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Superior Court of California,
County of Los Angeles
2/16/2024 8:03 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By S. Drew, Deputy Clerk

Attorneys for Plaintiff

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

JOSE CERON, individually, and on behalf
of other members of the general public
similarly situated,

Plaintiff,

vs.

SEVEN NINETY-TWO COMPANY,
INC., an unknown business entity; IHOP
#792, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

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

Plaintiff,

vs.

SEVEN NINETY-TWO COMPANY,
INC., an unknown business entity; IHOP
#792, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV05360 (lead)
(Consolidated with Case No. 21TRCV00365)

Honorable William F. Highberger
Department SSC10

CLASS ACTION

**DECLARATION OF JOSE CERON IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Brian J. St. John); and [Proposed]
Order filed concurrently herewith]

Date: March 14, 2023
Time: 11:30 a.m.
Department: SSC10

Class Action Filed: February 10, 2021
PAGA Action Filed: May 17, 2021
Trial Date: None Set

DECLARATION OF JOSE CERON

I, **Jose Ceron**, 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. 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 Seven Ninety Two Company, Inc. (“Defendant” or “Seven Ninety Two”) as an hourly-paid employee from approximately June 2009 to March 2020. I decided to seek legal advice about my work experiences with Seven Ninety Two and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Seven Ninety Two paid me and other employees what was owed to us for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **8 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **16 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a named plaintiff and class representative, which included gathering documents concerning my employment with Seven Ninety Two, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Seven Ninety Two. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout my involvement in this case, I was 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 and identified as many documents as I could. I spent at least **10**

1 **additional hours** speaking with my attorneys about the case, identifying potential witnesses,
2 providing my attorneys with documents and information concerning the case, and also describing
3 policies, practices, and procedures of Seven Ninety Two.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about **3 hours** reviewing the settlement
6 agreement and about **3 hours** asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
10 and the State of California. I think my efforts helped to get the result obtained in this case, and as
11 a class representative, I respectfully request that the Court award me a service award in the
12 amount of \$7,500.00 for my active participation in this case. Taking into consideration the time
13 that I have dedicated to this case, I believe that this amount is reasonable.

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

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as a service award as well as my share of the settlement as a class member.

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

02/16/2024

20 Executed this ____ day of February 2024, at Gardena, California

21 Electronically Signed Jose Ceron 2024-02-17 02:41:49 UTC - 107.197.218.107
Nintex AssureSign® bd4e197e-97af-4aba-be94-b1180182d995

22 Jose Ceron