

HEATHER DAVIS, SBN 239372
heather@protectionlawgroup.com
AMIR NAYEBDADASH, SBN 232204
amir@protectionlawgroup.com
PROTECTION LAW GROUP, LLP
237 California Street
El Segundo, California 90245
Telephone: (424) 290-3095
Facsimile: (866) 264-7880

Attorneys for Plaintiff
FRANCISCO SALOME RENOJ HERNANDEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

FRANCISCO SALOME RENOJ
HERNANDEZ, individually and on behalf
of others similarly situated,

Plaintiff,

vs.

BALTAZAR CONSTRUCTION, INC., a
California corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 21STCV11456

*Assigned for All Purposed to the Honorable
Yvette M. Palazuelos, Dept. 9*

CLASS ACTION

**DECLARATION OF FRANCISCO
SALOME RENOJ HERNANDEZ IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Date: June 14, 2023
Hearing Time: 10:00 a.m.
Dept: 9

Complaint filed: March 24, 2021
Trial: None Set

1 **DECLARATION OF FRANCISCO SALOME RENOJ HERNANDEZ**

2 I, Francisco Salome Renoj Hernandez, respectfully declare as follows:

3 1. I am over 18 years of age and a resident of California. I am the class and PAGA
4 representative in *Hernandez v. Baltazar Construction, Inc.*, Los Angeles County Superior Court
5 Case No. 21STCV11456. I have personal knowledge of the facts stated herein and if called as a
6 witness I could and would competently testify thereto.

7 2. I worked for Defendant Baltazar Construction, Inc. ("Defendant"), from
8 approximately May 2017 to approximately March 2020. During my employment I worked as a
9 Rebar Installer. I was classified as a non-exempt employee and was paid an hourly rate for the
10 work I performed.

11 3. In or about February 2021, I decided to seek legal advice about my experiences
12 working for Defendant and about pursuing my grievances against it.

13 4. After speaking with my attorneys, I agreed to serve as a class representative in this
14 Action. I was aware that becoming a class representative could involve additional work including
15 searching for documents, my deposition being taken, and that I might have to take time off to
16 participate in the case. I still agreed to serve as a class representative in order to help others recover
17 these wages and penalties.

18 5. After agreeing to serve as a class representative I spoke with my attorneys
19 extensively. I discussed issues regarding Defendant's policies, practices, and procedures, and
20 generally my employment with Defendant.

21 6. At my counsel's request, I searched for documents I might have related to this
22 case. I sent these documents to my attorneys in order to help with the prosecution of the case.

23 7. I wanted to do whatever I could to make sure Defendant paid me and other
24 employees what I believe was owed to us for all the hours we worked and for what I believe were
25 non-compliant meal and rest breaks. I believed that this lawsuit could help not only myself but
26 others who I believe had similar difficulties working for Defendant.

27 8. As the case moved forward, I provided substantial information regarding
28 Defendant's policies, practices, and procedures. I had several additional phone calls with my

1 attorneys throughout the case and attempted to respond promptly whenever counsel contacted me
2 or needed additional information. I spoke with my attorneys for many hours including extensively
3 before mediation and attempted to provide any help I could on the case. I proactively monitored
4 the status of the case and reached out to my counsel regarding ongoing developments.

5 9. When the case settled, I reviewed the Settlement Agreement and discussed its
6 terms with my attorneys. When I had questions about the Settlement, I contacted my attorneys
7 and reviewed the provisions of the Settlement Agreement where I was unclear.

8 10. I kept in contact with my attorneys throughout the settlement process and provided
9 additional information when Class Counsel reached out to me.

10 11. I believe I took on a substantial risk in agreeing to serve as the class representative
11 despite being made aware that there was no certainty regarding the outcome of the case or how
12 long it would take to recover the wages owed to myself and the other Class Members.

13 12. I fully understand the substantial risk I faced in serving as a class representative
14 and that doing so could make the case more complex. However, I did so to ensure that not only
15 myself, but others would be able to receive what they were owed.

16 13. Since joining this lawsuit, I have considered the interests of the Class Members
17 just as I would consider my own interests. I understand and have understood throughout the
18 lawsuit that I must put the interests of the Class Members before my own interests. Although I
19 was concerned about being the representative in this public lawsuit, I decided to put my own
20 interests aside and bring a lawsuit that would be beneficial not just for myself, but for all
21 employees. I have not yet suffered any adverse consequences as a result of this lawsuit, but neither
22 have I received any benefit for representing the Class or for the help I provided my attorneys.

23 14. Furthermore, as part of the Settlement, I have agreed to a much broader individual
24 release than that agreed to by the rest of the Class.

25 15. I believe that I have done everything that my attorneys have asked of me and have
26 tried to the best of my ability to represent the Class. I think my efforts as a class and PAGA
27 representative helped to achieve the result obtained in this case.

28 16. Accordingly, I respectfully request that the Court award me a service award in the

amount of \$5,000.00 for my active participation in this case, the risks I took in order to recover on behalf of not just myself but others, and the general release I have entered on my own behalf.

17. I am not related to anyone associated with Protection Law Group, LLP.

18. I have not entered into any undisclosed settlement agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, as well as my share of the settlement fund 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 4/13/2023.

DocuSigned by:

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Francisco Salome Renoj Hernandez