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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF TULARE**

SAMUEL RANGEL, 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,

Plaintiff,

v.

SERPA PACKAGING SOLUTIONS, an
unknown business entity; FOOD
MACHINERY SALES, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: VCU285951

Honorable Bret D. Hillman
Department 7

CLASS ACTION

**DECLARATION OF SAMUEL RANGEL
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND
ENHANCEMENT PAYMENT**

[Plaintiff's Motion for Final Approval of Class
Action Settlement, Attorneys' Fees and Costs,
and Enhancement Payment; Declaration of
Class Counsel (Joanna Ghosh); Declaration of
Settlement Administrator (Yami Burns); and
[Proposed] Order and Judgment filed
concurrently herewith]

Date: March 5, 2024
Time: 8:30 a.m.
Department: 7

Complaint Filed: February 10, 2021
FAC Filed: March 15, 2021
Trial Date: None Set

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1 4. I was available to answer any questions my attorneys had, and available to speak
2 and meet with my attorneys whenever they needed me. I responded to them as quickly as
3 possible and gave them as much information and identified as many documents as I could. I
4 spent at least 6 additional hours speaking with my attorneys about the case, identifying potential
5 witnesses, providing my attorneys with documents and information concerning the case, and also
6 describing policies, practices, and procedures of Serpa Packaging. During the discovery phase
7 of the litigation, I spent approximately 5 hours reviewing Serpa Packaging's discovery requests,
8 locating documents, and providing documents, and responses to my attorneys.

9 5. As far as the settlement is concerned, I spent about 2 hours reviewing the
10 settlement agreement and about 1 hour asking questions and discussing the potential settlement
11 with my attorneys before signing the settlement agreement.

12 6. I believe that I have done everything that my attorneys have asked of me and have
13 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
14 and the State of California. I think my efforts helped to get the result obtained in this case, and
15 as a class, I respectfully request that the Court award me an enhancement award in the amount of
16 \$5,000.00 for my active participation in this case. Taking into consideration the time that I have
17 dedicated to this case, I believe that this amount is reasonable.

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

19 8. I have not entered into any undisclosed agreements, nor have I received any
20 undisclosed compensation in this case. The only compensation I will receive is whatever amount
21 the Court awards as an enhancement payment, as well as my individual settlement payment.

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

24 07/12/2023

25 Executed this ____ day of July 2023, at Visalia, California.

26 
27 Nintex eSign® 8c1609f6-89fb-4775-92e0-b03c018a3461

28 Samuel Rangel