

Armond M. Jackson, SBN 281547
ajackson@jacksonapc.com
Andrea M. Fernandez, SBN 295924
afernandez@jacksonapc.com
Anthony S. Filer Jr., SBN 337704
afiler@jacksonapc.com
JACKSON LAW, APC
2 Venture Parkway, Ste. 240
Irvine, California 92618
Phone (949) 281-6857
Fax (949) 777-6218

Attorneys for Plaintiff Eva Jardon

**SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE –CIVIL COMPLEX CENTER**

EVA JARDON, as an individual and on behalf
of other similarly situated employees,

Plaintiff,

vs.

FULLERTON BAEKJEONG, LLC, a
California corporation, IRVINE
BAEKJEONG, LLC, a California corporation,
ROWLAND HEIGHTS BAEKJEONG, LLC,
a California corporation, SAN JOSE
BAEKJEONG, LLC, a California corporation,
TEMPLE CITY BAEKJEONG, LLC, a
California corporation, TORRANCE
BAEKJEONG, LLC, a California corporation,
and DOES 1-50, inclusive,

Defendants

CASE NO: 30-2021-01207008-CU-OE-CXC

Assigned for all purposes to:
Judge William Claster
Dept. CX104

**DECLARATION OF EVA JARDON IN
SUPPORT OF MOTION FOR ORDER
APPROVING SETTLEMENT UNDER
CALIFORNIA LABOR CODE SECTION
2699 ET SEQ**

Hearing Date: December 2, 2022
Hearing Time: 9:00 a.m.
Department: CX104

Case filed: June 22, 2021
Trial date: TBD

**DECLARATION OF EVA JARDON IN SUPPORT OF MOTION FOR ORDER
APPROVING SETTLEMENT UNDER CALIFORNIA LABOR CODE SECTION 2699
ET SEQ**

1 I, Eva Jardon, declare as follows:

2 1. I currently reside in California. I am over the age of eighteen and have personal
3 knowledge of everything stated below and could competently testify to these facts if sworn.

4 2. I submit this Declaration in support of the motion for approval of Private Attorney
5 General Act claims and enhancement fee.

6 3. I worked for Defendants. I worked for Defendants as an hourly worker. While working
7 for Defendants, I worked very hard and felt that I was not being treated like a valued worker.
8 After my employment ended with Defendants, I determined that I would attempt to effectuate a
9 change in Defendants' practices and policies through a representative action under the Private
10 Attorney General Act. After consulting with a law firm, I decided to file a class action and
11 representative action claim against Defendants. I would consider myself a lower wage hourly
12 worker but despite this I still decided to take the risk of filing this representative action and risk
13 losing this case that could have exposed myself and my family to certain attorneys' fees and
14 costs incurred by Defendants. However, my passion to vindicate the rights of my coworkers
15 outweighed the risk exposure to myself and my family as I believed that my co-workers deserved
16 to be treated fairly in the eyes of the law.

17 4. Throughout this case, I was required to answering questions during several interviews
18 by my attorney and the staff either in person or via telephone related to the case, and locating and
19 submitting documents to my attorney in support of the claims.
20

21 5. Throughout this litigation, I made myself available for a full-day mediation. This
22 mediation ended with a mediator's proposal. During the mediation, I remained involved and
23 provided information and details about Defendants practices and policies in support of the
24 representative action claims so that the claims could be maximized for the aggrieved employees.
25 I also made myself available to complete the settlement agreement and finalize the terms of the
26 settlement agreement and execute the settlement agreement.
27
28

6. In this litigation, I was committed throughout the entire process to ensure that the private attorney general act members were treated fairly. I would estimate that I devoted approximately 50 hours to the prosecution and resolution of these claims.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 21, 2022 in California.

Eva Jardon

Eva Jardon, Declarant