

JAMES HAWKINS APLC
James R. Hawkins (SBN 192925)
james@jameshawkinsaplc.com
Gregory Mauro (SBN 222239)
greg@jameshawkinsaplc.com
Michael Calvo (SBN 314986)
michael@jameshawkinsaplc.com
9880 Research Drive, Suite 200
Irvine, California 92681
Phone: (949) 387-7200
Fax: (949) 387-6676

Attorneys for Plaintiffs, the Putative Class, and the Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

MARIA KUZMINOVA, on behalf of
herself and a class of similarly situated
employees,

Plaintiffs,

v.

READY RESPONDERS, INC., a Delaware
corporation, and DOES 1 through 10,
inclusive,

Defendants.

Case No. 21STCV13080

*Assigned for all purposes to: Hon. Yvette M.
Palazuelos, Dept. SSC- 9*

**DECLARATION OF PLAINTIFF RYAN
MUNOZ IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: April 12, 2022

Time: 10:00 a.m.

Dept.: SSC-9

Action Filed: April 6, 2021

DECLARATION OF RYAN MUNOZ

I, RYAN MUNOZ, declare as follows:

1. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I was previously employed by defendant Ready Responders Inc., ("Defendant") as a full-time, non-exempt Responder from approximately May 2020 through December 2020.

3. While working for Defendant, I experienced a number of violations of the California Labor Code. Among other things, I did not receive compliant meal or rest breaks or receive premium payments for having not been provided a compliant meal or rest breaks; I was not issued accurate wage statements; and I did not receive all owed wages, including overtime and minimum wages. In short, I experienced the key violations alleged in the currently-operative complaint.

4. I understand that, as a class representative, I have a duty to look out for and protect the interest of the class as a whole. I do not believe, nor do I have any reason to believe, that my interests in this lawsuit are in conflict or in any way antagonistic to the interests of those of my fellow class members. I am committed to the Class and believe I am an adequate representative serve the interests of the Class in this litigation.

5. Given the various defenses asserted by Defendant, I believe, along with my attorneys, that the settlement obtained is fair and reasonable to the other employees in the class.

6. As a named Plaintiff in this action, I provided invaluable assistance to my attorneys and the class in this case, including: providing factual background for the litigation and class complaint, reviewing the relevant documents, participating in phone calls with my lawyers to discuss litigation and settlement strategy, and reviewing the settlement documents. My efforts were instrumental in securing the favorable terms of the settlement agreement now before this court, which will provide monetary compensation to the class and former nonexempt hourly employees who worked for Defendant.

7. I agreed to participate in this case with no guarantee of personal benefit.

8. This case involved risks for me, such as the potential risk of having to pay Defendant's costs if we lost. Disregarding these risks, I pursued this case on behalf of the class to a successful resolution and settlement. Further, as part of the settlement agreement now before this court, I am agreeing to a general release of all claims, which is broader than the release of claims that the members of the class will agree to if they wish to participate in the settlement.

9. It is my understanding that based upon my industrious efforts as a named plaintiff in this action there is something called a class representative payment. I respectfully request that the court grant this award to me in the amount of \$5,000.00 in addition to my pro rata share of the settlement fund.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on January 5, 2022, in Irvine, California.

DocuSigned by:
By: **RYAN MUNOZ**
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RYAN MUNOZ