

ZORIK MOORADIAN, Bar No. 136636

zorik@mooradianlaw.com

HAIK HACOPIAN, Bar No. 282361

haik@mooradianlaw.com

MOORADIAN LAW, APC

24007 Ventura Blvd., Suite 210

Calabasas, CA 91302

Telephone: (818) 487-1998

Facsimile: (888) 783-1030

Attorneys for Plaintiff Rafael Jimenez, individually and on behalf of other persons similarly situated and similarly aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

RAFAEL JIMENEZ, individually and on behalf of other persons similarly situated and similarly aggrieved employees,

Plaintiffs,

v.

CARGO HS LLC, an active California Limited Liability Company; and DOES 1 through 10,

Defendants.

Case No.: 21STCV15258

CLASS AND REPRESENTATIVE ACTION

[Assigned to Hon. Elihu M. Berle in Dept. SS-6]

DECLARATION OF RAFAEL JIMENEZ IN SUPPORT OF PLAINTIFF’S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

[FILED CONCURRENTLY NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL; DECLARATION OF HAIK HACOPIAN WITH EXHIBITS; DECLARATION OF ZORIK MOORADIAN; AND [PROPOSED] ORDER]

Date: July 13, 2023

Time: 9:00 a.m.

Dept.: SS-6

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

2

3
4
5
6

8
9

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

18
19
20
21

22
23

24
25
26
27
28

1 documents. I have also spent time reviewing the settlement agreement as well as this
2 declaration.

3 7. In total, I estimate that I have spent approximately 8-10 hours to date
4 participating in this case.

5 8. I understand that the parties have agreed to a \$7,500 service award to me for
6 coming forward and participating in this case and for providing a release of claims to Cargo
7 which includes more claims than what the other class members are releasing. I also understand
8 that any amounts payable to me must be approved by the Court.

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

11 Executed this 6 day of June 2023, at LOS ANGELES California.

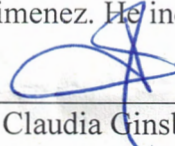
12
13
14 

15 Rafael Jimenez

16 **Translation Authentication**

17 I, Claudia Ginsburg, am an employee of the Mooradian Law, APC, at 24007 Ventura Blvd.,
18 Suite 210, Calabasas, California 91302.

19 On June 8, 2023, I translated this Declaration from English to Spanish during a conference
20 with Rafael Jimenez. He indicated to me that he understood and signed the Declaration.

21 By: 

22 Claudia Ginsburg