

Matthew S. D'Abusco (SBN 251116)
 Cynthia S. Sandoval (SBN 191390)
 ARES LAW GROUP, P.C.
 23 Corporate Plaza Drive, Suite 150
 Newport Beach, California 92660
 Telephone: (949) 629-2519
 Email: Matt@areslawgroup.com
 Email: Cynthia@areslawgroup.com

Attorneys for Plaintiff
 BERNIE GERMANI

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

BERNIE GERMANI, as an aggrieved employee pursuant to the Private Attorneys General Act ("PAGA"), PLAINTIFF, vs. HORIZON AIR INDUSTRIES, INC., a Washington Corporation; Alaska Airlines, Inc., an Alaska Corporation; and DOES 1 through 20, DEFENDANTS.	) Case No.: 21STCV11163)) PAGA ENFORCEMENT ACTION)) DECLARATION OF BERNIE GERMANI IN) SUPPORT OF MOTION FOR APPROVAL) OF PAGA SETTLEMENT)) Date: April 26, 2022) Time: 8:30 a.m.) Dept: 78) [Reservation No. 966662442038])) [Filed concurrently with Notice of Motion and) Motion; Memorandum of Points and Authorities;) Declaration of Matthew S. D'Abusco; Declaration) of Cynthia S. Sandoval; Declaration of Carlos) Canizales; and [Proposed] Judgment])) Complaint Filed: March 23, 2021) Trial Date: None)
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DECLARATION OF BERNIE GERMANI

I, BERNIE GERMANI, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.
2. I am a named Plaintiff in this action and submit this declaration in support of Plaintiff's

1 Motion for Approval of PAGA Settlement. Because I believe I have provided invaluable assistance
2 during the course of this case, I am hopeful that the Court will approve our request of a \$5,000.00
3 service payment for serving as a private attorney general in this matter.

4 3. I was employed by Defendant Horizon Air Industries, Inc. (“Defendant”) as an hourly
5 Ground Services Agent at Los Angeles International Airport from October 2018 to October 2020, at
6 which point Defendant ceased its operations. During the course of my employment with Defendant, I
7 believed I suffered several violations of California wage laws including not being paid for all hours I
8 worked because Defendant maintained a practice and procedure of automatically deducting a thirty (30)
9 minute meal period regardless of whether a full thirty (30) minute break was actually taken. Similarly, I
10 believe Defendant denied me meal and rest periods, as well as accurate itemized wage statements as a
11 result of each of these violations, in violation of California law.

12 4. As a result, on January 12, 2021, I sent a letter to the California Labor and Workforce
13 Development Agency (“LWDA”) outlining the wage violations I believed occurred during my
14 employment with Defendant.

15 5. When the LWDA did not respond to our letter, I decided to file this case as an aggrieved
16 employee under the California Private Attorneys’ General Act (“PAGA”). Therefore, on March 23,
17 2021, I filed my Complaint against Defendant in Los Angeles County Superior Court asserted a PAGA
18 claim. On May 17, 2021, I filed an Amended Complaint to included my former co-worker, Carlos
19 Canizales, as a plaintiff.

20 6. By filing and joining this lawsuit and becoming a private attorney general, I hoped that I
21 might be able to hold Defendant accountable for its practices. I also understood it was my duty as a
22 private attorney general to represent the best interests of all aggrieved employees, know about the
23 lawsuit, help my attorneys, and keep updated on the case, all of which I did.

24 7. Since late 2020, when I started this case by retaining an attorney, I have been actively and
25 consistently involved in pursuing my claims against Defendant. This has included numerous telephone
26 calls and communications with my attorney, reviewing documentation and pleadings provided by my
27 attorneys and Defendant, strategizing regarding settlement negotiations, and the reviewing settlement
28 documents.

8. Participating in this case was not easy for me. Much of my participation required serious effort on my behalf. I also fear the repercussions this may have against me in my working career because I chose to stand up and pursue what I believed was right. I know other companies are able to search my name and find out I was involved in a lawsuit or could otherwise ask or find out. Although this took considerable thought, I decided I still needed to move forward.

9. Altogether, I have spent approximately twenty-five (25) hours working to make my case against Defendant to do what I believe is right.

10. I believe the settlement is a good settlement and I would request that the Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I had the opportunity to represent other aggrieved employees in this lawsuit and that I was able to recover penalties on their behalf.

11. I have observed my attorneys' work throughout this case. They have been thorough, diligent, prompt, courteous, and professional, and I believe they are fully entitled to the award of fees that they have requested for their hard work.

12. I understand that the settlement agreement provides a service payment to me in the amount of \$5,000.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment.

13. I respectfully request that the Court award me a \$5,000.00 service payment. Despite the risks associated with moving forward with this case, I believe I did the right thing.

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

Executed on 2/14/2022, in Lawndale, California.

DocuSigned by:
Bernie Germani
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Bernie Germani