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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

OSTON JEMBA MADENGUE, HECTOR REYES, 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;

Plaintiffs,

vs.

GOORIN BROS., INC., a California corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 19STCV23129

Honorable Maren E. Nelson
Department 17

CLASS ACTION

**DECLARATION OF HECTOR REYES
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; Declaration of Proposed Class Counsel (Edwin Aiwazian); Declaration of Proposed Class Representative (Oston Jemba Madengue); and [Proposed] Order filed concurrently herewith]

Date: August 19, 2021
Time: 9:30 a.m.
Department: 17

Complaint Filed: July 3, 2019
FAC Filed: October 24, 2019
SAC Filed: June 22, 2021
Jury Trial: None Set

DECLARATION OF HECTOR REYES

I, **Hector Reyes**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs 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 Goorin Bros., Inc. ("Goorin Bros.") from approximately December 2014 to approximately June 2016 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences at Goorin Bros. 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 Goorin Bros. paid me and other employees what was owed to us 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 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost 6 hours discussing my situation, complex wage-and-hour class actions in general and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, a class representative and, eventually, a PAGA representative.

3. I have spent over 15 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which has included providing documents concerning my employment with Goorin Bros., reviewing documents with my attorneys and answering their questions, providing information regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Goorin Bros. 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. Throughout this case, 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 as I could.

I spent at least 10 additional hours speaking with my attorneys about the case, sending them documents, identifying potential witnesses, and also describing policies, practices, and procedures of Goorin Bros.

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

6. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court award me an enhancement payment in the amount of \$7,000.00 for my efforts and active participation in the case and broader release of claims. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

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

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards me as an enhancement payment, as well as my share of the settlement as a class member.

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

Executed on 04/27/2021, at Los Angeles, California.

Electronically Signed 2021-04-27 18:36:34 UTC - 23.125.223.60
AssureSign® Hector Gustavo Reyes 6baa78c5-8b5f-450c-b60c-ad1201468b25

Hector Reyes