prior to my	7.5 hours
10	deposition. Reviewed documents with my attorneys in preparation of	
11	my deposition.	
12	Travel to and attend deposition at my attorneys' office in El Segundo,	10.5 hours
13	California on April 8, 2022.	
14	May 2022 Mediation. Pre-mediation telephone calls with attorneys to	10.0 hours
15	discuss upcoming mediation. Remained available throughout May 3,	
16	2022 mediation for telephone calls from attorneys. Telephone calls	
17	following mediation regarding next steps and litigation strategy.	
18	Motion for Class Certification. Telephone calls with my attorneys	3.0 hours
19	regarding motion for class certification and declaration in support of	
20	motion for class certification. Reviewed declaration with my	
21	attorneys and staff and signed declaration.	
22	Settlement negotiations. Multiple telephone calls with my attorneys	3.5 hours
23	and staff regarding ongoing settlement negotiations with mediator.	
24	Reviewed initial settlement agreement and discussed with my	4.0 hours
25	attorneys and staff. Reviewed declaration in support of approval of	
26	class action settlement and signed declaration. Reviewed amended	
27	settlement agreement and discussed with my attorneys.	
28	Telephone calls with attorneys following settlement regarding case	1.0 hours
	status and status of settlement approval.	

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 June 27, 2024 at
3 Paramount, California.

Luciano Jimenez
Luciano Jimenez (Jun 27, 2024 14:23 PDT)

Luciano Jimenez