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Attorneys for Plaintiff Victor Erazo,
individually, and on behalf of all other similarly situated employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE-CIVL COMPLEX CENTER

VICTOR ERAZO, as an individual, and on
behalf of other similarly situated employees,

Plaintiff,
vs.

UNI-CAPS, LLC., a California corporation;
and DOES 1 through 50, inclusive,

Defendant.

Case No.: 30-2021-01193402-CU-OE-CXC

Assigned for all purposes to:
Hon. Randall J. Sherman
Dept. CX-105

**DECLARATION OF PLAINTIFF
ERAZO IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: January 31, 2025
Time: 9:00 a.m.
Place: Department CX-105

1 **DECLARATION OF VICTOR ERAZO**

2 I, Victor Erazo, declare as follows:

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

5 2. I submit this Declaration in support of the motion for final approval of class action
6 settlement and class representative enhancement fee.

7 3. I worked for Defendant Uni-Caps, LLC., (referred to herein as “Defendant”). As I
8 worked for Defendant as an hourly worker during the class period, I worked very hard, especially
9 when I worked above five and six hours and not able to take all of my entitled meal breaks and rest
10 breaks and worked without receiving all wages I was entitled to. After my employment ended with
11 Defendant, I determined that I would attempt to effectuate a change in Defendant’s practices and
12 policies through a wage and hour class action and representative action under the Private Attorney
13 General Act and class action.

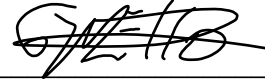
14 4. After consulting with a law firm, I decided to file a class action and Private Attorney
15 General Action claim and class action against Defendant. I would consider myself an wage hourly
16 worker but despite this I still decided to take the risk of filing this class action and losing this case
17 that could have exposed myself to certain attorneys’ fees and costs incurred by Defendant. However,
18 my passion to vindicate the rights of my coworkers outweighed the risk exposure to myself as I
19 believed that my co-workers deserved to be treated fairly in the eyes of the law.

20 5. Throughout this case, I was required to appear at my attorneys’ office, answering
21 questions during several interviews by my attorney and his staff either in person or via telephone
22 related to the case, and locating and submitting documents to my attorney in support of the claims.

23 6. I remained involved and provided information and details about Defendant’s
24 practices and policies in support of the class claims so that the claims could be maximized for the
25 class members. Through the litigation I made myself available to complete the settlement agreement
26 and finalize the terms of the settlement agreement and execute the settlement agreement.

27 7. In this litigation, I was committed throughout the entire process to ensure that the
28 class members were treated fairly and committed approximately 45 hours to this case.

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2 I declare under the penalty of perjury under the laws of the State of California that the
3 foregoing is true and correct. Executed on this 7th day of January, 2025 in Irvine, California.
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8 Victor Erazo, Declar
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