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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – NORWALK COURTHOUSE**

JACOB SANCHEZ individually, and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

TRENCH PLATE RENTAL COMPANY, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 21NWCV00317

Honorable
Department C

**DECLARATION OF JACOB SANCHEZ
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRIVATE ATTORNEYS
GENERAL ACT (CAL. LAB. CODE §
2698, *ET SEQ.*) SETTLEMENT
AGREEMENT AND AWARD OF PAGA
COUNSEL FEES PAYMENT, PAGA
COUNSEL LITIGATION EXPENSES
PAYMENT, GENERAL RELEASE
PAYMENT, AND ADMINISTRATION
EXPENSES PAYMENT**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Lab.
Code § 2698, *Et Seq.*) Settlement Agreement
and Award of PAGA Counsel Fees Payment,
PAGA Counsel Litigation Expenses
Payment, General Release Payment, and
Administration Expenses Payment;
Declaration of PAGA Counsel (Arby
Aiwasian); and [Proposed] Order and
Judgment filed concurrently herewith]

Date:
Time:
Department: C

Complaint Filed: May 21, 2021
Trial Date: None Set

DECLARATION OF JACOB SANCHEZ

I, **Jacob Sanchez**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case, and I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Trench Plate Rental Company (“Trench Plate”) as an hourly-paid, non-exempt employee from approximately April 2017 to approximately December 2019. I decided to seek legal advice about my work experiences at Trench Plate and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Trench Plate was held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **13 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **10 hours** discussing my situation, representative action lawsuits under the Private Attorneys General Act (“PAGA”) generally, and what it meant to bring a PAGA action.

3. I have spent over **27 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included gathering and providing documents concerning my employment with Trench Plate, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Trench Plate. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with any additional information that I had obtained.

4. Throughout my involvement in this case, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could. I spent at least **19 additional hours** speaking with my attorneys about the case, sending them

documents, identifying potential witnesses, and also describing policies, practices, and procedures of Trench Plate.

5. I spent about **3 hours** reviewing the settlement agreement and about **2 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case.

7. I respectfully request that the Court award me a general release payment in the amount of \$15,000.00 for my active participation in this case and broader release of claims. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

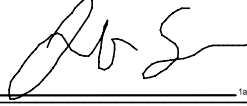
8. I am not related to anyone associated with Lawyers *for* Justice, PC.

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as a general release payment, as well as my share of the settlement as an aggrieved employee.

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

04/25/2023

Executed this ____ day of April 2023, at Fontana, California


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Jacob Sanchez